



PRIVACY NOTICE

Data Protection Act, 2020 (Jamaica)

Effective Date: September 24, 2023

Last Updated: September 24, 2023

Data Controller: Data Assurance Services	Address: 66 Duke Street, Kingston, Jamaica Email: info@dataassurance.net Telephone: (876) 833-2553 Website: https://dataassurance.net
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1. What this notice covers

This Privacy Notice explains how Data Assurance Services collects, uses, discloses, stores, and protects personal data, and outlines the rights available to individuals ("data subjects") under Jamaica's Data Protection Act, 2020.

2. Personal data we collect

(a) Data you provide to us

- Name, email address, telephone number, company name, job title or role
- Messages or enquiries submitted via website forms, email, WhatsApp, or other channels
- Engagement and billing information (e.g., invoices, payment confirmations, and related records)
- Identity verification information where required for an engagement or to protect against fraud and misuse

(b) Data collected automatically (website usage)

- IP address, device identifiers, browser type and operating system
- Pages visited, time spent, referring/exit pages, and similar usage information
- Cookies and similar technologies (see Section 10)

(c) Sensitive personal data

We do not intentionally collect sensitive personal data through this website. If sensitive personal data is required for a specific engagement, it will be collected and processed only where lawful and with appropriate safeguards.

3. Why we use personal data (purposes)

We process personal data only for specific, explicit, and lawful purposes, including:

- Responding to enquiries and communicating with you
- Providing professional services (including assessments, audits, training, registrations, policy drafting, incident support, and related services)
- Administering engagements, maintaining client records, and managing our business relationship with you
- Billing, accounting, and record-keeping
- Improving our website, services, and user experience
- Sending updates or marketing communications where you have consented or where permitted by law
- Complying with legal obligations and protecting our legal rights

4. Lawful bases for processing

Where required, we rely on one or more lawful bases to process personal data, as applicable:

- **Consent** (for example, where you subscribe to updates or where consent is required for specific processing)
- **Contract** (where processing is necessary to enter into or perform a contract with you)
- **Legal obligation** (where processing is required to comply with applicable law)
- **Legitimate interests** (where processing is necessary for our legitimate business interests and not overridden by your rights, such as service improvement, security, and fraud prevention)

Where we rely on consent, you may withdraw your consent at any time by contacting us using the details in Section 12.

5. Data minimisation, accuracy, and fairness

We collect only personal data that is adequate, relevant, and limited to what is necessary for the purposes described above. We take reasonable steps to ensure personal data is accurate and up to date. If you believe any personal data we hold is incorrect or incomplete, you may request correction.

6. Sharing and disclosure

We may share personal data only when necessary and with appropriate safeguards, including with:

- Service providers who support our operations (e.g., website hosting, email, cloud storage, analytics, payment processing)
- Professional advisers (e.g., accountants, auditors, legal advisers) where necessary
- Regulators, law enforcement, or public authorities where required by law or to protect our legal rights
- A successor entity in the event of a business transfer, merger, or restructuring (subject to lawful processing and confidentiality protections)

We do not sell personal data.

7. International transfers

Personal data may be stored or processed outside Jamaica (for example, where our hosting, email, cloud storage, or analytics providers are located abroad). Where personal data is transferred

internationally, we take reasonable steps to ensure appropriate safeguards are in place, including contractual protections and security controls consistent with the Data Protection Act, 2020.

8. Security

We use reasonable technical and organisational measures to protect personal data against loss, misuse, unauthorised access, alteration, or disclosure. Measures may include access controls, encryption where appropriate, secure configurations, staff confidentiality obligations, and incident response procedures.

9. Data retention

We retain personal data only for as long as necessary for the purposes described in this notice, including legal, regulatory, accounting, and dispute-resolution requirements. After applicable retention periods expire, personal data is securely deleted or anonymised.

Typical retention approach (guidance):

- Enquiries: up to 24 months after last contact
- Client engagement records: typically 7 years after completion/termination (or longer where required by law or for active disputes)
- Billing and accounting records: typically 7 years
- Website analytics: 14 to 26 months (depending on provider settings)

10. Cookies and analytics

We may use cookies and similar technologies to enable core website functionality, understand traffic and usage, and improve content and performance. You can control cookies through your browser settings and (where implemented) our cookie banner/preferences tool. Disabling cookies may affect website functionality.

11. Your rights

Subject to the Data Protection Act, 2020, you may have rights in relation to your personal data, including the right to:

- Be informed about how your personal data is used
- Access personal data we hold about you
- Request correction of inaccurate or incomplete data
- Request deletion/erasure in appropriate circumstances
- Object to processing in certain circumstances
- Request restriction of processing in certain circumstances
- Withdraw consent where consent is the lawful basis

12. Complaints

If you have questions, concerns, or complaints about how we handle personal data, please contact:

Data Assurance Services

Email: info@dataassurance.net

Telephone: (876) 833-2553

Address: 66 Duke Street, Kingston, Jamaica

We will review and respond to complaints within a reasonable time and may request information to verify your identity before processing certain requests.

13. Children's privacy

Our website and services are not directed to children, and we do not knowingly collect personal data from children. If you believe a child has provided personal data, please contact us so we can take appropriate steps.

14. Third-party links

Our website may include links to third-party websites. We are not responsible for the privacy practices of those sites. Please review their privacy notices before providing personal data.

15. Updates to this notice

We may update this Privacy Notice from time to time. The updated version will be posted on our website and will take effect from the stated effective date.