



AEROTEL / KOOL97 FM

Data Protection Act Privacy Notice

TABLE OF CONTENTS

	<i>page</i>
1. DATA CONTROLLER OVERVIEW:	2
2. TYPES OF PERSONAL DATA COLLECTED:	3
3. PURPOSES OF DATA PROCESSING:	3
4. LEGAL BASIS FOR PROCESSING:	4
5. DATA SUBJECT RIGHTS:	4
6. DATA SHARING AND ACCESS CONTROL:	5
7. DATA RETENTION STRATEGY:	6



1. DATA CONTROLLER OVERVIEW

Policy Background

Jamaica's Data Protection Act (DPA) was passed into law in May 2020 and seeks to safeguard individuals' privacy by securing certain classes of personal data held by public and private entities. It sets standards for fair and lawful processing, data accuracy, and data disposal. The Act applies to both public and private sector organizations and to identifiable natural persons and includes individuals who have been deceased for less than 30 years. Breaches, such as unlawfully obtaining or disclosing personal data, are punishable by law. The Office of the Information Commissioner (OIC) has been setup to regulate the provisions of the law.

Scope/Target

This Data Protection Act notice, alternatively referred to as a Privacy Policy or Privacy Notice, explains how and why AEROTEL collects, uses, stores, shares and protects personal data. It informs users about their rights and how they can exercise them.

This document is intended for all AEROTEL employees, customers and partners as well as external persons who utilize this website or engage with the company at all levels.

The term **AEROTEL**, for the purposes of this document, refers to the registered Data Controller, **Aeronautical Telecommunications Limited** and its division, **Kool97 FM**.

Contact Information

The Data Protection Officer (DPO)

Company phone: (876) 978-3974

DPO email address: DataProtection@aerotel-jm.com

Mailing address: 1 Braemar Avenue, Kingston 10, Jamaica West Indies.

Office of the Information Commissioner (OIC)

Company Phone : (876) 929-8568 /6952

OIC email address: info@oic.gov.jm



2. TYPES OF PERSONAL DATA COLLECTED

The types of personal data the company collects are primarily:

- Identity: Name, driver's license, TRN, passport number
- Contact Info: Email address, phone number, residential, work and mailing address, emergency contacts
- Demographic Info: Date of birth, nationality, gender, marital status
- Biometric Data: Photograph, signature
- Work/Lifestyle info: Occupation, employment history, spouse and dependents, references, medical info, social networks, background checks
- Web-sourced data: captured while browsing our webpages - utilizing cookies or via links, forms etc.
- Special Info: Information specifically collected/requested by AEROTEL through radio programming, special applications, activities, events – e.g. personal stories, media content, gaming
- Basic Financial info: Bank A/C location, number and type – AEROTEL does not collect credit/debit card information but may interface with entities that do.
- Confidential Information collected from staff and submitted on behalf of government entities as authorized: Integrity Report form.

3. PURPOSES OF DATA PROCESSING

The company collects and uses personal data primarily for:

- Human Resources: hiring, payroll, benefits, employee engagement, analytics
- Procurement of goods & services: individual contractors/service-providers
- Sales: Kool97fm advertising client contracting
- Marketing: Kool97fm campaigns/events
- Analytics: Kool97 assessment and planning
- Customer Relationship Management: Kool97 listenership
- Payment and receipt processing
- Fullfill regulatory requirements: Integrity Commission
- Establishing and defending legal claims



4. LEGAL BASIS FOR PROCESSING

AEROTEL processes personal data for its own legitimate interests, provided that the interests of AEROTEL does not override any of your own rights and freedoms. We process personal data with your consent, but you have the right to withdraw your consent to processing for specific purposes.

Personal data may be used without consent in situations when legally required. We rely on the following lawful bases, other than consent, for processing your information:

- Contractual obligation for the performance of a contract or taking steps at the request of the data subject with a view to entering into contract.
- Compliance with legal obligations.
- To protect the vital interests of the data subject.
- For the exercise of functions conferred by or under an enactment and functions of a public nature exercised in the public interest.
- Legitimate interest.
- The data subject has published the personal data concerned.

5. DATA SUBJECT RIGHTS

This notice informs users about their rights under the Data Protection Act, such as the right to access, rectify, erase, or restrict processing of their personal data. It also clarifies how users can exercise these rights. Note that some data rights depend on the legal basis on which the data is processed.

- Access – right to request a copy of their personal data
- Rectification – right to correct inaccurate data
- Erasure (“Right to be Forgotten”) – right to request data deletion
- Restrict Processing – right to temporarily halt data use
- Data Portability – right to receive data in a machine-readable format
- Objection – right to object to data processing (e.g., Matomo tracking)
- Consent Withdrawal – right to withdraw previously given consent (e.g., unsubscribe from emails)
- Not to be subject to automated decisions – right to challenge profiling-based decisions

To exercise any of the rights mentioned in this Privacy Policy and/or in the event of questions or comments relating to AEROTEL’s use of Personal Data you may contact our Data Processing Officer or if necessary the Office of the Information Commissioner.
(See contact information).



6. DATA SHARING AND ACCESS CONTROL

Personal data may be shared with third parties when it is necessary to provide services to users of our website, other stakeholders, and/or for other legitimate interests. AEROTEL will only share your information in circumstances where it is permitted under the DPA or we are legally obligated to do so. We may share your personal data with the following categories of recipients where necessary to offer, administer, and manage services provided to you or to fulfill our regulatory or statutory functions and obligations:

- Law enforcement
- Public authorities and regulators (such as Tax Administration Jamaica, the Transformation Implementation Unit, Integrity Commission)
- Financial institutions
- Pension Fund Administrators and Trustees
- Attorneys-at-law
- The Judiciary
- Authorized third-party service providers (for technology support – cloud service providers)
- Personal Representatives
- To any other entity as duly authorised

Your personal data is secured both online and offline through the implementation of appropriate safeguards to prevent any unauthorised access , unlawful processing, accidental loss, destruction, or damage thereon.

Employees and third parties are only provided with personal data on a need-to-know basis and with the minimum amount they require to complete their specific job or professional assignment. All employees are also subject to confidentiality agreements and are expected to be trained on the proper handling of sensitive data.

Physical personal data is secured in locked compartments in secured offices, while the digital data on devices and online is secured using username/password combinations and pins where allowed. Data encryption is utilised where possible.

AEROTEL has an ICT Policy that covers all data security features deployed.



7. DATA RETENTION STRATEGY

Personal Data captured by AEROTEL is maintained in digital form on secured devices (mobiles, PCs, servers etc.) and online on secure applications and sites. Backup repositories are periodically created of this data to ensure that your data can be accessed in the event the original copy is lost. The backups are appropriately stored to ensure long-term retention. Physical documents and media are stored in secured desks, cabinets and safes in protected areas within AEROTEL office locations.

Personal data will be retained based on COMPANY and Government of Jamaica Retention Policy. Information will only be retained to fulfil the purposes for which it is collected or otherwise in the public interest, scientific or historical research purposes, or statistical purposes.

NB: You will not necessarily be so informed if your data is stored outside of Jamaica, however you have the right to enquire as to whether this is the case.