

Privacy Statement

Who is Oracle Group?

We are Oracle Group Eswatini, an improved kind of insurance company yet somehow familiar. Oracle was born in Eswatini over 15 years ago under the brands of Momentum and Metropolitan Holdings. We are built from the best parts of their business and our home is deeply rooted right here in Eswatini.

Regulation of data privacy and protection

As we operate through various legal entities, we comply with the applicable data protection and privacy laws in each of these countries. Accordingly, the specific Oracle Group legal entity that is responsible for determining the purpose and means of processing your personal information (responsible party or controller), in other words the legal entity who holds the business relationship with you will not always be the same. It will be made clear to you when you take up a product or service, who the responsible party or data controller is.

What is the purpose or scope of this statement?

The purpose of this statement is to inform you how we collect, use, store, make available, disclose, update, safeguard, destroy or otherwise deal with (process) your personal information (also referred to as personal data) and also to explain your rights relating to the privacy of your personal information and how the law protects you.

We may combine your personal information, available across the Group, and use the combined information for any of the purposes set out in this statement where we have lawful grounds for doing so. Your personal information may be processed in another country that does not provide you with the same data protection that the country of origin, but we will only process in and transfer personal information to countries that we are satisfied will provide adequate data protection.

Protecting the privacy, confidentiality and security of your personal information is very important to us as it is critical for us to maintain your trust and act in the right way to meet your needs. We have therefore implemented Group-wide policies and procedures to ensure that your personal information is protected.

What is personal information and what type of personal information do we collect?

Personal information is any information from which you can be identified. The personal information we may collect about you includes:

- Name, age, gender, sex, and identifying numbers;
- Physical and email addresses and contact numbers;
- Online identifiers and your online behaviour such as cookies and IP addresses;
- Engagements with us including use of products or services, transactions, requests, queries, applications and complaints;
- Financial information including with regard to financial behaviour, goals and needs;
- Internal reports and other derivative data based on the personal information we collect;

- Other personal information including, criminal history and behaviour, medical history and health and your personal beliefs and persuasions such religious, philosophical, trade, union membership or political beliefs.

How do we collect your information?

We will collect personal information directly from you or by telephone or through online channels such as our website, mobile applications, electronic messaging platforms or Internet Banking.

We also collect information about you from other sources where lawful and reasonable, such as reputable third parties that you deal with or that the Oracle Group interacts with for the purposes of conducting its business. These third parties include:

- Business partners (including partners and participating partners involved in reward programs, campaigns or other business activity, joint-venture partners, social media platform partners)
- Service providers (including payment processors, card network providers, debt collection agencies, credit agencies and bureaux, electronic communication service providers, public and private data and data verification providers including data registries, aggregators, search engines, social media and marketing list providers).
- Employers, advisers, agents, associates, assignees, cessionaries, successors in title, trustees, executors, curators, and appointed, third parties (including lawyers and contractors).
- Government departments, regulatory authorities, courts of law and law enforcement agencies, ombudsmen and tax authorities.

If you are a third-party service provider, we may collect personal information about you as a data subject in order to ensure that the business relationship and matters relating to the agreement between you and us can be fulfilled. You warrant that, if you provide us with any personal information about other persons, such as employees, shareholders or directors, you are authorized to share their personal information with us for purposes set out in this statement.

Providing your personal information to us is usually voluntary. However, it may be mandatory under certain circumstances, for example when you apply for products and/or services or to comply with anti-money laundering legislation. If you fail to provide us with your personal information when requested, we may not be able to provide the products or services to you or comply with our legal obligations.

When you provide us with the personal information of third parties, you must inform them that you need to disclose their personal information to us. We will process information in accordance with this statement.

Why do we process your personal information?

Our responsibilities to you are very important to us and we aim to provide you with personalised services to meet your needs. We may process your personal information for any of the reasons outlines below.

Contract requirements

We may need to process your personal information if we require to conclude or perform under a contract or agreement with you for a product or service that you have applied for either with us or through our business partners with whom we have entered into partnership, collaboration or alliance arrangement or for purposes of;

- Providing products and services to you that involve opening and maintaining your account, administering and executing claims, collecting payment due to us by you, managing our risks and maintaining our overall relationship with you;
- Providing you with further information that you request from us regarding the products or services you have with us.

Lawful obligations

We may need to process your personal information for the following purposes;

- To complete integrity and business conduct checks required for compliance with purposes including due diligence and onboarding processes, monitoring and assurance reviews and conduct sanction screening against sanction lists.
- To comply with other risk management, regulatory and legislative requirements.
- To comply with voluntary and mandatory codes of conduct.
- To detect, prevent and report theft, money laundering, terrorist financing, corruption, or other potentially illegal activity, or activity that could lead to loss.
- To process and settle claims.
- To conduct research and analysis (which may include assessing product suitability, credit quality, insurance risks, market risks, developing insurance models and tools and obtaining related information).

Legitimate interest

The Oracle Group may process your personal information in the regular management of its business and to protect the interests of the Group and its clients, depositors, shareholders, employees and other third parties, including our business partners and members of the general public. The Oracle Group may process your information in order to;

- Maintain, monitor, improve, and develop our business policies, systems and controls;
- Maintain and improve data quality;
- Design, develop and test products, services and solutions for clients, which may include combining resources and types of your personal information across multiple legal entities and countries, subject to compliance with applicable laws;
- Personalise and customise products, services and solutions for clients, which may include combining sources and types of your personal information across multiple legal entities and countries, subject to compliance with applicable laws;
- Personalise and customise products, services and solutions, messaging and advertising;
- Respond to client enquiries and communications and to record these interactions for the purpose of analysis and improvement;
- Manage business emergencies and stress events;
- Process and settle transactions and payments;
- Meet record-keeping obligations;

- Conduct research and analysis (among other things, to assess product suitability, insurance risks, market risks, and affordability, to conduct behavioural profiling, to develop insurance models and tools and to obtain related information).
- Enable clients to use value-added solutions and participate in rewards programmes
- Achieve other related purposes

Consent

In addition to the reasons given above, we may process your personal information where we have your specific consent for a defined purpose. We will seek your consent where applicable laws require it.

We will store your personal information according to our defined retention schedules and thereafter delete.

Where will we process your personal information?

Due to the integrated nature of Oracle Group's business and to provide you with efficient access to our products and services, we may process your personal information in Eswatini or in countries our products and services are provided or where our third-party service providers comply with the minimum data protection standards of the Oracle Group.

Integrated processing holds the following benefits for you;

- A single, holistic view of your information that helps us to manage your client profile, authenticate your identity and protect you against fraud.
- Improved business processes and service delivery (and less duplication of information provided).

How long do we retain your personal information?

We retain your personal information in line with our legal and regulatory obligations and for our business and operational purposes as highlighted above. This will generally be for at least five years from your last transaction with us.

How will we communicate with you?

Besides in-person communication, we use a wide array of channels to engage with you regarding your existing products and services and to keep updated. These include SMSes, email, phone calls, notifications sent to your mobile device and in-app notifications. We need to keep up to date on an ongoing operational basis about existing products and services and their new features especially where we are making them more secure and as we make banking more convenient for you. We may contact you through these means for research purposes or to communicate with you for marketing of new products or services as explained in greater detail below.

How do we use your personal information for marketing?

Whether you are an existing client or a prospective client with whom we have had previous interactions in respect of your financial well-being or needs, you are important to us and therefore we would like to share information about our products, services and special offers with you (subject to applicable laws).

If you are a prospective client, and we have had no previous interaction or have no relationship with you, we will seek your express consent in compliance with local laws to market to you electronically.

Each Group entity that you have a relationship with will allow you to manage your marketing preferences in line with locally applicable laws.

When, how and with whom will we share your personal information?

We share information with third parties, auditors, and advisers supporting our services to you, with our trusted partners to introduce products and services to you, with agencies and other financial institutions on credit, fraud and risk matters, with data validation and trust providers to verify your data and identity and with the relevant local and foreign government and other authorities as required by law.

We take extra care when we transfer or share information and will enter into suitable contracts with the trusted parties with whom we share your information, thus ensuring your rights under relevant data protection legislation are upheld.

How is your personal information protected?

The security of your personal information is important to us and we take reasonable steps to keep your personal information safe and to prevent loss, destruction and damage or unlawful access to your personal information by unauthorised parties. We require the same level of security to be implemented by our service providers and other third parties. However, you must not share or send us any personal information through unauthorised channels, as these are not a secure way of communication and carry a risk of interception and unauthorised access. You should only share personal information through authorised channels.

What are your rights?

We value your trust and want you to be familiar with your rights under the legislation and to know how you can exercise them in your interactions with the Oracle Group. You have the right to;

- Access personal information we hold about you and to correct and update your information;
- Object to our processing your personal information, where applicable;
- Request that we delete your personal information, where applicable;
- Be notified that your personal information is being collected by us or has been accessed or acquired by an unauthorised person;
- Object to the processing of personal information for the purposes of direct marketing;
- Not be subject to automated decision-making processes in respect of an application for products and/or services, except under certain circumstances; and
- To request reasons or make a representation to us if your application for products and/or services is refused.

Use of cookies on our website

A “cookie” is a small text file that is stored on your computer, smartphone, tablet or other device when you visit a website or use an application. It helps to distinguish you from other users and contains specific information related to your use of our website or application, such as your log in details and your preference settings, and helps the website or the application to recognise your device.

Cookies help to make a website or app function better and make it easier for us to give you a better user experience on our online platforms. To use or store cookie types that are not required for the function of the website or app and are optional, we will obtain your consent first.

We limit our use of cookies to the following;

- Providing products and services that you request
- Delivering advertising through marketing communications
- Providing you with a better online experience and tracking website performance; and
- Helping us make our website more relevant to you.

We use the following types of cookies on our online channels, such as our website.

- **Strictly necessary**
These are mandatory cookies required for the effective operation and functioning of our website on your device. They enable you to use the website and the features on the website and cannot be switched off.
- **Performance cookies**
These are optional cookies that collect information about how you use the website but not any personal information. Performance information is anonymous and mostly statistical and is used to improve the performance of our website.
- **Marketing cookies or advertising cookies**
These cookies are also optional and are used to deliver and display advertisements that are relevant and engaging for you as the user. They help us measure how effective our advertising campaigns are by your interaction with the advertisement.
- **Session cookies**
These cookies are temporary and optional and only exist while you browse our website to remember your activities on the website. As soon as you close the website or move to a different website, the cookies are deleted.