Sagicor

Privacy Notice

Our Promise to You

At our core, we strive to be your trusted financial partners. To ensure that we are always delivering on this promise, we are dedicated to earning and retaining your trust in everything we do.

We are guided by our company Values embodied in our S.C.R.I.P.T. (Service, Communication, Respect, Integrity, Performance and Teamwork) and so wherever you live, whatever your relationship with our brand and our businesses is, we make the following promises to protect your personal data.

As your trust is important to us:

- We will treat your data confidentially.
- We will only share your data with third parties where it is needed to provide the services you have asked for or to comply with the law.
- We will never sell your data.
- We will always ensure that decisions taken based on your data are made fairly.
- We will always ensure and that you have the opportunity to discuss any decisions taken involving your data directly with a team member.
- We will never use your data to take advantage of you.
- We will always communicate with you in simple language about what we are doing with your data and why we need it.
- We will only share your information within the Sagicor Group where it is necessary to provide you with the advice, products and services you have asked for, or to comply with a legal requirement.

Our Client Experience mantra "only when our clients win, we win", guides all our client interactions and so the protection of your data is just as important as your financial needs.

It is our intention to always deliver value to you, now and in the future.

Thank you for your confidence and trust.

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About this Privacy Notice

This document explains Who We Are, what personal data we collect and why, how and where we use it and for how long we keep it. It explains Your Rights over your personal data, both those we guarantee you across all of Sagicor and any that are specific to your home country or the countries where we process it. In here you can find the addresses for all Sagicor companies across the Caribbean and the contact details for our Data Protection Officer.

This notice applies to all processing by all Sagicor entities within the countries listed for all purposes other than employment by Sagicor. If you are a Sagicor team member you can find our privacy notice relating to employment processing on the Sagicor intranet.

This privacy notice was last updated on 22 July 2025. It is updated frequently. If you are an active customer of Sagicor and we hold an email address for you, we will email you to notify you of significant updates, but you should always check this website page to ensure you are referring to the current version.

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. The definition of sensitive data varies between countries and is detailed in the country-specific information below, but you may rest assured that across all of Sagicor we treat your health records, financial information and other highly personal data with the utmost sensitivity and confidentiality and, of course, in full compliance with the law.

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 Protection Officer 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.

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.

"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 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.

Country-specific Information

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

Jamaica

Audience

This information is for residents of Jamaica. If you are an employee of Sagicor in the countries listed below, your data is also processed by Sagicor in Jamaica and this information applies to you.

- Costa Rica
- Panama
- The Cayman Islands

Data protection law

The data protection law in Jamaica is the Data Protection Act of 2020. This act defines sensitive personal data as information on a person's:

- genetic data or biometric data;
- filiation, or racial or ethnic origin;
- political opinions, philosophical beliefs;
- religious beliefs or other beliefs of a similar nature;
- membership in any trade union;
- physical or mental health or condition;
- sex life;
- the alleged commission of any offence by the data subject or any proceedings for any offence alleged to have been committed by the data subject.