



## **DOLLA FINANCIAL SERVICES LIMITED CUSTOMER PRIVACY NOTICE**

### **1. Introduction**

At Dolla Financial Services Limited (“Dolla”), we are committed to protecting the information we hold about you. This Customer Privacy Notice applies to a person’s personal information held by Dolla as Data Controllers under the Data Protection Act 2020 (“the DPA”). This Customer Privacy Notice describes what information we collect about you, how we may use it, who we share it with, the circumstances under which it is shared and most importantly, your rights relating to it. It further details what steps we will take to ensure that, at all times, your information is kept private and secure. This notice continues to apply even after your agreement for our services ends.

#### **Wherever we say ‘you’ or ‘your’, this means: -**

- You;
- Any authorised person on your account;
- Anyone who does your banking or deals with us for you, for example, trustees, executors or attorneys under a Power of Attorney; or
- Other related people, for example, authorised signatories, partners, members, and trustees

When we say “we”, we mean Dolla Financial Services Limited and its subsidiaries, which acts as a data controller for your personal data.

### **2. What information we collect**

At Dolla, we only collect information relevant to providing you with our services. The information we hold about you will often come from you directly (for example, when you apply for one of our loan products). That information may include the following: -

- **Your personal details** (For example, your name, date of birth, and other identification information.)
- **Your contact details** (For example, your address, phone number and email address.)
- **Information concerning your identity** (for example, tax registration number, national ID card and copy of driver's license.)



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- **Proof of Income/Assets** (such as payslips, bank statements and motor vehicle and property titles.)
- **Proof of Employment**
- **Character References**
- **Other information that you give us** by filling in forms or by communicating with us, whether face-to-face, by phone, email, online, or in other ways.

If information is uploaded to our systems in connection with the services, we retain this information in line with our Data Retention Policy.

### **3. What we use your information for, and the legal basis for doing so**

At Dolla, we may use the information collected from you for varying reasons. These may include: -

- Provide, operate and maintain services offered.
- Process and complete transactions.
- To send you notifications and of outstanding payments to be made reminders (if necessary).
- To send updates relating to the services being provided to you.
- Manage your use of our services, respond to your enquiries or comments and provide you with customer service and support.
- To investigate and prevent illegal activities.
- To carry out credit checks.
- Manage risk to ensure security and business continuity.
- To satisfy debts owed to us

### **4. Legal Basis**

We must have a legal basis or a lawful reason to process your personal data. In most cases, the legal basis will be one of the following:



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- To allow us to take actions that are necessary for us to provide you with the product or service you want (for example, creating customer accounts and processing and fulfilling transactions);
- To allow us to meet our legal obligations (for example, getting proof of your identity to meet our anti-money laundering obligations);
- To protect our legitimate interests (for example, to understand how customers use our services so we can develop new services and improve the services we currently provide); or
- We have your permission to use your information.

### **5. Compliance with laws and regulatory compliance obligations**

We may use your information to meet our compliance obligations. We may also use it to comply with other laws and regulations. At times, we may be required to share your information with regulators and other government bodies that our operations are subject to. This may include using it to help detect or prevent crime (including terrorism financing, money laundering and other financial crimes). We will only do this if it is needed to comply with a legal requirement in our legitimate interests and that of others or to prevent or detect unlawful acts.

### **6. Marketing**

We may use your information to provide details about our products and services. We may send you marketing messages via email, telephone, text, secure messages or social media. You can change your mind about how you receive marketing messages or stop receiving them at any time. To make that change, you may contact our marketing department at [marketing@dollafinancial.com](mailto:marketing@dollafinancial.com). If you ask us not to send you marketing communication, it may take us a short period of time to update our systems and records to reflect your request. During this time, you may continue to receive marketing messages. If you tell us not to send you marketing messages, we may continue to use your contact details to send you important notifications subject to your agreement for our services or if we need to inform you of something to comply with our regulatory obligations.



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### **7. Who we might share your information with**

We will keep your information confidential, but we may share it with third parties who also must keep it secure and confidential. Your information may be shared with the following persons: -

- Providers of payment processing services and other businesses that help us process your payments.
- Government agencies such as the Tax Administration of Jamaica, Stamp Office, National Land Agency, Real Estate Brokers etc.
- Debt collectors or recovery agencies who may assist with recovering collateral due to default on loan payments.
- Regulatory Bodies such as the Bank of Jamaica, the Financial Service Commission or Financial Investigations Division.
- Auditors who examine and analyse our records for business purposes.

### **8. How long we keep your information for**

We keep your information in line with our Data Retention Policy. We will keep your personal data as long as you are our customer. Once our relationship with you has ended (for example, after your account has closed, or your application for a product is refused, or you decide not to go ahead with an application), we will only keep your personal data for a period that is appropriate for the type of personal data, and what we hold it for. This is usually seven (7) years from when our relationship ends. This allows us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes, such as managing your account and dealing with any disputes or concerns that may arise. We may need to keep your information longer where we need the information to comply with regulatory or legal requirements, help detect or prevent fraud and financial crime, answer requests from regulators, etc. If we do not need to keep information for this length, we may destroy, delete or anonymise it sooner.

### **9. Your rights**



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You have certain rights relating to your personal data. These include the right to: -

- a) Be informed about how your personal data is being processed.
- b) Request access to your personal data.
- c) Consent and withdraw consent.
- d) Request the correction or rectification of your personal data.
- e) Object to the processing of your personal data.
- f) Request transfer of your personal data.
- g) Require that your personal data is not subject to automated decision making only.

Your ability to exercise these rights will depend on a number of factors. In some instances, we will not be able to agree to your request (for example, if we have a legitimate reason for not doing so or the right does not apply to the particular information we hold about you). If you want more information on your rights or want to exercise them, contact us at [compliance@dollafinancial.com](mailto:compliance@dollafinancial.com).

### **10. What we need from you**

You are responsible for ensuring the information you give us is accurate and up to date, and you must tell us if anything changes as soon as possible.

### **11. How we keep your information secure**

We use a range of measures to keep your information safe and secure, which may include encryption and other forms of security. We require our staff and any third parties who carry out any work for us to comply with appropriate compliance standards, including obligations to protect any information and apply appropriate measures for the use and transfer of information.

### **12. How to contact us**

If you have any questions about our privacy notice, you may contact our Chief Privacy Officer at: -



## **DOLLA FINANCIAL SERVICES LIMITED CUSTOMER PRIVACY NOTICE**

**Dolla Financial Services Limited**

**88 Barbican Road**

**Kingston 6**

**Email: [compliance@dollafinancial.com](mailto:compliance@dollafinancial.com)**

**Telephone: 876-927-4881**

If you are unhappy about how we have dealt with your privacy, you may contact our Chief Privacy Officer or file a complaint at the Office of the Information Commissioner.

### **13. Changes to our Privacy Notice**

This Privacy Notice may be updated from time to time. You are encouraged to check back regularly to see any changes that may have occurred.

This notice was last updated in **October 2023**.