



PRIVACY NOTICE LASCO FINANCIAL SERVICES GROUP

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Introduction

We use this privacy notice to disclose the privacy practices of LASCO Financial Services Limited (Group) in accordance with The Data Protection Act 2020. We aim to help you understand what personal data we collect, how we use it, and what control you have over it. This notice applies solely to data collected by the LASCO Financial Services Limited Group being LASCO Financial Services Limited (LFSL) & LASCO Microfinance Limited (LASMF) This notice defines the following.

1. What personal data is collected from you.
2. How personal data is collected, used, shared, stored, and otherwise processed.
3. Your choices and rights regarding the use of your data.
4. How you can contact us for issues such as correcting inaccuracies of your data or to request the removal of your personal data.

Please read the following privacy notice to understand the processing, collection, sharing, protection, and your rights associated with your personal data.

Who We Are

LASCO Financial Services Group (LFSL Group) is comprised of LASCO Financial Services and LASCO Micro Finance Limited. The entities offer a range of financial services consisting of Cambio, Remittance & Payments, Bill Payment, Visa Prepaid Card, eCommerce Platform, Small, Medium & Micro Loans and Back to School Loans. The group consists of experts in providing solutions. The team is individualistic in nature, meaning all clients have personalized access to the services offered by LFSL Group.

For the purpose of this notice and the ACT, we act as the "Data Controller", because we determine how your personal data is used and processed.

We have appointed a Data Privacy Lead to assist with questions, requests, and complaints regarding this privacy notice and the collection and processing of your personal data. For details on how to contact us, see the Contact Information section at the end of this notice.

Data We Collect

- Full name
- Email address
- Phone number
- Address (Previous and Current)
- Applicant/ Customer's Social Media Handle
- Marital Status
- Photograph
- ID Type
- TRN
- Gender
- Nationality
- Date of Birth
- Employer's Name
- Occupation
- Occupation Tenure
- Employer's Address
- Work Email
- Work Phone Number
- Spouse's Full Name
- Spouse's Email address
- Spouse's Address
- Spouse's Email address
- Spouse's Address
- Spouse's Phone number
- Spouse's Occupation
- Referral's Name
- Referral's Email Address
- Referral's Phone number

How We Use Your Data

Your personal data is used for the following purposes:

- Client on-boarding
- Know your customer (KYC) requirements
- Legal obligations
- Internal audits
- Fulfillment of obligations outlined in any agreements
- Respond to your requests and comments
- Verifying transaction requests
- Processing your transactions
- Keeping you our clients informed

Legal Basis of Processing

To fulfill LASCO Financial Services and LASCO Microfinance Limited's contractual obligation to offer financial services in keeping with Regulatory requirements and the legislations under which the group operates. These include: -

- The Proceeds of Crime Act (2007) and its Amendments of (2013), (2019) the Principal Act
- The Proceed of Crime (Money-Laundering Prevention) Act 2007
- The BOJ Guidance Notes on The Prevention of Money Laundering and Countering the Financing of Terrorism, Proliferation and Managing Related Risks (Gazetted) June 14, 2018
- The Terrorism Prevention Act 2005 & its Amendments of 2011 & 2013
- FATF 40+9 Recommendations
- The Law Reform (Fraudulent Transactions) (Special Provisions) Act, 2013
- The Micro Credit Act 2021 & The Micro Credit Regulation 2021
- The Credit Reporting Act, 2010

How & With Whom We Share Your Data

Your personal data is shared with the following third parties, which include service providers and other members/affiliates of LFSL's Group network:

- Regulatory Authorities (e.g., BOJ, FID, MOCA, C-TOC)
- Regulated Entities (Banks, Credit Bureaus, Card Networks)
- Money Service Providers
- Transactions Processing Software for:
 - Cambio Transactions
 - Remittance Transactions
 - Loans Transactions
 - Card Payment and Processing Services
 - eCommerce Transactions
- Transaction Monitoring/ Screening Tools
- Finance and Accounting Software
- Internal, External & Independent Auditors (EY, BDO, PwC)
- Document Processing and Storage Facility
- Client Communication Services

Where We Process Your Data

Under certain circumstances, your personal data that we collect may be transferred to other countries for various purposes outlined below.

COUNTRY

United States
Storage - Software Architecture

DATA CATEGORY

Personal identifiable data – Identifying/Contact/Professional for e.g.,

PURPOSE

Amazon Online Cloud

How Long We Store Your Data

We will only retain your personal data for the duration necessary to fulfil the purposes for which it was collected, or as required by the regulatory authority or law enforcement.

Your Rights Regarding Your Personal Data

We aim to maintain data that is accurate and up-to-date. Under the circumstances that your personal data changes (e.g. moving addresses), please notify us of any changes or update to your data.

N.B. : It is your responsibility to update us on any changes to your data.

You have the legal right to the following:

- To be informed as to whether we process your personal data.
- Request all personal data we have collected about you, if any.
- Request transfer of your personal data to another data controller.
- Withdraw consent given for the processing of your personal data at any time. (only as allowed by Law)
- Object to the processing of your personal data for the purposes of direct marketing at any time.
- To ensure that no decisions having significant impact on you the data subject, are made solely by automated means.
- Request rectification of any errors or omissions in the personal data we have collected about you.

In certain instances, you have the legal right to prevent the processing or processing for a specified purpose or in a specified manner of your personal data. To exercise these rights, please contact us via email, mail, or phone as indicated below in the "Contact Information" section.

Contact Information

For any questions, concerns, or requests to exercise your rights outlined in this privacy notice, please contact us via email at DPOLasFin@lascoja.com phone at (876) 906-7473 or send a mail to us at:

LASCO Financial Services Limited
Data Protection Officer
38 ½ Red Hills Road
Kingston 10, Jamaica W.I.

Changes to This Privacy Notice

This privacy notice was last updated on October 25, 2023.

Any changes to this privacy notice can be found on our website at www.lascojamaica.com/financial