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# VM GROUP PRIVACY NOTICE

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**Chairman:** Michael McMorris

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**Transform Your Everyday.**

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## Introduction

VM Group recognizes the value of your privacy and has taken steps to ensure that the personal information you share with us is given utmost respect from the point of collection to termination of relationship with us, and after.

The Data Protection Act 2020 has placed certain obligations of accountability and transparency on organizations, including VM, with respect to the personal data of our clients and business partners. This privacy notice honours one of the many requirements of the Act, to share with you why we collect your personal data, how it is used by us, as well as to inform you of your rights as dictated by the Data Protection Act.

Please take the time to carefully read this privacy notice. If you have questions or concerns, see contact details below.

## Who we are:

References to “we”, “us”, and “our” throughout this document shall mean VM Group and its subsidiaries. This privacy notice applies to all businesses owned and operated by The VMGroup.

VM Group, which started as Victoria Mutual Building Society in 1878, is comprised of nine (9) Strategic Business Units, namely VM Building Society, VM Wealth Management, VM Pensions Management, VM Money Transfer, VM Property Services, VM Innovations, VM Investments, VM Finance Limited, VM Foundation, VM Real Estate Holdings and representative offices in the US and UK. We currently offer a variety of products and services in the areas of pensions management, property services, wealth management, financial advisory, money transfer services, and casualty and life insurance. For more information about us, visit myvmgroup.com.

## Information We Collect

In the process of applying for our products and services, as well as throughout the use of our services, we may collect your personal information directly from you, related individuals, and other third-party sources.

- Personal details - name, gender, date and place of birth, occupation, employment details, education, valid government issued identification (driver's license, passport, voter ID, state ID, citizenship card, TRN, SSN, NI Card, SIN).
- Contact information – home and work address, email address, and telephone numbers; utility bill or other statement for verification purposes.
- User login data - login details for online banking and mobile banking applications.
- Information about yourself from completed forms, communicating with us face-to-face, by phone, email, online, or otherwise.
- Financial Data: income, asset and liability details, bank account details, account activities, debit/credit card activities, credit history, pension, source of funds, and investment products, etc.
- Joint account holder information provided by you or the other individual. If applying for a joint account, make sure to discuss this with the other individual(s), and share with them this privacy notice.
- Sensitive personal data not limited to biometric information (signatures, etc.) or criminal convictions.
- Marketing or sale preferences which you have permitted.
- Internet activities captured by cookie technology or related methods to manage your preferences and identify you.
- Internet Protocol (IP) address and internet browser settings
- Video surveillance at our branches, ATMs, and other office locations,
- Information pertinent to the discovery of unusual or suspicious activity, or persons linked to you or such activities,
- Other information necessary to fulfil our regulatory or lawful obligation.

We may also collect and hold personal data for non-customers who are account beneficiaries, guarantors, customer representatives, potential customers, and more.

#### **SOURCES OF YOUR PERSONAL INFORMATION:**

- Your employer
- Credit bureaus and other agencies

- Third party institutions from payments initiated on your account.
- Public forums and social media
- When you make specific product/service requests
- Information you wilfully made public.

## How We Will Use Information About You

- To evaluate your eligibility for our products and services.
- To verify your identity.
- To promote our products and services.
- To protect and preserve our operations and reputation.
- To conduct credit checks.
- To recover debts owed to us.
- To manage our relationship with you and keeping your information current.
- To manage, investigate, and resolve verified or possible losses due to fraud or other crimes.
- To protect against financial crimes and terrorism financing, and effectively assess and mitigate risks to us, and to you, our customers.
- To ensure information security and business continuity.
- To comply with a search warrant, production order, court order, or other legal mandates both locally and overseas.
- To handle your complaints.
- To evaluate customer behaviour and trends to improve our products and services.
- To adhere to legal and regulatory obligations.
- To correspond with solicitors, surveyors, valuers, adjusters, conveyancers and other intermediaries.
- To investigate and handle insurance solutions and claims by our affiliate British Caribbean Insurance Company (BCIC) or any insurance provider
- To facilitate system or product development and planning, as well as other internal processes.
- To engage in the acquisition/merger of VM Group or any of its businesses or assets. The confidentiality and security of your personal data will be guaranteed at every stage of this process with all parties involved.

## Automated Decisions

We may analyze your accounts using automated systems in to improve our products and services and to comply with our legal duty to monitor transactions for unusual activities, and to identify and prevent fraud, money laundering and terrorist financing.

We have a duty to notify you of decisions made by automated means, and you have a right to contest any such decision and request an alternative method of decision-making.

Automated systems used with the business all comply with data protection standards

## Recording and Monitoring Communication

Your interactions with us through mediums such as phone calls, face-to-face meetings, letters, emails, live chats, video meetings and any other kinds of communication may, with notice and your consent, be monitored, recorded, and later stored.

This helps us to verify your information, confirm your instructions to us; assess, analyze, and improve our service; for training purposes our people; and to manage risk, detect and prevent financial crimes.

## Marketing

VM Group and its affiliates strive to give you superior service and may contact you directly with information about events, promotions, details of our product and services, and product offerings specific to your needs. We may send you marketing messages by post, email, telephone, text, or other electronic methods. We will only do so with your approval.

VM Group will not ask for any personal information via such marketing activities and/or communications.

Feel free to refuse or object to or withdraw your consent to direct marketing pursuits by any business within the VM Group at any time. You have the right to opt out of any marketing to which you had agreed. Please inform us of your objection to being contacted by either calling us at 876-754-8627, or email at [Manager@myvmgroup.com](mailto:Manager@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.

We will not under any circumstances sell or share your data with third-party marketing companies. We may, however, share the following information about you:

- Within Group's offices and branch locations locally and overseas.
- Any third party to whom we transfer or may transfer our rights and obligations because of any restructuring, sale, or acquisition of all or part of our business, provided that your information is used for the same purposes it was originally supplied to us and/or used by us.
- With people you authorize - intermediaries, lawyers (Power of Attorney), or other representatives.
- With appropriate third parties to facilitate your requested transactions – direct debits, payment schemes, etc.
- With joint account holders, trustees, beneficiaries, or executors.
- With people who give guarantees or other security for any amount loaned to you.
- With regulatory and governmental authorities, courts, auditors, tax authorities, including those overseas, where we are requested by them to do so.
- With credit bureaus and private investigators.
- With other lenders and holders of security over any property held by us.
- With contractors, agents or service providers operating on our behalf, or providing services to us or other businesses within the VM Group (including their employees, sub-contractors, service providers, and officers).

## Your Rights

You are afforded several rights with respect to the personal data we hold about you. They are as follows:

- 1) The right to access your data, find out if we use your data, how we use your data, and request a copy of the information which we hold about you. This is called a Data Subject

Access Request, which you can make by writing to the UK Representative Office at 380 Brixton Road, Brixton, London, GB or our Chief Offices at 8-10 Duke Street, Kingston, Jamaica.

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 additional 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.

- 2) The right to withdraw consent at any time to the processing of your personal data.
- 3) The right to object to direct marketing, which requires your consent.
- 4) The right to request that VM discontinue or not commence processing of your personal data.
- 5) The right to not be subject to decisions of a solely automated nature, and where automated decisions are made by us, to be duly notified.
- 6) The right that we correct or update inaccurate or incomplete information about you. This right also includes the right to erase or block your personal data in instances where it is no longer required for its original purpose.
- 7) The right to make a complaint to the Information Commissioner's Office if you are unhappy about how we handle your personal information.

UK: <https://ico.org.uk/concerns/> or calling the ICO on 0303 123 1113.

Jamaica : <https://oic.gov.jm/form/data-subject-complaint>.

These rights are not absolute, due to other conditions and exceptions.

You may exercise your right via a written submission to [manager@myvmgroup.com](mailto:manager@myvmgroup.com). We will respond to requests within 30 days. If we are unable to meet this deadline, we may extend this timeline up to a further two months, giving you explanation.

## Cross-Border Transfers

Your personal data may be transferred and stored in territories outside of Jamaica. In the event that storage of your data will be in territories outside of Jamaica, VM Group will implement appropriate arrangements to ensure that the data is protected in accordance with data protection standards. Such transfer of personal data will be to our service providers and other entities that we work closely with, on conditions that they operate under our instructions and with high standards of data protection. Transfers of this nature are to carry out our transactions on your behalf as agreed with you, to fulfil a legal obligation, to protect the public interest s. An example of institutions we might share your information with are banks and worldwide payment systems operated by SWIFT to make foreign currency payments. These overseas companies may process and store your personal information abroad and may disclose it to foreign authorities to help them in their fight against money laundering and terrorism financing.

Other important considerations for transferring your personal data to other countries are:

- You giving your explicit consent;
- The transfer is necessary for the performance of a contract with you, or in order to enter into a contract at your request.
- To comply with a legal duty.
- To protect the vital interest of you, or another, where you are physically or legally incapable of providing consent.
- To deal with matters of substantial public interest.
- For the defense of legal rights and claims.
- Transfers have been approved and authorized by Jamaica's Information Commissioner.
- To address issues of national security - the detection, prevention, and investigation of crime.

## 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.

## Data Retention and Disposal

The standard period your information may be retained is 7 years. There are, however, other factors to be considered when storing personal data:

- Respective laws and regulations
- The type of financial product we provide to you.
- Any current or ongoing legal disputes.
- The nature and type of personal data.
- Request by you or a regulatory authority to keep holding data for a specific reason.

If your data is no longer required, we will dispose of such data in accordance with the best practices and in a secure manner in accordance with our Information Disposition and Retention Policy.

## Legal Basis for Processing Personal Data

VM group will not process your personal data if at least one of the following legal bases stipulated by law, does not apply.

- You clearly and explicitly agree to us using your personal data (including sensitive personal data) for one or more specific purposes.
- We are entering into or carrying out a contractual arrangement with you.

- Complying with legal or regulatory requirement. For example, disclosing information to in accordance with Court Orders local tax authorities as required by U.S. Foreign Account Tax Compliance Act (“FATCA”).
- Necessary to protect your vital interest (life/survival), or that of another individual, where consent is unattainable.
- It is determined to be in the best interest of the public.
- We find it necessary to pursue our legitimate interest. This is where we rely on our business purpose as the reason to use your information. But this must not unfairly affect your rights and best interests. E.g. To evaluate how you use our products and services.
- You have made your personal data (likewise sensitive personal data) publicly available.
- The processing of sensitive personal data is necessary for the establishment, exercise, or defence of legal claims.
- The processing of sensitive personal data is necessary for the identification and prevention of fraud; as well promoting racial and ethnic equality.

## Consequences of Withholding Information

To reiterate, we collect and use your personal data to provide our products and services to you and fulfil our contract with you, exercise our legitimate interest in the daily operations of our business, and to comply with our legal obligations.

You have the choice not to share your information with us, but be mindful that withholding information may limit the services we are able to provide to you or even result in relationship termination.

When we request information, we will identify the terms involved, for example contractual undertaking, legitimate interest, legal obligations, or other appropriate terms.

## Safeguarding Your Information

To secure your information, we use a variety of measures, including encryption, pseudonymization, and other forms of security. Our employees, vendors and other third parties completing operations in the course of their duties to us, must comply with appropriate compliance standards.

## Changes to Our Privacy Policy

Our privacy notice will be updated frequently as is necessary. Updates will be accessible on our webpage, myvmgroup.com.com. The policy was last updated.

## Contact Us

### **MEMBER ENGAGEMENT CENTRE**

Address:

73-75 Half Way Tree Road, Kingston 10

Telephone:

**Tel:** (876) 754-VMBS (8627) | **Toll Free (from Jamaica):** 1-888-YES-VMBS (937-8627)

**Toll Free (from USA/Canada):** 1-866-967-VMBS (8627) | **Free Phone (from UK):** 0-800-068-VMBS (8627)

Fax/Email :

**Fax :** (876) 929-5224 | **E-mail :** [manager@myvmgroup.com](mailto:manager@myvmgroup.com)

### **Member Engagement Centre Opening Hours:**

<b>Monday – Friday</b>	7:00 a.m. - 8:00 p.m.
<b>Saturday</b>	10:00 a.m. - 6:00 p.m.
<b>Sunday</b>	10:00 a.m. - 3:00 p.m.