

FIRST MUTUAL HOLDINGS LIMITED PRIVACY STATEMENT

The First Mutual Holdings Group respects your privacy and we are committed to keeping your personal information and other data confidential and secure.

“First Mutual”, “First Mutual Holdings Limited Group”, the Company or “we” refers to First Mutual Holdings Limited and/or its subsidiaries.

1. DATA PROTECTION PRINCIPLES

First Mutual complies with the principles of data protection. The six overall guiding principles are:

- **Quality of Data**
- **Lawfulness, transparency and fairness**
- **Purpose Limitation**
- **Accessibility**
- **Accuracy**
- **Consent**
- **Storage Limitation**
- **Confidentiality and Integrity**

Your privacy and security are of the utmost importance to us. We will always follow these principles and ask you how you would like us (or our partners) to communicate with you.

2. COLLECTION AND USE OF INFORMATION

During the course of our business dealings, the First Mutual Holdings Limited Group will collect certain information from you. The information collected will depend on the purpose for which it is to be used.

We may collect and process the following data about you:

- Information that you provide by filling in forms on this site or forms that you complete when you intend to take up any of the products offered by First Mutual, or where you intend to provide services to First Mutual. This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services.
- We may also ask you for information when you participate in a competition or promotion and when you report a problem with our site.
- Details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

If you contact us, we may keep a record of that correspondence.

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Personal data collected on you, and where appropriate, your family, will be used by First Mutual only for the purposes for which it was collected. Such purposes may include providing you with access to our services and products, underwriting, assessment and processing of claims, policy administration, credit referencing / credit management, debt collection, identity checks, improving our offerings, conducting market or customer satisfaction surveys or statistical analysis, audit and record-keeping, legal proceedings, compliance with legal and regulatory requirements, and/or other legitimate purposes.

Our strategy is to provide you with a one-stop-shop where you can access a wide range of financial services under one roof i.e. within the First Mutual Holdings Limited Group or via our partners. We may therefore use your information to keep you informed about other financial products and services which may be of interest to you, unless you do not want to receive these communications, in which case you should advise us at the numbers/addresses provided below.

3. CONSENT

By returning or submitting any document with your personal information to us, you consent to the Company processing your personal data for the above purposes. Where the legal basis for us processing your personal data is that you have provided your consent, you may withdraw your consent at any time. If you withdraw your consent this will not make the processing which we undertook before you withdrew your consent unlawful.

You may also exercise your right to opt out of the use of your information for marketing purposes at any time by contacting us using the methods explained at the end of this policy.

Your personal information will be disclosed without your consent where we are obliged or permitted by law to do so. If you post or send offensive or objectionable content anywhere on or to any of our websites or otherwise engage in any disruptive behaviour on any of our websites, we can use whatever information that is available to us about you to stop such behaviour. This may involve informing relevant third parties such as law enforcement agencies about the content and your behaviour.

4. METHODS OF COLLECTING INFORMATION

When you submit an enquiry or purchase products or services from the First Mutual Holdings Limited Group, you will be asked to provide your personal details. Sometimes we may obtain further information from other companies in the First Mutual Holdings Limited Group to enable us to enhance our offerings for your benefit.

5. IP ADDRESSES AND COOKIES

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration among other uses. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

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When you visit our website, we may send you a cookie. A cookie is a small file that can be placed on your computer's hard disk for record keeping purposes and we may use them to do a number of things.

Cookies help us to recognise you when you next visit one of our pages and note the content displayed to you. This allows us to tailor the content we provide to your preferences. We may use the services of third-party ad servers for this purpose.

Cookies may be used to compile anonymous statistics related to the take up or use of services, or to patterns of browsing. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service

You can choose to 'not accept' cookies by changing the settings on your web browser but if you block all cookies, including strictly necessary cookies, you may find that certain features on our websites will not work properly.

6. DATA PROTECTION

We use our best efforts to provide adequate protection for your personal information and to stop unauthorised access and use thereof. We will take appropriate technical and organisational measures that are necessary to protect your data from negligent or unauthorised destruction, negligent loss, unauthorised alteration or access and any other unauthorised processing of the data. The First Mutual Holdings Limited Group continually reviews its controls and procedures to ensure that your personal information is kept safe.

Access to personal information is limited to those who need it for the purposes referred to in this policy.

Among other aspects, we monitor physical security, computer and network security and security of communications. We have procedures for responding to security incidents.

7. DISCLOSURE OF INFORMATION

Your personal information may be disclosed to our service providers who are involved in the delivery of products or services to you and who are themselves bound by this privacy policy. Our service providers are obliged to handle your information in accordance with our instructions and using the same level of care that we would apply.

We may share your personal information with, and obtain information about you from, third parties for the purposes listed above.

We may also obtain information about you from other companies in the First Mutual Holdings Limited Group when we believe it will enhance the services and products we can offer to you, unless you have objected to such information-gathering.

We may disclose your information where we have a legal duty or right to do so and/or where we believe it is necessary to protect our rights.

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Medical information is classified as sensitive information and will be kept confidential. It will only be disclosed to those involved with your treatment or care, including your General Practitioner/Primary Health Physician, or to their agents, and, if applicable, to any person or organisation who may be responsible for meeting your treatment expenses, or their agents. We note that these health professionals and their agents will be subject to the duty of professional secrecy.

8. RETENTION OF INFORMATION

Your information will be retained for as long as it is required for the purpose for which it was collected. It is then destroyed unless it is needed for legal, regulatory or accounting purposes or to protect our interests.

9. UPDATING YOUR INFORMATION

You are encouraged to ensure that the information we have about you is up to date and accurate. You may at any time ask us to update, correct or delete your personal information. In such cases, we will take all reasonable steps to confirm your identity before making changes to your personal information.

10. YOUR RIGHTS

Under certain circumstances by law you have the right to:

- Be informed of the use to which your personal information is to be put.
- Request access to your personal information in our custody. This enables you to receive a copy of our data and to check that we are lawfully processing it.
- Object to the processing of all or part of your personal information.
- Request for the correction of false or misleading personal information and request deletion of false or misleading data that we hold concerning yourself. This enables you to ask us to correct any incomplete or inaccurate information that we hold about you or ask us to delete such data.
- You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing.
- You have the right to ask us not to process your personal data for marketing purposes. We will ask you to opt in (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.
- You have the right to opt out of receiving marketing communication at any time.

Please take note that First Mutual may refuse to delete your personal information upon request on the basis that the data is required to comply with legal obligations, for public health purposes or for the defence or exercise of legal claims

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information please contact First Mutual Data Protection Officer at DMupasiri@firstmutual.co.zw

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11. DATA BREACHES

In the event of an unlawful data breach of our database or the database(s) of any of our third-party data processors, it will be assessed and reported to the Data Protection Authority, within 24 hours of the discovery of the breach.

12. AMENDMENTS TO THE PRIVACY POLICY

First Mutual Holdings Limited reserves the right to amend this Privacy Policy from time to time. Please check our websites periodically to check for changes.

13. WHO IS THE DATA CONTROLLER?

When you provide personal information to First Mutual or any of our Subsidiaries, the data controller is the Company.

If another company is the data controller, this will be made clear when you provide your personal information.

14. CONTACT DETAILS

You may contact us at the following numbers/ addresses:

Twitter: @FirstMutualhold
Facebook: @FirstMutualHoldingsLimited
WhatsApp: 0778917309
Tel: +263 (242) 886000 - 17
Email: info@firstmutual.co.zw

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