

# Privacy Policy

Hamilton Insurance (Private) Limited — WhatsApp Business API

**Effective Date:** 09 March 2026

**Last Updated:** 09 March 2026

**Important Notice** This Privacy Policy explains how Hamilton Insurance (Private) Limited collects, uses, stores, and protects your personal information when you interact with us through WhatsApp Business API and our website at [hamiltoninsurance.co.zw](https://hamiltoninsurance.co.zw). Please read it carefully.

## 1. Who We Are

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Hamilton Insurance (Private) Limited is a licensed insurance company registered and operating in Zimbabwe. We provide insurance products and services including motor, household, GIT, bonds insurance.

**Registered Office:** Hamilton Insurance (Private) Limited, Zimbabwe

**Website:** <https://hamiltoninsurance.co.zw/>

**Email:** [enquiries@hamiltoninsurance.co.zw](mailto:enquiries@hamiltoninsurance.co.zw)

**Telephone:** +263 242 745611/31/90

## 2. Scope of This Policy

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This Privacy Policy applies to personal data collected through:

- Our website at [hamiltoninsurance.co.zw](https://hamiltoninsurance.co.zw)
- Our WhatsApp Business API chatbot (powered by Meta's WhatsApp Business Platform)
- Any digital communications initiated by you through these channels

## 3. Legal Basis & Compliance

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We are committed to complying with the Zimbabwe Data Protection Act [Chapter 11:12] (2021) and applicable international best practices for data protection. Where relevant, we also align with Meta's Platform Terms and Policies governing the use of WhatsApp Business API.

## 4. Data We Collect

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### 4.1 Information You Provide Directly

When you interact with our WhatsApp Business chatbot or contact us through our website, we may collect:

- Full name
- WhatsApp phone number and associated profile name
- Email address (if provided)
- Physical or postal address
- Policy-related information (vehicle details, property details as relevant)
- Claims information and supporting documentation

- Payment preferences (non-sensitive; no card numbers collected via these channels)

## 4.2 Automatically Collected Information

When you visit our website, we may automatically collect:

- Browser type and version
- Pages visited and time spent on pages
- Referring URLs
- General geographic location (country/city level)
- Device type and operating system

## 4.3 WhatsApp Interaction Data

Through the WhatsApp Business API (Meta Cloud API), we collect:

- Message content you send to our WhatsApp business number
- Message timestamps and delivery status
- Your WhatsApp phone number and display name

Note: Meta processes WhatsApp messages in accordance with Meta's own Privacy Policy and WhatsApp's Privacy Policy. We encourage you to review those policies at [www.whatsapp.com/legal/privacy-policy](https://www.whatsapp.com/legal/privacy-policy).

## 5. How We Use Your Data

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We use your personal information only for the following purposes:

- To respond to your insurance inquiries and provide quotations
- To process and manage your insurance policy applications
- To handle and resolve insurance claims
- To provide general customer support and service updates
- To send policy renewal reminders or important service notices
- To comply with legal and regulatory obligations under Zimbabwean law
- To improve the quality and functionality of our services

We do not use your data for unsolicited marketing without your express consent.

## 6. Data Sharing & Third Parties

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Hamilton Insurance (Private) Limited does not sell, rent, or trade your personal information to third parties.

Limited sharing may occur only in the following circumstances:

- With Meta Platforms Inc. as required for the technical operation of WhatsApp Business API, governed by Meta's own data terms
- With regulatory or law enforcement authorities when required by Zimbabwean law or court order
- With professional advisors (e.g., auditors, legal counsel) under strict confidentiality obligations

In all cases, data is shared only to the minimum extent necessary.

## 7. Data Retention

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We retain your personal data for as long as necessary to fulfil the purposes for which it was collected, and in accordance with Zimbabwean legal and regulatory requirements:

- Active policy data: retained for the full duration of the policy and for a minimum of 7 years after policy expiry, in compliance with insurance regulations
- Claims data: retained for a minimum of 7 years after claim closure
- WhatsApp conversation logs: retained for up to 24 months from last interaction
- Website analytics data: retained in aggregated, anonymized form

After the applicable retention period, data is securely deleted or anonymized.

## 8. Data Security

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We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, alteration, or disclosure. These measures include:

- Encrypted data transmission (HTTPS/TLS)
- Access controls limiting data access to authorised personnel only
- Regular security reviews of our systems
- Secure server infrastructure

While we take all reasonable precautions, no method of electronic transmission is 100% secure. We encourage you to contact us immediately if you suspect any unauthorised use of your information.

## 9. Your Rights

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Under the Zimbabwe Data Protection Act (2021), you have the right to:

- Access: Request a copy of the personal data we hold about you
- Correction: Request that inaccurate or incomplete data be corrected
- Deletion: Request erasure of your data where it is no longer necessary for the purpose collected
- Objection: Object to processing of your data in certain circumstances
- Portability: Request your data in a structured, machine-readable format
- Withdraw Consent: Withdraw consent to data processing at any time (where processing is based on consent)

To exercise any of these rights, please contact us using the details in Section 12. We will respond within 30 days of receiving your request.

## 10. Cookies & Analytics

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Our website may use cookies and similar tracking technologies to improve your browsing experience and collect analytics data. These may include:

- Essential cookies required for website functionality
- Analytics cookies (e.g., to measure page traffic and user behaviour)

You may adjust your browser settings to refuse cookies. Disabling cookies may affect certain website functionality. We do not use Meta Pixel or targeted advertising cookies at this time.

## 11. Children's Privacy

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Our services are not directed to individuals under the age of 18. We do not knowingly collect personal information from minors. If you believe we have inadvertently collected data from a minor, please contact us immediately and we will take steps to delete that information.

## 12. Contact Us

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For any questions, concerns, or requests regarding this Privacy Policy or your personal data, please contact:

**Data Privacy Contact — Hamilton Insurance (Private) Limited** Email: [enquiries@hamiltoninsurance.co.zw](mailto:enquiries@hamiltoninsurance.co.zw) Telephone: +263 242 745611/31/90 Website: <https://hamiltoninsurance.co.zw/>

### 13. Changes to This Policy

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We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. When we make significant changes, we will update the 'Last Updated' date at the top of this document. We encourage you to review this policy periodically.

Continued use of our WhatsApp Business service or website following the posting of changes constitutes your acceptance of those changes.

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