

## DIGICEL GROUP PRIVACY POLICY

### 1. Who We Are

**We are the Digicel Group of Companies; a consortium of affiliated digital and telecommunications entities delivering world-class mobile services, award-winning LTE & fibre networks, and cutting-edge apps and digital services across 25 markets worldwide.**

Like our products, services, and brands, we're not only committed to enabling you to connect more, learn more, listen more, play more, and share more, but we are committed to respecting and protecting your privacy and personal data whilst complying with all applicable laws and regulations. In doing so, we take reasonable steps to ensure that your data is safe and secure with all our subsidiaries, affiliates, and brands, including putting in place technical safeguards, organizational measures, and necessary policies and procedures across our environment.

This Privacy Policy is intended to give you a general understanding of how the entities and affiliates within our group of companies may collect, use, protect, and otherwise deal with your personal information, across our brands, products, services, and subsidiaries. Different Digicel branded or affiliated products and services collect different kinds of data. We invite you to read the privacy notice we may provide for specific products and services, and on specific occasions when we are collecting or processing your personal data.

### 2. What Do We Collect?

**We primarily collect information that you provide to us directly or through your interactions with our products and our services. The information we collect about you and how we collect it may vary depending on the products and services that you use, how you have used them and how you have interacted with us, or what we have obtained from a third party with permission to share it with us.**

Information we may collect includes:

*Direct Data:* Information collected directly from you, your devices, or your activities with your consent:

- your identity, contact, and financial information, such as your full name; username; date of birth; national identification; tax registration or identification number; telephone numbers; email; billing address; and payment card information.
- your profile, transactions, and calls, such as your Digicel ID; Digicel+ account number; service packages; account status; preferences; survey responses; transaction history; call history/logs; records of domestic calls, and online chats with customer service.
- your devices and how you interact with our websites and applications, such as internet protocol (IP); global positioning system (GPS); mobile station integrated services digital network (MSISDN); unique device IDs; and browser plug-in types and versions.
- how you interact with our network which includes performance and diagnostic data about your use of our network, Wi-Fi services, or your performance information about devices connected to your service package, plan, or subscription.

*Third-Party Data:* We may collect data from third parties, where (i) you have consented to this disclosure, (ii) information is needed to perform our contract with you or to fulfil a legal obligation or a legitimate interest, (iii) you have interacted with us via these third-party entities. This includes but is not limited to:

- financial and credit information through credit bureaus, financial investigators, and payment processors;
- information about you from social media platforms;

- your interests, preferences, and demographic information from your devices, activities online, and participation in marketing campaigns and promotions.

*Volunteered information:* We may collect other volunteered information that you may share publicly through comments on articles and posts via our applications or websites.

*Automated technologies or interactions:* As you interact with our applications and websites, we will automatically collect Technical Data about your equipment, browsing actions, in-app and web activity, and patterns. We collect this personal data by using application permissions where applicable, cookies, and other similar technologies. These technologies may also receive technical data about you if you visit other websites. We invite you to read the cookie notices of our various websites that you may interact with for further details.

*Data about children:* We do not knowingly collect data from or about individuals under the legal minimum age without the permission of a parent or guardian. When we do collect that data, we might do it directly, like when you sign up for a service or initiate a transaction. We might also collect it automatically if the child uses our product or service. If you believe your child may have provided us with personal information without proper consent, we invite you to contact us and request that we delete the information.

### 3. How Do We Use Your Information?

**We only use your personal data in accordance with applicable laws; where you provide consent or we need to fulfil a contract with you, comply with a legal obligation, or for our legitimate interests.**

We use your personal data primarily to help us to provide you with our products and services in a way that is most useful for you, customized to your needs, preferences, and interests. Some of these include, to:

- Register you as a new customer;
- Process and deliver our products and services such as:
  - Manage payments, fees and charges
  - Process plans and subscriptions
  - Use our network for transmission of calls
  - Collect and recover money owed to us
- Manage our relationship with you;
- Enable you to partake in a prize draw, competition or complete a survey;
- Administer and protect our business including our services, our applications and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- Deliver content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you;
- Measure performance and use data analytics to improve our applications and websites, products, services, marketing, customer relationships and experiences; and
- Make suggestions and recommendations to you about goods or services (i.e., plans and/or subscriptions) that may be of interest to you.

*Aggregated data:* We also collect, use, and share aggregated data such as statistical or demographic data for a range of purposes. Though aggregated data can be derived from your personal data, it is not considered personal data in law as it will not directly or indirectly reveal your identity. For example, we may aggregate your transaction data to calculate the percentage of users who purchase a particular service package. If we combine or connect your personal data with aggregated data, we will treat the combined data as personal data, which will be used in accordance with our privacy practices.

#### 4. Do We Share Your Information?

We may share your personal data internally throughout the entities of Digicel Group of Companies and externally with third parties.

Your personal data within Digicel: Different companies in the Digicel Group may act as joint controllers or processors, and may provide IT, customer service, and system administration services, and/or process your personal data through leadership reporting. The list includes:

Data Controllers/ Digicel Affiliates	Territory/ Head Office Incorporated
Wireless Ventures (Anguilla) Ltd.	Anguilla
Caribbean Cable Communications (Anguilla) Ltd.	
Antigua Wireless Ventures Limited	Antigua & Barbuda
New Millennium Telecom Services N.V T/A Digicel Aruba	Aruba, Netherland Antilles
Digicel (Barbados) Limited	Barbados
Digicel Caribbean Limited	
The Bermuda Telephone Company Ltd.	Bermuda
Telecommunications (Bermuda and West Indies) Ltd.	
Digicel Suriname N.V.	Suriname
Antilliano Por N.V. T/A Digicel Bonaire	Bonaire
Digicel (BVI) Limited	British Virgin Islands
Digicel SVG Limited	St. Vincent & The Grenadines
Digicel Panama S.A	Panama
Digicel (Cayman) Limited	Cayman Islands
Digicel (Trinidad & Tobago) Limited	Trinidad & Tobago
Curacao Telecom N.V. T/A Digicel Curaçao	Curaçao
Digicel Bonaire Antilliano Por N.V.	
Santa Barbara Utilities N.V. T/A Tres Networks	
Wireless Ventures (Dominica) Limited	Dominica
Digicel S.A. de C.V.	El Salvador
Digicel (Grenada) Limited	Grenada
U-Mobile Cellular Inc	Guyana
Unigestion Holding S.A	Haïti
Digicel (Jamaica) Limited	Jamaica
Paymaster (Jamaica) Limited	
SportsMax Limited	
Trend Media Limited	
Caribbean Cable Communications (Montserrat) Limited	Montserrat
Digicel (St Lucia) Limited	St. Lucia
Prism Services Holdings Limited	
Digicel Antilles Françaises Guyane	Martinique
Idom Technologies SAS (c/o Digicel Antilles Françaises Guyane)	
Digicel French Caribbean	
Southern Caribbean Fiber	Guadeloupe
Digicel Investments France	

Digicel St. Kitts Wireless Ventures (St. Kitts & Nevis) Limited T/A Digicel St. Kitts & Nevis	St. Kitts & Nevis
Digicel Turks and Caicos Ltd	Turks and Caicos Islands
Caicos Television Holdings Ltd	

*Your personal data with our external third parties:* We may share your personal data, where we are required to do so, with various service providers and professional advisors acting as processors, relevant regulators, and other authorities as required by law. We may use special contracts to ensure an adequate level of protection is achieved through the use of technical and organizational measures. Where your personal data is shared across borders, we only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. More information on how we share your personal data can be found in the privacy notice specific to the brand, product, service or subsidiary you are interested in.

*Third-party marketing:* We endeavour to get your consent before we share your personal data with any third-party for marketing and advertising purposes.

## 5. What Choices Do You Have?

**Find out about your options related to how your personal data is used for marketing purposes.**

You can ask us to stop sending you marketing messages at any time by following the opt-out links or directions on any marketing message sent to you, or by contacting us at any time. Please check the contact information within the Privacy Notice of the product or service from which you would like to cease receiving marketing messages.

Please note that where you opt out of receiving these marketing messages, this will not apply to any system or functional messaging regarding a product or service purchase, product or service experience or other transactions that you may conduct.

## 6. Want To Learn More?

**Now that you have a general understanding of your personal data and how we may use it, feel free to take a closer look by reading through the notice that best suits the brand, product offering, service, or subsidiary you are interested in, or locate the relevant notice based on the territory or market in which you reside.**

Other Privacy Notices	
Digicel Mobile	<a href="https://www.digicelgroup.com/en/privacy-notice.html">https://www.digicelgroup.com/en/privacy-notice.html</a>
Digicel Plus	<a href="https://www.digicelgroup.com/jm/en/digicel-plus/legal/privacy-notice.html">https://www.digicelgroup.com/jm/en/digicel-plus/legal/privacy-notice.html</a>
MyDigicel App	<a href="https://www.digicelgroup.com/en/mda-privacy-policy.html">https://www.digicelgroup.com/en/mda-privacy-policy.html</a>
Trend Media Limited	<a href="https://trend.media/privacy-notice/">https://trend.media/privacy-notice/</a>
Loop	Jamaica <a href="https://jamaica.loopnews.com/content/privacy-policy">https://jamaica.loopnews.com/content/privacy-policy</a>
	Trinidad & Tobago <a href="https://tt.loopnews.com/content/privacy-policy">https://tt.loopnews.com/content/privacy-policy</a>
	Barbados <a href="https://barbados.loopnews.com/content/privacy-policy">https://barbados.loopnews.com/content/privacy-policy</a>
	Cayman Islands <a href="https://cayman.loopnews.com/content/privacy-policy">https://cayman.loopnews.com/content/privacy-policy</a>

	St. Lucia	<a href="https://stlucia.loopnews.com/content/privacy-policy">https://stlucia.loopnews.com/content/privacy-policy</a>
	Haiti	<a href="https://haiti.loopnews.com/content/politique-de-confidentialite">https://haiti.loopnews.com/content/politique-de-confidentialite</a>
	Caribbean News	<a href="https://caribbean.loopnews.com/content/privacy-policy">https://caribbean.loopnews.com/content/privacy-policy</a>
GoLoud	<a href="https://www.digicelgroup.com/go-loud-privacy.html">https://www.digicelgroup.com/go-loud-privacy.html</a>	
Bip	<a href="https://bip.com/en/privacy-policy/">https://bip.com/en/privacy-policy/</a>	
Digicel International	<a href="https://topup.digicelgroup.com/en/privacy-policy/">https://topup.digicelgroup.com/en/privacy-policy/</a>	
MyCash	<a href="https://mycashdfs.com/privacy-policy/">https://mycashdfs.com/privacy-policy/</a>	
Paymaster	<a href="https://my.paymaster-online.com/">https://my.paymaster-online.com/</a>	
Sportsmax	<a href="https://www.sportsmax.tv/privacy">https://www.sportsmax.tv/privacy</a>	
DigicelMore	<a href="https://digicelmore.mobi/?ix=Legal-PrivacyPolicy">https://digicelmore.mobi/?ix=Legal-PrivacyPolicy</a>	
<b>Job Candidate's Privacy Notice - <a href="https://www.digicelgroup.com/en/legal/privacy-notice-for-job-candidates">https://www.digicelgroup.com/en/legal/privacy-notice-for-job-candidates</a></b>		

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

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