

PRIVACY NOTICE

Last updated: December 01, 2023

Introduction

At CUNA Caribbean Insurance (herein after referred to as “CCI”), we understand that you care how information about you is collected, used, and shared, and we appreciate the trust you place with us. At the core of our commitment to protect the financial well-being of you and the people that matter most in your life is a commitment to protect your privacy. Our policies and procedures are designed to protect personal information about you. This Privacy Notice (sometimes referred to as a Privacy Policy) will help you understand how we collect, use, share and protect any personal information we have about you.

In general, we collect and process personal information (like your name, address, telephone number, payment information) necessary to issue you insurance and financial service products, to assist you if you need to file a claim or obtain a benefit (for example, your health information), or to provide you with information on our products or special offers. We also are required to collect and process certain personal information to meet legal and regulatory requirements (for example, to verify your identity).

While we share your information with credit unions, our affiliates, service providers, and other businesses that we work with to provide our products and services (“Business Partners”), we do not sell your personal information, and we prohibit any sale of the personal information we share with our Business Partners. As described in more detail below, you may have rights with respect to the information we collect about you. We encourage you to read this Notice carefully, and to contact us if you have any questions.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Notice:

- **Affiliate** means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

- **CUNA Caribbean Insurance** (referred to as either " CCI", "We", "Us" or "Our" in this Agreement) refers to CUNA Caribbean Insurance Jamaica Limited, CUNA Caribbean Insurance Society Limited and CUNA Caribbean Insurance OECS Limited.
- **Country** refers to: All territories which CCI operates.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service Provider** means any natural or legal person who processes the data on behalf of CCI. It refers to third-party companies or individuals employed by CCI to facilitate the Service, to provide the Service on behalf of CCI, to perform services related to the Service or to assist CCI in analyzing how the Service is used.
- **Website** refers to <https://cunacaribbean.com>
- **You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Application of Notice

This Notice applies to all companies apart of the CUNA Caribbean Insurance Group and all its affiliates located across the Caribbean Region to include Jamaica, Trinidad & Tobago and the Organization of Eastern Caribbean States (OECS). This Notice applies when we process personal information about our customers, our potential customers, applicants for jobs with CCI, and visitors to our website(s).

Whenever we collect personal information about you, we make decisions about how and why we process that personal information and, because of this, we are responsible for making sure it is used in accordance with applicable data protection and privacy laws.

If you are an employee or contractor of CCI, please refer to our internal policies and procedures on how we process your personal information.

Personal Data We Collect and Why

We typically collect personal information directly from you or from our Business Partners. We also may collect personal information about you through your interactions with our information technology resources, such as our website(s) and social media pages. In addition, we may create records of personal information about you while providing services or products to you, either directly or through our Business Partners. We also may collect personal information about you from third parties, including government agencies and third parties who provide services to us. In all cases, we collect personal information about you in accordance with the standards outlined in this Notice and applicable law.

Information we collect	Why we collect it
If you apply for, inquire about, or obtain a service or product from us, we collect a range of identifiable personal information based on the particular product and circumstances, possibly	This information is necessary for us to provide services or products you requested or to take steps to enroll in those services or

Information we collect	Why we collect it
including: name, address, contact information, tax registration number or other identifier, financial and account information, health information, biometric information, demographic information, commercial information about your previous interactions with us.	products, for us to comply with a legal obligation, or to carry out related business and operational activities.
If you do business with our Business Partners, we may collect personal information about you to allow us to identify and offer you products that may be of interest to you. This information may include your name, address, contact information, Social Security number, Tax Registration number or other identifier(s), financial information, demographic information, , employment and professional information, and inferences based on this information regarding your preferences.	This information is used to offer products and services that may be of interest to you as permitted and subject to applicable law.
If you visit our website(s) or interact with our electronic communications, we collect your IP address as well as electronic activity information about your use and interaction with our website(s) or communications, and geolocation data. You can find more information on how we collect information in the Cookies section of this Notice.	This information is necessary for us to ensure the security and functionality of our website(s) and related technology resources. This information is also used to offer products and services that may be of interest to you.
If you provide your email address to us or otherwise request or agree to receive electronic communications from us, we may collect your name, email address, phone number, or physical address. Note that we may send you electronic communications based on your other interactions with CCI and our Business Partners. You may unsubscribe at any time by clicking the unsubscribe link or by unsubscribing in your account settings.	This information is necessary to send you the communications and information you have requested.
If you apply for a position with us, or apply to be our registered representative or agent, we will collect your name, address, telephone number, email address, employment and educational history, and other biographical and background information.	This information is necessary to determine whether to extend an offer of employment, or approve your application to represent us, as applicable. This information also is necessary to comply with our legal obligations.

We also collect **sensitive personal data as defined under laws of the various jurisdiction in which we operate**

Sensitive Data Category	Sources	Purpose for processing
Racial or ethnic, religious or philosophical beliefs, or trade union membership.	We collect information in this category: <ul style="list-style-type: none"> directly from you or your interactions with our 	If you are a policyholder or prospective policyholder or job applicant, we collect and process this information for diversity, equity and inclusion analysis, policy and account administration, risk

	<p>information technology resources</p> <ul style="list-style-type: none"> • from our Business Partners • from records we have about you in the course of providing services or products 	<p>management and overall process improvements.</p> <p>This information is also used for marketing purposes, including offering you products that may interest you through both direct and Business Partner marketing.</p>
Biometric information for the purpose of uniquely identifying a consumer.	<p>We collect information in this category:</p> <ul style="list-style-type: none"> • directly from you or your interactions with our information technology resources • from our Business Partners • from records we have about you in the course of providing services or products • from government agencies 	<p>If you are a policyholder or prospective policyholder or job applicant, we collect and process your biometric information for security purposes, policy and account administration and management, risk and compliance management.</p> <p>We do not collect this information from website users.</p>
Personal information collected and analyzed concerning a consumer's health.	<p>We collect information in this category:</p> <ul style="list-style-type: none"> • directly from you or your interactions with our information technology resources • from our Business Partners • from records we have about you in the course of providing services or products • from government agencies 	<p>If you are a policyholder or prospective policyholder or job applicant, we collect and process your health information for policy and account administration and management, risk and compliance management.</p> <p>This information is also used for marketing purposes, including offering you products that may interest you through both direct and Business Partner marketing.</p>

Sharing and Transfer of Personal Data

We may disclose your personal information to our affiliated companies, when required by law, or with our service providers for the purposes described in this Notice and in accordance with our financial privacy notices. We may also share information, including your personal information, to third parties as necessary to provide the products and services you request, such as underwriting your risk or assisting you in completing a transaction.

The third parties we may share your personal information with include:

- credit unions or other business partners;
- nonaffiliated service providers;
- regulatory authorities;
- our auditors and legal advisors;
- relevant industry self-regulatory bodies; and

- others, where permitted by law.

We do not sell your personal information, and we have contracts with our business partners to prohibit any sale of your personal information and to provide written assurances regarding the security and privacy protections they have in place to protect your personal information. We may share your personal information with your credit union and other nonaffiliated financial companies to offer you products and services that may interest you.

We may share your information with our corporate affiliates (companies related by common ownership or control) where permitted by law. We share your information with affiliates so they can provide services to us and where necessary to provide you with services, products, or information you have requested or expressed an interest in.

In the event there is a change in the corporate structure of CCI, such as, but not limited to, merger, consolidation, sale, liquidation, or transfer of substantial assets, CCI may, in its sole discretion, transfer, or assign personal information we have about you to one or more affiliated or unaffiliated third parties.

Your information may only be transferred to another country for processing as permitted and in compliance with applicable law or with your consent.

Retention of Your Personal Data

The CCI will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Notice. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The CCI will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

We retain your personal information for the purposes stated in this Notice. Our organization uses the following criteria to determine retention periods:

- time required to fulfill business purposes and the terms of your contracts, including servicing your accounts, creating better products, and improving our products.
- time required to comply with applicable laws and regulations.
- time needed to protect our rights and legal interests, including preventing fraud and responding to any complaints or claims made by you or on your behalf.

How we Protect your Personal Data

We maintain physical, technological and administrative safeguards to protect your personal information and prevent unauthorized or accidental use, access, or loss.

- We limit access to personal information about you to those who have a business need for such access. Individuals who process personal information on our Business Partner's behalf generally may do so only in an authorized manner and are required to keep your information confidential.

- We have policies in place that regulate how our employees and contractors handle information about you.
- We limit access to our premises and to our computer networks and take steps to safeguard against unauthorized access to such premises and networks.
- We have procedures in place to manage any suspected data security incident and will notify you consistent with applicable legal requirements.

Your Privacy Rights

Your rights under data protection regulations are:

The right to access/Know:

You have a right to be informed of whether their personal data is being processed by or on behalf of the data controller, and if so, they have the right to be provided with:

- A description of the personal data;
- The purposes for which the data is being processed; and
- The recipients to whom the disclosure is made.

The right of rectification:

The right to request that the data controller rectify any inaccuracy in any personal data in its possession or control. For the purposes of the Act, the term “rectify” means to amend, block, erase, or destroy and the term “inaccuracy” includes any error or omission.

The right to object to data processing

You have the right to prevent the processing of one’s personal data in specified circumstances such as:

- Where the processing is likely to cause substantial damage or substantial distress to the data subject or to another person and that the damage or distress caused or likely to be caused (as the case may be) is unwarranted;
- Where the processing of the data is incomplete/irrelevant;
- Where the processing of the data is prohibited by law; or
- Where the data has been retained by the controller for a period longer than required by the law.

Rights related to automating decision-making and profiling:

- The right to request that a data controller does not make any decisions which would significantly affect them solely based on results of automated processing. These decisions also include matters related to the evaluation of the data subject’s work performance, credit worthiness, reliability, or conduct.

Right to give/withdraw consent

- In respect of Direct Marketing – You have the right to withdraw consent without unnecessary formality and free of charge if CCI uses information they currently possess to market their own similar services.

- Your consent is required in cases where there is no other lawful basis (such as, contract, public interest, vital interest, legitimate interest, made public by you, legal) for processing your data exist.

The right to complain to the Office of the Information Commissioner

If you are not satisfied with the response from the CCI, you may reserve the right to escalate to the Office of the Information Commissioner within your jurisdiction for further action if applicable.

Exercising your Privacy Rights

You may exercise most of your privacy rights by submitting an Application for Access to Personal Data form or through our contact page. Request can be made for the following:

- Whether personal data for you is being processed by CCI
- Description of:
 - Personal data being processed
 - Purpose for which data is being or are to be processed
 - Recipients to whom the data may be disclosed
- Make the personal data and its source available
- Transfer the personal data to another controller.

For some personal information requests, we may need to verify your identity before fulfilling your request. To verify your identity, we will collect information from you, including, to the extent applicable, your name, government identification number, date of birth, contact information, your account information, answers to security questions, or other personal identifying information. We will match this information against information we have previously collected about you or against information available from consumer reports to verify your identity and to respond to your request. Information collected for purposes of verifying your request will only be used for verification and to respond to your personal information request.

If you maintain an account with us, we may require you to login to that account as part of submitting your request. If we are unable to verify your identity as part of your request, we will not be able to satisfy your request.

If you would like to appoint an authorized agent to make a request on your behalf, and that agent is not already authorized to access your account in your profile, we require you to verify your identity with us directly before we provide any requested information to your approved agent.

Unsubscribe from promotional emails

If you no longer wish to receive marketing or promotional emails from us, please click the unsubscribe or manage subscriptions link included in the footer of every promotional email we send or contact us directly as provided in the “Contact Us” section of this Notice.

Changes to this Privacy Notice

We may update Our Privacy Notice from time to time. We will notify you of any changes by posting the new Privacy Notice on this page.

We will let you know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Notice.

You are advised to review this Privacy Notice periodically for any changes. Changes to this Privacy Notice are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Notice, you can contact us:

- By email: dpo@cunacaribbean.com
- By phone number: (876) 929-3570/3
- By mail: 2A Manhattan Road, Kingston 5, Jamaica