

BARITA FUND MANAGERS LIMITED

PRIVACY NOTICE

1. OUR WHY TO PRIVACY

This Privacy Notice explains how Barita Fund Managers Limited (“BFM”, “we”, “our”, or “us”) collects, uses, discloses and otherwise process your personal data through the use of our site or any channels in which you interact with us. We want you to know that the personal data we collect from you depends on the nature of the services we provide and how we interact with you.

WHO WE ARE

Barita Fund Managers is a member company of the Barita Financial Group (the parent company). We are one of the Caribbean’s leading investment companies, providing innovative solutions for more than 25 years, enriching the lives of our clients and adding value to the communities we serve. We provide wealth and asset management services, investment banking and pension management services.

2. OUR DATA PROTECTION COMMITMENT

BFM respects our customers’ and other stakeholders’ right to privacy and we commit to safeguarding your personal data we hold for you. We utilize international best standards appropriate data protection standards in compliance with the Data Protection Act, 2020 (“DPA”) and regulations and other privacy laws in the communities in which we operate.

3. THE TYPES OF INFORMATION WE COLLECT

We may collect various personal data that is necessary for the products and services you use. In some instances, we may also act as a data processor or joint controller in circumstances where we provide pension management services where we will process personal data for employees and pensioners of the pension fund or superannuation scheme.

Some of the types of information we process include:

a)	Personal Identifiers For example: name, driver’s license number, passport number, photo ID, TRN, SSN, NIS
b)	Contact Details For example: email address, telephone numbers, residential address, mailing address
c)	Employment Information For example: employment status, employer name and address, nature of self-employment, type of business, salary and benefits, employment history
d)	Demographic Details For example: date of birth, gender, age, nationality, marital status, residency, citizenship
e)	Banking Information For example: bank name and branch, account number, account type
f)	Financial Information For example: credit report, credit card statement, bank statement, income, expenses
g)	Background Check Information For example: sanction list checks
h)	Health Information: For example: medical history, family medical history, health status, test results and outcomes of medical reports
i)	Account Login Credentials: For example: username and password

j)	Employee Information: For example: employment history, dependent information, emergency contact, background check information, educational qualifications
k)	Beneficiary Information For example: beneficiary name, relationship
l)	Online Details For example: IP address, operating system, and browser type, when you visit our sites or use our online services
m)	Political Affiliation Whether politically exposed person
n)	Criminal History Criminal charges and convictions

4. HOW WE GET YOUR PERSONAL INFORMATION

Most of the personal data we collect will be obtained from you directly. We may collect this information when you request our services or when you complete a form, and may include the following:

- Information you provide us e.g. by corresponding with us or by email and when you fill out personal data on this site, enter a competition/ promotion/ survey or give us feedback, subscription to a service or contact us;
- Information that your devices or web browser provide to us or that is obtained using web technologies e.g. device details, browsing actions and patterns through the use of cookies;
- Information from a variety of third-party sources such as business customers, government agencies, consumer and credit reporting agencies and other suppliers of public information.

COOKIES AND INTERNET TECHNOLOGY

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. We use Internet technology like cookies and Web Beacons for a variety of purposes, including:

- to assist us in providing services to you;
- track visitor use of this site; deliver information specific to your interests on additional Web sites; and
- compile statistical reports on site activity.

You can set your browser not to accept cookies. If you disable or refuse cookies or select the option which allows only the cookies which allow functionality, however, please note that some parts of this site may become inaccessible or not function properly.

5. HOW WE USE YOUR PERSONAL INFORMATION

To facilitate your transactions or meet your service requests, it is necessary for us to collect and retain your personal data to confirm who we are assisting.

We shall not disclose your personal data to any person or organization unless you have provided the required informed consent and there is a lawful basis to do so.

With your consent we may share your data with a third-party where it is part of our service offering or where it is deemed necessary for the services, we provide to you. To this effect, we may use your

personal data for the following purposes:

a	Facilitating and processing applications including for opening new accounts and customer care.
b	To carry out “Know Your Customer” due diligence checks including credit reference checks, data validation, sanction checks, and risk management checks.
c	Facilitating an investigation of or prosecution for fraud, money laundering or offences associated with terrorism or terrorist financing in accordance with laws.
d	To administer, investigate and settle complaints in relation to the services that we provide.
e	Delivering site content and advertisements to you and understanding the effectiveness of such advertising.
f	To ensure adherence to internal controls and external regulatory requirements.
g	To enforce our contracts and recover any outstanding debt in connection with the services we provide.
h	To fulfil our legal and regulatory obligations.
i	Protecting our own business interests including collecting a debt owed to us or allowing the undertaking of a transaction.
j	Verifying information previously given by you with any other organization when necessary.
k	To respond to your requests, inquiries, comments, and concerns.
l	Enabling you to participate in a competition, promotion or survey.
m	To provide services for data controllers under a data processing arrangement.
n	Finding out how many persons use our electronic channels and which aspects of our channels are used most frequently.
o	To facilitate the use of Artificial Intelligence (AI) and streamline various Processes for enhancing customer experience.
p	Managing our relationship with you;

We will retain your personal data for as long as it is reasonably necessary to fulfil the purposes, we collected it for, including the purposes outlined in the DPA.

6. OUR OBLIGATIONS TO YOU

The DPA requires us to inform you about the legal basis for using, sharing, or disclosing your data. To the extent those laws apply, we may rely on the following legal bases for processing this data:

- The performance of a contract;
- Compliance with any legal obligation;
- To protect the vital interest of the data subject (you);
- For the administration of justice, exercise of any function conferred by or under any

enactment, or exercise of any other functions of a public nature exercised in the public interest;

- Purposes of legitimate interest; and
- With consent by the data subject (you).

The relevant information and/or personal data is used by us, our agents, representatives, and sub-contractors to process your application, act upon your request and to communicate with you in general.

You will receive marketing communications from us if you have requested information from us and you have not opted out of receiving that marketing information.

Notwithstanding the requirement for consent by you to utilise your data, please note we may be compelled to share your data with law enforcement, or in complying with a legal obligation or a court order.

7. HOW WE PROTECT YOUR PERSONAL DATA

Subject to certain exceptions, you have privacy rights under the DPA, including, but not limited to, right of access, right to rectification, right to prevent processing, rights in relation to automated decision-making. These rights include:

- Right of access: You may have the right to access the personal data we have on you by obtaining a copy of this personal data;
- Right to rectification: You may have the right to request the correction or amendment of any errors in the personal data we have about you;
- Right to prevent processing: You may have the right to request that the data controller cease; or not begin, processing, of your personal data; and
- Rights in relation to automated decision-making: You may have the right to ensure that no decision to which this section applies is based solely on the processing, by automatic means, of personal data in respect of the data subject for the purpose of evaluating matters relating to the data subject.

If you would like to exercise any of these rights or obtain further information about them, please contact us or please feel free to review the Data Protection Act or seek independent advice. Please note that if you contact us to do any of the things listed above, we may require you to provide sufficient personal data to allow us to identify you. However, this personal data will only be used for this purpose. If you contact us to exercise these rights, we will respond to your request within thirty (30) days.

We do not rent or sell your personal data and will only share your information in circumstances where we are legally permitted to do so.

For instructions on how to make a request, please visit the privacy page on our website.

8. SHARING OF YOUR PERSONAL DATA

Subject to your consent, we may disclose your personal data to our affiliate companies and to other related third-parties. Your personal data will only be shared with third-parties that perform services

for us including marketing services and/ or other financial institutions with which we collaborate with for the provision of financial products/services.

The contractual arrangements between us and these third-parties require them to keep the personal data we provide them with confidential and to use the data only for the purposes authorized by us.

BFM may share your personal data to affiliated companies, service providers, and other third-parties located outside of Jamaica. This is necessary to provide our services and for the purposes outlined in this Privacy Notice. We have taken steps to ensure that reasonable safeguards are in place with the aim to ensure an appropriate level of protection for your information, in accordance with applicable law. These measures include data transfer agreements.

LINKS TO OTHER WEBSITES

Our site may contain links to other websites and to plug-ins and applications. Clicking on those links or enabling those connections may allow third-parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our site, you should read the privacy notice of every website you visit.

YOUR CONSENT

By providing us with your consent in the required form, you are providing permission for us to process or otherwise use your data within the parameters of the Act.

We may require your consent to continue to provide expedited service. If you have any questions about our privacy notice or your personal data, please contact our Privacy Office at privacyoffice@barita.com or our Data Protection Officer at dpo@barita.com.

QUICK ACCESS LINK

<Similar to that at Barita.com> [Use the same forms **(with respective logo)** and DSR Guidelines at <https://www.barita.com/data-subject-request-guidelines/>] integrated with **[Privacy Complaint Form - The Jamaica National Group \(jngroup.com\)](#)**..:

- **[Access to Personal Data](#)**
- **[Notice to Prevent Processing](#)**
- **[Notice to Prevent Automated Decision Taking](#)**
- **[Rectification of Personal Data](#)**
- **[Delegation Form](#)**

HOW TO EXERCISE YOUR DATA PROTECTION RIGHTS?

You may contact us by visiting any of our locations where you will be assisted to complete the respective forms or may use our online data subject access forms.

ACCESS TO THE INFORMATION COMMISSIONER

If our DPO or Privacy Office has not addressed your concerns appropriately, you may also reach out to the Office of the Information Commissioner ("OIC"). However, we would love for you to let us know so that we can work with you to resolve your privacy concerns in an amicable way.

Office of the Information Commissioner

The Masonic Building (2nd Floor)
45-47 Barbados Avenue
Kingston
5 Jamaica
Telephone (876) 920-4390
Email address: info@oic.gov.jm

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to amend or make changes to this Privacy Notice at any time; however, we will provide you with reasonable notice before changes are effected. However, your data privacy rights will not be impacted by any changes in our notices unless authored by law.

This Privacy Notice was last updated December 2025.