Sagicor

Contents

About this Privacy Notice

Who We Are

How We Collect Your Persional Information

Definition of Personal Data and Sensitive Personal Data

Your Rights

- Transparency
- Access
- Correction
- Erasure and the right to be forgotten
- Review of Automated Decision Making
- Objection to processing on the basis of legitimate interest
- Restriction of Processing
- Direct Marketing
- Data Portability
- Withdrawal of Consent

Southern Caribbean Country-specific Information

- Sagicor Southern Caribbean Summary by Country, Data Controller, and Data Protection Regulator

Sagicor Life Country-specific information

- Antigua and Barbuda
- Aruba
- The Bahamas
- Barbados
- Belize
- Bermuda
- Curaçao
- Dominica
- Grenada
- Saint Lucia
- St. Kitts & Nevis
- St. Vincent and the Grenadines
- Trinidad and Tobago
- Other Countries

Details of our Data Processing

- Types and sources of information that we collect
- Processing under legal obligation
- Data Sharing
- Transfers of data to other countries

Purpose for Processing

- General website visitors

In-person visitors
CCTV
Individual life and health insurance
Group life and health insurance via your employer
Pensions provided via your employer
Individual pensions
General insurance
Retail banking including lending and deposit-taking services
Wealth and investment management
Remittances
Property sales and services
Shareholders
Job Applicants
Whistleblowing
Sagicor Events and Corporate Social Responsibility ("CSR") Projects

About this privacy notice

We are committed to protecting and using your personal information responsibly. If you have any questions about this privacy notice, please email dpo@sagicor.com

The **Sagicor Southern Caribbean entities** ("Sagicor", "we", "our", "us") provide this privacy notice as a basis on which we will process your personal data. Please read it carefully to understand our practices regarding your personal data and how we will use it. The information we process, and the reasons why, may vary across our products and services. We explain any differences in this privacy notice.

This privacy notice is for:

- anyone who buys, uses or contacts us about our products and services, or
- someone who is a Sagicor job applicant, or
- people who work with Sagicor, such as intermediaries or third party suppliers providing goods and services to Sagicor. If you are a Sagicor employee or financial advisor, you can find our privacy notice relating to employment on the Sagicor intranet.

This privacy notice was **last updated on 12 March, 2024.**

Who we are

Sagicor offers a wide variety of financial products and services across the Caribbean under one brand. Due to regulatory and licensing requirements, these products and services are provided by a number of different legal entities. We are required by law to inform you of the specific legal entities that are responsible for your personal data – these are called "data controllers".

We address this in the country-specific information below, with specific entity information and contact details. However, for any data protection query related to any Sagicor product or service you should contact our Data Privacy Office directly at dpo@sagicor.com. Our data protection function operates across and has responsibility for all of our legal entities and you do not need to be able to identify the appropriate legal entity in order to exercise your rights over your data; we will assist you in doing so.

How we collect your personal information

From You	**Third Parties**
We collect your personal information from you when you get in touch with us:	Depending upon the nature of your relationship with us and subject to applicable laws and regulations, we may also collect information about you from third parties:
• by phone, where we may record or monitor phone calls for quality assurance and to make sure we're keeping to legal rules, codes of practice and internal policies • by email • through our websites, including webchats and virtual assistants • through our apps • by using our products and services • by post • by completing an application or other form(s) (e.g recruitment application or applications for any of our products or services) • by entering competitions • through social media • face to face, for example at Sagicor hosted events	• Sagicor affiliated companies • Your parent or guardian (for children) or persons acting through a Power of Attorney • Your employer • Healthcare providers • Sagicor policyowners who name you as a dependant or beneficiary of their policy • Sagicor motor insurance policyowners who name you as an authorised driver on the motor policy • Re-insurers • Credit bureaus

Definition of personal data and sensitive personal data

Personal data is any information about you that is held in a way that allows you to be identified. We treat all personal data with great care and with the commitment to confidentiality that comes from our more than 180 years of experience and responsibility.

Data protection and privacy laws categorise some personal data as "sensitive." This places additional duties on us to protect it and show that we are processing it for the right reasons. Please see below for the definition of how your country defines sensitive personal data.

Your rights

Your personal data belongs to you. We use it to provide products and services to you, to obey the law and to improve our services.

Different countries have different laws regarding personal data. Your legal rights will depend on where you live and where we process your data; you can find more details in the relevant **country-specific sections** below. To make things simple, wherever you live and whatever your relationship with us, we give you the following rights over your

data:

Transparency

You have the right to a detailed explanation of what data we have about you, how and where we use it, how long we keep it and with whom it is shared. That information is contained in the **details of our data processing** below.

Access

You have the right to a copy of the data we hold about you. We will not charge you for providing this information in electronic form; we may charge for providing it on paper to reflect the costs and environmental impact of doing so. We may ask you to prove your identity before we release your data to you. If you want the data for a specific reason, you can help us by letting us know. Please be aware that no-one can force you to get a copy of your data and no-one should ask you to share it with them.

Correction

You have the right to have your data corrected. If you believe we have incomplete or incorrect information about you, please let us know. We may ask you to provide your identity and to provide evidence supporting the changes you would like made.

Erasure and the right to be forgotten

You have the right to have your data erased if we no longer need it. Note that in many cases we need to retain data about you in order to honour our obligations to you, because we are required to by law, or to protect your and our interests.

Review of automated decision making

You have the right to a human review of decisions we have made about you by purely automated means. Please note that almost all of our decision-making is already reviewed by a person – we use automation to support our team members.

Objection to processing on the basis of legitimate interest

You have the right to object to processing of your data where we use it to help us improve our services and develop our business. Technically this is known as processing on the basis of our legitimate interests and there is more information about this processing in the privacy notice. We are required carefully to consider and respond to your objection and show that we have taken care to protect you when doing such processing; you may also require that we do not process your data while we are considering your objection.

Restriction of Processing

You have the right, in certain other circumstances, to require us to stop processing your data. These circumstances are:

- Where we disagree about the accuracy of the information we hold about you and while we are verifying that information.
- Where we no longer require personal data that we hold about you and would normally erase it, but you wish us to retain it without otherwise processing it, for instance where you believe that you may need the information for your own purposes in a

legal claim.
- You believe that the processing of your data may cause you substantial harm or distress and that our processing is not justified in accordance with the law.

Direct Marketing

You have the right to opt out of direct marketing. Note that if you do not specify which marketing you no longer wish to receive, we will stop sending you any marketing information. You will need to tell us the email addresses, phone numbers and other relevant details, and you will understand that we will need to keep these details so that we can be sure not to add you back to marketing lists in error. You also, of course, have the right to opt back into marketing at any time.

Please note that in relation to service communications, Sagicor may be required contractually or legally to continue to send you service related messages only for administrative or customer service reasons.

Data portability

In some circumstances you have the right to ask us to transfer your data to another service provider directly. This can only be done where it is technically possible both for us and for the other service provider; we and they will let you know when this is the case.

Withdrawal of consent

Most of our processing of your data is performed for one of three reasons:

- in service of a contract between you and us, or in order to enter into such a contract;
- to comply with legal obligations placed on us by the government and our regulators; or
- to help us improve our services by better understanding our customers and their needs.

However, in some cases we will ask you for your consent to processing. Where we have done so, you have the right to withdraw your consent at any time and we will stop processing. We will explain the consequences of withdrawing consent at the time we ask for it and when you ask to withdraw it.

If you are not satisfied with Sagicor's response to any enquiry or complaint you make to us, you have the right to complain to your Data Protection Regulator, whose contact details (where available) have been provided in this privacy notice.

If you would like to know more about our processing of your data or would like to exercise any of your rights, you can email us at dpo@sagicor.com. You can also write to us at the address given in the relevant section for your country of residence or call our any of our regular service centre numbers and ask to speak to the privacy team.

Southern Caribbean Country Details
Country-specific information

The following information is specific to your country of residence and the Sagicor products you have.

Sagicor Southern Caribbean Summary by Country, Data Controller, and Data Protection Regulator

Country	Data Controller	Data Protection Regulator