

At the **TRELAWNY CO-OPERATIVE CREDIT UNION LTD** (“TCCU”, “we”, “us”, “our”), we are committed to protecting your privacy. We ensure that the processing of your Personal Data is compliant with **Jamaica’s Data Protection Act (JDPA)**, and any country-specific data protection laws and regulations to the extent applicable to TCCU. This Privacy Notice describes how TCCU collects, uses, shares and stores your Personal Data, and informs you of your rights regarding your Personal Data. This Privacy Notice applies to data we collect when you use our website, when you subscribe to our newsletter, take part in a survey, access our products and services, or any other marketing initiatives.

When you visit our website, you are free to explore without providing any Personal Data about yourself. We only collect Personal Data from you when you register, subscribe to a service or fill out a form.

1. How we Collect Data

We may collect your Personal Data through the following means:

- Information you provide via our Website, Social Media Networks or Events
- Information you provide when accessing our Services
- Third Parties

2. Types of Data We Collect

- Identity data: name, username, marital status, nationality, age, title, date of birth, gender, etc
- Contact data: address, phone numbers, email address, etc.
- Financial information: financial status, transaction history, credit history, etc.
- Transaction information: account details, product/service information, etc.
- Valid Photo ID: passport, driver's license, ID card, etc.
- Employment/Income Data: employment letters, pay slips, source of funds, etc.
- Biometric data: images, voice, surveillance footage, etc.
- KYC and other Data: beneficiary information, character references, etc
- Employee Information: job application details, employment contract, performance appraisals, etc.

3. How We Use Your Personal Data

We may use your personal data for:

- Providing products and services

- Processing transactions and sending records
- Managing member use and providing customer support
- Sending alerts, updates, and notifications
- Verifying identity and creditworthiness
- Ensuring compliance with laws and regulations
- Tracing debtors and recovering debts
- Investigating and preventing fraud and money laundering
- Recording CCTV footage for safety and security

4. Legal Basis for Collecting Personal Data

- **Contractual Obligation:** To fulfill contractual obligations or consider entering into a contract with you.
- **Legal Obligation:** To comply with laws, investigate financial crimes, and share data with authorities.
- **Legitimate Interest:** To provide and market services efficiently, while respecting your rights and freedoms.
- **User Consent:** With your clear and informed consent, which can be withdrawn at any time.

Third Parties and Transfers

We may disclose your Personal Data to third parties to whom you expressly ask us to send your Personal Data or to third parties for whom you consent to us sending your personal information. Third parties include our partners, affiliates, service providers and professional advisors. Personal Data may also be shared with regulators in order to demonstrate compliance with legal obligations. Personal Data will only be shared with third parties to provide our services to you and/or to comply with legal obligations. These third parties do not retain, share, use or process personal data beyond the defined purpose of providing our services to you.

5. How We Protect Your Personal Data

We protect your personal data with:

- Vulnerability scanning and PCI standards

- Regular malware scanning
- Secured networks with limited access
- Encryption via Secure Socket Layer (SSL) technology
- Security measures for user transactions
- Gateway provider for transaction processing (not stored on our servers)

Note: While we make reasonable efforts to protect your personal data, no method is 100% secure.

6. Your Rights

Under Jamaica's Data Protection Act data subject enjoy the following rights:

- **Right to Access:** Request a copy of your personal data and ask for it to be transferred to a third party.
- **Right to be Informed:** Request reconsideration of automated decisions regarding your personal data.
- **Right to Prevent Processing:** Request to cease or not begin processing your personal data in a specific manner or for a specific purpose.
- **Right to Rectification:** Request correction of inaccuracies in your personal data, including erasure upon expiration of applicable retention periods.

7. Retention Policy

We only retain your Personal Data for as long as it is needed to provide our services to you. We also retain Personal Data in line with legal requirements which may stipulate retention periods for different categories of Personal Data. We typically therefore retain members' Personal Data for a minimum of seven years following the date of transaction or termination of customer relationship.

We may also keep your data for longer than seven years if we cannot delete it for legal, regulatory or technical reasons.

8. Children's Privacy

Our services are not offered to persons under the age of 18 without parental or guardian consent. Any information that is in breach of this provision will be deleted.

9. Changes to This Privacy Policy

This policy may be revised to match changing regulations and security needs. We reserve the right to modify or replace any part of this policy. It's your responsibility to check for updates. Changes take effect once posted on our website.

13. Contact Information

If you have any question or comment regarding this Privacy Notice or you would like to make a complaint, please submit a written request to our Data Protection Officer as follows:

In person – at any TCCU branch, addressed to the Data Protection Officer

Mail: Trelawny Co-Operative Credit Union Ltd, Water Square, Falmouth, Trelawny and addressed to the Data Protection Officer

Email: dpo@jtccu.com.

Changes to This Privacy Notice

This privacy notice was last updated on March 13, 2025