



# PARTICULAR PRESENCE

## Privacy Policy

*Last updated: July 8th, 2025*

### 1. Introduction

Particular Presence Technologies (“PPT”, “we”, “us”, or “our”) is committed to protecting your privacy and ensuring that your personal information is handled safely and responsibly. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you interact with us, whether through our websites, products, services, or in any other capacity as a customer, partner, user.

We are a software development and technology company delivering technology solutions to clients worldwide. We comply with the Jamaica Data Protection Act, 2020, and other relevant local laws.

### 2. Information We Collect

We may collect and process the following types of personal information:

- **Contact Information:** Name, email address, phone number, job title, company name, and mailing address.
- **Account Information:** Username, password, preferences, and other account details.
- **Business Information:** Details regarding your organization, systems, and the services you engage us for.
- **Usage Data:** Information about how you use our website, products, and services (IP address, browser type, device information, pages viewed, etc.).

- **Communications:** Records of communications with us (emails, chat, phone calls, support tickets).
- **Marketing and Event Data:** Information provided during webinars, events, surveys, or marketing activities.
- **Other Data:** Any other information you choose to provide.

### 3. How We Use Your Information

We use your personal information for the following purposes:

- To provide, operate, and maintain our products and services.
- To process and fulfill orders and requests.
- To communicate with you regarding our offerings, updates, and customer support.
- To improve our products, services, and user experience.
- To comply with legal and regulatory obligations.
- For security, fraud prevention, and to protect our rights and interests.
- For marketing, advertising, and analytics (where permitted by law).

### 4. Legal Bases for Processing (GDPR)

Where required by law, we rely on the following legal bases to process personal data:

- Consent
- Performance of a contract
- Compliance with legal obligations
- Legitimate interests

### 5. Sharing and Disclosure of Information

## 5.1 Use of Sub-Processors

We engage trusted third-party providers (such as Amazon Web Services (AWS) and other cloud or analytics partners) to support our services. These providers act as “data processors” under applicable law and are contractually bound to protect your information.

We may share, with your explicit consent, your information with :

- **Affiliates and subsidiaries** within our corporate group.
- **Service providers and partners** who assist in delivering our services (cloud hosting, analytics, payment processors, etc.).
- **Regulatory authorities** and law enforcement, as required by law.
- **Business transfers** (in case of merger, acquisition, or sale of assets).

We do **not** sell your personal information.

## 6. International Data Transfers

We may transfer your information to jurisdictions outside your home country. Where we do so, we ensure appropriate safeguards (e.g., Standard Contractual Clauses, adequacy decisions) are in place as required by law.

## 7. Data Security

### 7.1 Data Breach Notification

In the event of a personal data breach, we will notify affected individuals and regulators without undue delay, and in any case within the timeframes required by applicable law

We implement appropriate technical and organizational measures to protect your data against unauthorized access, loss, misuse, or alteration.

## 8. Data Retention

We retain your personal information only as long as necessary to fulfill the purposes outlined in this Privacy Policy. When information is no longer required, we will securely delete or anonymize it, unless a longer retention period is required by law.

## 9. Your Rights

Depending on your jurisdiction, you may have rights to:

- Access, correct, or delete your personal data.
- Object to or restrict processing.
- Withdraw consent (where applicable).
- Data portability.
- Lodge a complaint with the relevant supervisory authority.

To exercise these rights, please contact us at [privacy@particularpresence.com](mailto:privacy@particularpresence.com).

## **10. Cookies and Tracking Technologies**

Our websites and services may use cookies and similar technologies to collect usage data and enhance your experience.

## **11. Children's Privacy**

Our services are not directed at children under 16. In line with Jamaica's Data Protection Act and other international laws, we do not knowingly collect information from children under this age.

## **12. Third-Party Links**

Our websites may contain links to third-party sites. We are not responsible for their privacy practices or content.

## **13. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. We will notify you of any material changes by posting the new policy on our website with an updated effective date.

## **14. Contact Us**

If you have any questions or concerns about this Privacy Policy or our data practices, please contact:

Privacy Officer  
Particular Presence Technologies  
Unit 3, 8 Hillcrest Avenue, Kingston 6, Jamaica  
Email: [privacy@particularpresence.com](mailto:privacy@particularpresence.com)  
Phone: +1 (876) 676-6927