



Privacy Policy

Introduction

At Jamaica Urban Transit Company (JUTC), we are deeply committed to safeguarding the privacy and ensuring the utmost security of your personal information. As a company that collects and uses personal data as part of our business processes, we understand our obligations to all our internal and external customers, referred to as data subjects under the Data Protection Act of Jamaica 2020. This Privacy Statement offers comprehensive details on the gathering, processing, and storage of personal data, including sensitive personal information. It will be reviewed alongside other privacy statements tailored to various categories of data subjects, which may be periodically created.

Information We Collect

- **Customers/Smarter Card Holders** For customers who acquire or seek to acquire a bus card (Smarter Card) or reserve charter services, JUTC collects personal data such as your name, address, telephone number, email address, age, and proof of age (for concession cards).
- **Suppliers/Contractors** From our suppliers, service providers, contractors, and other persons doing business with the company, we collect data including name, Taxpayer Registration Number (TRN), address, telephone number, email address, tax compliance certificate, and banking details. For merchants seeking approval from JUTC to top-up Smarter Cards for customers via POS systems, we collect the company name, company documents, contact email, proof of address for the business owner, and a police record.
- **Sub-Franchise Operators** For applicants for sub-franchise licenses, we collect personal data including TRN/driver's license, name, address, contact information, vehicle registration information, and insurance details.
- **Employees** From our employees, we collect data necessary for employment purposes, such as name, contact details, employment history, TRN, National Insurance Scheme (NIS) number, banking details, and information related to performance and conduct.
- **Website Users** Upon visiting our website, you can explore its content without disclosing any personal data. We collect personal data from you only when you voluntarily provide it, such as when you register, book charters, or submit forms like the Sub-Franchise License Application and Renewal. The types of information we collect include:
 - **Personal Information:** Your name, contact information, and payment specifics when using our services.
 - **Anonymous Data:** Information that is not connected to your personal data, such as browser details, and other usage information. Cookies may be used to gather user data to improve your experience on JUTC's website.
- **Information Collected automatically** Closed Circuit Television Systems (CCTV) are installed across our premises to uphold the security and safety of our staff, customers and visitors. This includes all locations affiliated with JUTC. Additionally,

our websites may capture personal and usage information for certain data subjects such as customers and sub-franchise operators.

How We Use Your Information

- **Providing Services** We use your data to fulfil your requests for services, such as booking charters or processing Sub-Franchise License Applications and Renewals.
- **Improving User Experience**, We utilize non-personal information to enhance the functionality and user experience of our website.
- **Security Measures** To ensure the security of our cloud-based applications, we implement robust security measures such as firewalls and Secure Sockets Layer (SSL) encryption in website communication.

Legal Bases for Processing Personal Data

- **User Consent:** We seek your explicit, informed, and voluntary consent before processing your personal data, except when processing is necessary due to legal obligations, safeguarding vital interests, public interest, or aiding in the administration of justice. You can withdraw your consent at any time by contacting us via the provided email or phone number.
- **Contractual Obligation:** We process your personal data to fulfill our contractual commitments to you or when considering entering into a contract.
- **Legitimate Interest:** We process your personal data based on our legitimate interest in efficiently delivering and promoting our services, provided it does not pose potential risks to your rights, freedoms, and vital interests.
- **Public Interest:** We process your personal data for tasks carried out in the public interest, such as promoting education access, social fairness, environmental responsibility, and children's well-being. This includes gathering basic personal details from children in line with our dedication to promoting education access, social fairness, environmental responsibility, and children's well-being, we gather basic personal details from children, such as their names and dates of birth. This data is essential for administering Smarter concession cards, which enable affordable transportation services throughout Kingston, St. Andrew, and St. Catherine. Our initiative is firmly grounded in serving the community's best interests, ensuring that every child can readily access transportation for educational and social engagements. While we acknowledge the significance of this service, we uphold strict adherence to data protection regulations to safeguard privacy rights.
- **Legal Obligation:** We may process your personal data to comply with legal requirements, including investigating financial crimes, fraud, and threats, and sharing data with law enforcement and regulatory bodies.

Data Security

- Ensuring the security of your data is of paramount importance to us at JUTC. We have implemented stringent measures to protect all data, which is stored in secure databases fortified with the latest layers of protection, including firewalls, anti-virus software, and encryption. Access to these databases is restricted solely to authorized personnel based on their position, managed through systems like Windows Active Directory and overseen by designated system administrators.
- Our website, hosted by the Jamaica Information Service (JIS), allows customers to book and pay for charters and manage Sub-Franchise License Applications, all secured with Secure Sockets Layer (SSL) encryption. Additionally, we commit to continuous staff training on data security protocols, ensuring that all electronic access is governed by strict user rights.
- Despite our best efforts, no method can be deemed 100% failsafe, but we remain dedicated to maintaining the highest standards of security and confidentiality. All personal data is securely stored in locked filing cabinets or on the Company's protected server system.

Your Privacy Rights and Choices

You have several rights under the Data Protection Act concerning your personal data, including:

- The right to be informed about how your personal data is being processed.
- The right to request access to your personal data.
- The right to consent and withdraw consent.
- The right to request the rectification of your personal data.
- The right to object to the processing of your personal data.
- The right to require that your personal data is not subject to automated decision-making only.

To exercise any of these rights, please contact us via the provided email or phone number. Please note that we may require you to provide sufficient personal data to allow us to identify you, which will only be used for this purpose. We will respond to your request within thirty (30) days. If we are unable to fulfill your request, we will provide an explanation for the refusal.

Third-Party Disclosure

We do not engage in the sale, trade, or transfer of your personal information to third parties without your explicit consent. However, we may share your information with trusted third parties who assist us in operating our website or providing services, always in compliance with the Data Protection Act of Jamaica 2020.

Retention of Personal Data

JUTC commits to retaining data for no longer than necessary, in accordance with the law and other Government of Jamaica rules, for statutory obligations, accounting, reporting, or auditing purposes. Specifically, the retention period for such data is set at 7 years. *Therefore:*

- Personal Data collected for purposes related to the performance of a contract between the data subject and the controller shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the data controller's legitimate interests shall be retained as long as needed to fulfil such purposes.

JUTC may retain Personal Data for an extended period if the data subject consents to such processing, provided that the consent is not withdrawn. Additionally, JUTC may be required to keep Personal Data longer to meet legal obligations or comply with an authority's order. Once the retention period ends, the Personal Data will be deleted, and certain rights may no longer be enforceable after that period.

Notifiable Data Breaches

We take data breaches very seriously and will meet the 72-hour deadline, as required by the Data Protection Act, to report any data breach to the Information Commissioner. If there is likely to be a high risk to your rights, we will contact you without undue delay.

Children's Privacy

Our services, except for Smarter Cards, are not available to individuals under the age of 18 unless they have obtained parental or guardian consent. Any data contravening this condition will be promptly removed. If you become aware of a situation where a child has provided us with information without the necessary parental or guardian consent, please reach out to us.

Links to Other Websites/Third-Party Content

Our website may include hyperlinks directing you to other websites. We are not accountable for the privacy practices of these sites, and this statement does not extend to any linked sites or companies outside of our ownership or control. Linked sites may gather information beyond what is collected on our website. We advise you to locate and review the privacy policy of each linked site you visit to understand how your information is collected, utilized, and safeguarded.

Marketing

If you have not informed us that you prefer not to receive communications, we will send you pertinent marketing information via mail, phone, email, text, and other electronic means.

Should you wish to alter your contact preferences or opt-out of receiving such information, you can unsubscribe using the link provided at the bottom of our emails or by contacting us.

We will always obtain your explicit consent before publishing any image, audio recording, or video of any data subject on our website.

Viewing and Maintaining Personal Data

Existing users can access and manage their personal data using our Customer Portal. Should you wish to make any modifications, you can conveniently do so through the portal. For any inquiries regarding the data we retain, please contact us.

Changes to this Privacy Statement

We retain the right to update and modify this statement as deemed necessary. Any amendments will take immediate effect upon posting on our website. You are responsible for periodically reviewing this statement.

We welcome your comments or questions regarding this Privacy Statement. If you have a question or comment regarding this statement or you would like to make a complaint, please contact us at:

(876) 749 – 3192 – 9 ext. 66210

rwrattray@jutc.com.jm

If you are not satisfied with the way that we have handled your complaint, you have the right to raise the matter with the Information Commission using the contact details below:

Information Commissioner's Office

The Masonic Building (2nd Floor)

45 - 47 Barbados Avenue

Kingston 5, Jamaica

(876) 920 - 4390

info@oic.gov.jm