



TTII
Trinidad & Tobago
Insurance Institute

Privacy Policy

1. TTII Respects Your Privacy

- 1.1 The Trinidad and Tobago Insurance (TTII) respects your privacy and understands that the processing and security of your personal data is important to you. This Privacy Policy provides details on how we collect, use, share, and protect your personal data, as well as the choices you have regarding our use and sharing of your personal data, along with other important considerations.
- 1.2 This Privacy Policy explains TTII's practices regarding the processing (such as the collection, use, storage, copy or disclosure) of your personal data received: (i) through our websites <https://mycpd.ttii.org.tt> and <https://ttii.org.tt>, email, and other written or in person communications; (ii) in the context of all our commercial relations with our customers, end-users, contractors, service providers and (iii) in the normal course of any other potential business relationship. We commit to comply with our obligations under all applicable Privacy and Data Protection Laws, and to respect your rights whenever we are processing your personal data.
- 1.3 By using this Website (<https://mycpd.ttii.org.tt>), you are subject to the terms and conditions of this Privacy Policy and your use will constitute an acceptance of same.

2. Privacy and Data Protection

- 2.1 "Personal Data" means any information that identifies, or can be used to identify, an individual.
- 2.2 "Privacy and Data Protection Laws" means any and/or all laws, rules, directives and regulations, on any local, provincial, state, federal or national level, pertaining to data privacy, data security and/or the protection of Personal Data including, but not limited to:
 - (a) the General Data Protection Regulation (GDPR), or Data Protection Act 2018 (UK)
 - (b) Data Protection Act 2011 (Trinidad and Tobago); and
 - (c) any successor legislation or regulations applicable thereto.

3. **When Do We Collect Your Personal Data?**

3.1 TTII may collect your personal data when you communicate with us by phone, e-mail, our Websites or otherwise, in the context of:

- a) Browsing our Website or visiting our social media sites (See: 11.1 and 11.2 below);
- b) Corresponding with TTII;
- c) Visiting one of our offices, events or facilities;
- d) Registering for and/or participating in our events, training or other activities;
- e) Requesting information, support, service, materials, assistance or other inquiries;
- f) Subscribing to a newsletter or other mailing list;
- g) Exchanging business cards;
- h) Completing Website contact forms, questionnaires, surveys, or contest entry forms or otherwise participating in these activities;
- i) Engaging in commercial relationships or other collaboration;
- j) Creating or registering an account;
- k) Uploading or downloading files;
- l) Verification of your identity as a data subject; or part of an audit process;
- m) Using TTII products or services (and those associated with our service providers) that are connected to the Internet, including mobile apps.

3.2 Our Websites are also governed by our Website Terms of Use, posted at: <https://mycpd.ttii.org.tt/> and <https://ttii.org.tt/>.

4. **Which Types of Personal Data are Processed by the TTII?**

4.1 We may process the following personal data:

- a) Name, surname, title, company, email address, phone number (mobile and landline), address, signature and other contact information;
- b) Specific data related to your employment. E.g., license number, issue or expiry date;
- c) Location data;
- d) Cookie ID;
- e) IP addresses;
- f) Personal preferences regarding training;
- g) Personal data provided in your submissions, responses and feedback;
- h) Personal data regarding your interactions with TTII, including your use of our Websites' products or services;

4.2 For the avoidance of doubt, TTII **does not** collect any sensitive personal data, such as race or ethnic origin; political opinions; religious or philosophical beliefs; genetic characteristics; health information; sexual preferences; information about children; criminal convictions; or biometric data.

5. How Do We Use Your Personal Data?

In order to better manage our own business needs and to better communicate with you, we may collect, analyze, use and otherwise process your personal data for the following purposes:

- a) To respond to your inquiries, questions and other requests;
- b) To optimize and manage the quality and content of our Websites, including the ability to personalize and secure your Website experience;
- c) To create and maintain your website accounts and registrations;
- d) To provide you with marketing, advertising, promotions, programs, offers and other opportunities;
- e) To conduct customer satisfaction studies and surveys;
- f) To manage our events and activities, and invite you to events;
- g) To provide products, services, training, technical support, customer service and other assistance;
- h) To manage and perform our agreements and obligations;
- i) To process payments, orders, invoicing, returns, collection and other requests;
- j) To provide pricing, quotations and custom configurations of our products and services;
- k) To grant you access to our service provider's software, technical information, and other proprietary content;
- l) To evaluate, troubleshoot, analyze and improve the use, functionality, features, and performance of our products, services, training, support and customer service;
- m) To use for our internal business operations and processes, including business and financial record keeping and data management; and
- n) To meet our legal and regulatory obligations.

6. On What Basis Do We Process Your Personal Data?

The following legal grounds might apply to the processing of your personal data for the purposes mentioned above:

- a) Processing is necessary to fulfil our remit as defined by the Ministry of Finance and in accordance with the functions of an approved educational institution referred to in the Insurance Act of 2018 (as amended).
- b) Processing is necessary based on any agreement with us or in order to take all pre-contractual steps required and pursuant to such agreement;
- c) Processing takes place based upon our legitimate interest (to comply with legal obligations such as record retention, to maintain business records, for fraud prevention and to maintain network and information security, etc.); and
- d) You have given your consent to the processing (e.g. in case of direct marketing and for the processing of analytic cookies)

7. **To Whom Do We Disclose Your Personal Data?**

- 7.1 The TTII may disclose your personal data to yourself, to cloud partners, to the Regulator (the Central Bank) or other competent governmental and public authorities in order to comply with legal or regulatory obligations or requests, or to certain other service providers, or partners that TTII has a strategic relationship with, in order to fulfil our obligations to you in the most effective way. Our website may also feature links to and from third party websites. If you follow a link to any such website, please note that these websites will have their own privacy policies and that we do not accept any responsibility or liability for those policies. You are advised to check such other policies before submitting any personal data.
- 7.2 TTII **will not** disclose to third parties any personal data you submit for purposes other than those described in this Privacy Policy. If, in the future, we intend to disclose your personal data to third parties for any purpose other than those described in this Privacy Policy, we shall inform you thereof in advance and request your consent.
- 7.3 Notwithstanding the foregoing, TTII will disclose your personal data to a third party if required to do so by law.
- 7.4 Unfortunately, the transmission of information via the internet is never completely secure. Although TTII will do its best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website and any such transmission will be at your own risk. However, once we are in receipt of your information, we shall use strict procedures and data protection/security features to prevent unauthorized access to your information.

8. **Data Transfer**

The TTII is under no obligation to transfer your personal data to any affiliate, business partner, or third- party entity, other than as described in 7.3 above.

9. **How Do We Secure Your Personal Data?**

- 9.1 TTII's service providers utilises a variety of security technologies and precautions, such as the Secure Socket Layer (SSL) protocol (encryption) to help protect your personal data from loss, theft, misuse and unauthorized access, in accordance with industry standards. To protect any personal data stored on their cloud-based storage, they regularly monitor their systems for vulnerabilities or attacks, and implement up to date information security measures. TTII will request a copy of their security reports as needed.

9.2 Access to personal data that is processed by the TTII is limited only to those of our employees, contractors and service providers that need to know that information in order to process it on TTII's behalf, in accordance with this Privacy Policy, and who have signed confidentiality agreements to this effect.

10. **How Long Do We Retain Your Personal Data?**

Unless a longer retention period is required by law, TTII will only retain your personal data for as long as needed to fulfil the relevant purposes described in this Privacy Policy.

11. **Use of Cookies**

11.1 "Cookies" means a small text file placed on your computer by the Website and used as an anonymous identifier. These are sent to your browser from the Website and are stored on your computer hard drive. Cookies enable websites to work properly, and to enhance user experience while visiting the Website. Cookie file(s), which are stored on the hard drive of computers, enable our service providers to measure and improve the performance of our Website. Cookies enable you to store your preferences, in order to enable our Website to recognize these preferences when you browse our Website. The TTII does not use cookies to obtain information about your usage of our website located <https://mycpd.tti.go.tt>. However, the TTII does use cookies to obtain information at <https://tti.org.tt>. In addition, our service providers may use cookies to fulfil their contractual obligation to the TTII on their platforms.

11.2 You may refuse to accept cookies by activating the setting on your browser which allows you to refuse cookies. However, if you select this setting **you may not be able** to access certain sections or features of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system, or that of our service provider, will issue cookies to your computer whenever you log on to our website. By continuing to browse our websites without changing your setting, you agree to our use of cookies as explained in this Policy.

11.3 **Google Analytics.**

We use industry standard web analytics to track visits to our website located <https://tti.org.tt>, namely those provided by Google Analytics. The information generated by the cookies about your use of our Website (including your IP address) will be transmitted to and stored by Google Analytics on their servers and is handled in accordance with Google's Privacy Policy which can be accessed at the following link: <https://policies.google.com/privacy>.

12. What Are Your Rights and How Can You Exercise Them?

- 12.1 You have the right at all times to be informed about the personal data we process about you, and to the extent authorized under the applicable Privacy and Data Protection Laws, to request access, modification, limitation of processing, transfer or deletion of personal data, or to object to the processing of your personal data, subject to the exceptions within the applicable Privacy and Data Protection Laws.
- 12.2 If processing is based solely on your consent, you also have the right to revoke your consent at any time, without prejudice to the lawfulness of processing prior to revocation. It may mean we will not be able to provide certain products and service to you and we will advise you if this is the case.
- 12.3 Through the contact information listed below, you can exercise the above rights regarding the processing of your personal data by the TTII, where applicable.
- 12.4 Please feel free to use the contact information listed below if you have any additional concerns regarding your personal data or your exercise of the above rights.
- 12.5 If you contact us to exercise one of your rights under the applicable Privacy and Data Protection Laws, we will reply within three (3) working days.
- 12.6 If we are unable to resolve an inquiry or request, where applicable, you may have the right to lodge a complaint with the Central Bank of Trinidad and Tobago, or the Ministry of Consumer Affairs.

13. Stay Informed of Changes in Our Privacy Policy

TTII reserves the right to change this Privacy Policy as we may deem necessary from time to time, which may be influenced by change in technology and legislation. TTII will inform you of any changes via our Website or other common communication channels and such changes are effective immediately, after posting on our website. We encourage you to review this Privacy Statement periodically to remain informed about how TTII is protecting your data.

14. Contact TTII

If you have questions and/or comments about this Privacy Policy or the manner in which TTII collects, uses and/or processes your personal data, please contact us:

Via e-mail: at admin@tii.org.tt, or call 628-2969, otherwise you can contact us using the contact form on our websites.