



## Customer Privacy Notice

### Our Privacy Commitment

At Caribbean Utilities Company, Ltd. (“CUC”) we value our customers and are committed to protecting their privacy. We collect, use and disclose personal information about our customers to enable us to establish and manage the relationship as necessary to provide services to you. We adhere firmly to the requirements of the Cayman Islands *Data Protection Law, 2017* (the “Law”) which governs how personal information must be managed and protected.

This Customer Privacy Notice is intended to inform you of why and how we collect, use, disclose, retain and secure your information, and is an extension of CUC’s Data Protection Policy.

### Purpose of Collection

CUC ensures that the purposes for collection, use and disclosure of personal information are limited to purposes that are reasonable and appropriate in the circumstances. The information collected is not sold, or shared with others except as otherwise required by law, or as disclosed to you in this Customer Privacy Notice.

Some purposes for which we collect, use and disclose or communicate Personal Information are:

- To create and maintain an effective business relationship, and enable us to provide you with requested services, manage your account and to provide a high standard of customer service;
- For quality assurance purposes such as the recording of telephone calls to our call centers;
- To facilitate account, billing, credit, collections and customer services, this may include the collection of contact information;
- To avoid and investigate fraud;
- To reduce energy and revenue theft which may include the collection of outage, voltage, load profile and consumption information;
- To confirm and verify service enrollment status;
- To enable energy efficiency and enhanced customer energy consumption feedback, including the collection of periodic consumption data;
- To understand customer needs and preferences, which may include contacting our customers to ask them to participate in surveys regarding our programmes and services;
- To meet legal and regulatory requirements; and
- To manage CUC’s business and operations.

#### Caribbean Utilities Company, Ltd.

457 North Sound Road, P.O. Box 38, Grand Cayman KY1-1101, CAYMAN ISLANDS  
Tel: (345) 949-5200, Fax: (345) 949-5203, Website: [www.cuc-cayman.com](http://www.cuc-cayman.com)



## **Consent for Collection of Personal Information**

We may seek consent in various ways, depending on the circumstances and the type of information collected, including, for example, using an application form and/or a check-off box.

## **Withdrawal of Consent**

An Individual may withdraw consent at any time, in writing and upon reasonable notice, subject to legal or contractual restrictions. We will inform the Individual of the implications of such withdrawal, which in some cases may be an inability for CUC to continue to provide services to the Individual.

## **Exceptions to the requirement for Consent**

The Law sets out specific circumstances under which CUC may collect use or disclose personal information without the consent of the individual.

## **Collection of Information**

CUC collects personal information during the electricity service enrollment process. Customers are required to provide the minimum amount of personal information necessary to activate an account and to fully utilise services.

This personal information may be collected through various means including;

- Online forms completed on the CUC website, or hand written forms that are emailed, faxed, or provided through personal interaction with a CUC representative.
- During contact with the CUC customer service department in the regular course of business it may also be necessary to obtain additional, or updated information for record keeping and follow-up.
- The monitoring and recording of communications when contacting CUC, including email, in person interaction and telephone conversations, date, time of day, and caller ID information.

We endeavour to keep Personal Information in our custody and control accurate, complete, and up-to-date as this will allow us to provide the best service to our customers. Customers can assist us by ensuring that the information they provide to CUC is current and accurate, and by providing updates promptly when information changes. Failure to maintain or update your contact information may result in CUC being unable to deliver crucial notifications or service information.

## **Use and Disclosure of Information**

We may use information to send e-mails describing new services, a change in rates, upcoming events, office closures, and to provide other operational or service notifications, such as scheduled outages affecting your electrical service. We may also use this information for other reasons, such as payment reminders and/or disconnections notices.

CUC limits the use and disclosure of Personal Information for purposes other than those purposes identified in this Notice, unless the Consent of the Individual has been obtained or if the use and disclosure is permitted or required by law. Personal information is not sold to third parties.



All employees, contractors and other independent companies engaged by CUC to perform work that involves access to personal information are contractually required to keep the information confidential and private and are not permitted to use it in any way other than what is necessary to perform their work for CUC.

Under certain circumstances CUC may disclose personal data, including account information, where release is appropriate to comply with laws, regulations or judicial orders; or to protect the rights, property, or safety of CUC, our customers, or others. In those instances where we do provide information to third parties, we provide only that Personal Information that is required in the circumstances. Third parties may include, but are not limited to:

- other companies and organisations for the exchange of information for fraud protection;
- remote payment agents to facilitate the collection of bill payments;
- collection agencies for the purpose of collection of accounts payable; and
- independent outside sources to conduct our customer satisfaction surveys.

We may further disclose your Personal Information without your consent, in the following circumstances:

- to comply with valid requests from governmental, regulatory and law enforcement agencies in accordance with the applicable law.
- during emergency situations or where necessary to protect the safety of a person or group of persons.

Except in the event of a business transfer or acquisition, and in accordance with the principles of the Data Protection Law, CUC will not otherwise share, trade, sell or disclose any of your personal information to a third party, unless we have your consent.

### **Retention Limited**

CUC has developed guidelines for the retention of personal data, which include minimum and maximum retention periods in compliance with the Law. The underlying principle of these retention guidelines is to keep personal data only as long as remains necessary or relevant for the identified purposes, and as required by law.

### **Protecting your information**

CUC takes reasonable precautions to protect personal information from loss, misuse or alteration. We have strict security and access systems in place, and all members of staff follow a careful identity verification process before any personal data is disclosed.



In meeting the data protection principles set out in the Law, we aim to ensure the security of our systems through adopting best practices, including but not limited to:

- Physical measures, for example, locked filing cabinets and restricted access to offices and data centers;
- Organisational measures, for example, access to personal information limited to authorized personnel only.
- Technological measures, for example, the use of passwords and encryption.

### **Access to Information**

An Individual may make a request for access to, or to correct, his or her Personal Information in the custody or control of CUC. The request must be made in writing and provide sufficient detail to allow CUC to identify the Personal Information they wish to access or correct.

For a personal information request customers may contact us by e-mailing us at [dpo@cuc.ky](mailto:dpo@cuc.ky) or by mail at:

***Caribbean Utilities Company, Ltd.***  
***Attention: DPO***  
***P.O. Box 38***  
***Grand Cayman KY1-1101***  
***Cayman Islands***

When contacting us by email or mail, be sure to include your name, account number, address, telephone number, and email address. In addition, please indicate your preferences for postal mail, telephone and email communications from CUC.

### **Complaints**

CUC is committed to working with customers to obtain a fair and rapid resolution of any complaints or disputes about privacy. Complaints must be submitted in writing. You may submit your questions, comments, or concerns regarding our privacy practices by either sending us an e-mail at [dpo@cuc.ky](mailto:dpo@cuc.ky) or by mail at:

***Caribbean Utilities Company, Ltd.***  
***Attention: DPO***  
***P.O. Box 38***  
***Grand Cayman KY1-1101***  
***Cayman Islands***



## **Policy Changes**

We reserve the right to make changes to this Customer Privacy Notice from time to time and we recommend that customers check for updates periodically, so that they are familiar with our current policy. If at any time in the future your information is to be used in a manner not previously disclosed, policy changes will be posted in our offices and to our website, and if significant, a more prominent notice to customers of these changes will be provided.