



OLD MUTUAL GENERAL INSURANCE KENYA LIMITED PRIVACY NOTICE

Introduction

Thank you for choosing Old Mutual General Insurance Kenya Limited. We, as a data controller, respect your privacy and are committed to protecting your personal data and the personal data of third parties that you provide to us. This Privacy Notice is a summary of our Privacy Policy and describes how we collect, use, disclose, transfer, store or otherwise process your personal data and tells you about your privacy rights and how the law protects you. For the full version of the Privacy Policy, please visit www.oldmutual.co.ke or contact us for a copy.

Personal data means any information relating to you as an identified or identifiable natural person. In order for us to provide the services you have requested from us, it is necessary that we collect and process personal data from you.

The Types of Personal Data That We Collect

We may collect, use, store, transfer or otherwise process personal data and sensitive personal data about you or persons connected to you including identification information such as name and national identity card number or passport number, KRA PIN, nationality, gender, contact information such as email address, telephone number and postal address and information relevant to the insurance product we have with you. If we require information about other people connected to you, we may request you to provide such information. If you are providing information about another person, please ensure that they know you are doing so and are content with their information being provided to us. It might be helpful to show them this Privacy Notice and our Privacy Policy and direct them to us if they have any concerns.

How Do We Collect Your Personal Data?

For most part, we will collect personal data directly from you and this may include personal data you provide when you apply for our products or services, make enquiries, register for our products offered through mobile and online platforms, request marketing information to be sent to you, give us feedback or contact us.

In some instances, we may collect and receive your personal data from third parties or publicly available sources including the Government of Kenya's e-citizen portal, Integrated Population Registration Services platform and other Government platforms; or publicly available sources such as the Companies Registry and the Business Registration Service.

How Do We Use Your Personal Data and What Legal Basis Do We Have For Processing Your Personal Data?

We use your personal data, including sensitive personal data in certain instances, for the following purposes:

- To consider your application for our insurance products and services and for initiating your contract in relation to the financial products and services;
- Responding to your queries and concerns, processing claims, quality control and effective systems operations;
- to provide you with the Old Mutual's Group products and services;
- To meet our legal and regulatory obligations;
- To maintain consistent practices and procedures across the Company and the Company's group and affiliates;
- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences;
- To provide you with optimised marketing analytics and information about the group's products and services that we consider may be of interest to you and/or your family;

In this regard, we rely on the following lawful basis for processing your personal data:

- **Performance of contract:** Including setting up and administering a contract for our financial products and services;
- **Legal and regulatory obligations:** Compliance with our legal and regulatory obligations such as KYC obligations under different statutes including the Proceeds of Crime and Anti-Money Laundering Act (No.9 of 2009) and the Tax Procedures Act (No. 29 of 2015);
- **Consent:** We will also rely on your consent as a lawful basis for processing your personal data in the instances where we (a) process personal data relating to a child; (b) process sensitive personal data outside Kenya; and (c) provide you with marketing information; and
- **Legitimate interests:** for our legitimate business interests, including product and service improvement, prevention and detection of fraud.

In the event that you fail to provide us with your personal data when requested, we may not be able to perform the contract we have or that we wish to enter into with you. In that case, we may have to cancel a product or service you have with us.

You have the right to withdraw your consent to our processing of your personal data at any time but please note, that your withdrawal will not affect the lawfulness of our processing of your personal data which was based on prior consent before your withdrawal or which is based on other legal basis for processing of your personal data. Please further note we may not be able to provide you with our products and services if you withdraw your consent.

Who Do We Share Your Personal Data With?

In connection with the above purposes, we may share your personal data with third parties located within and outside Kenya, such as our affiliates, public authorities or governments when required by law, our third-party service providers who help us manage our products and services, including those service providers who maintain our IT and office systems, provide marketing and advertising services, provide application processing, fraud monitoring, call center and/or other customer services, as well as service providers involved in offering our customers services during the claims process, including health service providers, assessors, and garages. In that connection, we will take adequate steps to protect your personal data, including entering into agreements with third-party recipients of your personal data (as applicable) governing the protection of personal data.

Automated Decision Making

We may employ automated decision-making processes to enhance service delivery and insurance recommendations. This includes profiling your insurance data to assess your preferences, risk tolerance, and potential needs for tailored insurance strategies. Automated assessments may influence suggestions for premiums calculations and insurance products. Clients can request not to rely solely on automated processes; however, this may limit the personalized insurance options available to them.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Retention and Storage of Your Personal Data

We will only retain your personal data for as long as may be necessary to fulfil the purpose we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting obligations.

Your Legal Rights

You have the right to:

- be informed of the use to which your personal data is to be put as we have endeavoured to outline in this Privacy Notice and our Privacy Policy;
- request access to your personal data that we hold about you;
- object to the processing of all or part of your personal data;
- human review for a decision made solely by automated processing if it negatively impacts you.
- data portability by asking us to provide your personal data to another entity in a machine readable format;
- request correction of inaccurate, false or misleading data that we hold about you; and
- request deletion of false or misleading data that we hold about you.

Contacting Us

If you have any concerns about the use of your personal data, questions about this Privacy Notice or our Privacy Policy including any requests to exercise your legal rights under the law, please contact us using the details set out below:

Email address: clientservice@oldmutual.co.ke

Postal address: P.O. Box 43013-00100, Nairobi

Physical address: Old Mutual Tower, Upperhill Road

Telephone number: +254 0711 065 100

We will respond to your questions or concerns in a timely manner and in compliance with the relevant laws.

OLD MUTUAL INSURANCE CONSENT CLAUSES

Old Mutual is dedicated to protecting your privacy and ensuring you feel confident about how your information is collected and used. We encourage you to review our Privacy Policy, which details how we collect, use, and process your personal data, the legal basis for our processing, and the rights you have regarding your information. Your trust is important to us, and we are here to support you every step of the way.

CONSENT FOR PROCESSING PERSONAL DATA RELATING TO A CHILD

We value your privacy and are committed to protecting both yours and your family's information. If you have listed a child under 18 as a beneficiary or next of kin, we may need to process their personal data. Rest assured, this is done securely and in accordance with Kenyan data protection laws. By consenting, you agree to the safe handling of their personal data. If you have any concerns, please don't hesitate to reach out to us.

☐ YES, I CONSENT

☐ NO, I DO NOT CONSENT

CONSENT FOR PROCESSING SENSITIVE PERSONAL DATA OUTSIDE KENYA

Old Mutual Group operates across Africa and to provide you with the best services, we may need to process your sensitive personal data outside your country of residence. Rest assured, we adhere to stringent international data protection standards and have robust safeguards in place to protect your information. By consenting, you allow the secure transfer and processing of your data in compliance with applicable regulations. If you have any questions or concerns, please feel free to contact us for more information. You may withdraw this consent at any time.

☐ YES, I CONSENT

☐ NO, I DO NOT CONSENT

CONSENT FOR COMMERCIAL USE OF PERSONAL DATA

At Old Mutual Group, we are committed to respecting your privacy and providing you with exceptional service. With your permission, we would like to use your personal data to share Company updates, promotions, and information about our products and services that may interest you. You can easily opt out at any time, and your privacy is our priority. By giving your consent, you'll stay connected and receive tailored information that enhances your experience with us. If you have any questions, please feel free to reach out. Remember, you can easily withdraw this consent at any time. Thank you for being a valued customer!

☐ YES, I CONSENT

☐ NO, I DO NOT CONSENT