

LASCO FINANCIAL SERVICES DATA PROTECTION AND PRIVACY STATEMENT

1. Introduction

1.1 Your privacy and your rights are important to us. This privacy policy explains what information we at LASCO Financial Services Limited situate at 38 1/2 Red Hills Road, Kingston 10 and LASCO Microfinance Limited its subsidiary collect about you and how we use it.

If you subscribe to, or have engaged in the use of, LASCO Financial Service Limited products and services (in money stores, online or via Agent location), you visit our websites or you download and use our mobile apps or services we provide within mobile device wallets or other third-party applications, this Privacy Notice will apply.

2.1 LASCO Financial Services Limited recognizes the importance of safeguarding the personal information (“**information**”) of its customers using the LASCO Financial Services Limited Services. This Privacy Notice (the “**Notice**”) sets out the basis on which any of your information will be collected, stored and used by us, and reflects LASCO Financial Services Limited's commitment to maintain the confidentiality and security of your information, and to provide its customers with the best possible service.

3.1 This Website is provided by LASCO Financial Services Limited and describes how your information is used by a member of the **LASCO Financial Services Limited Group of Companies** (“**LASCO Financial Services Limited**”, “**we**”, “**us**”, “**our**”) when:

- a. you use this website (the “**Website**”), any of our mobile software applications (Apps) or platforms (together the “**Sites**”);
- b. you use services we provide within mobile device wallets or third-party applications;
- c. you obtain services from our Money Stores, or by walking in to one of our or agent locations;
- d. you call the customer services telephone lines or when you interact with us using other channels including by email, live chat, SMS or social media platforms;
- e. you purchase or use LASCO Financial Services Limited branded products, or products we provide under the branding of our partners. These services and products are collectively referred to in this Notice as “**LASCO Financial Services Limited Services**”. Dependent on how the services are provided to you, the partner's Privacy Notice may also apply.

4. LASCO Financial Services Limited collects, stores, processes and discloses (collectively "uses") your information in a manner consistent with the Jamaica Data Protection Act 2020 and by extension the General Data Protection Regulations 2019 that governs the (UK) and the General Data Protection Regulation 2016/679 (GDPR) that governs in the EU, as well as the local laws of our country in doing business.

4.1 If you have any requests concerning your information please refer to Section 11, or if you have any queries with regard to our practices please contact us using the contact details in Section 5.

4.2 What Information we collect

LASCO Financial Services Limited collects, stores, processes and discloses (collectively "uses") your information in a manner consistent with the Data Protection Act 2020 and the General Data Protection Regulation 2016/679 (as may in future be amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (UK GDPR), that governs in the United Kingdom, as well as the Data Protection Act 2018

4.3 We collect and process your information in the following ways:

(1) Information you give us:

You give us information about yourself when you use LASCO Financial Services Limited Services, or communicate with us (whether in writing, by phone, via social media or by any other means), or enter into any of our competitions, promotions or surveys. Where we request information from you, we will collect your information in the relevant forms or pages we use, including when you set up a LASCO Pay/MASTERCARD/VISA Prepaid card account with us or when you register for loyalty schemes offered by us or make an application for loan from our subsidiary LASCO Microfinance Limited. You can choose to provide additional information to us when you contact us or otherwise interact with us.

If you subscribe to receive our newsletter, then you will provide us with your name, email address and information indicating how you heard about us. You can also provide us with information on your marketing preferences.

The registration details that you provide when you register a particular service sometimes include a unique ID for that product, your date of birth, the answer to a security question such as your mother's maiden name, your email address and marketing preferences. If you register for a prepaid card account, you will be asked to create a unique password which enables you to access your account.

If you conduct any LASCO Financial Services Limited Services, we will collect information from you that will enable us to complete your transaction. Such information can include your name, date of birth, home address, billing address, office address, e-mail address, the form(s) of identification you provide (e.g. passport or driver's licence) and the information contained

within those forms of identification, mobile telephone number, landline telephone number, prepaid card information, other payment details, such as your bank account information, as required by us in order to complete your transaction . We will also require your Sender's name and contact and your source of funds to complete a remittance or cambio transaction, or when loading a prepaid card with cash. If you do not provide the information we require to process a transaction, we may not proceed with your request.

(2) **Information we collect automatically**

- LASCO Financial Services Limited also collects certain information about you by automated means, such as cookies and web beacons, whenever you visit our Sites or when you use the LASCO Financial Services Limited Services and how you use them. More information can be found in our Cookie Statement.
- When you download our mobile app or our third party partner's mobile app or access our services from a mobile device we may collect personal information from you such as, your name, email address, user name, password, mobile device information and system (for example android or IOS), and your geo-location. Dependent on your marketing and cookies preferences and your geo-location settings, we may present and display to you in the app targeted marketing and advertising messages, or information about how you use the app in order to improve app performance and our digital online services.
- We use the information we collect automatically:
 - to administer our Sites for internal operations including troubleshooting purposes;
 - to ensure that content from our Sites is presented in the most effective manner for you and your devices;
 - as part of our effort to keep our Sites safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
 - to make suggestions and recommendations to you and other users of our Sites about goods or services that may interest you or them.
- When we collect CCTV images of you from equipment in place when you visit our premises such as at our Money Stores a, we will do so for the prevention and detection of crime and public safety.

(3). **Information we receive from third parties**

- We also receive information from third parties (including publicly available information). This information includes:
 - Non-personal information used to supplement existing information, such as demographics and affluence metrics (e.g. social-demographic groupings through matching postcode information).
 - Information about you from other members of the **LASCO Financial Services Limited Group of Companies**, and other sources with whom LASCO Financial Services Limited work closely to provide the LASCO Financial Services Limited Services to you (including LASCO Financial Services Limited agents, Money Service

providers, third party payment providers,— identity verification services, credit reference agencies, regulators, fraud prevention services and social media platforms).

(4). How we use the information we collect

The information we hold on you will be used in a number of ways. This is generally to provide you with the services that you request from us, to keep you informed and to improve your customer experience and the quality of the LASCO Financial Services Limited Services. In some instances we use this information to send you marketing communications we think are relevant to you, but we only do this where it is lawful to do so, or you have given your consent to receiving this information.

You have the right to object to us sending you such information at any time. We will collect, process and retain your data for the purpose of us providing to you payment services, but this does not affect your data protection rights.

(1) To provide a requested service or carry out a contract with you

- Collecting loan payments, paying out money transfer, paying out currency exchange, collecting cash to load to your prepaid card and otherwise providing you with any information requested from us at LASCO Financial Services Limited;
- providing you with any alerts, in-app messages or other messages, and newsletter that you have registered to receive;
- when we partner with other organisations to provide a particular LASCO Financial Services Limited Service (these partners will be identified to you at the time of the provision of the relevant LASCO Financial Services Limited Service e.g. when you visit the partner website or app);
- when you connect to our mobile hot spots in our Money Stores
- providing you with service messages, including messages notifying you about conditions and policies;
- enforcing any contract entered into between you and us for the provision of LASCO Financial Services Limited Services.

(2) Where we have your consent

- ◆ contacting you (including by email, social media or SMS) with marketing messages according to your marketing preferences.
- ◆ contacting you via email with short surveys, according to your survey preferences;
- ◆ when you are using a mobile device (such as mobile phone, tablet or wearable device), we may use your precise geo-location to provide you with location-based services and provide you with targeted advertisements. You can control your geo-location settings within the app settings or your mobile device settings;
- ◆ sending you an e-receipt if you confirm you would like one;
- ◆ where you have consented, collecting your marketing preferences and sharing these with a LASCO Financial Services Limited partner service providers and agents.

(3). Where we have a legitimate interest

- ✧ improving customer experience and our quality of LASCO Financial Services Limited Services. This can also include tracking emails to know when they are opened and read and the type of device they emails are accessed from;
- ✧ data analysis and research to allow us to derive insight and to help make the LASCO Financial Services Limited Services personalised and relevant, as well as to develop our business processes and LASCO Financial Services Limited Services. In doing so, we will anonymise your data so that we may continue to use it for analysis and research after the period that it has been used for processing our services to you. Where data is anonymised, we ensure that it cannot be used (singularly or with other data) to re-identify you;
- ✧ sharing any loyalty card number you have provided to us, with the providers of the loyalty scheme, in order for you to receive points, where you have already consented to this with the loyalty scheme provider;
- ✧ LASCO Financial Services Limited carries out direct marketing from business to business (B2B) which means, if you engage with us in your professional capacity (for example: if you represent a company with whom LASCO Financial Services Limited has an existing or prospective business relationship) we may keep you up to date with services we offer/provide. B2B customers will have the right to opt out of receiving marketing communications at any time. To see how you can exercise your right to opt out, see information below.

Note that where we rely on legitimate interests for processing your information, we carry out a ‘balancing test’ to ensure that our interests are not outweighed by your fundamental rights of privacy. More information on such balancing tests is available from LASCO Financial Services Limited on request.

(4). Where we have a legal obligation

Complying with our legal and regulatory obligations (including fraud prevention, anti-money laundering and sanction screening and counter-financing of terrorism). This includes checking the information you provide to us against information from our screening tool World Check and all relevant Sanctions list provided.

(5). Information we share

- ✓ We only share your information with LASCO Financial Services Limited Group Companies and with other companies in the limited circumstances set out below, for specific purposes. NB* **We do not sell your information.**
- ✓ Even where shared, we ensure your information will only be used for the purposes outlined in this notice:
- ✓ In the event that our business is acquired by a third party or we enter into any kind of merger or other acquisition type, your information where required would be shared with the relevant party.
- ✓ We may also share your information with businesses that we partner with to offer LASCO Financial Services Limited Services under that partner’s branding (e.g.

featuring their logos and via their websites). They may only market their own products or services to you if you consent that they can do so). LASCO Financial Services Limited may be the 'Data Controller' of the personal data you provide when using these services (which means we determine how personal data is used) or 'Data Processor' (which means we act on the written instructions of that partner on how to use personal data) of this data. The relationship will be indicated to you via the privacy policy available at the partner's website).

Our Agent Network/partners include:

- Supermarket chains;
- Cambios and Credit Unions;
- Pharmacies and Wholesales;
- Other retail businesses.
- Money Transfer companies
- Prepaid card companies
- Merchants
- Bill collection companies
- The Government of Jamaica

We share your Personal Information with fraud prevention agencies such as the Financial Investigations Division of the Ministry of Finance and Public Service in the provision of certain LASCO Financial Services Limited services to you. These agencies keep a record of enquiries and other records. We give them this information to make assessments and to help make decisions on you to prevent fraud and money laundering.

Our business partners include:

- payment gateways and payment services providers
- international money transfer services providers
- identity verification providers and credit referencing agencies
- providers of fraud prevention, anti-corruption and anti-money- laundering checks
- cloud and online security services providers
- outsourced service providers to the LASCO Financial Services Limited Group
- providers of telecommunications, webchat and networking services
- marketing communications providers
- online advertisers and targeted advertising providers
- social media networks;

who are using a third party to send targeted advertisements on our behalf, using an identifier such as an email address or site cookies. This will only be done with your express consent, in accordance with our Cookie Statement; have aggregated, non-personally identifiable information, which is to be used for segmentation, statistical modelling, general research or trend analysis. If we are purchased by a third party, in which case information held by us including your information will be transferred. NB* In any such event LFSL will notify you of this through the most appropriate means.

In the need to comply with the obligations we have to our third party product issuers or third parties providing products or services on our behalf, so that they can provide the information, products or services you have requested (please note that these third party product issuers have their own privacy policies and accordingly we cannot accept any responsibility or liability for the handling of your information by such third parties in accordance with such policies); and enforce our Site terms of use.

5. How to opt in or opt out from direct marketing, third party marketing and surveys

We may use the information you give us on our platforms for direct marketing purposes to provide you with updates, newsletters, events, offers and promotions or other communications by email or SMS, that we think may interest you but, where required by law your prior consent will be obtained before sending direct marketing.

We may also from time to time send you surveys about our products and services. We will only do this where we have your consent.

You have the right to opt in or opt out of direct marketing and surveys from us at any time by visiting our online Privacy Centre, where available on our Sites, clicking the ‘unsubscribe’ link in any email we have sent you, sending an email to unsubscribe@www.lascojamaica.com/financial, or by calling us on (876) 906-7473.

6. Third Party Marketing Cookies and Social Advertising

LASCO Financial Services Limited has relationships with online advertisers and social media networks (our marketing partners). These partners use cookies and similar technologies for marketing purposes and may serve you with targeted advertising about LASCO Financial Services Limited while you are on a third-party website, at our request and only with your express consent. More details can be found in our Cookie Statement on our website.

We encourage you to learn more about how companies use advertising on social media and how to adjust your marketing preferences by checking their privacy statements and opt out options.

7. Retention of your Information

We will keep your information only for as long as is for the purposes set out in this Privacy Notice and to fulfil our legal and regulatory obligations. Where you are a customer this is usually at least for as long as you remain a customer, to be able to meet our legal and contractual obligations to you, and if necessary, to resolve any disputes and if kept thereafter, this will only be for legal and regulatory purposes as per the time frame required by legislation and regulations.

We retain some of your information after you cease to use LASCO Financial Services Limited Services, for instance if this is necessary to meet our legal obligations, such as retaining the

information for tax and accounting purposes or for Anti Money Laundering obligations. Otherwise we securely erase your information once it is no longer needed.

8. Links to Third Party and LASCO Financial Services Limited Group websites

Our Sites may contain links to and from the websites of our group companies, selected partner networks, advertisers and affiliates, including websites which are outside of our control and are not covered by this Notice.

If you access other sites using the links provided, the operators of these sites collect information from you which will be used by them in accordance with their privacy notice, which differ from ours. Please note that these other sites have their own privacy policies and accordingly we cannot accept any responsibility or liability for such policies.

On some pages of our Sites, third parties that provide content, applications, services (such as a webchat service enabling you to speak to an adviser about the LASCO Financial Services Limited service offerings) or plug-ins through our Sites track your use of content, applications and plug-ins or customize content, applications and plug-ins. For example, when you share an article using a social media button on our Sites (e.g. Facebook, Twitter, Instagram, LinkedIn, or Google Plus), the social network that has created the button will record that you have done this, or when you speak to an advisor about the LASCO Financial Services Limited service offerings, they may provide you with advice over the Facebook chat facility, and Facebook has access to your information. You should check the Privacy Notice of third party websites to find out how they manage cookies and process your information.

9. Security

We take all reasonable steps to ensure that all information collected through our Site is treated securely and in accordance with this Notice. We do this by applying appropriate technical and organizational measures that meet all of the standards of our regulatory obligations, including regular review measures.

To protect your information you provide to us through our Site LASCO Financial Services Limited has a number of security measures in place to protect against unauthorized disclosure, use, alteration, or destruction. However, when transmitting information over the internet, please bear in mind that no transmission over the internet can ever be guaranteed secure even upon encryption. Therefore, while we endeavour to protect your information, please note that we cannot guarantee the security of any information that you transfer over the internet to us, especially from your portal.

As part of using our Sites you are sometimes asked to set-up a user name and password. You are responsible for maintaining the confidentiality of your user name and password and are responsible for all activities that are carried out when logged using your name/username and password. You are responsible for ensuring the security of the passwords set by you.

10. International Transfers

In providing the LASCO Financial Services Limited service offerings to you we sometimes transfer your information to other countries such as the United States of America. Where we transfer your information outside the Jamaica in this way, we ensure that all data is treated with the same security measures regardless of location, and in accordance with our standards, policies, regulatory and legal obligations.

The internet is a global environment, so using the internet to collect and process your information necessarily involves transmitting data internationally. Therefore, by browsing our Sites and communicating electronically with us, you acknowledge our processing of your information in this way. However, we will take all reasonable steps to ensure that all information collected through our Sites is treated securely and in accordance with this Notice and strict data protection and data privacy standards.

In providing our services to you, such as fulfilling orders and taking and making payments, we may transfer the data we collect from you and about you to destinations outside of Jamaica, within the LASCO Financial Services Limited group of companies, with our third-party processors, or with our partners/alliances. This is because the information is processed in those other locations. Where we do so, we ensure that security measures and appropriate safeguards are put in place to protect your information and ensure that all transfers of your information comply with applicable data protection and privacy laws. We also ensure that processing is only ever carried out in accordance with our instructions and as per the customers/clients consent executed.

In all cases where we transfer information across borders, we rely on acceptable and defined legal mechanisms to ensure that we protect data at all times. For transfers between LASCO Financial Services Limited group of companies, and others, we may use new standards as these are developed by the appropriate regulatory authorities

11. Your rights

By law, as a data subject you have a number of rights (subject to certain conditions) when it comes to your information. These include the right to ask us what information we hold about you, and to request us to modify any incorrect details, add missing information, or at the appropriate time to delete the information we hold. You also have the right to object to us processing your data or ask us to restrict processing your information. If you want to use the information that we hold about you for services with others, you can ask us to provide your data in a commonly used electronic format. You can exercise any of these rights by contacting us using the contact details and form referred to in Section 5.

You can obtain further information about your rights, or make a complaint to your data protection authority with regards to how we use your information, and Section 5 provides contact details should you need them.

(i) **The right to object to processing.** You have the right to object to certain types of processing, including processing for direct marketing.

- (ii) **The right to be informed.** You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Notice.
- (iii) **The right of access.** You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Notice). This is so you are aware and can check that we are using your information in accordance with data protection law.
- (iv) **The right to rectification.** You are entitled to have your information corrected if it is inaccurate or incomplete.
- (v) **The right to erasure.** This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information that we hold.
- (vi) **The right to restrict processing.** You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but will not use it further.
- (vii) **The right to data portability.** You have rights to obtain and reuse your information for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
- (viii) **The right to lodge a complaint.** You have the right to lodge a complaint about the way we handle or process your information with your national data protection regulator.
- (ix) **The right to withdraw consent.** If you have given your consent to anything we do with your information), you have the right to withdraw your consent at any time. You can withdraw your consent to the processing of your information at any time by contacting us using the contact details in Section 5.

12. Children's Privacy

In rare cases we collect information on children under the age of 18 for the purposes of providing remittance services when they use LASCO Financial Services Limited Services. This only applies where an accompanied minor walks in to one of our stores and carries out a transaction over-the-counter. We usually only collect this information with the prior consent of the responsible parent or guardian that accompanies them.

We do not knowingly collect or solicit any additional information from children under the age of 18. If you are under the age of 18, you should not register or provide information on the LASCO Financial Services Limited Applications. If we later obtain actual knowledge that a user is under 18 years of age, we will take steps to remove that user's information from our systems. If you believe that we might have any information for or about a child under 18, please notify us using the contact format at section 5.

13. Changes to Our Notice

This notice was last updated on the 05th August, 2021. It will be updated from time to time to take into account changes to the LASCO Financial Services Limited service offerings or, for example, to reflect changes to applicable regulations.

Any changes we make will be posted on our Website. Please do check our notice to take note of any changes made. By providing us with your information, using the online services and/or any service or product offered via the online services, providing us with information at one of our Money Stores, Agents, or over the phone, or after we have changed the terms of our notice, you will be deemed to have accepted these changes. Questions, comments and requests regarding this Notice are welcomed and should be addressed to customerservices@lascoja.com or Customer Services Department/Marketing Department, LASCO Financial Services Limited-381/2 Red Hills Road, Kingston 10. Jamaica W.I.

14. Contact

You can obtain further information about your rights, or make a complaint to your data protection authority with regards to how we use your information, and this section provides contact details should you need them.

Our Data Protection Officer can be contacted at dataprotectionteam@lascoja.com.

HOW TO CONTACT YOUR LOCAL SUPERVISORY AUTHORITY

Details of the Jamaican Supervisory Authority: The Information Commissioner's Office. You can contact them in the following ways:

Phone: TBA

Email: TBA

Post: Information Commissioner's Office

Address: TBA