

PRIVACY NOTICE - MEMBERS



Pula Medical Aid Fund or **Pulamed** (“we” or “us”) respects and values your privacy and through this Notice we are being transparent to you about the processing of your personal data, explaining the personal data that we process, why we are processing it, what your rights are, who we will share it with and how you can get in touch with us regarding any issues about your personal data.

CONTACT DETAILS	DATA PROTECTION OFFICER
Unit 1 (Acacia), Prime Plaza Plot 74358 Western Commercial Road, New CBD Gaborone, Botswana 365 0555	Pulamed: Phenyo Kedisitse phenyok@pulamed.co.bw AFA: Olerato Marakalala oleratom@afa.co.bw

THE PERSONAL & SENSITIVE PERSONAL DATA WE COLLECT & WHY

Personal data is information that is capable of identifying you directly or indirectly. We collect the following information:

- Names, address and contact details (including proof of identity and address)
- Spouse and beneficiary details
- Gender
- Date of birth
- Health information (including medical conditions, allergies, medical requirements and medical history)
- Banking information
- Employment information (including salary information)

Why we collect your personal data	Legal basis for collecting personal data (our justification for processing)	Condition for collecting sensitive personal data (e.g., health information)
Member Registration and Verification	Performance of a contract	Management of health or social care/treatment (this relates to the provision of medical aid)
Administration of Benefits: determining eligibility for benefits and services, managing and processing claims and coordinating benefits for you and your beneficiaries.		
Communication and Support		
Beneficiary and Dependent Management		
Claims and Healthcare Management: facilitating appropriate treatment, chronic disease management, coordinated care and processing authorizations for medical services, medicines, or procedures.		
Spouse and Nominee Identification		
Banking and Financial Transactions		

Legal and Regulatory Compliance (e.g., KYC)	Legal obligation	
Improvement of services	Legitimate interest (customer satisfaction and revenue increment)	
Proactive identification of health trends or risk factors such as early signs of chronic conditions like pre-diabetes or hypertension to propose enrolment in targeted care programmes, such as our chronic medication programme.	Legitimate interest (supporting early intervention, ensuring continuity of care, and promoting long-term health and wellbeing)	Management of health or social care/treatment (this relates to the provision of medical aid)
Direct marketing of our products and benefit packages	Consent	

WHOM WE MAY SHARE YOUR PERSONAL DATA WITH

We share your personal data with our appointed third party medical aid fund administrator, actuaries, medical practitioners and third-party service providers to achieve the purposes we have stated. We may share your personal data with law enforcement and other governmental entities (such as the Botswana Unified Revenue Service (BURS), Financial Intelligence Agency (FIA), the Non-Bank Financial Institutions Regulatory Authority (NBFIRA), courts of law, etc.) should we be required to do so. When we do, we will ensure that your privacy is protected.

YOUR RIGHTS UNDER THE DATA PROTECTION ACT

Access: You have a right to access your personal data and may exercise this right at any time by contacting our office at the electronic mail address provided above.

Rectification: You have a right to rectify your personal data, which you believe is inaccurate, incomplete or not up to date.

Erasure: You have a right to the erasure of your personal data, which you cannot exercise while your contract with us is active or when the law requires us to keep your personal data for a certain period.

Data portability: You have the right to ask for your personal data to be sent directly to another organisation only if the processing was based on your consent or our contract with you.

Objection: You have a right to object to the processing of your personal data, which you cannot exercise while your contract with us is active, in instances of emergency medical treatment or when the law requires us to continue to process your personal data.

Restriction: You have a right to ask that we restrict or 'pause' from processing your personal data. This can be done if you discover that the personal data is inaccurate or are of the view that the processing is unlawful.

You have a right not to be subjected to decisions made solely based on automated processing of personal data. You may request human intervention in the decision made.

Please note that the above rights are not absolute and may be limited if the request is excessive or unfounded. You reserve the right to lodge a complaint with the Commissioner should there be a contravention with the Act.

Retention of Your Information

Pulamed will retain your personal data for as long as is necessary to comply with contractual and legal obligations.