



**Effective as at:** December 23rd, 2019

MC Systems Limited endeavors to maintain the highest standards of confidentiality and to respect the privacy of our customers and associated persons who deal with us. Our commitment to privacy includes being transparent about the nature and extent of the personal data processing we undertake and the use and confidentiality of all data provided to us. This privacy statement aims to inform you about how we collect, store, use and disclose information about you when you:

- interact or use our websites;
- register and/or attend any of our events, webinars, or the conferences we host; and
- if you use any of our products, services or applications (collectively the “services”) in any manner.

If you are someone who doesn't have a relationship with us, but believe that a Subscriber to any of our Services has entered your personal data into our websites or services, you will have to contact that Subscriber for any questions or instructions you may have regarding your personal data, including where you want to access, correct, amend, or request that the user delete, your personal data.

**Changes to this privacy statement occur from time to time as the business develops and grows and adds more processing. You are encouraged to check back regularly to see any changes that may have occurred.**

### **Who we are**

MC Systems Limited is a member company of The Jamaica National Group Limited (the parent company). Our registered address is located at 10-12 Grenada Crescent, Kingston 5, St. Andrew, Jamaica. The effective management of all personal data, including its security and confidentiality, lies at the very heart of our business and underpins our practices and processes. Our aim is to consistently apply the highest standard of privacy laws to our approach as we obey all applicable laws.

## **What information do we collect?**

We gather various types of information that may identify you as an individual (“personal information”). We may collect any personal information that you choose to send to us or provide to us. For example, through registration forms for our services and data uploaded to our various cloud-based platform services, such as BizPay Central.

The types of information we may collect directly from our customers include:

- Company Incorporation Documents
- Company TRN
- Name, address and phone number
- Geographic location
- Valid Photo ID, for example a Passport, Drivers Licence or ID card
- Proof of address, for example a utility bill or credit card bill

## **How do we use the information?**

We may use the information we collect from our customers and their users in connection with the services we provide for a range of reasons, including to:

- provide, improve, operate and maintain the services;
- process and complete transactions, and send related information, including transaction confirmations and invoices;
- manage our customers’ use of the services, respond to enquiries and comments and provide customer service and support;
- send customers technical alerts, updates, security notifications, and administrative communications;
- verify customers identity and check credit with credit reference agencies;
- investigate and prevent fraudulent activities, unauthorised access to the services, and other illegal activities; and
- for any other purposes about which we notify customers and users.

## **Marketing**

Unless you have told us that you do not want to hear from us, we will send you relevant marketing information (including details of other products or services provided by us or other Group companies which we believe may be of interest to you), by mail, phone, email, text and other forms of electronic communication. If you change your mind about how you would like us to contact you, or you no longer wish to receive this information, you can have your information removed by clicking the unsubscribe link at the bottom

of each email communication or by contacting us. For the contact information, please look at the "Contact Us" section of this notice.

We may still send you non-promotional communications, for instance, administration related emails concerning your account.

**When you use the Websites:**

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;

*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.

*Log information* – we log information about our customers and their users when you use one of the services including Internet Protocol ("IP") address.

*Information collected by cookies and other similar technologies* – we use various technologies to collect information which may include saving cookies to users' computers.

For further information, please read the section headed "Cookies" in the "Your Privacy Rights" section of this statement.

We collect this information via our websites:

- to administer our website, our events and for internal operations, including troubleshooting, data analysis, testing, statistical and survey purposes;
- to improve our website to ensure that content is presented in the most effective manner for you and for your computer;
- for trend monitoring, marketing and advertising;
- for compliance purposes
- 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;
- as part of our efforts to keep our website secure.

We may access and use information from credit reference and fraud prevention agencies when you begin your subscription and periodically to:

- prevent criminal activity, fraud and money laundering;
- check your identity and verify the accuracy of the information you provide to us;
- to trace debtors and recover debts.

## **Retention policy**

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it, such as to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements.

MC Systems does not store/retain any of the digits on credit or debit cards used on the BizPay Central platform.

Data uploaded on any of our platforms may be accessed, modified, downloaded and deleted by the subscriber and our retention policy for such data where an account falls into disuse is communicated to you in the terms of use of that platform.

## **How do we use your information and control access to third parties?**

We do 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:

- to our business partners, but only to the extent you have purchased product or service from such partner, interacted with such partner or otherwise authorized the sharing, or where required for your desired product or service. If you ask us to, we will share information with any third party that provides you with account information or payment services. If you ask a third-party provider to provide you with account information or payment services, you're allowing that third party to access information relating to your account. 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.
- we may share your information with the Police, National Crime Agency or Her Majesty's Revenue and Customs (HMRC) if requested to do so;
- we may share your information to enforce our rights, protect our property, or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will also disclose Personal Data when required to do so for compliance purposes or by law, such as in response to a subpoena, including to law enforcement agencies and courts;
- we may share your information with third party vendors, consultants and other service providers who we employ to perform tasks on our behalf;

- 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;
- 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;
- In the event that any additional authorised users are added to your account, we may share information about the use of the account by any authorised user with all other authorised users.

If MC Systems receives your personal information and subsequently transfers that information to a third-party agent or service provider for processing, MC Systems remains committed to ensuring that such third-party agent or service provider processes your personal information to the standard required to meet the applicable privacy laws.

### **Linked Websites**

For your convenience, hyperlinks may be posted on the website that link to other websites. 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 notice of each linked site that you visit to understand how the information that is collected about you is used and protected.

### **Jamaica National Group Companies:**

We may also share your personal data with our parent company or group company for the purposes consistent with this Privacy Notice. When we send your data to our group companies outside of the EU, you are protected by model contract clauses.

### **Security**

We use appropriate technical, organizational and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorised access, disclosure, alteration and destruction. Our website supports TLS 1.2, transaction security. We have written procedures and policies which are regularly audited, and the audits are reviewed at senior level.

## Cookies

We use cookies and other internet tracking software to collect data while you are using our websites or mobile apps. Cookies allow us to store information about the computer device you use to access our website so that you can conduct business with us easily. They allow us to recognise when you revisit our websites and to evaluate our websites' advertising and promotional effectiveness. We use both our own (first party) and partner companies' (third party) cookies to support this activity.

We do not use Cookies to:

- track your Internet usage after leaving the website or
- store personal information others may read and understand.

Processing of personal data associated with the use of these cookies occurs based on

You set your browser's setting to deactivate cookies. If you use that option, some functions of this website (e.g. login, memory of preferences etc.) may not be available. Detailed guidance on how to control cookies preferences for the most common browsers can be found at:

[Google Chrome](#)

[Mozilla Firefox](#)

[MacOS Safari](#)

[Microsoft Internet Explorer](#)

For other browsers please see [allaboutcookies.org](http://allaboutcookies.org)

You also have the option to install the Google Analytics opt-out browser add-on and thereby deactivate the use of Google analytics cookies and the associated data processing. You can find the Opt-out browser add-on here.

<https://tools.google.com/dlpage/gaoptout>

### **Contact Us - How Can I Contact You regarding my Privacy Rights?**

You can always opt not to disclose information to us, but keep in mind some information may be needed to access our Services.

If you would like to access, review, update, rectify, and delete any personal information we hold about you, or exercise any other data subject right available to you, our support team will examine your request and respond to you as quickly as possible. You may contact our support team at [bizpaysupport@mcsystems.com](mailto:bizpaysupport@mcsystems.com).

Please note that we may still use any aggregated and de-identified personal information that does not identify any individual. We may also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.