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OLD MUTUAL EAST AFRICA PREMISES SECURITY AND PRIVACY STATEMENT

Introduction

Old Mutual East Africa Group is a leading provider of comprehensive financial services, including insurance, investment, banking, and savings solutions. As part of Old Mutual Limited (OML), a premier African financial services group with a presence in 12 countries, we combine local expertise with global experience to serve diverse client needs, leveraging advanced technology and world-class financial insights.

We are committed to protecting your privacy and ensuring that all data we process is handled in compliance with applicable data protection laws. Old Mutual East Africa Group entities are registered as Data Controllers and Data Processors with their in-country data protection authorities we take your privacy seriously.

SEARCHES AND DOCUMENT RECORDING SECURITY PRIVACY STATEMENT

1. Statutory Security Responsibilities

To ensure the safety and protection of all persons, property, and assets within these premises, management has engaged a licensed private security service provider to conduct manned guarding and access control in accordance with the *Private Security Regulation Act, 2016.*

To comply with this law, we hereby inform all persons that:

Search Obligations:

- All persons, vehicles, and belongings entering or leaving the premises will be subject to reasonable security searches. These searches are conducted in accordance with *Section 47 of the Act* to prevent unlawful acts and protect life and property.

Identification and Document Handling:

- All persons seeking entry to the premises are required to present valid identification documents upon request. Security personnel are authorized to record relevant details and, where necessary, temporarily retain identification documents strictly for the purposes of verifying identity, recording entry and exit, and ensuring controlled access, as provided under *Section 48 of the Act*. Compliance with this requirement is mandatory for all visitors and occupants.

Cooperation with Lawful Authorities:

- The contracted security service provider is legally required to cooperate with law enforcement agencies and national security organs where such cooperation is mandated by law (*Section 45*). Any disclosure or assistance provided will be done lawfully, with due regard to privacy, confidentiality, and the protection of personal data.

Respectful and Lawful Conduct:

- All security operations are conducted professionally, courteously, and in strict observance of constitutional rights and freedoms. Searches and document handling are performed with discretion and respect, ensuring that the privacy and dignity of all persons are preserved at all times.

Old Mutual ensures that its contracted security provider:

- Operates strictly within its legal mandate;
- Adheres to all licensing, code of conduct, and professional standards under the Act; and
- Exercises all powers of search, verification, and document handling in a lawful, proportionate, and non-intrusive manner.

These measures are implemented solely to promote safety and security. Both the entity and its appointed security provider remain jointly accountable for ensuring that all operations comply fully with Kenyan law and uphold the dignity, rights, and privacy of every individual.

2. Lawful and Responsible Handling of Personal Data

Any personal information collected during security procedures, such as names, contact details, identification numbers, or entry and exit records; is managed in full compliance with the *Data Protection Act, 2019*.

Your information will:

- Be used only for identification, access control, and lawful security purposes;
- Be securely stored and accessed only by authorized personnel;
- Not be disclosed to any third party except where required by law or upon the request of a competent authority; and
- Be retained only for as long as necessary to fulfil lawful security and compliance obligations.

3. Your Rights and Assurances

All security personnel are required to act with courtesy, integrity, and professionalism. Any search or request for identification will be carried out respectfully, in a manner that safeguards your privacy, dignity, and fundamental rights.

You have the right to be informed about how your personal data is collected and used and may raise any questions or concerns regarding security operations or data handling at any time.

CLOSED CIRCUIT TELEVISION (CCTV) PRIVACY NOTICE

1. **Introduction**

Our use of Closed-Circuit Television (CCTV) systems in various premises, including our offices, branches, and other facilities, is to ensure public safety, prevent crime, protect our property, and uphold the integrity of our operations. This Privacy Notice explains how we collect, process, and protect personal data captured by our CCTV systems.

2. **Legal Basis for Data Processing**

The processing of personal data captured by our CCTV systems is carried out in accordance with the legal bases under the Data Protection Act, 2019, including but not limited to:

- **Public Interest**: The use of CCTV for public safety, crime prevention, the apprehension and prosecution of offenders, and the exercise of criminal proceedings. These purposes are essential for safeguarding the interests of our employees, customers, visitors, and the security of Old Mutual East Africa Group's assets.

- **Legitimate Interests**: We may process personal data captured by CCTV to fulfill legitimate interests related to the protection of property, ensuring the safety of individuals, and the prevention of fraud.

In addition, CCTV footage may be used for purposes related to compliance with other legal obligations and regulations governing our industry, including financial regulations.

3. **What Information Do We Collect?**

Our CCTV systems collect video footage of individuals present in our premises. This may include images of staff, customers, visitors, and other individuals. The footage may contain personal data such as:

- Facial images

- Behavioural data (e.g., movements and interactions)

- In some cases, sensitive data, such as health-related information, may be incidentally recorded, particularly in emergency situations.

4. **How Do We Obtain Your Personal Data?**

We collect personal data through the CCTV systems that are placed in and around our facilities, including but not limited to:

- Entrance and exit points

- Hallways and corridors

- Customer service areas

- ATM and bank areas

- Parking lots and external areas

5. **What Do We Use Your Information For?**

CCTV recordings are used for various purposes, including but not limited to:

- **Public Safety**: To ensure the safety of employees, customers, visitors, and other stakeholders.

- **Prevention and Detection of Crime**: To deter criminal activity such as theft, fraud, or vandalism.

- **Investigation and Prosecution of Offences**: To assist law enforcement agencies in criminal investigations and prosecutions.
- **Protection of Property**: To protect Old Mutual East Africa Group's property and assets.
- **Enforcement of Internal Policies**: To monitor compliance with internal policies, procedures, and codes of conduct.

6. **Who Else Do We Pass This Information On To?**

The personal data collected through CCTV may be disclosed to the following parties:

- **Law Enforcement Authorities**: To assist in investigations or the prosecution of criminal offences.
- **Regulatory Bodies**: In compliance with relevant legal and regulatory obligations.
- **Other External Agencies**: Such as emergency services, where required in cases of emergency or to prevent harm.

We will ensure that any disclosure is made in compliance with applicable data protection laws and only when necessary.

7. **Do We Transfer the Information Overseas?**

Currently, we do not transfer CCTV footage overseas. However, should the need arise to transfer personal data outside Kenya, we will ensure that appropriate safeguards are in place to protect your personal data, in accordance with the requirements of the Data Protection Act, 2019.

8. **How Long Do We Keep This Information?**

- CCTV footage is typically retained for **30 days**.
- Footage that is needed for legal or investigatory purposes will be retained for **longer periods** as required by law, for example, when requested by law enforcement or retained for evidentiary purposes in legal proceedings.

Once the retention period has expired, the footage will be securely deleted or anonymized.

9. **What Are Your Rights as a Data Subject?**

Under the Data Protection Act, 2019, you have rights regarding your personal data collected through CCTV systems. These rights can be exercised by submitting a written request to the Data Protection Officer. However, because CCTV footage may include images of other people and is used primarily for security and safety purposes, some rights may be limited in practice to protect the privacy of others, ongoing investigations, and the public interest.

Right to Access:

You may request access to CCTV footage or related records in which you appear. Access can only be granted where disclosure does not compromise the privacy of other individuals, ongoing investigations, or public security. In some cases, footage may be redacted or withheld if it contains sensitive or protected information.

Right to Rectification:

You may request correction of inaccurate information linked to CCTV footage, such as time, date, or associated record details. However, the footage itself cannot be altered, edited, or replaced, as this would compromise the integrity of the security record.

Right to Erasure:

You may request deletion of your personal data where there is no lawful or legitimate reason for it to be retained. In practice, CCTV footage is automatically deleted after a fixed retention period unless it is required for security, legal, or investigative purposes. Footage subject to investigation or legal process cannot be erased until those processes are concluded.

Right to Restrict Processing:

You may request temporary restriction on the use or disclosure of footage involving you while a data-related complaint or access request is under review. However, this restriction may not apply where footage is already being used for lawful security or investigative purposes.

Right to Object:

You may object to the processing of your personal data based on your specific circumstances. However, as CCTV processing is conducted for legitimate security, safety, and crime-prevention purposes, objections will generally not apply unless exceptional personal reasons exist that outweigh those legitimate interests.

Right to Data Portability:

Transfer or release of CCTV footage can only occur in limited, lawful circumstances, such as when required under a court order, police warrant, or other legally authorized request.

These rights can only be exercised in a manner that aligns with the purpose for which the CCTV footage was collected — security and safety. Requests that fall outside this purpose, or that would breach the privacy of others, public security, or ongoing investigations, may lawfully be declined under the Access to Information Act, Section 6, and Section 51(2)(b) of the Data Protection Act, 2019.

10. **Where Can I Get More Information?**

For more information about how we process your personal data or if you wish to exercise any of your data protection rights, please contact Old Mutual East Africa Group's Data Protection Officer (DPO) at:

Email: dataprivacy@oldmutual.co.ke

12. **Updates to This Privacy Notice**

We may update this Privacy Notice periodically to reflect any changes in our practices, legal requirements, or technological advancements. When we make updates, we will take appropriate steps to inform you, in line with the nature and significance of the changes.

This Privacy Statement was last updated on 13 November 2025.

OLD MUTUAL EAST AFRICA Group – Protecting Your Privacy, Ensuring Your Security.