

SFP.COM PRIVACY POLICY

SFP.COM Jamaica Ltd. (SFP.COM) is committed to respecting your privacy and to complying with applicable data protection and privacy laws. This Privacy Policy is provided to help you understand how we may collect, use, protect, and otherwise deal with your personal information.

You acknowledge that by providing your personal information to SFP.COM, you consent to the processing of your data in accordance with this Privacy Policy. You should read this notice in conjunction with the Terms and Conditions of use for our websites, apps and our products and services.

This Privacy Policy covers all SFP.COM businesses and entities in all countries in which it operates.

Personal Information Collection

SFP.COM collects and uses your personal information with your knowledge and consent and typically when you:

- Use SFP.COM's products and services that are offered or for which you may choose to opt-in;
- Make customer enquiries, register for information or other services;
- Respond to communications from us (such as SMS, emails, questionnaires or surveys);
- Interact with SFP.COM's websites such as submitting an application form, completing survey form, use online services. (If your browser has Internet cookies enabled it can facilitate SFP.COM's tracking of personal preferences, pages visited etc.);
- Participate on SFP.COM's social media pages such as Facebook;
- Participate in SFP.COM's promotional events, incentive or loyalty programs;
- Provide information through SFP.COM's customer care centre, agents and sales channels or any other affiliates or business dealings with SFP.COM by which you have consented to provide your personal information.

Types of Information Collected

The types of personal information that SFP.COM may collect include, but are not limited to:

- contact information (such as name, address, email address and telephone number)
- identification information (such as passport identification number, tax registration number or social security number, driver's license, date of birth)

- demographic information (such as age range, marital status, gender)
- photographs such as those that you may submit for contests or prize winning competitions
- product specific information (such as preference, friends and family who you chose to include in your service plan, credit limit)
- banking information (such as direct debit and related bill payment banking transactions)
- service account information (such as account balances, transaction history, credit information, billing, loyalty points).

Use of personal information by SFP.COM

Any personal information collected by SFP.COM will be used in support of the intended purposes stated at the time at which it was collected, and subject to any preferences indicated by you. We may otherwise use your personal information to assist with service related issues, account management, technical support, billing, credit assessments, debt collection, directory purposes, market research, customer profiling, product and service development, marketing and customer care, to enhance your customer service experience by providing you with specific products and services tailored to meet your needs, for general marketing campaigns, network protection, legal and regulatory compliance. You acknowledge and consent that we may use, copy, reproduce, process adapt, publish, transit, display and distribute data collected in any media including the transfer of this information to other jurisdictions to the extent permitted by law for storage and processing,

You acknowledge and expressly consent to SFP.COM:

- a. disclosing your information including use of SFP.COM Services to third parties with which you have separately contracted or with which you intend to contract (and have informed SFP.COM of this intention in writing or electronically through and opt in process);
- b. disclosing your information to third parties (such as to our agents, credit agents, credit bureaus and other carriers) for purposes including credit referencing, fraud detection and prevention, debt collection, investigating insurance claims, directory purposes, for any reason required by law and for any other lawful purpose; and
- c. using your information to tell you about our and other products or services, any promotions that we may have from time to time, or any other matter that we have reason to believe you or other customers like you would be interested in.

Mobile Applications

SFP.COM may from time to time offer and request your participation in various mobile applications to enhance user experience. If you chose to register for an application, we may obtain information about you and/or your mobile device. SFP.COM will use the

information collected in accordance with this Privacy Policy. You may stop the collection of your personal information at any time by uninstalling the relevant applications for which you have registered or contact us and make a request to opt-out.

SFP.COM may also offer applications developed by third parties to enrich your experience. When you download a third party application to your mobile device, the third party affiliate may collect information about you in connection with your download or use of that application. SFP.COM is not responsible for the collection or use of information by third party application. SFP.COM recommend that you carefully review the privacy statement of each third party application prior to downloading or using them.

Linked Sites

SFP.COM's websites may contain links to third-party sites not controlled by SFP.COM or covered by this Privacy Policy, such as those belonging to SFP.COM agents, co-branded websites offered in conjunction with a business partner, or independent product review sites. SFP.COM recommend that you check the Privacy Policy of other sites you visit before providing any personal information.

SFP.COM Agents

When you buy service from a SFP.COM agent, the agent will share your information with SFP.COM as your service provider. While SFP.COM encourages its agents to ensure full compliance with all applicable data privacy or data protection laws and policies, and has provided information to our agents relating to non-disclosure obligations, SFP.COM is not responsible for agents' compliance with applicable laws.

Sharing

SFP.COM does not sell, trade, transfer or otherwise share your personal information except in the following instances:

- as required by law, such as in conjunction with a subpoena, government inquiry, litigation, dispute resolution or similar legal process;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your security, investigate fraud or respond to a law enforcement request;
- with SFP.COM service providers, field engineers, contractors who work on our behalf and who do not have an independent right to use the information to which they have access or that we disclose to them;
- with our business partners for SFP.COM's marketing activities, in such case no specific personally identifiable information is provided, as such information is generally aggregated;
- with third parties for research and development purposes;
- with our subsidiaries and affiliates such as SFP.COM agents;

Third parties must in all cases agree to a strict duty to keep all personal information confidential and to use it only for the purpose for which it was obtained.

Data Transfer

SFP.COM may have to transfer data to jurisdictions outside of the jurisdiction where we collect such information. In such circumstances, SFP.COM will endeavour to ensure adequate commercial agreement is established with third party affiliates with respect to cloud computing services and exporting of data to countries in accordance with applicable legislation governing different territories. SFP.COM also ensures secure data transfers using well-known security technologies and practices to secure data from unauthorized access or interception. However, please be aware that communications over the Internet, such as emails/webmails, facsimile, are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered - this is the nature of the World Wide Web/Intranet. SFP.COM cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

Data Retention

SFP.COM retains data for a specific period of time required, however certain data can be retained for longer periods as required by the laws of the territory within which the specific service is operated.

Security

We are concerned about safeguarding the confidentiality of your information. Notwithstanding, although we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

Cookies/Tracking Technologies

SFP.COM websites use common Internet technologies, such as cookies and web beacons, to keep track of user interaction with the sites, to remember user preferences and to maximize the user experience and performance of the website and services. For example, using cookies on our websites provides benefits to you, such as allowing you to autofill fields on forms, provide details of last time you login online. You can disable the cookie and the information will not be collected. Please refer to your browser Help instructions to learn more about cookies and how to manage their use. If you choose to decline cookies, some of the functionality of a website may be impaired.

Consent and Withdrawal of your consent

By consenting to this Privacy Policy, you are giving us permission to process your personal data specifically for the purposes identified. Your continued use of our Services is an acceptance of this Privacy Policy. If you wish to withdraw your consent to our continued collection of your personal information, you must immediately exercise the opt-out avenues available on the terms and conditions governing the Service you are receiving from us or follow directions in the Privacy Support and Inquiries cause below. Should you choose to use our sites and applications or Services after such withdrawal, we shall assume that your consent has been reinstated and collect the information you provide to us.

Privacy Support & Inquiries

If you have concerns or questions regarding this Privacy Policy or if you wish to update your personal information or stop the collection of your personal information, please contact us directly.

Changes to Privacy Statement

SFP.COM reserves the right to amend or modify this Privacy Policy at any time and in response to changes in applicable data protection and privacy legislation. Notice of any such change along with the revised policy will be posted on our website.