

Member Privacy Notice (Approved Superannuation Funds/ Approved Retirement Scheme)

1. About this Privacy Notice

The Trustees and Employee Benefits Administrator Limited (a subsidiary of Sagicor Group Jamaica) ("We") are committed to the protection and security of your personal information.

It is important that you read this privacy notice so that you are aware of how and why we collect and use such information. This notice describes how we collect and use personal information in your Fund or Scheme. It applies to anyone who interacts with us in relation to your Approved Superannuation Fund/ Retirement Scheme administration which includes enrolment, administration and offboarding. If necessary, we will provide further privacy information for specific methods of contact or in relation to specific products or services.

If you have any questions relating to the above, please contact us at dpopensionjm@securys.co.uk. You can also write to the Data Protection Officer at the address below:

Data Protection Officer
Sagicor Group Jamaica
R. Danny Williams Building
28-48 Barbados Avenue
Kingston 5
Jamaica

2. The personal data that we collect and process

We collect personal information from you which is submitted to us through third parties (anyone authorised to submit your personal data relating to your Approved Superannuation Fund/ Retirement Scheme on your behalf). An example of a third party is the HR Teams who are responsible for collecting personal data from members for the purposes of enrolment into an Approved Superannuation Funds/ Retirement Scheme.

Where you provide us with information about other people such as a beneficiary, you must make them aware of how their personal data will be processed. Once enrolled, your beneficiary(s) or third parties if legally required will also be made aware of how we process their personal information for the stated purpose(s) through receipt of a Privacy Notice.

We may collect personal information from you through your contact with us, including by email, by post or by filling in an application or other forms.

We may also collect information from your employer. This information will be processed solely for the effective administration of the Approved Superannuation Fund/ Retirement Scheme.

3. The categories of personal data that we process

We currently collect and process the following standard personal information:

Member information

- Personal information; your name, gender, date of birth, marital status, address, contact email and contact number
- Tax information; your TRN
- Financial information: your salary and pension contributions, either personal or via your employer
- Work related information; your employee ID, employment date, plan entry date

Beneficiary information

- Personal information; beneficiary name, beneficiary relationship, date of birth, address, contact email, contact number
- Tax information; TRN
- If a minor is a beneficiary, their Trustee information will be collected

Trustee information

- Personal information; trustee name, address and contact number
- Tax information; TRN

We may need to collect additional information in order to process an application either from the applicant directly or an authorized third party.

The above information is collected specifically for the purposes of: enrolment or administration into an Approved Superannuation Fund/ Retirement Scheme; preparation of communications and relevant offboarding activities.

4. The purpose and legal basis for processing your personal data

We process your personal information for the purposes set out in this privacy notice.

Under the Jamaica Data Protection Act 2020, the purpose and lawful basis that we rely on to process your data is outlined below.

Purposes of processing

We are joint data controllers for pensions administration. We process your data, which may be obtained from your employer as well as directly from you, for the following purposes and under the following lawful bases:

- To facilitate an efficient and effective pension process and customer service
 - Performance of a contract
- To ensure current and future members' pension provision is matched to their requirements
 - Legitimate interest (for marketing and product development), legal obligation and performance of a contract.
- To manage your pension fund
 - Performance of a contract
- To make and receive payments
 - Performance of a contract
- To identify and communicate with beneficiaries
 - Performance of a contract
- To detect, prevent and investigate fraud
 - Legal obligation and our legitimate interest
- To assess and improve business performance
 - Legitimate interest
- To meet our "know-your-customer" (KYC) and anti-money-laundering (AML) obligations
 - Legal obligation
- To report to regulators
 - Legal obligation

5. Sharing of your personal data

We sometimes need to share your information with other people or organisations for the purposes set out in this privacy notice. The exact information we share depends on the reason we are sharing it.

As part of our Approved Superannuation Fund/ Retirement Scheme administration process we may share your information with:

- employers with whom you have an existing working relationship;

- regulators who are responsible for ensuring that our Approved Superannuation Fund/ Retirement Scheme conform to the relevant regulations; and
- Trustees to facilitate a benefit transfer; and
- External Auditors.

If we share your personal information, we will make sure appropriate safeguards are in place to protect your personal information in accordance with data protection laws.

6. Retention of your personal data

We keep your personal information for a period of 7 years after it is no longer needed, or for a period recommended by regulators, professional bodies or associations, which is based on the following criteria:

- How long you have been enrolled into Approved Superannuation Fund/ Retirement Scheme;
- When you have requested to transfer to another plan;
- When you are offboarded from your pension plan(s) due to death or extinguishing of the benefit;
- Any relevant proceedings that apply.

Personal data is stored securely and in accordance with periods specified in our data retention policy. At the end of the relevant period your data will be securely disposed of in accordance with our data disposal procedures.

7. Your rights

You have the following rights under the Jamaica Data Protection Act 2020 and may also have these rights in other jurisdictions where applicable data protection laws are in place (please note that certain exceptions may apply):

- **Right of access:** you have the right to make a request for details of your personal information and a copy of that personal information.
- **Right to rectification:** you have the right to have inaccurate information about you corrected or removed.
- **Right to object:** you have the right to object to the processing of your data for specific purposes, unless these purposes have been expressly stipulated by Trust deed and plan rules, or by a regulatory body.
- **Right to be informed:** you have the right to be kept up to date with the progress of your pension enrolment, as well as any changes that may be made to your Approved Superannuation Funds/ Retirement Scheme in the future.
- **Right to limitation of processing:** you have the right to ask us to cease the processing of your personal data if you feel that the processing will cause undue damage or distress. Additionally, you have the right to ask us to stop sending you any communications relating to the administration of your Approved Superannuation Funds/ Retirement Scheme.

Please note: These rights are not absolute. This means they do not always apply in all cases, and we will let you know in our correspondence with you how we will be able to meet

your request relating to your rights. Facilitation of rights requests is done on a case-by-case basis.

If you make a request, we may ask you to confirm your identity if we need to, and to provide information that helps us to understand your request better. Once we have received your request, we will tell you what action we have taken within a maximum time frame of 30 days of receiving your request and will inform you of any statutory extension of the period for attending to your request. We may require a fee to provide you with the requested data and will provide further details about any payments that need to be made subject to receiving your request.

If we are unable to satisfy your request, we will explain why. In order to exercise your rights, please contact us at dpopensionjm@securys.co.uk

8. Complaints and data protection contacts

If you have any questions, comments, complaints or suggestions relating to this notice, or any other concerns about the way in which we process information about you, please e-mail our Data Privacy Officer at dpopensionjm@securys.co.uk.

You also have the right to make a complaint to the Information Commissioner's Office if you are resident in Jamaica. If you are unhappy about the way we have dealt with your privacy, you can contact:

Office of the Information Commissioner
2nd Floor, Masonic Building
45 – 47 Barbados Avenue
Kingston 5
Jamaica
Tel: (876) 920-4390
Email: info@oic.gov.jm

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