

CLIENT PRIVACY NOTICE

Morula Management Company is committed to protecting your personal data. This privacy notice explains how we collect, use and safeguard your information when you interact with us as a client. We adhere to the Data Protection Act, No.18 of 2024.

1. **Personal Data**

We collect and process the following types of personal data that you provide to us

- Full Names
- Contact Information (email, phone number, and physical address)
- Business Information (company name, job title, business contact details, account details, and tax identification number)
- Date of Birth
- Citizenship and Identification Details (including identification documents such as national ID or passport)
- Sex and Gender
- Employment and Income Details
- Financial Information (e.g., account and bank statements)

Additionally, we collect personal data of clients' next of kin or contact person, including names, addresses, and telephone numbers.

2. **Purpose of Data Collection and Processing**

We collect and process your personal data during the onboarding process and on an ongoing basis as and when circumstances change, or the information becomes outdated. The primary purposes for collecting and processing your data include the provision of Services, Compliance with Legal and Regulatory Requirements, Security and Fraud Prevention. Sanctions and adverse media screening -as part of our onboarding process, Management company uses system to assess the perceived level of risk the client carries before the establishment of a business relationship.

3. **Legal Basis for Processing**

We will process your personal data based on your explicit consent, or as necessary to fulfill a contract or comply with legal obligations.

4. **Sharing/Transferring of Data**

We may share your data with subsidiaries, affiliates, service providers, or third-party partners for operational, legal, and security purposes. In some cases, we may transfer data outside Botswana in accordance with applicable data protection laws.

5. **Data Retention**

We will retain your personal data for the duration necessary to fulfill the purposes outlined or as required by law, with a minimum retention period of 20 years as per the Financial Intelligence Act. Once no longer needed, data will be securely deleted or anonymized.

6. Data Security

We implement technical and organizational measures to protect your personal data from unauthorized access disclosure, alteration misuse or destruction. We ensure that third-party service providers adhere to appropriate security standards. Our security protocols include encryption of sensitive data, access controls and authentication mechanisms.

7. Your Rights

You have the right to: access, correct, or request the deletion of your personal data as well as to withdraw consent, you can request for transfer of your personal data in specific situations or object to processing of your data under certain conditions.

8. Changes to This Privacy Notice: We may update this notice from time to time to reflect changes in our practices or legal requirements.

9. Contact Us

If you have any questions or concerns about how we process your personal data, please contact us

at: Morula Management Company
Plot 64518, Fairgrounds | Gaborone,
Botswana t: +2673931063
e: dpo@morula.co.bw

10. Consent: By signing below, you confirm that you have read and understood this notice, and consent to the processing and disclosure of your personal data as described herein.

SIGNED AT(PLACE):

DATE:

Signature:

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Name:

Name: