



Data Privacy Policy Notice

Introduction

Islandsmiles respects the privacy rights and security of our clients', employees' and other stakeholders' personal data. We are committed to taking the highest level of care to safeguard personal data in our possession.

This Privacy Notice outlines how Islandsmiles collects, processes, and protects personal data in compliance with the Jamaican Data Protection Act (JDPA) and give details on the following:

- How personal data is collected from our clients.
- The type of personal data collected.
- Legal Basis for processing your personal data.
- Data storage and security implemented to protect your personal data.
- Data Subject Rights.
- Data Sharing
- How you can contact us for issues such as correcting inaccuracies/ removal of your personal data

How Personal Data is collected

Islandsmiles will collect pertinent personal data that you voluntarily provide:

- In-person at our locations.
- Via telephone, emails, forms, chat functions, social media platforms, and other interactions that take place remotely.
- When you request information about our products and services.
- When conducting any business with us.

Data Collection

Islandsmiles will collect personal data in a lawful and transparent manner. The types of data collected may include but is not limited to:

Clients' data:

- **Personal Information:** Name, TRN, contact number, address, email, date of birth (DOB), gender, nationality, client's dentist, emergency contact and referral person.
- **Medical Information:** Treatment records, health and medical history.
- **Financial Information:** Payment and insurance details.

Legal Basis for Processing your Personal Data

Islandsmiles will process personal data under the following legal bases:

- **Consent:** The data subject has given explicit consent to the processing of their personal data.
- **Contractual Necessity:** Processing is necessary for the performance of a contract to which the data subject is a party.
- **Legal Obligation:** Processing is necessary for compliance with a legal obligation to which Islandsmiles is subject.

- **Legitimate Interests:** Processing is necessary for the legitimate interests pursued by Islandsmiles, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

Data storage and Security

Islandsmiles will implement appropriate technical and organizational measures to protect personal data from unauthorized access, accidental loss, destruction, or damage. These measures include:

- **Data Storage** Personal data is stored both on a local server and in the cloud for redundancy.
- **Data Backup:** Personal data is backed up daily
- **Encryption** of all personal data
- **Access Controls:** Limiting access to personal data to authorized personnel only.
- **Users' Access Level Control** Setting authorized personnel access level according to their respective duties and responsibility
- **Regular Security Audits:** Conducting regular audits of data security practices.
- **Data Breach Procedures:** Implementing procedures to detect, report, and investigate data breaches.

Personal data will not be shared with third parties unless it is legally required or necessary for the performance of critical support services by third parties. Only the minimum personal data required to complete their specific support services is provided. Any third party service providers who process data on behalf of Islandsmiles will be required to sign a non-disclosure agreement with Islandsmiles. All employees are also subject to confidentiality agreements and undergo training on proper handling of personal and sensitive information.

Data Subject Rights

Data subjects have the following rights under the JDPa:

- **Right to be Informed:** The right to know how their personal data is being processed.
- **Right of Access:** The right to access their personal data and obtain information about how it is being used.
- **Right to Rectification:** The right to have inaccurate personal data corrected.
- **Right to Restrict Processing:** The right to restrict the processing of their personal data in certain circumstances.
- **Right to Data Portability:** The right to receive their personal data in a structured, commonly used, and machine-readable format and transmit it to another controller.
- **Right to Object:** The right to object to the processing of their personal data on grounds relating to their particular situation.
- **Rights to Lodge a Complaint:** The right to lodge a complaint with the Office of Information Commission (OIC) if there is violation of data privacy or an unresolved dispute

You may exercise any of the following rights available to you by contacting us using the information found in the “How to contact us” page on our website.

We will examine your request and respond to you as quickly as possible, and in accordance with the relevant law.

How to Contact Us

Any questions, concerns, or complaints regarding this privacy notice or how we use your personal data, you may contact us via the information below:

Virtual Tech Training and Services Ltd.
Data Protection Officer
Telephone: 876-324-2302
Email: coordinator@virtualtechtrainer.com

If you are not satisfied with how we have handled your complaint, you have a right to raise the matter with the Office of Information Commissioner using the contact details below:

Islandsmiles reserves the right to make changes to this privacy notice as warranted to ensure that it accurately reflects the way that we collect and use your personal data.
