

# WEBSITE PRIVACY POLICY

Last Updated: [January 23, 2015]

## PRIVACY & SECURITY OF YOUR INFORMATION

We are committed to protecting the security and privacy of our client's information. We want to make your experience Online satisfying and safe. Because we gather information about our users, we feel that you should fully understand 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 your personal information please contact us by clicking on the "Contact Us" link from any page, or you can email us at: options@sagicor.com.

## WHAT TYPE OF INFORMATION WE COLLECT

We collect two types of information about users of this website:

- Information that users provide through optional, voluntary submissions. These are voluntary submissions from participation in polls, surveys, completion of Online forms and subscriptions for services.
- Information that we gather through aggregated tracking and information derived mainly by tallying page views throughout our sites. This information allows us to better tailor our content to user's needs and to better understand the demographics of our audience. Compiling such aggregated demographic 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.

## HOW WE COLLECT INFORMATION

### [1] Optional Voluntary Information

We offer the following services, which require some type of voluntary submission of personal information by users:

[Insert list of services which require information to be provided]

### [2] Usage Tracking

We track user traffic patterns throughout all of our sites. However, we do not correlate this information with data about individual users. 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).

### [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 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. However, you do need cookies to participate actively in Online message boards, forums, polling and surveys.

## USE OF INFORMATION

We use information provided by users to enhance their experience on our site, whether to provide interactive or personalised elements on the site or to better prepare future content based on the interests of our users. We use information that users voluntarily provide in order to send out electronic newsletters and to enable users to participate in polls and surveys. We send out newsletters to subscribers on a regular schedule (depending on the newsletter), and occasionally send out special editions when we think subscribers might be particularly interested in something we are doing. We never share newsletter mailing lists with any third party. When we use tracking information to determine which areas of our sites users prefer based on traffic to those areas, we do not track what individual users read, but rather how well each page performs overall. This helps us continue to build a better service for you. We track search terms entered in Search functions as one of many measures of what interests our users but we do not track which terms a particular user enters.

## SHARING OF THE INFORMATION

We use the information provided by users to tailor our content to suit your needs. We will not share information about individual users with any third party, except with the consent of the specific user or in circumstances where we are legally permitted or required to provide information.

## SECURITY

We operate secure data networks which comply with the industry standards for information systems 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.

## OPT-OUT POLICY

We try to give users options wherever necessary and practical, this includes the ability to opt not to participate in certain interactive areas which removes the need to provide any personally identifiable information to us.

## YOUR CONSENT

By using this site, you consent to the collection and use of this information by us. 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.

## RETENTION AND DESTRUCTION OF INFORMATION

We 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.