

WHO WE ARE

MWC Associates Limited (collectively “MWC”, “we”, “us” or “our”) is the data controller and is responsible for the processing of your personal data. MWC values your privacy and is dedicated to safeguarding your personal data. This privacy notice will explain how we process your personal data in our capacity as a controller (i.e. when MWC determines the purposes and means for the processing of personal data) as well as inform you about your privacy rights under the Data Protection Act, 2020 (DPA). This privacy notice applies to <https://www.mwcassociatesjm.com/> and <https://jamaica.actioncoach.com/>.

WHAT PERSONAL DATA DO WE COLLECT?

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** which includes your Full name and Date of Birth.
- **Contact Data** which includes your billing address, delivery address, email address and telephone numbers.
- **Financial Data** which includes payment card details.
- **Transaction Data** which includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** which includes internet protocol (IP) address, time zone setting and location, browser type and version, operating system and platform, and other technology or the devices you use to access our website(s).
- **Usage Data** which includes information about how you use our website(s), products, and services.
- **Marketing and Communications Data** which includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Sensitive Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We may collect **Business Information** which includes details about your business or company. This does not include personal data.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- a) Direct Interactions. You may give us your personal data by filling out forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you:
 - i. Sign up for our coaching programs, events including webinars and seminars and/or workshops on this website or on <https://jamaica.actioncoach.com/>; or any of our marketing opt-in pages.
 - ii. Make orders on our web shop (<https://shop.mwcassociatesjm.com/>);
 - iii. Subscribe to our newsletters or publications; and
 - iv. Give us feedback or contact us through our website and/or landing pages.
- b) Automatic technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data in accordance with specific legal bases, for instance:

- a) For the performance of a contract in which we have entered with you or for the taking of steps to enter into a contract with you on your request;
- b) To register you for any events (online or in-person) that you have signed up for using our various marketing opt-in pages.
- c) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- d) Where we need to comply with a legal obligation; and
- e) Where we have obtained your consent.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) Identity (b) Contact	Performance of a contract with you

<p>To process your membership and to process and deliver your order from our shop including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover sums due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy notice</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

	(f) Marketing and Communications	
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MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You will receive marketing communications from us if you have signed up for and/or used our services and you have not opted out of receiving that marketing. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you **OR** by contacting us at [insert email address].

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

DATA SHARING

MWC may utilize coaching platforms such as the ActionCOACH theCOM Portal and Engage and Grow Portal to assist coaches and their clients achieve their business objectives. This may involve sharing of your personal data and transferring of your personal data outside of Jamaica.

We have set out a table below of all the entities (including those which fall into the category above) to which we share your personal data.

ENTITY	TERRITORY
ActionCOACH Global	Nevada, United States of America
Engage and Grow Global Limited	Australia

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

DATA SECURITY

We have implemented appropriate measures to safeguard your personal data, preventing accidental loss, unauthorised access, alteration, or disclosure. Access is restricted to authorised

personnel with a legitimate business need, and they process the data under our instructions, bound by confidentiality obligations.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. The specific retention period will vary according to the purpose of processing and in keeping with our data retention policy. After the retention period, your personal data will be permanently erased, or we may anonymise your data so that it can no longer be associated with you.

YOUR LEGAL RIGHTS

You have the following rights under the Data Protection Act:

- The right to request a copy of the personal data that we hold about you.
- The right to ask us to rectify any inaccuracies in the personal data we hold about you.
- The right to object or to prevent the processing (or further processing) of your personal data in certain circumstances.
- The right to withdraw consent to marketing.
- The right related to solely automated decision-making including profiling. We do not use automated decision-making processes that would significantly affect you. But, if we did, you have the right to human intervention, to be informed of the logic of the decision and to have the decision reconsidered.
- The right to data portability to transfer your data to another controller.

If you wish to exercise any of the rights set out above, please contact us at info@mwcassociatesjm.com. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

THIRD-PARTY LINKS

Our websites (jamaica.actioncoach.com & mwcassociatesjm.com) may include links to third-party websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices or their privacy policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

CHANGES TO THE PRIVACY NOTICE

We keep our privacy notice under regular review. This version was last updated on [DATE]. We will contact you if we make significant changes to this NOTICE.

CONTACT US

If you have any questions about this privacy notice or our privacy practices, you may contact us at info@mwcassociatesjm.com.