

JMMB Group Privacy Standard

1. Introduction

This Privacy Standard is general in its application and sets out how JMMB Group Limited and its subsidiaries and affiliated companies (“JMMB Group”, “we”, “us” or “our”) handles the personal information (“personal data”) of our clients, team members, suppliers, contractors and other third parties (“you”, “your”). It briefly describes how we collect, hold, use and, whenever necessary, disclose your personal data. It also aims to give you information on how we collect and process your personal data when you use our website. This Privacy Standard is in addition to other agreements that you may have with JMMB Group, including client/customer agreements, and other notices. This document sets out a standard which JMMB intends to adhere to, but it is not a legally binding contract.

JMMB Group views privacy issues very seriously. These privacy issues include, but is not limited to, the security and confidentiality of personal data, including personal information that is disclosed on or through our website or any other electronic or social media channels that we maintain. This Privacy Standard, and other policies governing the protection of privacy are strictly observed and enforced to ensure high standards of protection of privacy and personal data. We keep our Privacy Standard under regular review and may from time to time revise this Privacy Standard.

2. Who We Are

The JMMB Group is made up of different legal entities. When we mention “JMMB Group”, “we”, “us” or “our” in this Privacy Standard, we are referring to the relevant company in the JMMB Group responsible for processing your personal data.

If you have any questions about our Privacy Standard, including any requests to exercise your legal rights, please contact the JMMB Client Care Centre at 1-876-998-5662 or email your concerns to info@jmb.com. Our Group IS Security, Risk and Compliance Manager, is our data protection officer/representative.

3. Personal Data Protection Principles

We adhere to common principles relating to the processing of personal data. When we mention “process” in this Privacy Standard in relation to personal data, we are referring to obtaining, recording or storing the information, or carrying out certain operations on the information such as organising, adapting, altering, retrieving, disclosing, erasing or destroying it. We require that personal data is:

- (a) processed fairly and lawfully;
- (b) collected only for specified and lawful purposes;
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- (d) accurate and, where necessary, kept up-to-date;
- (e) not kept for longer than is necessary for the purposes for which it is processed;
- (f) processed in accordance with any applicable laws and allows you to exercise your legal rights in relation to your personal data;
- (g) processed in a manner in which appropriate technical and organisational measures are used to protect against unauthorised or unlawful processing and against accidental loss or destruction or damage;
- (h) not transferred to another country without appropriate safeguards being in place.

4. The Data We Collect About You

JMMB Group may from time to time collect and process your personal data. Personal data is any information relating to a living individual who can be identified from that information or from other information that we have or are likely to obtain. JMMB Group will not collect sensible information, unless express consent of the client; sensible information refers to political opinions, religious, philosophical or moral convictions, union affiliation or information referring to health or sexual orientation.

We may get this personal data from, or about, you by different means, including, but is not limited to, (a) in direct interactions with you, and (b) through automated technologies or interactions or from third parties or publicly available sources, as set out below:

(a) **Direct interactions.** You may give us personal data by filling in forms or by communicating with us by post, phone, email or otherwise. This includes, but is not limited to, personal data you provide when you:

- apply for our services;
- enter into an employment or service arrangement with us;
- create, or apply to create, an account, including on our website;
- conduct transactions;
- subscribe to our publications;
- request marketing material to be sent to you;
- enter a competition, promotion or survey;
- schedule an appointment; or
- give us feedback or contact us.

(b) **Automated technologies or interactions & Third parties or publicly available sources.**

We may receive/obtain personal data about you from various third parties and public sources. Also, when you access our services through any of our relevant channels, including our website, and move from page to page, read pages, or download content onto your electronic device from these channels, we may collect “Technical Data” about you. We may get Technical Data from analytics providers such as Google or social media platforms, which provides us with statistics. The Technical Data that may be obtained includes, but is not limited to, information on your:

- equipment; and
- browsing actions and patterns, which include, but are not limited to:
 - internet protocol (IP) address;
 - what kind of device was used to access our website (e.g. desktop, mobile phone)
 - browser type and version;
 - time zone setting and location;
 - browser plug-in types and versions;
 - operating system and platform;
 - other technology on the devices you use to access our website;
 - which pages are visited;
 - what content is downloaded;
 - the address of the web sites that you visited immediately before coming to our website;
 - the amount of time you spend logged in to the particular electronic channel; and
 - details of the types and number of transactions completed.

That Technical Data may be collected automatically and may include, but is not limited to, personal data. We collect this information by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, some parts of our website may become inaccessible or not function properly. You may see our cookie policy on our website for further details.

Our website may include links to third-party websites, 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 practices. We encourage you to read the privacy policy of every website you visit when you leave our website.

It is important that the personal data we hold about you is accurate and current. Please inform us of any changes during your relationship with us.

5. How we use your personal data

Once we have your personal data, we will not use it where the law does not allow us to. Most commonly, but not exclusively, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into, or have entered into, with you, including to conduct a transaction.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and are not overridden by your rights, freedoms and legitimate interests.

We may also collect and process your personal data if you give your consent. We will look to your actions to determine whether you have given your consent to our existing and future personal information practices. These actions include, but are not limited to, your:

- voluntary provision of personal information to us through any of our channels;
- express consent or acknowledgement, including those contained within a written, verbal or electronic application process;
- consent solicited by us for a specified purpose;
- receipt of this Privacy Standard, until you notify us of a withdrawal of your consent;
- or
- consent given through your authorised representative such as a legal guardian, agent or holder of a power of attorney.

Subject to certain legal or contractual restrictions and reasonable notice, you may withdraw your consent for us to process your personal data at any time or request the updating or suppression of data. If you wish to withdraw your consent or update or suppress data or discuss the implications of that withdrawal, updating or suppression, please contact us at info@jmmb.com. In some circumstances, legal requirements may prevent you from withholding consent. Your decision to withhold consent may also limit the products and services that JMMB Group is able to provide to you.

Similarly, where we need to collect personal data by law, or under the terms of a contract with you, and you fail to provide that data when we request it, we may not be able to perform that existing or prospective contract with you. In such a case, we may have to cancel a product or service you have with us.

We have set out below a description of some of the ways we plan to use your personal data, and which of the legal bases we intend to rely on to do so. We have also illustrated what our legitimate interests may be, where relevant. Note that we may process your personal data for more than one lawful ground.

Purpose/Activity	Lawful basis
To engage you as a new, or potential, client, employee or contractor	Performance of a contract with you
To process and deliver your instructions including: (a) Manage investments, deposits, payments, fees and charges, deliver statements, recover passwords (b) Collect and recover money owed to us	(i) Performance of a contract with you (ii) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you, including: (a) Notifying you about changes to our website terms or privacy standard (b) Asking you to leave a review or take a survey (c) Undertaking due diligence	(i) Performance of a contract with you (i) Necessary to comply with a legal obligation (ii) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services)
To enable you to partake/participate in a prize draw, competition, event or complete a survey	(i) Performance of a contract with you (ii) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(i) Necessary to comply with a legal obligation (ii) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve you	Necessary for our legitimate interests (to study how persons use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, client relationships and experiences	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To undertake research and to make and market suggestions and recommendations to you about goods or services that may be of interest to you	Necessary for our legitimate interests (to develop our products/services and grow our business)

Promotional Offers from Us

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. You will receive marketing communications from us if you have requested information from us or used a service from us and you have not opted out of receiving that marketing.

Opting Out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data as a result of a product/service experience or other transaction.

6. Disclosure of Your Personal Data

We may share your personal data with third parties, including but not limited to any of the persons set out below, who may be based in Jamaica, Trinidad and Tobago or Dominican Republic or elsewhere worldwide, for the purposes set out in the table above:

- Companies in the JMMB Group.
- Service providers.
- Professional advisers, including lawyers, bankers, auditors and insurers.
- Regulators and other authorities who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International Transfers

We may share your personal data within the JMMB Group. This will involve transferring your data to/from Jamaica, Trinidad and Tobago, Dominican Republic and any other jurisdiction in which the JMMB Group may have operations. We check to ensure that in transferring your personal data, an adequate level of protection for your rights and freedoms in relation to the processing of personal data is in place.

8. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, which security measures we update from time to time. We will also limit access to your personal data to those team members, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. For example, by law we have to keep basic information about our clients for a specified number of years after they cease being clients. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.