



ZSIC LIFE PLC

**DATA PROTECTION AND PRIVACY
POLICY**

2022

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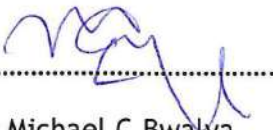
LIST OF ABBREVIATIONS

ICT	Information and Communication Technology
PLC	Public Limited Company

FORWORD

ZSIC Life Plc strategic theme for 2021 to 2023 is to Enhance Customer Experience through Digital Transformation. This implies that there is an increased collection, processing, and electronic transfer of customers' personal data. It is of great importance that customers personal data is well secured both at rest and in transit. As such, the company has developed The Data Protection and Privacy Policy to address various operational and strategic needs regarding usage, monitoring, and management of data.

I am glad that we now have a policy whose implementation will ensure the company continues to demonstrate and meet its commitment to ensuring the protection and privacy of consumer data.



.....

Mr Michael C Bwalya

BOARD CHAIRPERSON

1 INTRODUCTION

ZSIC Life Plc manages different insurance and pension products under different schemes. In the process of conducting its business, the company collects and processes customer information to arrive at various pricing, distribution, and administration models, as well as improve ways of enhancing its customer care. With this, it is paramount that the company has a policy and supporting procedures and guidelines that inform how it will ensure ongoing compliance with customer expectations as well as the Data Protection Act, 2021.

2 SITUATION ANALYSIS

In the recent past, ZSIC Life Plc has seen an increased rate of amount of data created and stored. With the increased processing of raw data, system interconnectedness and increased importance of the resultant information, it is imperative that management puts in place Data Protection and Privacy Policy to safeguard customers' data.

3 VISION

The vision of ZSIC Life PLC is to be the “Most preferred provider of exceptional insurance and pension services”. The policy helps the company achieve this vision by demonstrating how the company is taking measures to ensure compliance with the Data Protection Act, 2021 and consumer expectations.

4 OVERVIEW

The Data Protection and Privacy Policy ensures important information is safeguarded from corruption, compromise, or loss. Protecting data from compromise and ensuring data privacy are other key components of data protection. There is also little tolerance for downtime that can make it impossible to access important information. Consequently, a large part of a data protection strategy is ensuring that data can be restored quickly after any corruption or loss. Protecting data from compromise and ensuring data privacy are other key components of data protection.

5 PURPOSE

ZSIC Life Plc's **Data Protection and Privacy Policy** refers to the company's commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

With this policy, ZSIC Life Plc ensures that it gathers, stores, and handles data fairly, transparently and with respect towards individual rights.

6 SCOPE

This policy refers to all parties (employees, job candidates, customers, suppliers, etc.) who provide any amount of information to ZSIC Life Plc. Employees of our company, and its subsidiaries must follow this policy. Contractors, consultants, partners, and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

7 GENERAL POLICY PROVISIONS

As part of ZSIC Life Plc operations, the company needs to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, financial data, etc.

ZSIC Life Plc collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. The collected information will be:

- Accurate and kept up to date
- Collected fairly and for lawful purposes only
- Processed by the company within its legal and moral boundaries
- Protected against any unauthorized or illegal access by internal or external parties

This data will not be:

- Communicated informally
- Stored for more than a specified amount of time
- Transferred to organizations, states or countries that do not have adequate data protection policies
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically, we must:

- Let people know which of their data is collected
- Inform people about how we'll process their data
- Inform people about who has access to their information

- Have provisions in cases of lost, corrupted, or compromised data
- Allow people to request that we modify, erase, reduce or correct data contained in our databases

To exercise data protection, we are committed to:

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train employees in online privacy and security measures
- Build secure networks to protect online data from cyberattacks
- Establish clear procedures for reporting privacy breaches or data misuse
- Include contract clauses or communicate statements on how we handle data
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization etc.)

Our data protection and privacy provisions will appear on our website.

8 COMPLIANCE

The Compliance Department will verify compliance to this policy through various methods, including but not limited to, periodic walk-throughs, video monitoring, business tool reports, internal and external audits, and feedback to the policy owner.

8.1. Exceptions

Any exception to the policy must be approved by the ZSIC Life Board or its delegate such as appointed Steering Committee or Managing Director.

8.2. Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action as enshrined in the Company Disciplinary code.

9 RELATED STANDARDS, POLICIES AND PROCESSES

Data Protection Act 2021

ZSIC Life ICT Security Policy

ZSIC Life Disaster and Recovery Policy

Data Privacy Policy Statement

10 AUTHORITY FOR APPROVING AMENDMENTS TO THIS POLICY

The Board is responsible for approval of this Policy and any subsequent amendments therein from time to time.

11 REVIEWS AND MODIFICATIONS

ZSIC Life Plc will keep this policy current and relevant. Therefore, from time to time it will be necessary to modify and amend some sections of this policy. This policy will be reviewed every year and may be amended at any time when need arises. In the absence of the completion of a review, the current policy will remain in effect.

12 REVISION HISTORY

Version	Date	Description	Approved By
1.0	1 June 2022	Initial Policy Drafted	
2.0	19 August 2022	Amendments after input from Audit and Risk Board Committee	Board Chairperson

BY ORDER OF THE BOARD

Signed this day 5th of September 2022

A handwritten signature in blue ink, appearing to read 'Michael C Bwalya', written over a horizontal dotted line.

Mr Michael C Bwalya

Board Chairman

APPENDIX I-DATA PRIVACY POLICY STATEMENT

This Data Privacy Policy statement highlights how ZSIC Life Plc collects, handles, and processes data of its customers and visitors (on its websites). Statement.

The ZSIC Life Plc Data Protection and Privacy Policy was written to help you understand what information we collect, how we use it and what choices you have about it. Some information is collected in the process of onboarding customers via employees, appointed agents and web and mobile applications.

We collect information in a few different ways

1. When you give it to us or give us permission to obtain it

When you sign up with ZSIC Life Plc you voluntarily share certain information including your name, email address, phone number, comments, and any other information you give us. You can also choose to share your precise location using your device settings. We will still use your IP address, which is used to approximate your location, even if you don't choose to share your precise location. You will also have the option to share other information about yourself such as your gender, age/Date of Birth, and any other information.

2. We also get technical information when you use ZSIC Life Web and Mobile Applications

When you use ZSIC Life Plc's web and mobile applications, like any other web or mobile application, certain internet and electronic network activity information gets created and logged automatically. Here are some of the types of information we collect:

- **Log data.** Our servers record information ("log data"), including information that your browser automatically sends whenever you visit a website, or that your mobile app automatically sends when you're using it. This log data includes your Internet Protocol address (which we use to infer your approximate location), the address of and activity on websites you visit that incorporate ZSIC Life features (like the searches, browser type and settings, the date and time of your request, how you used our applications, cookie data and device data).
- **Cookie data.** We also use "cookies" (small text files sent by your computer each time you visit our website, unique to your ZSIC Life account or your browser) or similar technologies to get log data. When we use cookies or other similar technologies, we use session cookies (that last until you close your browser) or persistent cookies (that last until you or your browser delete them).
- **Device information.** In addition to log data, we collect information about the device you're using, including the type of device, operating system, settings, unique device identifiers and crash data that helps us understand when something breaks.

What we do with the info we collect

- **We are committed to showing you content that's relevant, interesting, and personal to you. To do that, we use your information to provide and improve your experience, including:**
 - Identify you when you use ZSIC Life Plc Applications.
 - Respond to your questions or comments.

- We have a legitimate interest for using your info in these ways. It's fundamental to what we do at our company and necessary to make ZSIC Life Plc web and mobile applications and its features relevant and personalized to you.
- We also have a legitimate interest in making ZSIC Life Plc Web and Mobile applications safe and improving our product features. We all benefit when we use your information to:
 - Conduct analytics and research on who is using ZSIC Life Plc Web and Mobile Applications and what they are doing. For example, by logging how often people use two different versions of a feature so that we can understand which version is better.
 - Improve web and mobile applications and offer new features

Choices you have about your info

If you have a ZSIC Life Plc account, you have choices available to you through the device or software you use to access ZSIC Life. For example:

- The browser you use lets you control cookies or other types of local data storage.
- Your mobile device lets you choose how and whether your precise location, contacts, and other data is shared with us.
- Close your account at any time. When you close your account, we'll deactivate it and delete your account data. Please note that there may be legal reasons for us to keep your data, such as if we receive a law enforcement request asking us to preserve data. We may also retain certain information in our backup systems for a limited period, or as required by law.

How and when we share information

- Third-party companies, service providers or individuals that we **may** employ to process information on our behalf based on our instructions and for the purposes described in this Privacy Policy. For example, we **may** share data with security consultants to help us get better at identifying spam. Some information we acquire may be collected by third-party providers on our behalf.
- Law enforcement agencies or government agencies. We only share information if we believe that disclosure is reasonably necessary to comply with a law, regulation, or legal request; to protect the safety, rights, or property of the public, any person, or ZSIC Life Plc; or to detect, prevent, or otherwise address fraud, security, or technical issues.
- Our wholly owned subsidiaries and affiliates. If we were to engage in a merger, acquisition, bankruptcy, dissolution, reorganization, or similar transaction or proceeding that involves the transfer of the information described in this Policy, we would share your information with a party involved in such a process (for example, a potential purchaser).

How long we keep your information

- We keep your information only so long as we need it to provide ZSIC Life Plc service to you and fulfil the purposes described in this policy. This is also the case for anyone that we share your information with and who carries out services on our behalf. When we no longer need to use your information and there is no need for us to keep it to

comply with our legal or regulatory obligations, we'll either remove it from our systems or depersonalize it so that we can't identify you.

Your options

You have options in relation to the information that we have about you. You can

- a). Request for your details to be removed or depersonalised through a Single Point of Contact (SPOC) in case of a Group Insurance or Pension Scheme
- b). Request for your details to be removed or depersonalised by contacting ZSIC Life Plc via communication channels listed on www.zsiclife.co.zm for individual insurance or Pension schemes or any other product line.
- c). Request to close web or mobile app account in the case of web and mobile applications via communication channels listed on www.zsiclife.co.zm.
- d) Request more details about the information we collect and how and why we use and share it.

Residents of Zambia

If you have any questions about our data processing activities, the data controller you should contact ZSIC Life Plc. If you think that we haven't complied with data protection laws, you have a right to lodge a complaint with Office of the Data Protection Commissioner.