

UAP OLD MUTUAL GROUP PRIVACY NOTICE FOR VENDORS

At UAP Old Mutual Group, we are committed to protecting your privacy and the security of your personal information and to ensure that your personal information is collected and used properly, lawfully and transparently.

This Notice explains how we obtain, use and disclose personal information about you during and after your working relationship with us, as is required by the Data Protection Legislation such as the Protection of Personal Information Act, South Africa (“POPIA”), the Data Protection Act, Kenya (“DPA”) and the Data Protection and Privacy Act, Uganda (“DPPA”) .

This Notice sets out

- Who we are
- What information we collect
- Lawful Basis for Processing
- How we use your information
- Our aim to provide ongoing financial services
- To whom we disclose your information
- How we safeguard your information
- Your rights to access and correction of your personal information
- Changes to this Notice
- How to contact us
- The Information Regulator’s contact details

WHO WE ARE

In this Notice, “UAP Old Mutual Group” or “or “we” or “us” or “our” refers to one or more of the companies in the UAP Old Mutual Group set out below responsible for processing your personal data when you become part of our approved Vendors or are under evaluation to become part of the approved supply chain panel.

No.	Entity	Contact Details
1.	UAP Holdings Plc	UAP Old Mutual Tower, Upper Hill Road P.O. Box 43013 - 00100, Nairobi, Kenya Tel: + 254 20 2850000 Mobile: + 254 711 065 000 Fax: + 254 20 2719 030 E-mail: uapholdings@uap-group.com

		Website: www.uap-group.com
2.	UAP Insurance Company Limited	UAP Old Mutual Tower, Upper Hill Road P.O. Box 43013 - 00100, Nairobi, KENYA Tel: + 254 20 2850 000 Mobile: + 254 711 065 000 Fax: + 254 20 2719 030 E-mail: uapinsurance@uap-group.com
3.	Old Mutual Life Assurance Company Limited	UAP Old Mutual Tower, Upper Hill Road PO Box 30059 - 00100, Nairobi, Kenya Tel +254 (20) 2829 000 / 2728 881 Email: clientservices@oldmutualkenya.com
4.	Old Mutual Investment Group Limited	UAP Old Mutual Tower, Upper Hill Road P.O. Box 11589, GPO 00400 Nairobi, Kenya Tel +254 (20) 282 9800, 272 8881 Email: omigclientservice@oldmutualkenya.com
5.	Old Mutual Securities Limited	UAP Old Mutual Tower, Upper Hill Road P.O. Box 50338-00200 Nairobi, Kenya Tel +254 720 909 091, +254 (20) 224 1408, +254 73100 206 Email: omsclientservice@oldmutualkenya.com
6.	UAP Life Assurance Limited	UAP Old Mutual Tower, Upper Hill Road P.O. Box 23842 – 00100, Nairobi, Kenya Tel: +254 20 2850 300 Mobile: +254 711 065 300 Fax: + 254 20 2719 030 E-mail: life@uap-group.com
7.	Faulu Microfinance Bank Limited	Head Office Address: Ngong lane, off Ngong Road P.O.Box 60240-00200 Nairobi, Kenya Telephone: +254 711 074 000 or +254 711 074 074 Email: info@faulunkenya.com
8.	Old Mutual Holdings Limited	UAP Old Mutual Tower, Upper Hill Road PO Box 30059, GPO 00100, Nairobi, Kenya Tel +254 (20) 2211 87/8
9.	UAP Old Mutual Insurance Uganda Limited	6 th Floor, Nakawa Business Park Plot 3-5 New Portbell Road P.O. Box 7185, Kampala - Uganda Tel: +256 - 414 - 332 700 Fax: +256 - 414 - 256 388 Email: uap@uapinsurance.co.ug
10.	UAP Old Mutual Life Assurance Uganda Limited	6 th Floor, Nakawa Business Park Plot 3-5 New Portbell Road P.O. Box 1610, Kampala - Uganda Tel +256 414 332 722 Email: life@uap.co.ug
11.	UAP Financial Services Limited	6 th Floor, Nakawa Business Park Plot 3-5 New Portbell Road

		P.O. Box 1610, Kampala - Uganda Tel +256 414 332 700 Fax: +256 414 256 388 Email: Financialservices@uap.co.ug
12.	UAP Properties Limited	6 th Floor, Nakawa Business Park Plot 3-5 New Portbell Road P.O. Box 7185, Kampala - Uganda Tel +256 414 332 700 Fax: +256 414 256 388 E-mail: properties@uap.co.ug,
13.	UAP Insurance South Sudan Limited	UAP Equatoria Tower Malakia Road P.O. Box 201 Juba, South Sudan Tel: +211 959 000000 / 977 296555 E-mail: info@uap-group.com
14.	UAP Insurance Rwanda Ltd	Grand Pension Plaza - 7 th Floor, BP 6644 Kigali, Rwanda, Tel: +250 25 2500905-7 Fax: +250 25 2500908 Email: uapinsurancerwanda@uap-group.com
15.	UAP Insurance Tanzania Ltd	Barclays House, 4 th Floor Ohio Street P.O. Box 71009 Dar Es Salaam, Tanzania. Tel: +255 22 213 7324 / 5 Fax: +255 22 213 7308 Email: uapinsurancetanzania@uap-group.com

WHAT INFORMATION WE COLLECT

We collect and process your personal information evaluate your suitability in becoming part of the approved supply chain panel and to enable us comply with our legal and regulatory obligations and for certain other purposes explained below.

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, for example you submit a prequalification form to us or when you provide goods or services to us as a supplier or contractor or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional.

We also collect information about you from other sources. In some instances, it may be necessary that we obtain your personal data from third parties or publicly available sources. The reasons for this include verifying the information you have provided to us, assessing whether you are eligible to be part of the approved

supply chain panel, complying with our legal or regulatory obligations or where it is necessary for our legitimate interests and for such other purposes as set out in our Privacy Policy

LAWFUL BASIS FOR PROCESSING

Depending on the processing activity, we rely on the following lawful basis for processing your personal data under the Data Protection Legislation:

- Which relates to processing necessary for the performance of a contract
- To comply with our legal obligations
- In order to protect your legitimate interests
- For the purposes of our legitimate interest

We will only use or disclose personal information concerning a vendor's sensitive personal information such as marital status, property details, health status, family details (such as next of kin and beneficiaries), ethnic origin, political opinions, religious beliefs or philosophical or trade union membership and criminal behaviour provided to us with your explicit consent or in limited lawful circumstances provided for in the Data Protection Legislation.

Where the information we process is special personal information we shall rely on additional bases for processing as provided in the Data Protection Legislation.

HOW WE USE YOUR INFORMATION

We will use your personal information only for the purposes for which it was collected or agreed with you, for example:

- To assess whether you are eligible to be part of the approved supply chain panel;
- To perform the contract we are about to enter into or have entered into with you.
- To verify the information you have provided to us;
- To maintain our relationship;
- To carry out performance evaluations;
- For operational purposes;
- To send you important notices such as changes to our terms, conditions and policies;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- To advertise and market to you our latest products and services;

- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- In connection with legal proceedings; and
- In complying with our legal or regulatory obligations.

ONGOING FINANCIAL SERVICES

Given our aim to provide you with ongoing financial services, we would like to use your information to keep you informed about other financial products and services which may be of particular interest to you.

We may advertise and market to you our latest products and services. Please note that if you do not want to receive our marketing information you may opt-out by contacting us at any time.

DISCLOSURE OF INFORMATION

We may disclose your personal information to the third parties set put below. We have agreements in place to ensure that they comply with these privacy terms.

We may share your personal information with:

- entities comprising the UAP Old Mutual Group or their affiliates.
- public authorities or governments when required by law, public interest, national security, regulation, legal process or enforceable governmental request.
- our third-party service providers who help us manage our products and services including those service providers who maintain our IT and office systems and provide marketing and advertising services.
- to service providers that provide application processing, fraud monitoring, call center and/or other customer services, hosting services and other technology and business process outsourcing services.
- persons or entities that you explicitly request us to transfer your personal data to them.
- financial advisers, business partners and third party administrators who help us manage our products and services.

- banks or financial institutions within the country and outside the country where you either transfer or receive payments from the said banks or financial institutions.
- our professional advisers such as auditors, tax advisers, insurers, reinsurers, medical agencies, legal advisers who act on our or your behalf, or who represent another third party.
- loss adjusters and claims experts who help us handle claims.
- third parties connected with the sale, transfer or disposal of our business.
- to counterparty banks, payment infrastructure providers and other persons from whom we receive, or to whom we make, payments on our clients' behalf.
- debt collection agencies, credit reference agencies, fraud detection agencies and other agencies that we will contract to provide services to us.

INFORMATION SECURITY

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information; and
- Investigating and reacting to security incidents.

When we contract with you, we shall impose appropriate security, privacy and confidentiality obligations on you to ensure that personal information that we remain responsible for, is kept secure.

We may need to transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

YOUR RIGHTS

You have the right to:

- Be informed of the use to which your personal data is to be put as we have endeavoured to outline in this Privacy Notice;
- Request access to your personal data that we hold about you;
- Object to the processing of all or part of your personal data;
- Request correction of inaccurate, false or misleading data that we hold about you; and
- Request deletion of false or misleading data that we hold about you.

We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you.

CHANGES TO THIS NOTICE

Please note that we may amend this Notice from time to time. Please check our website periodically to inform yourself of any changes [available at www.uapoldmutual.com].

HOW TO CONTACT US

If you have any concerns about the use of your personal data, questions about this Privacy Notice including any requests to exercise your legal rights under the law, please contact us using the details set out below:

Email address: dataprivacy@uapoldmutual.com
Postal address: P.O. Box 43013-00100, Nairobi
Physical address: UAP Old Mutual Tower, Upperhill Road
Telephone number: +254 20 2850000

We will respond to your questions or concerns within [seven (7) days] of receipt of the query.

INFORMATION REGULATOR

You have the right to complain to the Regulator whose contact details are:

Kenya- <https://www.odpc.go.ke/contact-us/>
Office of the Data Protection Commissioner
P.O. Box 30920 – 00100 NAIROBI
CA Centre
Email: info@odpc.go.ke

Uganda- <https://www.nita.go.ug/>
National Information Technology Authority- Uganda
Palm Courts, Plot 7A, Rotary Avenue (Former Lugogo Bypass)
P.O. Box 33151, Kampala - Uganda
Telephone: +256-417-801038
Email: info@nita.go.ug