



Data Protection Policy

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**DATA PROTECTION POLICY
ORION LOSS ADJUSTERS LIMITED**

1. Introduction

1.1 This Data Protection Policy (“this Policy”) outlines how Orion Loss Adjusters Limited (“Orion”) processes your personal data in compliance with the Data Protection Act. 2020 and its attendant regulations (“the DPA”).

2. Scope

2.1 This Policy applies to all our employees, contractors, and third parties who have access to personal data, whether electronic or manual, processed by Orion.

3. Data Processing

3.1 We process your personal data to deliver the services you request from us. Orion will collect personal data fairly and lawfully and shall only process personal data that is relevant for specified and lawful purpose/s. Personal data will be processed in compliance with the consent of the individual concerned or other relevant provisions of the DPA.

3.2 The personal data we collect will depend on the service you desire, but will generally include, your name, residential address, telephone number, email address, vehicle information and driver’s licence information.

3.3 The personal data are processed to: i) establish your identity; ii) enable the provision of the service you require; and iii) provide you with information regarding the service you require.

3.4 In order to keep your personal data accurate and up to date, all data you provide to us must be true, complete and accurate.

4. Data Retention and Disposal

4.1 Personal data will not be retained for longer than is necessary for the purpose/s. Orion will develop policies and implement procedures specifying, among other things, clear retention periods and procedures for ensuring personal data, when no longer needed:

- i) cannot be further processed or used to identify, or be linked to, your personal data; and
- ii) is permanently deleted or anonymised.

5. Data Security

5.1 Orion will implement appropriate technical and organisational measures to protect personal data from unauthorised or unlawful processing, or accidental loss, damage

or destruction. These measures will include encryption, access controls, firewalls, and regular security assessments.

6. Data Transfers

- 6.1 Orion may share your personal data with third parties such as service providers, contractors and third party vendors. Personal data sharing with external parties will be governed by contractual agreements that ensure compliance with data protection.

7. Data Subject Rights

- 7.1 You have been given certain rights under the DPA. These rights are as follows:

- a) **Right of Access.** You have a right to be informed whether your personal data is being processed, and for a fee, to be provided with the data and to be informed of the logic involved in a decision.
- b) **Right of Data Portability.** You have a right to have your personal data transmitted to another data controller personal data in a structured, commonly used and machine-readable format. However, this transmittal must be technically feasible.
- c) **Right to Prevent Processing.** You have the right to request that Orion refrains from or halts processing of your personal data. This right is exercisable where the:
 - processing is causing or is likely to cause unwarranted substantial damage or distress;
 - your personal data is incomplete or irrelevant;
 - processing or the purpose for processing is unlawful; or
 - your personal data has been retained for longer than required.
- d) **Right to Prevent Direct Marketing.** You have the right to not have your personal data processed for the purpose of direct marketing unless you give written consent, or you are a customer of Orion. If you are a customer, we may only process your personal data if:
 - your contact details were obtained in the context of the provision of any of our services;
 - our own similar services are being direct marketed; and
 - at the time the personal data was collected and on each occasion of direct marketing, we provided you with a reasonable opportunity to object, free of charge, and without unnecessary formality to being direct marketed.
- e) **Right not to be subject to automated decision-making.** You have a right to request that Orion avoids making a decision pertaining to you solely based on

automated processing results. However, Orion does not make decisions without human involvement.

- f) **Right to rectification/correction.** You have the right to ask Orion to correct any inaccuracies, including any errors or omissions, in the personal data we process.

7.2 Orion will provide a transparent process for you to exercise your rights and will promptly respond to any requests. You may exercise your rights by using the forms contained the First Schedule of the Data Protection Regulations, 2024 and which are available on our website.

8. Data Breach Response

8.1 In the event of a data breach, Orion will follow a documented incident response plan. This plan will include notifying the relevant authorities (to include the Office of the Information Commissioner (OIC)) and affected individuals, as required by law, mitigating the impact, and taking steps to prevent future breaches.

9. Training and Awareness

9.1 All employees will receive regular training on data protection principles and the importance of compliance with this Policy. Awareness campaigns will be conducted to foster a culture of data protection within the company.

10. Compliance Monitoring

10.1 Orion will regularly monitor and audit compliance with this Policy to identify and address any potential issues. Non-compliance may result in disciplinary action, including termination of employment or legal action.

11. Policy Review

11.1 This Policy will be regularly reviewed and updated to ensure its continued relevance and effectiveness. Changes to this Policy will be communicated to all relevant stakeholders.

12. Complaints

12.1 If you believe that Orion has not processed your personal data in accordance with the provisions of the DPA, you can lodge a complaint with the OIC. The contact details of the OIC are as follows:

The Information Commissioner
Office of the Information Commissioner
Masonic Building, 2nd Floor
45 – 47 Barbados Avenue
Kingston 5, St. Andrew

Email: info@oic.gov.jm

13. Contact Information

13.1 For any questions or concerns related to this Policy, please contact our Data Protection Officer at:

Alden Facey
Data Protection Officer
138G Maxfield Avenue
Kingston 10, St. Andrew
Tel.: 876-929-5586 / 920-5384
Mobile: 876-502-4850
Fax: 876-929-9045
Email: afacey@orionlossadjusters.com

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