

## BANK OF BARODA (BOTSWANA) LIMITED EMPLOYEE PRIVACY NOTICE

At Bank of Baroda (Botswana) Limited ("Bank" or "Baroda") we respect and are committed to protecting the privacy of our employees. This Employee Privacy Notice ("Notice") describes how we collect, use, share, and protect personal data about our employees. This notice also outlines the rights of employees in relation to their personal data and provides information on how to contact us for questions or to exercise their rights.

### 1. PURPOSE AND LEGAL BASIS FOR DATA PROCESSING

We process employee personal data for the following purposes, under specific legal bases:

PURPOSE	LEGAL BASIS
<b>Recruitment and hiring:</b> To evaluate candidates, conduct background checks, and make employment decisions.	Legitimate interest and consent for specific checks where required by law.
<b>Employment contract administration:</b> To manage the employment relationship, including payroll, benefits, and performance management	Necessary for the performance of the employment contract.
<b>Compliance with legal obligations:</b> To meet legal, regulatory, and tax obligations such as reporting to government agencies and maintaining records for employment and payroll.	Compliance with legal obligations.
<b>Health and safety:</b> To provide a safe workplace, including processing health-related data for work injury reports, and insurance claims.	Compliance with legal obligations, protection of vital interests, or explicit consent where required.
<b>IT and security:</b> To monitor and protect the Bank's IT systems, secure data, and prevent unauthorized access.	Legitimate interest in protecting the security of systems and information.

<b>Performance monitoring and development:</b> To assess and improve employee performance, provide training, and manage career progression.	Legitimate interest in managing employee performance, and in some cases, necessary for contract performance.
<b>Pension and benefits administration:</b> To manage pension schemes and insurance plans.	Performance of the contract and compliance with legal obligations.
<b>Business operations and compliance:</b> To ensure compliance with banking and financial regulations, including Anti-Money Laundering (AML), Know Your Customer (KYC), and audit requirements.	Compliance with legal obligations and legitimate interests in regulatory compliance.

## 2. CATEGORIES OF PERSONAL DATA COLLECTED

We may collect distinct types of personal data inclusive of the following:

- a. **Personal identification data:** Name, date of birth, Identity number, passport information, nationality.
- b. **Contact information:** Residential and postal address, phone number, email address.
- c. **Employment details:** Job title, department, employment contract details, and performance data.
- d. **Payroll and compensation:** Bank account information, salary, tax information, benefits, bonuses, and deductions.
- e. **Health and safety data:** Health information related to occupational safety, accident reports, and workplace accommodations.
- f. **IT and access data:** User IDs, passwords, access logs, and device usage information.
- g. **Background verification data:** Background check information, criminal records (where permitted by law), and references.
- h. **Emergency contact information:** Details of next of kin or emergency contacts.

### 3. **SOURCES OF PERSONAL DATA**

We collect personal data directly from employees, through job application processes, during onboarding, and throughout employment. Additionally, we may collect data from third parties, such as recruitment agencies, previous employers (references), government agencies, and background check providers.

### 4. **DATA SHARING AND RECIPIENTS**

We may share employee personal data with the following categories of recipients, when necessary:

- a. **Service providers:** health insurance providers, pension scheme administrators, background check providers.
- b. **Government authorities and regulators:** Tax authority, Bank of Botswana and other regulatory bodies, as required by law.
- c. **Professional advisors:** Auditors, legal advisors, and consultants, for legitimate business purposes.

### 5. **INTERNATIONAL DATA TRANSFERS**

If employee data is transferred outside of Botswana to a country without an adequacy decision, we will ensure appropriate safeguards are in place, such as standard contractual clauses or binding corporate rules, or use permitted derogations where required.

### 6. **DATA RETENTION**

We retain employee personal data only as long as necessary for the purposes for which it was collected, or as required by law. After employment ends, certain data may be retained for legal or regulatory purposes, typically for [20 Years].

### 7. **EMPLOYEE RIGHTS**

Employees have the following rights regarding their personal data:

- a. **Access:** Request access to their personal data and receive a copy of it.
- b. **Rectification:** Request correction of inaccurate or incomplete data.

- c. **Erasure:** Request deletion of data when it is no longer necessary or lawful to process it.
- d. **Restriction:** Request restriction of processing under certain conditions.
- e. **Data Portability:** Request a copy of personal data in a machine-readable format.
- f. **Objection:** Object to processing based on legitimate interests, especially concerning direct marketing.
- g. **Withdraw Consent:** Where processing is based on consent, employees can withdraw their consent at any time.

To exercise any of these rights, employees should contact the DPO at [ +267 3992706].

## 8. **DATA SECURITY**

We take appropriate technical and organizational measures to protect personal data against unauthorized access, loss, misuse, alteration, or destruction. This includes access controls, encryption, and regular security assessments.

## 9. **CHANGES TO THE PRIVACY NOTICE**

This Privacy Notice may be updated periodically to reflect changes in our practices or applicable laws. We will notify employees of any significant changes.

## 10. **CONTACT INFORMATION**

For any questions about this Privacy Notice or to exercise rights, employees can contact the DPO at [+267 3992706].