DATA PRIVACY STATEMENT

How and why we process your personal information?

To enter this Competition, you provide Sagicor with certain personal information. We collect and use certain personal information about you and are responsible under the applicable Data Protection laws as controller of that information. Personal information collected in the Competition entry forms will include your name and contact information. When we process your personal information, we are required to have a legal basis for so doing. The legal bases we rely on in relation to the Competition are as follows:

i. **Consent:** where you opt in or consent to our use, collection and processing of your personal information. If you consent to the processing of your information, you may later withdraw your consent. Please note that if you withdraw your consent, it will not affect the lawfulness of our past processing of your personal information.

ii. **Contract**: where our use of your personal information is necessary because you have asked us to take specific steps before entering into a contract or for performance of a contract that we concluded with you.
We collect and use your personal information in taking steps to evaluate your entry into the Competition and the submissions made.

iii. **Legitimate interests**: where our use of your personal information is necessary to advance our legitimate interests or those of a third party (unless your right to privacy rights override our legitimate interests).

Sagicor has a legitimate interest in deriving administrative efficiencies and in backing-up and securing data for business purposes and may process your personal information on this basis using contracted individuals who work for or provide services to affiliated companies of the Sagicor Group.

Security Measures

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We have procedures in place to deal with any suspected data security breach.

Data Recipients

- **Affiliated companies**: We may share your personal information with our affiliates within the Sagicor Group in furtherance of our interests in promoting business efficacy.
- **External Service Providers**: We may share your personal information with third-party providers of technical, or administrative who act on our behalf and in accordance with our instructions, including in the contexts of software and application development, quality assurance, payment processing and mail processing. Sagicor will use reasonable efforts to ensure that third party service providers who receive your personal information are bound by a data processing agreement with us requiring that they agree to keep such data confidential and use it only to perform their obligations set under such agreement.
- **Other Disclosures**: We may disclose your personal information to third parties if we reasonably believe that disclosure of such information is helpful or reasonably necessary to comply with any applicable law or regulation, to comply with or respond to a legal process or law enforcement or governmental request, to enforce our terms and conditions or other rights (including investigations of potential violations of our rights), to detect, prevent, or address fraud or security issues, or to protect against harm to the rights, property, or safety of Sagicor.

Retention period

We will retain your personal information for one year after the end of the Competition or until our obligations under the Competition have been fully

discharged.

Your rights

Under the Data Protection laws, you have a number of important rights, including rights to:

- fair processing of information and transparency in our use of your personal information
- access to your personal information
- require us to correct any mistakes in your information which we hold
- claim compensation for damages caused by our breach of data protection laws

If you would like to exercise any of these rights, please write to:

The Data Privacy Officer

Cecil F de Caires Building

Wildey BB15096

St. Michael

Barbados