

Privacy Policy

Prime Trust Financial Corporation Limited (hereinafter called “Prime Trust”, “we”, “us”, “our”) is committed to maintaining the privacy, accuracy and security of your Personal Information. We fulfill this commitment through our employee training, the safeguards used to protect your information and our policies, including this Privacy Policy. We comply with all applicable laws and regulations relating to privacy in Jamaica.

1. Applicability

- 1.1. This Privacy Policy is applicable between Prime Trust Financial Corporation Limited, its subsidiaries and/or affiliates of the one part and our customers, authorized users of our products and services, and employees, (hereinafter collectively mentioned and referred to as “you” or “your”) as applicable, of the other part.
- 1.2. All Personal Information that we collect, use or disclose about our individual Customers, authorized users and employees is covered by this Privacy Policy. This may include information such as your name, mailing address, email address, phone number, service records etc. The legal exceptions to what might ordinarily be considered Personal Information shall apply.
- 1.3. While our suppliers and authorized agents may have their own privacy policies, our contracts ensure they treat your Personal Information with safeguards as strong as those set out in this Privacy Policy.
- 1.4. We reserve the right to change our products and services or amend or modify this Privacy Policy at any time without prior notice to you. The updated Privacy Policy shall be available on our website at all times. Your continued use of our products and services implies ongoing acknowledgement and consent to same.

2. Consent

- 2.1. You acknowledge that by providing your personal information to Prime Trust, you agree to us collecting, using and appropriately disclosing your personal information in accordance with this Privacy Policy. You should read this Privacy Policy in conjunction with the Terms and Conditions of use for our websites, apps and our products and services.

3. Collection of Personal Information

- 3.1. "Personal Information" is information about you as an identifiable individual that is protected by law. Prime Trust may collect and store your personal information when you:
 - 3.1.1. provide your Personal Information during the inquiry, activation or purchase process for a product or service;
 - 3.1.2. provide service to our Customers, including technical support; or

- 3.1.3. automatically when you use our products or services, or visit our website (such as through the use of cookies or similar technologies),
 - 3.1.4. call into customer service, and
 - 3.1.5. when you shop in one of our corporate retail locations via security cameras.
- 3.2. The types of personal information that Prime Trust may collect include, but are not limited to:
- 3.2.1. contact information i.e. name, address, email address and telephone number;
 - 3.2.2. identification information i.e. passport identification number, tax registration number or social security number, driver's license, date of birth;
 - 3.2.3. demographic information e.g. age range, marital status, gender;
 - 3.2.4. photographs such as those that you may submit for contests or competitions
 - 3.2.5. product specific information;
 - 3.2.6. banking information such as direct debit and related bill payment banking transactions;
 - 3.2.7. service account information such as account balances, transaction history, credit information, billing, loyalty points;
- 3.3. When you visit our Websites, we may collect certain information related to your device, such as your device's IP address, what pages your device visited, and the time that your device visited our Website. These include:
- 3.3.1. Usage information– we keep track of user activity in relation to the types of services our customers and their users use, and the performance metrics related to their use of the Services.
 - 3.3.2. Log information– we log information about our customers when you use one of the services including Internet Protocol (“IP”) address.
 - 3.3.3. Information collected by cookies and other similar technologies– we use various technologies to collect information which may include saving cookies and other similar technologies to your computers. You can disable the cookie and the information will not be collected. Please refer to your browser Help instructions to learn more about cookies and how to manage their use. If you choose to decline cookies, some of the functionality of a website may be impaired.

4. Use of Personal Information

- 4.1. Any personal information collected by us will be used in support of the intended purposes stated at the time at which it was collected, and subject to any preferences indicated by you. Our use of your information includes to:
- 4.1.1. provide, operate and maintain the services;
 - 4.1.2. process and complete transactions, and send related information, including transaction confirmations and invoices;
 - 4.1.3. manage our customers' use of the services, respond to enquiries and comments and provide customer service and support;
 - 4.1.4. send customers technical alerts, updates, security notifications, and administrative communications;

- 4.1.5. verify customers identity and check credit with credit reference agencies;
 - 4.1.6. investigate and prevent fraudulent activities, unauthorised access to the services, and other illegal activities;
 - 4.1.7. fulfill legal and regulatory requirements; and
 - 4.1.8. for any other purposes about which we notify customers and users.
- 4.2. Information may be collected via our websites:
- 4.2.1. to administer our website, our events and for internal operations, including troubleshooting, data analysis, testing, statistical and survey purposes;
 - 4.2.2. to improve our website to ensure that content is presented in the most effective manner for you and for your computer;
 - 4.2.3. for trend monitoring, marketing and advertising;
 - 4.2.4. for compliance purposes, for example, to comply with Know Your Client (KYC) and Anti Money Laundering (AML) laws;
 - 4.2.5. for purposes made clear to you at the time you submit your information – for example, to fulfil your request for an information note requested about our services;
 - 4.2.6. as part of our efforts to keep our website secure.
- 4.3. We may use customer contact information to send the user information about the services of our company. The customer's contact information is also used to contact the customer when necessary.

5. Sharing Personal Information

- 5.1. Prime Trust does not rent or sell your personal information to anyone. We may share and disclose information (including personal information) about our customers in the following limited circumstances:
- 5.1.1. where you instruct us to disclose your information to a third party. We're not responsible for any such third party's use of your account information, which will be governed by their agreement with you and any privacy statement they provide to you;
 - 5.1.2. where required for your product or service;
 - 5.1.3. we may share your information for law enforcement and regulatory purposes if requested to do so by the relevant authorities;
 - 5.1.4. we may share your information with third party vendors, consultants and other service providers who we employ to perform tasks on our behalf;
 - 5.1.5. we may share your information with credit reference agencies, and they will give us information about you for the purpose of credit and identity checks;
 - 5.1.6. we may share information to help trace funds where you are a victim of suspected financial crime and you have agreed for us to do so, or where we suspect funds have been disbursed to you because of a financial crime;
 - 5.1.7. we may share information with third parties providing services to us, such as sub-contractors acting on our behalf.

- 5.1.8. If false or inaccurate information is provided and/or fraud is identified or suspected, details will be passed to fraud prevention agencies. Law enforcement agencies and other organisations may access and use this information;
- 5.1.9. In the event that any additional authorised users are added by you, we may share information about the use of the account by any authorised user with all other authorised users; or
- 5.1.10. For our marketing activities we may disclose information to our business partners, in such case no specific personally identifiable information is provided, as such information is generally aggregated.

6. Data Transfer

- 6.1. We will endeavor to ensure adequate commercial agreement is established with third party affiliates with respect to cloud computing services and exporting of data to countries in accordance with applicable legislation governing different territories.
- 6.2. We also ensure secure data transfers using well-known security technologies and practices to secure data from unauthorized access or interception. However, please be aware that communications over the public Internet, such as emails/webmails, facsimile, are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered - this is the nature of the World Wide Web/ Intranet. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

7. Linked Sites

- 7.1. Our websites may contain links to third-party sites not owned or controlled by us. We are not responsible for these sites, and this privacy notice does not apply to the privacy practices of any linked sites or of any companies that we do not own or control. Linked sites may collect information in addition to that which we collect on our website. We encourage you to seek out and read the privacy policy of each linked site that you visit to understand how the information that is collected about you is used and protected.

8. Business Transfers:

- 8.1. We may choose to buy or sell assets and may share or transfer customer information in connection with the evaluation of this transaction. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, personal information could be one of the assets transferred to or acquired by a third party.

9. Data Retention

- 9.1. Prime Trust retains data for a specific period of time required, however certain data can be retained for longer periods as required by the laws of the territory within which the specific service is operated.

10. Security

- 10.1. We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our services.
- 10.2. We engage well-known technologies including but not limited to firewalls, intrusion detection, SSL (Secure Sockets Layer), routine network vulnerability assessment and monitoring of our network to protect any information we hold in our records from loss, misuse, and unauthorised access, disclosure, alteration and destruction.
- 10.3. Please be aware that although we endeavor to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

11. Automated Decision Making

- 11.1. You may be subject to automated decision making in the following circumstances:
 - 11.1.1. **Pricing**- We may decide what to charge for some products and services based on what we know. This will help us decide whether to offer you the product and what price to charge you.
 - 11.1.2. **Tailoring Products** - We may place you in customer segments. We use these to study and learn about our customers' needs and behaviours, and to make decisions based on what we learn. This helps us to design products, services and offers for different types of customers, and to manage our relationships with them. It also helps us tailor the information that individuals receive or see on our own and other websites and mobile apps, including social media.
 - 11.1.3. **Detecting Fraud**- We use your personal information to help decide if your personal or business accounts may be being used for fraud or money-laundering. We may detect that an account is being used in ways that fraudsters work. Additionally, we may notice that an account is being used in a way that is unusual for you or your business. If we think there is a risk of fraud, we may stop activity on the account or refuse access to it.
 - 11.1.4. **Loans and Credit provision** - If you take a loan, or we provide credit to you, we will use your personal information to assess the outcome of the decision to grant you a loan mortgage or credit. To help us make decisions on when to give you credit, we may look at information you give us when you apply; information from credit reference agencies that will show us whether you've kept up to date with payments on any credit accounts (that could be any mortgages, loans, credit cards or overdrafts), or if you've had any court action such as judgments or bankruptcy; your history with us such as maximum level of borrowing; and affordability, by looking at your available net income and existing debts.

12. Privacy Support & Inquiries

12.1.If you have concerns or questions regarding this Privacy Policy or if you wish to update your personal information or stop the collection of your personal information, you may contact us via telephone at (876) 968-7261 or email us at DPQueries@ptf.online.

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