

## PRIVACY NOTICE (GENERAL)

### WHO WE ARE

Musson (Jamaica) Limited (hereinafter “Musson Jamaica”, “we”, “us” or “our”) is the data controller for the processing of your personal data under this privacy notice. This means we determine the purposes and means for the processing of your personal data. We take your privacy very seriously and are committed to ensuring your personal data is processed securely and in compliance with the Data Protection Act, 2020 (DPA). This privacy notice will explain how Musson Jamaica processes your personal data and will inform you about your privacy rights under the DPA.

### WHOSE PERSONAL DATA DO WE COLLECT?

We may collect and process your personal data if you are:

- a) A business customer of Musson Jamaica who is a sole proprietor or a partner in a business partnership.
- b) A director, officer, authorized person, or contact person of a Musson Jamaica business customer who is a limited liability company.
- c) An individual who has been nominated as a character reference or guarantor by a business customer of Musson Jamaica.
- d) A visitor of our premises

For information on how we process the personal data of our employees, contractors and job applicants, you may read our [Engagement & Employment Privacy Notice(s)].

### WHAT PERSONAL DATA DO WE COLLECT?

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) and it does not include corporate data.

We may collect, use, store and transfer different kinds of personal data about you as follows:

| Category                                | Example of Personal Data   |
|---|--|
| Identity Data                           | Name, Address, TRN, Government Issued Identification, Occupation/Job Title |
| Contact Data                            | Telephone Number, Email Address  |
| Transaction Data                        | Banking & Billing Information, Purchase History                            |
| Marketing and Communication Preferences | Your preferences in receiving marketing communication from us              |

### HOW IS YOUR PERSONAL DATA COLLECTED

We may collect your personal data directly from you, from your employer or principal, and, where permitted by law, from publicly available sources:

- a) **Direct Interactions.** We may collect your personal data directly in the following ways:
  - i) When you contact us in person or over the phone.
- b) **Third Parties or Other Sources.** We may collect your personal data indirectly in the following ways:
  - i) Where your personal data has been shared with us because you are an officer or authorized personnel of a business customer of Musson Jamaica.
  - ii) Where your personal data has been shared with us as a character reference by a business customer of Musson Jamaica.
- c) **Automated Technologies or Interactions.** We may collect information about you automatically in the following ways:
  - i) Through our Closed-Circuit Television Systems (CCTV) installed on our premises.

## HOW WE USE YOUR PERSONAL DATA

We have set out below, in table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

| Purpose/Activity   | Type of data                                  | Lawful basis for processing                         |
|--|---|---|
| To onboard you as a customer and manage the customer relationship where you are a sole proprietor or a partner to a business partnership         | Identity Data, Contact Data, Transaction Data | Entering into a Contract, Performance of a Contract |
| To onboard limited liability business customers and manage the customer relationship where you are an officer or authorised person of the entity | Identity Data, Contact Data                   | Legitimate Interest                                 |
| To fulfil your orders where you are sole proprietors or a partner to a business partnership  | Identity Data, Contact Data, Transaction Data | Performance of a Contract                           |
| <u>To prepare credit analytics and profiles</u>  | <u>Identity Data, Transaction Data</u>        | <u>Legitimate Interest</u>                          |

|   |   |                     |
|---|---|---------------------|
| To fulfil orders made by our limited liability business customers where you are an officer or authorised person of the entity | Identity Data, Contact Data                               | Legitimate Interest |
| To facilitate marketing and promotion   | Identity Data, Contact Data                               | Consent             |
| To guarantee the safety and security of employees, customers, and visitors on the premises of Musson Jamaica                  | Identity Data, Images of you captured on our CCTV systems | Legitimate Interest |

## **DIRECT MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You will receive marketing communications from us if you have signed up for and/or used our services and you have not opted out of receiving that marketing. 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 [insert email address].

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## **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.

## **YOUR LEGAL RIGHTS**

You have the following rights under the Data Protection Act:

- The right to request a copy of the personal data that we hold about you.

- The right to ask us to rectify any inaccuracies in the personal data we hold about you.
- The right to object or to prevent the processing (or further processing) of your personal data in certain circumstances.
- The right to withdraw consent to marketing.
- The right related to solely automated decision-making including profiling. We do not use automated decision-making processes that would significantly affect you. But, if we did, you have the right to human intervention, to be informed of the logic of the decision and to have the decision reconsidered.
- The right to data portability to transfer your data to another controller.

If you wish to exercise any of the rights set out above or have any questions about this privacy notice or our privacy practices, please contact us at [insert identity & email address of Data Protection Officer.]

## **DATA SHARING**

Musson Jamaica is member to a group of companies being the Musson Group (“Musson Group”). During the processing of your data, your personal data may be shared with T. Geddes Grant (Distributors) Limited (“T. Geddes Grant”), being a company within the Musson Group for the purposes of administration and other shared services engaged for business efficiency and otherwise as may be described in their Privacy Notice.

We may share your personal data with other third parties, including service providers which help us ensure the seamless operation of our business relationship toward fulfilment of your contract with us. These service providers may transfer your personal data out of the jurisdiction to enable cloud storage or other to facilitate any software or other technology which aids us in operating our business.

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.

## **CHANGES TO THE PRIVACY NOTICE**

We keep our privacy notice under regular review. We will contact you if we make significant changes to this NOTICE.

This version was last updated on [DATE].

## **HOW TO CONTACT US**

If you have any questions about this privacy notice, our privacy practices, or you wish to exercise any of your rights under the Data Protection Act such as making a data subject access request, you may contact us using the information below:

Data Protection Officer  
Musson (Jamaica) Limited  
109 Marcus Garvey Drive,  
Kingston

*[insert email address of general inbox of Musson's Privacy Champion e.g. [privacy@musson.group](mailto:privacy@musson.group)]*

*[insert telephone number]*