

[Company Legal Name]

Privacy Policy

How we collect, use, share, and protect personal information.

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Effective Date	[DD Month YYYY]
Applies To	Customers, visitors, and anyone engaging with our Stock Sector, Service Sector, or Agricultural Sector.
Contact	[Support Email] [Support Phone] [Business Address]

Important notice: This document is a template and should be reviewed by qualified legal counsel in Trinidad and Tobago before publication. Where any term conflicts with mandatory law, mandatory law prevails.

1. Introduction

This Privacy Policy explains how **[Company Legal Name]** ("we", "us", "our") collects, uses, shares, and protects personal information when you engage with our business across the Stock Sector, Service Sector, and Agricultural Sector.

We operate in Trinidad and Tobago and aim to handle personal information responsibly, including in line with applicable Trinidad and Tobago laws such as the Data Protection Act, 2011 (as proclaimed from time to time), and any other relevant legal obligations.

1.1 Relationship to other notices

This Privacy Policy applies across all sectors and departments. Some services (for example Finance agreements or Auctions) may require additional identity verification and recordkeeping. Where a specific signed agreement includes privacy/confidentiality terms, both apply.

2. Scope

This Policy applies to personal information we collect through: our in-person operations, telephone/WhatsApp/SMS communications, social media, websites or online forms, invoices and receipts, auctions and events, plant applications, and private agreements.

3. Key definitions

- **Personal information:** Information that identifies you or can reasonably identify you (e.g., name, phone number, address, ID number).
- **Sensitive information:** Information that requires higher protection (e.g., certain identification documents, financial details).
- **Processing:** Collecting, storing, using, disclosing, deleting, or otherwise handling personal information.

4. What information we collect

4.1 Information you provide

- Identity and contact details (name, phone number, email address, billing/delivery address).
- Transaction details (items/services requested, quantities, prices, invoices, receipts).
- Account or access details you provide for service delivery (for example, an email used to create a streaming profile, or a gamer tag for in-game purchases).
- Communications (messages, emails, calls, and support requests).
- Plant Application information (plant type, preferences, timeline, delivery instructions, and progress records).
- Auction registration information (identity details needed for bidder registration and compliance checks).

- Finance and agreement information (details needed to evaluate or document a loan, hire purchase, sponsorship, collaboration, or investment discussion).

4.2 Information we collect automatically (if applicable)

If we operate a website or digital platform, we may collect certain technical information automatically, such as IP address, device type, browser type, and usage data, through cookies or similar technologies.

4.3 Information from third parties

In limited cases, we may receive information from third parties to complete a transaction (e.g., delivery partners, payment processors, or a person authorised to act on your behalf). Where finance services are involved, we may also use lawful sources to verify information provided.

5. Why we use your information

We may use personal information for the following purposes:

- **To provide goods and services:** process orders, deliver items, provide streaming access, perform eCommerce purchasing services, manage auctions, and complete plant applications.
- **To communicate with you:** confirmations, delivery updates, support, and responses to queries.
- **To process payments:** validate and record transactions, prevent fraud, and handle chargebacks.
- **To manage agreements:** document and administer hire purchase, personal loans, and private agreements where applicable.
- **To comply with legal obligations:** accounting, tax, consumer protection obligations, court orders, and lawful requests by competent authorities.
- **To improve operations:** internal analytics, quality control, training, and service improvements (where appropriate).
- **Marketing (optional):** send promotions or updates if you consent or where permitted by law. You can opt out at any time.

6. Lawful basis for processing

We process personal information only where we have a lawful basis to do so. Depending on the context, this may include: (a) fulfilling a contract with you; (b) taking steps at your request before entering into a contract; (c) complying with legal obligations; (d) protecting legitimate business interests (such as fraud prevention) where not overridden by your rights; and/or (e) your consent, where required.

7. How we share information

We do not sell your personal information. We may share it with:

- **Payment providers** to process card, bank transfer, or other payments.
- **Delivery and logistics providers** to deliver items to your address.

- **Service providers** who support our operations (IT, cloud storage, document management), subject to confidentiality obligations.
- **Third-party platforms** when necessary to deliver a service you requested (e.g., purchasing a digital gift card or setting up access), using only the information required for that purpose.
- **Professional advisers** (legal, accounting) where needed for compliance or dispute resolution.
- **Authorities** where required by law, court order, or lawful request.

If a private agreement is between you and an agent personally (and not the business), information may be shared with that agent as a separate party, as described in the agreement. You should review the agreement carefully to understand who the contracting party is.

8. International transfers

Some service providers or platforms may store or process information outside Trinidad and Tobago. Where this occurs, we aim to take reasonable steps to ensure appropriate safeguards are in place (such as contractual protections and access controls).

9. Security

We use reasonable administrative, technical, and physical safeguards to protect personal information against loss, misuse, unauthorized access, disclosure, alteration, or destruction. Examples may include access controls, password protection, encryption where available, and staff confidentiality.

No method of transmission or storage is 100% secure. If you believe your information has been compromised, contact us immediately.

10. Data retention

We keep personal information only as long as necessary for the purposes described in this Policy, including legal, accounting, and dispute resolution needs. Retention periods may vary by record type (e.g., invoices, delivery records, finance agreements, auction records, plant application logs).

11. Your choices and rights

Depending on applicable Trinidad and Tobago law and the circumstances, you may have rights to request access to, correction of, or deletion of certain personal information, and to object to certain processing. We will consider and respond to requests within a reasonable time, subject to legal limitations.

- You may opt out of marketing communications at any time by contacting us or using any opt-out method we provide.
- You may update your contact information by notifying us.
- You may request copies of certain records (fees may apply for excessive or complex requests where permitted).

12. Children

Our services are not intended for children under 18 without parental/guardian involvement. If we become aware that we collected personal information from a child without appropriate consent, we will take steps to delete it where appropriate.

13. Cookies and tracking (if applicable)

If we operate a website, we may use cookies or similar technologies to improve site performance and user experience. You can control cookies through your browser settings.

14. Changes to this Policy

We may update this Privacy Policy from time to time. The updated version will be posted or made available upon request. Your continued engagement with our services after an update means you acknowledge the updated Policy, subject to any legal requirements.

15. Contact us

Privacy inquiries and requests can be sent to: **[Privacy Contact Email]** or **[Support Email]**.
Business address: **[Business Address]**.

16. Legal and regulatory context (non-exhaustive)

This Policy is intended to support transparent business operations in Trinidad and Tobago. Depending on the transaction type, applicable laws and regulations may include (among others):

- Data Protection Act, 2011 (as proclaimed from time to time)
- Electronic Transactions Act, Chap. 22:05 (electronic records and signatures)
- Any other applicable consumer protection, taxation, or sector-specific obligations depending on the transaction

If any part of this Policy conflicts with mandatory law, mandatory law prevails. For regulated activities (including lending, investment-related arrangements, or auctions), professional advice and/or licensing may be required.