

**ISLAND CAR RENTALS LIMITED**  
**Data Protection Policy**

<b>Policy Owner</b>	Data Protection Working Committee
<b>Policy Approver(s)</b>	Board of Directors
<b>Effective Date</b>	30 April 2023
<b>Next Review Date</b>	01 May 2024

## Purpose

Island Car Rentals Limited recognizes that as part of our operations we must collect and process personal data. The purpose of this policy is to describe how personal data must be collected, handled and stored to meet Island Car Rentals Limited's data protection standards, comply with governing privacy and data protection laws, and respect individual rights. The purpose of this policy is as follows:

- Comply with the Data Protection Act and follow best practices.
- Protect the rights of employees, customers and any related data subjects as guaranteed by the Charter of Fundamental Rights and Freedoms.
- Ensure transparency around how Island Car Rentals Limited collects, stores and processes individuals' data.

## Scope

This Data Protection Policy applies to all business processes, information systems and components, personnel, and physical areas of Island Car Rentals Limited. This policy applies to the collection, processing, storage and handling of personal data and any other procedures related to personal data of any individual in both electronic and manual format.

Individuals or groups this policy applies to include, but are not limited to:

- Executives and directors
- All employees, whether employed on a full-time or part-time basis, by Island Car Rentals Limited
- All previous employees, whether employed on a full-time or part-time basis, by Island Car Rentals Limited
- All job applicants for positions at Island Car Rentals Limited
- All contractors, suppliers and other people working on behalf of Island Car Rentals Limited
- All customers of Island Car Rentals Limited
- Any other data subjects identified through the regular course of business by Island Car Rentals Limited

## Definitions

**Data:** Information in a format that can be processed, including electronic data and physical data.

**Personal Data:** Any information relating to an individual data subject who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person. This data could be anything from a name, an email address, geolocation data, or even a username or IP address.

**Sensitive Personal Data:** Any personal data that pertains to, or can be specifically attributed to an individual, that reveals information of the following sensitive nature: genetic or biometric data, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sexual orientation, personal health information, information regarding the alleged commission of an offence.

**Data Subject:** An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

**Consent:** Consent is any freely given, specific, informed, and unambiguous indication of a data subject's wishes by which the data subject, either by a statement or by a clear affirmative action, signifies agreement to personal data relating to them being processed.

**Data Controller:** The person or public authority who, either alone or jointly in or in common with other persons determines the purposes for which and the manner in which any personal data are, or are to be, processed, and

where personal data are processed only for purposes which they are required under any enactment to be processed, the person on whom the obligation to process the personal data is imposed by or under that enactment is for the purposes of this Act a data controller.

**Data Processor:** In relation to personal data, means any person other than an employee of the data controller, who processes the data on behalf of the data controller.

**Processing Data:** Any operation or set of operations that is performed upon personal data or sets of personal data, which includes obtaining, recording or storing the information or personal data, or carrying out any operation or set of operations (whether or not by automated means) on the information or data, including - (a) organisation, adaptation or alteration of the information or data; (b) retrieving, consulting or using the information or data; (c) disclosing the information or data by transmitting, disseminating or otherwise making it available; or (d) aligning, combining, blocking, erasing or destroying the information or data, or rendering the data anonymous.

**Data Storage:** These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager.

## Governing Laws, Regulations, and Standards

Guidance	Clarification/Section
The Data Protection Act	Jamaican data privacy law
General Data Protection Regulation (GDPR) 2016/679	European Union (EU) data protection regulation

## Policy Statements

### Baseline Requirements:

- Employees will keep all data secure by taking sensible precautions and following guidelines outlined within this policy and any associated procedures.
- Data will not be shared informally; defined data access levels will be determined based on role and existing access controls.
- Island Car Rentals Limited will provide training to all employees to help them understand their responsibilities when handling data. Refer to the Security Awareness Training Policy for further detail.
- Personal data will not be disclosed to any unauthorized person, either within the organization or externally.

### Data Collection:

- Island Car Rentals Limited and associated users or partners will collect personal data in a manner that is fully transparent with data subjects and in accordance with the law.
- Users will refrain from knowingly collecting the personal data of any data subject without authorization from a direct manager.
- If personal data is collected from someone other than the data subject, the data subject will be informed of the collection unless one of the following criteria apply:
  - The data subject has received the required information by other means.

- The information must remain confidential due to a professional secrecy obligation.
- A national law expressly provides for the collection, processing, or transfer of the personal data.
- When determined that the notification of the data subject is required, notification should occur promptly and adhere to guidelines within the Consent Policy.
- When necessary, Island Car Rentals Limited will obtain consent from data subjects in accordance with the Consent Policy.
- Consent from the data subject will be provided in writing.
- Consent obtained orally from a data subject will be reviewed by the data protection officer.
- Island Car Rentals Limited's external-facing website(s) will include a privacy notice.

**Data Storage:**

- When data is stored electronically, it will be protected from unauthorized access, accidental deletion and malicious hacking attempts.
- Island Car Rentals Limited will protect data with strong passwords. Refer to the Access Control Policy for further detail.
- Users will refrain from using removable media; if data is stored on removable media devices, they will be stored securely.
- Island Car Rentals Limited's data will be stored on designated drives and servers and will only be uploaded to approved cloud computing service(s).
- Servers containing personal data will be sited in a secure location, away from general office space.
- Users will refrain from saving data directly to devices.
- Users will refrain from storing data on paper and only print when necessary.
- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Island Car Rentals Limited users will ensure paper documents are not left where unauthorized persons could view them (e.g. on a printer).

**Data Use:**

- Where applicable, Island Car Rentals Limited will provide each data subject with information regarding the processing of their information.
- Island Car Rentals Limited will consider the data subjects' perspective whenever processing personal data.
- Any processing of data subjects' data must comply with the data processing standards as set out in the Data Protection Act.
- When working with personal data, users will ensure screens are locked when left unattended.
- Island Car Rentals Limited users will not informally share personal data. For example, personal data will not be shared via email unless explicitly noted as being encrypted.
- Users will refer to their manager or to the data protection officer if personal data is anticipated to be transferred outside of the users' region.
- When possible, users will access personal data via a master copy or set of data.

**Data Accuracy:**

- Island Car Rentals Limited will take reasonable measures to ensure that personal data remains accurate across the organization.
- All users at Island Car Rentals Limited will take reasonable steps to ensure personal data is kept as accurate and up to date as possible.
- Data stored at Island Car Rentals Limited will be held in centralized locations. Users will not create unnecessary additional data sets.
- Where applicable, Island Car Rentals Limited will ensure data subjects can easily update their information.

**Data Retention:**

- Data should be regularly reviewed against the Records Retention Schedule. If no longer required, data should be deleted and disposed of. Refer to Records Retention Schedule for further detail.
- Paper documents will be shredded and disposed of securely when no longer required.

**Data Protection:**

- Security staff will use necessary physical and technical controls and organizational measures to ensure all infrastructure containing data is protected and secured. Refer to Physical Security Policy and Access Control policy for further detail.
- Users will follow associated procedures and notify relevant staff when reporting incidents or data breaches. Refer to the Incident Response Policy for further detail.

**Providing Information – Data Subject Requests:**

- Island Car Rentals Limited will ensure that requests based on each of the following data subject rights can be satisfied:
  - Right of Access
  - Right to object to processing for the purpose of Direct Marketing
  - Objection to automated decision making and profiling
  - Right to Prevent Processing
  - Right to Data Portability
  - Data rectification
- Island Car Rentals Limited aims to ensure that individuals are aware that their data is being processed and they understand:
  - How the data is being used
  - How to exercise their rights
- Should Island Car Rentals Limited reasonably require further information in order to satisfy itself as to the identity of the data subject making the request, it shall inform the data subject of that requirement.
- Data subject rights requests will be managed by the data protection officer.
- Island Car Rentals Limited will respond to each data subject request within the time period set out in the Act for the specific request.
- When a data subject request cannot be adequately addressed, the following information will be provided to the data subject:
  - An acknowledgement of receipt of the request
  - Any information located to date
  - Details of any requested information or modifications that will not be provided to the data subject, the reason(s) for the refusal, and any procedures available for appealing the decision
  - An estimated date by which any remaining responses will be provided
  - An estimate of any costs to be paid by the data subject (e.g. where the payment of a prescribed fee under the Act is required in order for the request to be fulfilled)
  - The name and contact information of Island Car Rentals Limited's point of contact