



Personal Data Access and Rectification Procedures

CONTROL TABLE	
Procedure Title / Name	Personal Data Access and Rectification Procedures
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Related Policies / Procedures	Data Privacy Policy Data Retention and Destruction Policy

1. Background

The Data Protection Act (DPA) grants data subjects the right to access their personal data in a data controller's possession and, where applicable, query the processing relating to their personal, request that it be amended, updated to make it accurate or deleted accordingly.

This Personal Data Access and Rectification Procedures (hereafter referred to as the "Procedure/s") outline the process and guidelines for data subjects who wish to exercise their rights to access, retrieve and rectify their personal data held by BIC. The Procedures are as follows:

2. Access and Rectification Procedures

2.1. Personal Data Access Procedure

STEP	PROCESS
STEP 1 DATA SUBJECT REQUEST	<p>Data subjects wishing to access their personal data held by BIC must submit a written request to the Data Protection Officer (DPO) via the below channels:</p> <p style="margin-left: 40px;">By email: info@bic.co.bw</p> <p style="margin-left: 40px;">By hand delivery: BIC House, Plot 50372 Fairgrounds, Gaborone</p> <p style="margin-left: 40px;">By Post: P. O. Box 715 Gaborone</p> <p>The access request should include the data subject's full names, contact details, and a description of the specific personal data they are seeking to access.</p>
STEP 2 VERIFICATION OF IDENTITY	<p>Upon receiving the access request, the DPO shall verify the identity of the data subject.</p> <p>This may involve requesting additional information or documentation to confirm the data subject's identity.</p>
STEP 3 ACKNOWLEDGMENT & CONFIRMATION	<p>The DPO shall acknowledge receipt of the access request and provide an estimated timeline for responding to the request, in any case, not more than ten (10) working days.</p>
STEP 4 DATA RETRIEVAL & REVIEW	<p>The DPO shall engage the relevant department regarding the request so that the department may initiate a search and retrieval process to locate the requested personal data.</p> <p>The relevant department shall review the retrieved data to ensure that it does not contain any third-party information or sensitive data that may be exempt from disclosure.</p>

STEP 5 DATA PREPARATION & REDACTION	If necessary, the relevant department in conjunction with the DPO shall redact any third-party information, confidential data, or other exempted information from the retrieved data.
STEP 6 PROVIDING ACCESS	<p>The DPO shall prepare the requested personal data for access by the data subject. This may involve creating copies of electronic records or printing physical documents.</p> <p>The DPO shall provide the data subject with a secure method to accessing the personal data such as a secure online portal, encrypted email, or a designated physical location for in-person access.</p>
STEP 7 ASSISTANCE & CLARIFICATION	The DPO shall offer assistance and clarification to the data subject if they have any questions or concerns about the accessed personal data.

2.2. Personal Data Rectification Procedure

STEP	PROCESS
STEP 1 SUBMISSION OF RECTIFICATION REQUEST	<p>A data subject who identifies inaccurate or incomplete personal data held by BIC can submit a written rectification request to the DPO via any of the below channels:</p> <p>By email: info@bic.co.bw By hand delivery: BIC House, Plot 50372 Fairgrounds, Gaborone By Post: P. O. Box 715 Gaborone</p> <p>The rectification request should clearly state the specific personal data that requires amendment or rectification, along with the reasons for the requested changes.</p>
STEP 2 VERIFICATION OF IDENTITY	<p>Upon receiving the rectification request, if the same is not as a consequence of the Personal Data Access request, the DPO shall verify the identity of the data subject to ensure the rectification request is valid and authorized.</p> <p>This may involve requesting additional information or documentation to confirm the data subject's identity.</p>

STEP 3 REVIEW & RECTIFICATION	<p>Upon verifying the request, BIC shall review the inaccurate or incomplete personal data.</p> <p>If the requested changes are valid and necessary, the data shall be amended or rectified in accordance with the data subject's request.</p> <p>BIC shall update its records and relevant systems to reflect the corrected information.</p>
STEP 4 CONFIRMATION & COMMUNICATION	<p>BIC shall communicate the rectification to the data subject, providing details about the changes made and confirming the implementation of the requested updates.</p> <p>The data subject shall be granted the opportunity to review the rectified information and provide feedback if needed.</p>

3. Record keeping

BIC shall maintain a record of all access and rectification requests received and actioned as well as any changes made pursuant to these procedures per the Access and Rectification Request Register below.

Access and Rectification Request Register

Request ID	Request Date	Data Subject Name	Contact Information	Type of Request	Department / Person Responsible	Status	Action Taken
001	04.08.2023	Jane Doe	jane@doe.co.bw	Access	Finance / Kago Kimane	Completed	Data Provided
002	04.03.2024	John Smith	john@smith.co.bw	Rectification	Underwriting / Advise Fele	In Progress	Awaiting verification

**NB: Sample data has been entered for guidance purposes*

3.1. Register Key

For purposes of the above register, the following terms shall be assigned the following definitions:

3.1.1. Request ID: A unique identifier assigned to each access and rectification request.

