

Customer Privacy Notice

CUSTOMER PRIVACY NOTICE

INTRODUCTION

At Letshego Financial Services Lesotho (hereafter referred to as “LFSL”, “we”, “us”, “our”), we value your privacy and are committed to the protection of your personal data as our customer. This Customer Privacy Notice explains how we process your personal data as per the Lesotho Data Protection Act 2011 (hereafter referred to as the “DPA”).

WHAT PERSONAL DATA DO WE COLLECT & PROCESS?

We may collect and process the following categories of personal data in relation to your interaction with Letshego regarding our products and services offering:

Identification and Contact Details

Letshego may request amongst others, Full Names, Date of Birth, Marital Status, Place of Birth, Email Address, Phone Number, Country of Residence, Nationality, National Identity Information, Passport information, Residential Address, Postal Address, Customer Photo.

Employment Information

Employer details (employment confirmation letter), Work Permit shall also be requested for processing purposes.

Personal Financial Information

This includes amongst others Bank Name, Bank Branch, Bank Account Number, Branch Code, Bank Reference Letter, Audited Financial Statements.

Other Information

Letshego may further request Spouse Name, Spouse Phone Number, Next of Kin Names, Next of Kin Phone Number, Marital Certificate, Form B and Spousal consent form.

HOW DO WE COLLECT YOUR PERSONAL DATA?

We may collect your personal data in the following ways:

- Directly from you, for example during interaction with our sales representatives when they offer various Letshego Products.
- From third party(ies), for example, credit bureau, CDAS (Central Deduction Administration System) and other institutions authorized to provide credit history information.

WHY DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data for the following purposes:

Onboarding you as our customer: To verify the identity and legitimacy of customers, product and service offering, credit history analysis for accurate automated affordability assessments.

Biometric Data: Use of Customer Photos as a form of identity verification.

Employment Confirmation: To ensure employment details and retirement dates match.

Communication: To manage communication and feedback between Letshego and yourself.

Product Testing and Enhancement: To improve product quality, reliability, and user experience.

Direct Marketing: Tele-selling of Letshego products and services which will be sent via various channels consented to such as SMS and email.

Comply with Regulatory Requirements: To comply with regulatory requirements imposed on Letshego, we process your personal data in accordance with the Data Protection Act of Lesotho and any other financial institutions regulations in Lesotho.

For record keeping: For record keeping purposes in alignment with legal and business requirements.

LEGAL BASIS FOR PROCESSING PERSONAL DATA?

We rely on various legal bases for processing your personal data, including:

Performance of a Contract: Processing of your personal data is necessary for the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Legal Obligation: Processing your personal data where it is necessary to comply with our legal obligations. This includes obligations under the Data Protection Act, and any other obligation mandated by the Central Bank of Lesotho.

Consent: Processing is based on your explicit consent in writing, which you can withdraw at any time.

Legitimate interest: Processing your personal data where it is necessary for purposes that form part of our legitimate interests or those of a third party. We will only rely on this basis where such interests are not overridden by your rights and freedoms, particularly your right to privacy.

HOW LONG DO WE RETAIN YOUR DATA?

We will retain your personal data only for as long as necessary to fulfil the purposes for which it was collected or as required by the law. Your Personal data will be retained as per Letshego's Internal Data Retention schedule, once the retention period has elapsed and there is no longer a lawful basis for retaining your data, Letshego will ensure that the data is securely deleted.

WHO DO WE SHARE YOUR DATA WITH?

Your personal data may be shared with the below:

Internal teams: Such as Sales & Distribution, Credit operations and Credit approvals departments and any other support service within Letshego Financial Services Lesotho.

Third-party providers: Third party service providers we work with such as credit bureaus, CDAS and third-party information management systems.

Legal or Regulatory Bodies: Where required by law, we will share personal information with our regulators, governmental, law enforcement authorities and with courts, in order to comply with our regulatory and legal obligations. In the event of a corporate restructuring, merger, or acquisition, your personal data may be transferred to a new entity as part of the transaction.

All third-party providers are contractually bound to protect your data and use it only for the purposes specified in this notice.

CROSS-BORDER TRANSFER OF PERSONAL DATA?

Your personal data may be transferred to and processed in other countries outside Botswana. We prioritise countries recognised as having data protection standards equivalent to those in Botswana.

If we transfer your personal data to other countries, we will ensure that this is done in compliance with the Data Protection Act and there are appropriate safeguards in place concerning the protection of your data, such as by using appropriate contractual data processing agreements.

Letshego may rely on permitted derogations for the transfer, such as your explicit consent, the necessity of the transfer for the performance of your contract and Letshego's legitimate interests.

HOW DO WE PROTECT YOUR DATA?

We prioritize the security of your personal data and have implemented robust Information Technology and Security policies to ensure the confidentiality, integrity, and availability of all physical and electronic information assets, including personal data.

We maintain procedures to promptly address any suspected data security breach and provide regular training and awareness programs to all Letshego employees who have access to your personal data.

AUTOMATED DECISION MAKING/PROFILING?

Letshego may use your personal data to make decisions about you solely on automated processing, including the use of an automated affordability calculator to determine customer credit affordability for product offering.

YOUR DATA PROTECTION RIGHTS?

As a customer, you have the following rights concerning your personal data:

1. Right to be informed

You have the right to be informed of any personal data that we hold about you and how we are processing your personal data.

2. Right of Access

You have the right to receive confirmation from us on whether we hold personal data about you and to receive a copy of your personal data.

3. Right to Erasure

You may request deletion of your personal data.

4. Right to Rectification

You have the right to request rectification of any inaccurate or incomplete personal data we hold about you.

5. Right to object

You have the right to object to the processing of your personal data for direct marketing purposes.

6. Right to Portability

You may request a copy of your personal data in a structured, machine-readable format and request that it be transferred to another controller.

7. Right to withdraw Consent

Where processing is based on consent you have the right to modify or withdraw your consent at any point.

8. Right to lodge a complaint

You also have the right to lodge a complaint with the Information and Data Protection Commission. We encourage you to contact us first so we can resolve your concerns directly.

These rights are not absolute and are subject to conditions or limitations as specified in applicable law. We will process your request in accordance with the Lesotho Data Protection Act. To protect your privacy and security, we will take steps to verify your identity before complying with the request.

CONTACT US

If you have questions about this Data Privacy Notice, how Letshego processes your personal data or you wish to exercise your rights, please contact the Letshego at:

Data Controller: Letshego Financial Services Lesotho

Physical Location: Find your nearest Letshego branch in Maseru or across Lesotho.

Postal Address: Letshego Financial Services Lesotho, P.O. Box 13670, Maseru 100, Lesotho

Email address: lesotho@letshego.com

Telephone Number: +266 2203 1017

Whatsapp Number: +266 5907 3570

UPDATES

We may update this notice from time to time to reflect changes in how we process personal data, including any amendments to the Lesotho Data Protection Act or applicable laws and regulations. The latest version will always be available on our website.