

VM INNOVATIONS LIMITED PRIVACY POLICY- TURNKEY PLATFORM

Last updated: July 30, 2024

General

In this Privacy Policy, “I”, “We” “Our” and “Us” refer to **VM Innovations Limited (or “VMI”)**, its agents and its Affiliates, while “Licensee” “You” and “Your” refer to the authorized user(s) of the TurnKey Platform (the “**Service**”). The Website and System are owned and operated by **VM Innovations Limited** located at **8-10 Duke Street, Jamaica, West Indies**, a wholly owned subsidiary of The VM Building Society. VM Innovations Limited will seek to ensure the highest level of security and privacy regarding the collection and use of customers’ personal information, as well as visitors to its website(s). We take your right to privacy very seriously and will not disclose information about you to anyone, except in instances where we have your consent, or where we are compelled or allowed by law to do so. If you decide to provide us with any information, then you expressly authorize us to use that information in accordance with this policy. This Privacy Policy forms part of and must be read in conjunction with the Terms and Conditions for the Service/Website, and any other website connected to the use of the Service. **By using the Service you are indicating that you have carefully read and understood the requirements under this Privacy Policy and confirm your agreement to comply with, be bound by, and be deemed to be bound by this Privacy Policy and the Terms and Conditions and any updates or modifications to same. DO NOT DOWNLOAD OR USE THIS SERVICE IF YOU DO NOT ACCEPT OR AGREE WITH THE PRIVACY POLICY AND/OR THE TERMS AND CONDITIONS.**

How information is collected

We collect information about you, which you provide to us through our offices, services, applications, websites, and written communications to us. In addition to the personal and financial information you submit (or we collect), we may collect information about your computing including, where available, your IP address, and operating system and browser type. We may also record and/or monitor calls for quality checks and staff training. We reserve the right to restrict or disallow any person from using any of its Services at any time, or from time to time as we deem fit.

How long we retain personal data/information

Any Personal data that we collect, access or process will be retained only for as long as is necessary for the fulfillment of the purposes for which it was collected and, in any event, currently for **seven (7) years** after the later of the last commercial transaction or commercial communication with you, unless otherwise provided in agreements between you and VM Innovations Limited, or as required or authorized by law. Personal

data that is no longer required to fulfill the identified purposes and for our retention purposes will be destroyed, erased or de-identified.

How we use information about you

The collection of non-identifying information assists VM Innovations Limited with compiling statistics and determining the level of interest in our Service and/or Website. Some areas of the Service and/or Website may use a “cookie”, temporarily stored in the visitor’s computer memory (RAM) to allow the web server to log the pages used within the site and/or Service and to know if a visitor has previously visited the site. Unless otherwise required by law, these cookies will be placed when you visit the site or Service. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some features of our services. For the Service, we will use your personal information to take steps to enter into a contract with you and/or to perform the contract we have with you. We will use your information to maintain your business relationship with us, to also help identify, develop, or improve products that may be of interest to you or to implement safeguards for your protection or ease of business. We will use your personal information to contact you by either email, SMS, letter, telephone or in any other way about products and services or to solicit feedback on service delivery; unless you tell us that you prefer not to receive any marketing information or for us to make contact. The information will be used to enable us to monitor and analyze our business and carry out market research. This information may be provided to independent external bodies such as governmental departments and agencies only when required by law. Your data may also be used for other purposes for which you give your permission or where we are permitted to do so by law or it is in the public interest to disclose the information or is otherwise permitted under the terms of the Data Protection Act (Jamaica) 2020, its regulations or other applicable Data Protection laws.

Your right to object to direct marketing websites

You have the right to object to direct marketing. Please inform us of your objection by either emailing us at vmi-admin@myvmgroup.com. Additionally, if you do not wish to be notified by telephone or postal mail regarding additional products, services, events, programs, and offers that we believe you may find of interest, you may opt-out from such communications by emailing us at vmi-admin@myvmgroup.com.

Information we share

We will keep your personal information confidential and only share it with others for the purposes explained in this policy or otherwise with your consent. You agree that VM Innovations Limited is permitted to share information about You and your account with our Affiliates, Payment Gateway Provider (s), Card Networks, other financial institutions, and government authorities/agencies for:

- for compliance and regulatory purposes;
- to conduct risk assessments (including the prevention, investigation, detection or prosecution of unlawful activities);
- for maintenance of the Services or efficient management of same;
- in order to assist such entities to update or create your customer records in an effort to provide more efficient service to you; and
- use in relation to their Agreements with us, to facilitate the relevant services, create reports or perform analytics, operate and promote their business, or for any other lawful business purposes.

We cannot, and do not, warrant or guarantee that any personal information that you provide on and in connection with the Service or Website will not be accessed, viewed, or used by unauthorized persons.

Access to your own information

You have the right to request a copy of the information which we hold about you, which you can make by writing to vmi-admin@myvmgroup.com. We may charge an administrative fee when a request is manifestly unfounded or repetitive. We may also charge a further administrative fee when you request for us to provide further copies of the information already provided to you. It is to be noted that you have the right to request access to your personal information in a machine-readable format such as Excel or CSV file if you require.

Rectify inaccurate information

We want to make sure that your personal information is accurate and up-to-date. You may ask us to correct or remove information you think is inaccurate. We will respond to your request within one (1) month of receiving your request.

Your right to restrict processing

You have the right to request that we restrict how we use your personal information. For example, if you want us to use your personal information for some purposes and not for others. You can do so by emailing us at vmi-admin@myvmgroup.com or writing to us at VM Innovations Limited, **8-10 Duke Street, Jamaica, West Indies**.

Your right to erasure

You have the right to request that we erase your personal information in certain circumstances such as when it is no longer required to meet the purpose we initially collected your personal information. You can do so by emailing us at vmi-admin@myvmgroup.com or writing to us at

Your right to withdraw consent

You have the right to withdraw your consent at any time. You can do so by emailing us at vmi-admin@myvmgroup.com or writing to us at writing to us at VM Innovations Limited, **8-10 Duke Street, Jamaica, West Indies**.

Right to make a complaint to the Information Commissioner's Office.

You have the right to make a complaint to the Information Commissioner's Office (ICO) established under section 4 of the Data Protection Act (Jamaica) 2020 if you are unhappy about how we handle your personal information. The ICO is an independent organization that protects individual's data and privacy rights.

Transfer of information

Your personal information is domiciled on our servers in Jamaica. We ensure the information is held securely to commercially acceptable standards.

Third party links

Our website contains links to third party websites of other companies within the VM Group. If you follow a link to any of these websites, please note that these websites maintain similar terms and privacy policies. This Service may provide you with hyperlinks to other websites or applications which are neither owned nor maintained by VM Innovations Limited and have separate terms and conditions governing their use. Please take the time to carefully read those separate requirements when you enter other websites via such hyperlinks. VM Innovations Limited shall bear no liability whatsoever for anything displayed on such linked websites and/or for their availability, or use. It is agreed and understood that any use of such links by you will be entirely at your own risk.

Security

We will use or best endeavours to implement appropriate technical and organizational measures to protect your Personal data against unauthorized access and disclosures. However, third parties may unlawfully intercept or access transmissions or private communications, and other users may abuse or misuse your Personal Information that they collect from the Website or the Service. Therefore, although we take great care to protect your privacy, the confidentiality of any communication or material transmitted to/from VM Innovations Limited through the Website or the Service, or via e-mail, cannot be guaranteed.

Changes to our policy

We keep our Privacy Policy under regular review and reserve the right to modify same at any time, and from time to time. We will place any updates on this webpage <https://www.helloturnkey.com/>. Your continued use of the websites and

Services after such changes will be subject to the then-current policy. If we make changes to this policy that are materially less restrictive on our use or disclosure of personal information we have collected, we will attempt to obtain your consent before implementing the change. We encourage you to periodically review this policy to stay informed about how we collect, use, and disclose personal information.