



Privacy Policy

A Product of Tumblehill Labs, the Product Studio of Tumblehill Holdings

Effective Date: 19 July 2026 · Version 1.0 · geoatm.app

Version History

1.0 — 19 July 2026 — Initial release

1. Introduction

GeoATM is a product of Tumblehill Labs, the product studio of Tumblehill Holdings (collectively, "Tumblehill", "we", "us", or "our"). GeoATM is a location-intelligence platform that enables consumers to locate Automated Banking Machines (ABMs) and provides financial institutions and regulators with network visibility, operational analytics, and regulatory reporting tools.

This Privacy Policy ("Policy") explains how we collect, use, store, disclose, and protect information when you access or use the GeoATM platform, including the consumer-facing mobile and web application available at geoatm.app, the Operator portal, and any associated services (collectively, the "Platform").

By accessing or using the Platform, you acknowledge that you have read, understood, and agree to be bound by this Policy. If you do not agree, you must immediately discontinue use of the Platform.

2. Who We Are

Product: GeoATM

Product Studio: Tumblehill Labs

Parent Entity: Tumblehill Holdings

Platform: geoatm.app

Privacy Contact: support@geoatm.app

Primary Jurisdiction: Jamaica (with support for additional jurisdictions as the Platform expands)

All privacy-related enquiries, data access requests, and complaints should be directed to support@geoatm.app.

3. Information We Collect

We collect the following categories of information depending on how you interact with the Platform:

3.1 Information You Provide

- Account registration details, including name, email address, and — for Operator accounts — organisation name and role
- Feedback, support requests, or other correspondence submitted through the Platform
- ABM network data uploaded or entered through the Operator portal

3.2 Information Collected Automatically

- Precise or approximate device location, where you grant permission, to enable proximity-based ABM search
- Device identifiers, browser type, operating system, and IP address
- Usage data, including pages visited, search queries, ABMs viewed, and session duration
- Crash reports and performance diagnostics

3.3 Information from Third Parties

- ABM location and availability data sourced from publicly published regulatory disclosures (including those of the Bank of Jamaica), participating financial institutions, and Operator submissions
- Geocoding and mapping data from third-party mapping service providers

Where participating financial institutions do not provide live operational data, GeoATM may display publicly available location information only. Such listings are intended to assist users in locating ABMs and do not indicate real-time operational availability.

3.4 Information We Do Not Collect

GeoATM does not collect, store, or process:

- Banking credentials, PINs, card numbers, or financial transaction data
- Biometric data of any kind
- Sensitive personal data as defined under the Data Protection Act (Jamaica) or equivalent legislation in applicable jurisdictions, except where explicitly and voluntarily provided by the user

4. How We Use Your Information

We use the information we collect for the following purposes:

- To provide, operate, maintain, and improve the Platform and its features
- To display ABMs near your current location, sorted by proximity and filtered by availability, accessibility, and institution
- To generate regulatory and Operator reports within the Platform
- To respond to support requests and user feedback
- To monitor Platform performance, diagnose errors, and ensure service reliability
- To enforce our Terms of Use and protect against fraudulent or unauthorised access
- To comply with applicable legal and regulatory obligations, including those under the Data Protection Act (Jamaica)

We do not use your information for advertising purposes, behavioural profiling for commercial sale, or any purpose incompatible with those stated above.

5. Location Data

Location data is central to the GeoATM consumer experience. When you use the consumer-facing application:

- We request access to your device location solely to identify nearby ABMs and calculate distances
- Location data is processed in real time during your active session and is not retained on our servers beyond that session unless you explicitly save a search
- You may use the Platform without granting location permission by entering a location manually; proximity-based features will be limited accordingly

You may revoke location permissions at any time through your device settings. Revoking location access does not affect your ability to use non-proximity features of the Platform.

6. How We Share Your Information

Tumblehill does not sell your personal information. We share information only in the following circumstances:

6.1 Service Providers

We engage third-party service providers for hosting, analytics, and mapping services. These providers are contractually required to process data solely on our instructions and in a manner consistent with this Policy.

6.2 Participating Financial Institutions

Where you interact with the Platform in connection with a specific institution's Operator module, that institution may receive aggregated, non-personally-identifiable usage data relating to their own ABM network. Individual consumer data is not disclosed to financial institutions.

6.3 Regulatory Authorities

Regulatory reports generated through the Platform are transmitted to relevant authorities — including the Bank of Jamaica — only upon the express instruction and consent of the relevant Operator. Consumer personal data is not included in any regulatory report.

6.4 Legal and Regulatory Requirements

We may disclose information where required by law, court order, or a lawful request from a competent regulatory authority in Jamaica or any other applicable jurisdiction.

6.5 Business Transfers

In the event of a merger, acquisition, or sale of Tumblehill assets, your information may be transferred as part of that transaction. Affected users will be notified in advance of any change affecting how their data is processed.

7. Data Security

Tumblehill implements appropriate technical and organisational measures to protect personal and Operator data against unauthorised access, loss, alteration, or disclosure. Our security

measures include:

- Encryption of all data in transit using industry-standard TLS protocols
- Encryption of Operator and personal data at rest using AES-256 or equivalent standards
- Role-based access controls (RBAC) ensuring that personnel access only the data necessary for their authorised function
- Audit logging of access to sensitive data and administrative functions
- Secure cloud hosting infrastructure with physical and logical security controls
- Regular security assessments and penetration testing of Platform infrastructure
- Incident response procedures aligned with applicable regulatory requirements

No electronic system is completely immune from risk. In the event of a data breach that presents a material risk to the rights and freedoms of affected individuals, Tumblehill will notify affected users and relevant authorities as required by the Data Protection Act (Jamaica) and applicable law.

8. Data Retention

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, or as required by law. Our retention schedule is as follows:

- Consumer session and location data: retained for the duration of the active session only, unless explicitly saved by the user
- Account registration data: retained for the life of the account and for twelve (12) months following account deletion or termination
- Operator and regulatory report data: retained in accordance with the data retention terms agreed with the relevant financial institution, subject to applicable regulatory requirements
- Usage and performance analytics: retained in anonymised or aggregated form for up to twenty-four (24) months for Platform improvement purposes

9. Your Rights Under the Data Protection Act (Jamaica)

In accordance with the Data Protection Act (Jamaica) and, where applicable, equivalent legislation in other jurisdictions, you have the following rights with respect to your personal data:

- Right of Access: to request a copy of the personal data we hold about you
- Right to Rectification: to request correction of inaccurate or incomplete personal data
- Right to Erasure: to request deletion of your personal data, subject to applicable legal retention obligations
- Right to Restriction: to request that we limit the processing of your personal data in specified circumstances
- Right to Object: to object to processing of your personal data for certain purposes
- Right to Data Portability: to receive your personal data in a structured, commonly used, and machine-readable format

To exercise any of these rights, please submit a written request to support@geoatm.app. We will acknowledge your request within five (5) business days and respond substantively within thirty (30) days.

10. Cookies and Similar Technologies

The GeoATM web platform uses cookies and similar technologies to maintain user sessions and preferences, analyse Platform usage and performance, and improve the relevance of search results. You may control cookie settings through your browser. Disabling essential cookies may impair certain Platform features. We do not use cookies for third-party advertising or cross-site behavioural tracking.

11. Children's Privacy

The Platform is not directed at persons under the age of eighteen (18). We do not knowingly collect personal data from minors. If you believe we have inadvertently collected information from a person under eighteen, please contact support@geoatm.app and we will promptly delete the relevant data.

12. Jurisdiction and Cross-Border Transfers

GeoATM is initially operated from Jamaica and is governed by Jamaican law. As the Platform expands to support additional jurisdictions, we will ensure that applicable local data protection requirements are observed. If you access the Platform from outside Jamaica, you acknowledge that your data may be processed in Jamaica and in countries where our service providers operate, which may have different data protection standards to your home jurisdiction. By using the Platform, you consent to such processing.

13. Changes to This Policy

We may update this Policy from time to time to reflect changes in our practices, applicable law, or Platform functionality. Material changes will be communicated through the Platform and, where practicable, by email to registered users. The updated Policy will display a revised effective date. Your continued use of the Platform following notification of changes constitutes acceptance of the revised Policy.

14. Contact

For questions, concerns, or data rights requests relating to this Policy, please contact:

Product: GeoATM

Studio: Tumblehill Labs, a division of Tumblehill Holdings

Email: support@geoatm.app

Website: geoatm.app

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