
PRIVACY NOTICE



Document Control

Reference: DPA REC 2.1A

Issue No:

Issue Date:

Page: 1 of 4

PRIVACY NOTICE

1. **Bank of Botswana**

The Bank of Botswana ("the Bank") is the central bank of the Republic of Botswana, established under the Bank of Botswana Act. For purposes of the Regulatory Sandbox Portal, the Bank of Botswana acts as the data controller and determines the purposes and means of processing personal data.

Contact Details:

Plot 17938, Khama Crescent, Gaborone, Botswana

Tel: +267 360 6000/ www.bankofbotswana.bw

2. **Data Protection Officer**

The Bank has appointed a Data Protection Officer.

All queries relating to the processing of personal data under this Privacy Notice may be directed to:

Email: masabaset@bob.bw

Tel: +267 360 6099

3. **Purpose of Processing**

Personal data submitted through the Regulatory Sandbox Portal is processed for the purpose of handling regulatory sandbox applications which involves the assessment of eligibility for participation in the regulatory sandbox, identity verification and fit-and-proper assessment, confirmation of licensing status and regulatory standing, evaluation of innovation proposals and regulatory readiness, ongoing supervision and monitoring of approved participants and regulatory correspondence and communication.

The portal shall further be used to conduct surveys relating to financial innovation, regulatory policy development, evaluation, and improvement of the Regulatory Sandbox framework. Where surveys collect personal data, this will be indicated at the point of collection. Certain surveys may be conducted on an anonymous basis.

PRIVACY NOTICE



Document Control

Reference: DPA REC 2.1A

Issue No:

Issue Date:

Page: 2 of 4

Where further processing for a new purpose is contemplated, the Bank will provide appropriate information prior to such processing.

4. **Legal Basis for Processing**

Processing is necessary for the performance of the Bank's statutory regulatory and supervisory mandate and compliance with applicable financial, prudential, and related legislation. Provision of personal data required as part of the sandbox application process constitutes a regulatory requirement necessary for the Bank to assess eligibility under its statutory mandate. Failure to provide required information may result in the application not being processed or participation being declined.

Where surveys collect personal data, processing is based on the data subject's consent. Participation in surveys is voluntary. Where personal data is requested for survey purposes, provision of such data is optional. Consent may be withdrawn at any time by contacting FintechPortal@bob.bw

Withdrawal of consent does not affect processing lawfully undertaken prior to withdrawal.

5. **Categories of Personal Data**

The portal processes identification and verification data such as your full names, national identity number, passport details, and proof of address, including professional and regulatory information such as curriculum vitae, directorship and shareholding information, position within the applying entity, as well as your contact information such as your email address, telephone number, and business address.

For security, audit and accountability purposes, the Portal processes limited technical information, including user identifiers, access timestamps, and system activity logs. This processing is necessary to protect the integrity of regulatory submissions, prevent unauthorised access, and maintain system security.

6. **Source of Personal Data**

Personal data is primarily collected directly from applicants and survey participants through the Portal. For regulatory verification purposes, the Bank may obtain or verify personal data from regulatory authorities, government authorities, public registers, financial institutions, and law

PRIVACY NOTICE



Document Control

Reference: DPA REC 2.1A

Issue No:

Issue Date:

Page: 3 of 4

enforcement authorities where required by law. Such data may include identification details, licensing status, regulatory history, and compliance records.

7. **Recipients of Personal Data**

Personal data may be disclosed, where necessary and in accordance with applicable law, to relevant regulatory supervision units within the Bank, legal and compliance functions within the Bank, authorised IT and system administrators responsible for maintaining and securing the Portal, external service providers acting under the Bank's documented instructions and subject to appropriate confidentiality and security obligations and other regulatory or governmental authorities where such disclosure is required or authorised by law.

8. **Location of Processing**

Personal data collected through the Regulatory Sandbox Portal is processed and stored within the Republic of Botswana. The Bank does not transfer personal data outside Botswana in connection with this Portal.

9. **Retention of Personal Data**

Personal data is retained for the duration necessary to fulfil regulatory and supervisory purposes in accordance with applicable statutory retention requirements and in line with the Bank's Records Management and Retention Policy. Following expiry of the applicable retention period, personal data will be securely destroyed or anonymised.

10. **Automated Decision Making**

The Bank does not engage in automated decision-making or profiling that produces legal or similarly significant effects in connection with the Regulatory Sandbox Portal.

11. **Data Subject Rights**

In accordance with the Data Protection Act, data subjects have the right to access personal data, request rectification of inaccurate data, request erasure in certain circumstances, request restriction of processing, object to processing where applicable, request data portability where applicable, withdraw consent where processing is based on consent, not be subject to automated decision-making producing significant effects.

PRIVACY NOTICE



Document Control

Reference: DPA REC 2.1A

Issue No:

Issue Date:

Page: 4 of 4

These rights may be subject to limitations where processing is required for statutory regulatory purposes or subject to confidentiality obligations under applicable law. Requests may be directed to masabaset@bob.bw

12. Complaints

Complaints regarding the processing of personal data may be lodged with:

Information and Data Protection Commission

4th Floor, Finance House

Tel: (+267) 3950836/ 7318263

Email: thchuma@gov.bw

Data subjects may also contact the Bank's Data Protection Officer in the first instance.

13. Amendments to this Privacy Notice

This Privacy Notice may be updated from time to time to reflect legal or operational changes. The current version will be published on the Regulatory Sandbox Portal.