



# Website Privacy Policy

**Last Updated:** February 24, 2026

Your privacy is important to us. This Website Privacy Policy explains how the National Education Trust (NET) collects, uses, discloses, and protects personal data when you interact with us online, including via <https://www.net.org.jm>, donation portals, subscription forms, or participation in NET initiatives. It also explains our use of cookies and similar technologies.

**Please note:** This Policy applies only to online interactions via our Website and does not cover all NET data processing activities.

By using this Website, you acknowledge that you have read and understood this Policy.

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## 1. About the National Education Trust (NET)

The National Education Trust is an agency of the Ministry of Education, Skills, Youth & Information, responsible for resource mobilisation and infrastructure development in support of the national education sector in Jamaica.

**Data Controller:** For the purposes of the **Data Protection Act, 2020**, NET determines how and why personal data is processed.

### Contact Details:

- **Address:** Caenwood Centre, 37 Arnold Road, Kingston 5
- **Email:** [info@net.org.jm](mailto:info@net.org.jm)
- **Telephone:** (876) 967-9007

### Designated Data Protection Officer (DPO):

- **Name:** Miguel Dias

- **Email:** miguel.dias@net.org.jm
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## 2. Personal Data We Collect and Lawful Basis

We organise personal data into categories, linking each to its purpose and lawful basis. This is presented in a sectioned format for readability:

### A. Contact Information

**Data Collected:** Name, email, telephone number, postal address

**Purpose:**

- Process donations
- Respond to enquiries
- Send updates (if consented)
- Manage donor relationships

**Lawful Basis:** Legitimate interests (balanced with individual rights), Consent, Legal obligation

### B. Payment Information

**Data Collected:** Payment details, transaction information

**Purpose:** Process and receipt donations

**Lawful Basis:** Legitimate interests, Legal obligation

**Note:** NET does not store full card details; transactions are handled securely by third-party processors

### C. Organisation / School Information

**Data Collected:** Organisation or school details (if applicable)

**Purpose:** Manage donor and partnership relationships

**Lawful Basis:** Legitimate interests

### D. Website and Usage Data

**Data Collected:** IP address, pages visited, browser type, cookies

**Purpose:** Improve website performance, analytics, and security

**Lawful Basis:** Legitimate interests

### E. Location Data

**Data Collected:** Approximate location based on IP address

**Purpose:** Tailor content and analyse engagement patterns

**Lawful Basis:** Legitimate interests

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### 3. Special Categories of Personal Data

NET does not routinely collect sensitive personal data, except when strictly necessary.

**When collected:** For volunteer registration or participation in NET initiatives.

**Sensitive Data Details:**

- **Health or accessibility information**
- **Purpose:** Ensuring safe participation in NET-approved projects, events, or volunteer activities
- **Lawful Basis:** Explicit consent

**Additional Safeguard:** Sensitive data is only collected when essential for safety or legal compliance.

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### 4. How We Collect Personal Data

Personal data is collected via:

- Forms on <https://www.net.org.jm>
  - Contact by phone, email, or post
  - Subscription to NET newsletters or updates
  - Participation in NET events, volunteer projects, or school initiatives
  - Interactions on social media
  - Browsing the Website (automatic cookies/analytics)
  - Third-party fundraising platforms (**note:** those platforms have their own privacy policies)
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### 5. Cookies Policy

#### 5.1 What Are Cookies?

Cookies are small text files placed on your device to store preferences, improve functionality, and enable analytics and security.

## 5.2 Types of Cookies We Use

We present cookie types in a **structured “card style” layout** for readability:

### 1. Strictly Necessary Cookies

- **Purpose:** Essential for site security, donation processing, and core functionality
- **Consent:** Always enabled; cannot be disabled

### 2. Performance & Analytics Cookies

- **Purpose:** Analyse site usage, improve functionality, and user experience
- **Consent:** Opt-in (the user must **give consent** before that type of data is collected or the feature is activated. )

### 3. Functional Cookies

- **Purpose:** Remember user preferences (language, accessibility settings)
- **Consent:** Opt-in (the user must **give consent** before that type of data is collected or the feature is activated. )

### 4. Marketing & Tracking Cookies

- **Purpose:** Campaign analytics, donor conversion tracking
- **Consent:** Opt-in only (the user must **give consent** before that type of data is collected or the feature is activated. )

**Additional Note:** NET uses tools such as Google Analytics and similar services to understand Website usage patterns.

## 5.3 Managing Cookie Preferences

- Accept all cookies
- Reject non-essential cookies
- Manage cookie settings through your browser

## 5.4 Cookies Collected Automatically

Automatic data may include:

- IP address
- Browser type

- Device identifiers
  - Pages visited
  - Session duration
  - Referral sources
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## 6. Sharing of Personal Data

NET may share personal data with:

- Third-party payment processors
- Technology and cloud service providers
- Professional advisers (legal, audit, compliance, financial)
- Government or regulatory bodies (if legally required)
- Approved research or reporting entities (anonymised and subject to confidentiality obligations)

**NET does not sell or rent personal data.**

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## 7. International Transfers

Where data is stored or processed outside Jamaica, NET ensures:

- Contractual safeguards for data protection
  - Comparable data protection standards
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## 8. Data Security

NET uses administrative, physical, and technical controls to safeguard personal data against:

- Loss, misuse, or unauthorised access
  - Disclosure, alteration, or destruction
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## 9. Data Retention

Personal data is retained only as long as necessary for the intended purposes, including legal, reporting, or audit obligations.

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## 10. Your Rights

Under the **Data Protection Act, 2020**, you have the right to:

- Access personal data we hold
- Correct inaccurate data
- Request deletion (where applicable)
- Withdraw consent
- Object to processing based on legitimate interests
- Request processing restrictions
- Request data transfer (data portability)

**Note:** Certain rights may be limited by law.

**To exercise any rights:** Contact the **DPO** at [miguel.dias@net.org.jm](mailto:miguel.dias@net.org.jm)

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## 11. Changes to This Policy

NET may update this Policy periodically. Updates will be posted on this page with a new Last Updated date.

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## 12. Contact Us

**National Education Trust (NET)**

- **Email:** [info@net.org.jm](mailto:info@net.org.jm)
- **Telephone:** (876) 967-9007
- **Postal Address:** Caenwood Centre, 37 Arnold Road, Kingston 5