



## SAGICOR REWARDS WEBSITE AND MOBILE APPLICATIONS PRIVACY POLICY

Last Updated: [September 2018]

### **Privacy & Security of Your Information**

We are committed to protecting the security and privacy of our client's information. Sagicor Group (Sagicor) and our authorized reward partners MasterCard International (MasterCard) may gather information about the users of this website and its related mobile applications in order to make your Online experience a rewarding and safe one.

This document outlines our policy and the terms and conditions surrounding the capture and use of that information. This Privacy Policy discloses the type of information we gather and how we use it. If you have any questions about this Privacy Policy or the use of your personal information please contact us by clicking on the "Contact Us" link from any page, or you can email us at:

[SBJ\\_CardServices@Sagicor.com](mailto:SBJ_CardServices@Sagicor.com).

To view the more detailed Sagicor Group Privacy Policy, please visit the Sagicor Group website at <https://sagicorjamaica.com/>

### **What Type of Information We Collect**

Sagicor and MasterCard will use the information provided by users to tailor our content to suit your needs. We use two (2) types of information about users of this website:

- Information that users provide through optional, voluntary submissions.  
These are voluntary submissions for Online redemption request, user updated contact, registration or user profile information.
- Information that we, and our service providers, gather through aggregated tracking.  
This information is derived mainly by tallying user access history and page views throughout this portal. This data also provides a basis for analysis so that we may better tailor our content, improve services to our users' needs and to better understand the demographics of our audience.

Compiling data is essential to keeping our service up to date for our users. We shall not disclose any information collected from any user unless such disclosure is permitted by law, required by an order of a court of competent jurisdiction or the disclosure is consented to by the owner of the information.

### **Sharing of the Information**

Information on your demographics, contact information and limited credit card transaction history will appear on our rewards portal. Sagicor shares this information with our authorized reward partner, MasterCard International, in order to provide current and up to date information on your reward account balance. Information on your access and use of this site is primarily collected by our reward partners and is fully available to Sagicor on demand. Data related to redemption requests and updates to contact information directly input on this portal is accessible to Sagicor, MasterCard, essential service providers and the relevant client care teams to facilitate efficient fulfillment of your reward requests. Do note, MasterCard is a global company and as such data collected will be shared external to your Sagicor account's local jurisdiction.



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### **Your Consent / Opt In Policy**

Sharing of your account related data is authorized under Sagicor's General Terms and Conditions. For credit cards, refer to the Sagicor Bank Credit Cardholder Agreement [here](#). By successfully completing registration on this website and its related mobile applications, you have implied consent to the collection and use of information on this site by Sagicor and our reward partners. If we decide to change our privacy policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

### **Your Right to Be Forgotten**

You may have a right to withdraw your consent to the collection and use of your information or request that some or all information held about you be erased. Such requests should preferably be made in writing. Please note however that as a financial institution we are legally required to maintain records for the duration of your relationship with Sagicor, even after account closure.

### **Opt-Out Policy**

You may opt out of receiving select communications and alerts on our reward program by changing your communication preferences at any point. You may also choose not to complete registration however your reward points will continue to accumulate and will be aged off or purged after a designated period of inactivity.

### **How We Collect Information**

#### **[1] Optional Voluntary Information**

Sagicor has partnered with MasterCard to offer the following services, which require some type of voluntary submission of personal information by users:

- Reward Redemption Options including requests for cash back, gift cards, travel and entertainment related booking, points for purchase (view our Pay with Rewards FAQ document [here](#) for more information).
- Options to confirm receipt of emails and electronic alerts relating to your rewards
- Input of knowledge-based answers that allow our system to confirm your identity and allow you to securely limit access to your account

#### **[2] Usage Tracking**

We track user traffic patterns throughout the rewards portal and related mobile applications. We break down overall usage statistics according to a user's domain name, browser type, and MIME (Multipurpose Internet Mail Extension) type by reading this information from the browser string (information contained in every user's browser). Data on individual user activity is tracked after secure login to ensure that access to your account and online requests are monitored to facilitate investigation for suspicious use if needed.

#### **[3] Cookies**

We may place a text file called a "cookie" in the browser files of your computer. The cookie itself does not contain personal information although it will enable us to relate your use of this site to information that you have specifically and knowingly provided. However, the only personal information a cookie can contain is information that you supply yourself. A cookie cannot read data off your computer or read

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cookie files created by other sites. You can refuse cookies by turning them off in your browser. If you have set your browser to warn you before accepting cookies, you will receive the warning message with each cookie. You do not need to have cookies turned on to use this site.

### **[4] Device identifiers**

Whenever our mobile applications are accessed through a mobile device, we may opt to collect identifying details for that device such as IP Addresses, MAC addresses, device OS, carrier information. Actions initiated in-app from that specific device will also be collected. Geo Location and GPS services are not utilized by the application.

### **Use of Information**

We use information provided by users to enhance their experience on our site and facilitate fulfillment of service requests. We may send out emails, SMS or in app alerts in response to user requests initiated on our portal.

### **Security**

Sagicor and MasterCard separately and jointly operate secure data networks which comply with the industry standards for information systems and payment card data security. Our security and privacy policies are periodically reviewed and enhanced as necessary and only authorized individuals have access to the information provided by users. Notwithstanding the foregoing, we cannot guarantee that the information you share will be secure during transmission to our web-server or mobile application server.

Sagicor takes every reasonable step in protecting your personally identifiable information:

- in accordance with relevant local and international acts, legislation, or regulations.
- throughout its lifecycle (i.e. through creation/collection, processing, transmission, storage and destruction).

Sagicor has implemented technical and procedural controls to protect the privacy of your information, including but not limited to:

- encryption to prevent unauthorized disclosure.
- data masking (also known as data obfuscation, data de-identification, data depersonalization, data scrubbing, and data scrambling), which involves concealing all or parts of information (e.g. credit card numbers) when being stored or transmitted
- tokenization, which substitutes valid information (e.g. database records) with random information and provides authorized access to this information via the use of tokens

Additionally, Sagicor has established methods of dealing with data privacy breaches, which includes:

- identifying when a data privacy breach occurs (typically by employing monitoring, intrusion detection, or information leakage protection tools)
- responding to a data privacy breach as per legal, best practice and other obligations
- notification of relevant stakeholders including affected clients in the event of a breach.



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### **Retention and Destruction of Information**

Sagicor and MasterCard will only retain your personal information as long as it is necessary or as required by law. When we destroy the information, we will use safeguards to prevent unauthorized parties from gaining access to the information during the process.

### **Disclaimer**

We have taken reasonable steps to ensure the security of personal information transmitted over the Internet. However, complete confidentiality and security over this medium are not yet possible, and there exists a remote possibility of data security violations occurring. In the event of such a violation, we do not accept any liability for direct, indirect, special or consequential damage arising out of the use of the site or release of confidential information, except where such damage is proven to be caused by negligence on our part.

For more information you may call the Sagicor Client Care team at 1-888-SAGICOR (1-888-724-4267) at any time.