# UnionBank Privacy Policy EON Privacy Policy

## Purpose & Scope

UnionBank respects and values your privacy and the secrecy of your account information with us. This Privacy Policy ("Policy") informs you how we collect, use, store, and process your personal data in EON. We adhere to the data privacy principles of (1) legitimate purpose – we only process upon your consent, in compliance with law or contract; (2) transparency – we notify everything that happens to your data; and (3) proportionality – collection is limited based on purpose.

This Policy applies to data subjects of EON whether as: (1) clients – current, past and prospective customers as individuals or corporations; or (2) non-clients – payees or payors or bank products and services we provide; visitors or inquirers at our branches and online channels; ultimate beneficial owners, directors or representatives of corporate clients; and such other persons involved in transactions with us or with our customers ("Data Subjects").

# Collection of your Personal and Sensitive Personal Data

Personal Data refers to any information that identifies or is linkable to a natural person. On the other hand, Sensitive Personal Data is any attribute that can distinguish, qualify or classify a natural person from the others such as data relating to your ethnicity, age, gender, health, religious or political beliefs, genetic or biometric data.

We collect your Personal and Sensitive Personal Data when you register, sign-up or use our bank products and services or contact us about them. We also collect through your organization whether private corporation or government instrumentality you authorized. We may also obtain your information from other sources (i.e publicly available platforms, financial institutions, credit agencies, payment gateway processors, public authorities, and other registers) for purposes of identity verification and regulatory requirements by the Bangko Sentral ng Pilipinas (BSP).

## Kinds of Data We Process

Know-Your-Customer (KYC) / Identification Data: refer to Personal Data and Sensitive Personal Data we collect when you sign up or register to our products and services such as full legal name, gender, date of birth, nationality, civil status, permanent address, present address, tax identification number and other government-issued identification numbers, mobile number, home number, office contact details, company name, job position or rank, office address, source of funds, gross annual income, and such other information necessary to conduct due diligence and comply with BSP rules and Biometric Data: upon your express consent and subject to limitations imposed by law, data processed for customer verification using: (1) facial recognition technology; (2) liveliness detection mechanism; and (3) fingerprint recognition

Transactional Data: linkable information to your Personal Data such as (1) bank account number, deposits, withdrawals, such other transfers made to or from your account, and details about them such as reference number, place and time these were made; (2) information when you contact us through our official channels such as branches, contact centers, web and mobile platforms; (3) credit card account number as well as purchases or transactions using your credit card; and (4) other forms of customer account number, payments, and transactions you have with

Financial Data: information about the value of your property and assets, your credit history and capacity, and other financial products and services you have with

Behavioral Data: this refers to your online behavior, customer segment, usage of our products and services, internet protocol address of your devices used to access our applications, interests and needs

you share with us, and customer behavior we collect as part of due diligence, to prevent fraudulent conduct, and comply with banking rules on anti-money laundering, terrorism financing, and tax Audio Visual Data: for security and improvement of our services, we process audio and video recordings of your interactions with us and surveillance videos at branches and automated teller machines, subject to limitations imposed by

Sensitive Personal Data: we may require the following Sensitive Personal Data upon your express consent: (1) your religion when you apply for insurance products with us; (2) for customer verification, your government-issued identification numbers or cards such as passport or driver's license ID; or (3) any information that is necessary, incidental to contractual agreement or in connection with a requested product or

Children's Data: we may collect information about children if they have opened an account with us with parental consent or if you provide us in relation to a product or service you signed up with us (i.e. when you register children as beneficiary to an insurance product or trust service with us).

The foregoing data are collectively referred to as "Customer Data" or "Personal Information".

## **Data Processing**

Processing means any activity pertaining to the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of Customer Data.

We process Customer Data only for legitimate purposes and with lawful basis such as your express consent, terms and conditions of product or service you signed up with us, and as required by law and regulation. We ensure that only authorized employees and third-party service providers, who satisfy our stringent risk management, governance, information security, and data privacy requirements, can process your data.

**Data Storage** 

We store Customer Data in secure and encrypted Bank-managed environments, devices, and media. For third-party managed environments such as cloud service providers, we employ BSP-sanctioned security protocols and procure BSP approval prior

We store physical copies of documents containing Customer Data in physical secure Data Access

Customer Data can only be accessed by authorized personnel on a role-based manner following the proportionality principle that authorized personnel can only access Customer Data they need for their role and purpose in the

Data Use

**Customer Engagement** 

We use your contact details with us to communicate with you about your relationship with us. We may ask for feedback, surveys or polls about our products and

We may send you email or mobile notifications, telephone calls, or newsletters about product and services enhancements and account security

You have the right to opt out from this form of communications with you or choose another means for which we can contact

Marketing

We may use your information for us to send out campaigns of commercial products and services we hope you find interesting, relevant, and

We want to establish a more personalized relationship with you by providing you offers that would suit your lifestyle and

We perform data analysis on results of our marketing campaigns to measure their effectiveness and You have the right to withdraw your consent or unsubscribe from receiving personalized

Due Diligence and Regulatory Compliance

We may use Customer Data to evaluate your eligibility for Bank products and

In assessing your ability to repay your loans, we conduct credit risk and investigation and reporting on your credit history and account

We use your account details when you instruct us to make a payment or fulfill an investment We use automated processes and data science solutions for faster decision-making in granting loan We process Customer Data in compliance with legal obligations and statutory requirements by BSP, and other regulatory

**Business Insights** 

We perform data analysis and reporting based on your Customer Data and how we operationalize to aid our management make better

We analyze your behavioral data, your interactions with our products and services, and our communications with you to aid us understand the areas for improvement and

We analyze transactional data performed through our third-party service providers and partners in order to determine how we can jointly improve our products and services for Data Quality

We shall process your Customer Data in compliance with the data quality standards imposed by BSP. We shall obtain additional information about you from government institutions or credit bureaus to improve the quality of your Customer Data with We may contact you to ensure accuracy and integrity of your information in our data processing systems.

**Protection and Security** 

We process Customer Data for your account protection against cybercrime, identity theft, estafa, fraud, financial crimes such as money laundering, terrorism financing, and tax

We use your Personal Data such as name, age, nationality, IP address, home address, and other Transactional Data to conduct profiling for detection of suspicious activity on your

We may employ artificial intelligence and machine learning in real-time detection of suspected fraudulent activities on your

We may reset your password or temporarily hold your online banking account to protect you from detected suspected fraudulent

**Data Retention** 

Pursuant to BSP Regulations, retention period for transaction records shall be five (5) years from the date of transaction except where specific laws and/or regulations require a different retention period, in which case, the longer retention period is observed.

For financial data and documents which indicate taxable transactions, data shall be preserved for ten (10) years per BIR

We keep your data as long as it is necessary: a) for the fulfillment of the declared, specified, and legitimate purposes, or when the processing relevant to the purposes has been terminated; b) for the establishment, exercise or defense of legal claims; or c) for legitimate business purposes, which shall be in accordance with the standards of the banking

Data Disposal

After the expiration of the imposed retention period, we dispose personal data in a secure manner in order to prevent further processing, unauthorized access, or disclosure to any other

#### **Data Sharing and Purpose**

When you consent to the processing of your Customer Data with us, you also agree to help us comply with our statutory and contractual obligations with other financial institutions. We may also share Customer Data externally with our partners, upon your written and/or electronic consent, for value added services you may find useful and relevant on top of your account with us. For contractual and

value-added service data sharing agreements, we employ standardized model clauses as recommended by National Privacy Commission to ensure data protection of Customer Data. Below are the disclosures required by the government entities, other regulatory authorities and financial institutions:

Bangko Sentral ng Pilipinas (BSP), Anti-Money Laundering Council (AMLC)

We are subjected to mandatory disclosures to the AMLC under Republic Act 9160 or the Anti-Money Laundering Act of 2001, as amended, when there is probable cause that the deposits or investments involved are in anyway related to unlawful activities or money laundering offenses.

BSP mandates disclosures and reporting in compliance with its issuances for the protection of the integrity of the banking

Bureau of Internal Revenue (BIR)

We may conduct random verification with the BIR in order to establish authenticity of tax returns submitted to

BIR may inquire into bank accounts of the following: a) a decedent in order to determine his gross estate; b) a taxpayer who has filed an application to compromise his tax liability on the ground of financial incapacity; and c) a taxpayer, information on whose account is requested by a foreign tax Credit Information Corporation (CIC)

Credit Information Systems Act (RA 9510) mandates us to submit your credit data to the CIC and share the same with other accessing entities and special accessing entities authorized by the CIC. Judicial and Investigative Authorities

We may be mandated to disclose certain Customer Data upon service of legal court orders (i.e. unexplained wealth under Section 8 of RA 3019) or express legal request from police, public prosecutors, courts, or dispute resolution providers allowed by law.

In these cases, we would notify you of the disclosure to the requesting government authority, subject to limitations imposed by

Other Regulatory Authorities

Regulatory authorities when such other persons or entities we may deem as having authority or right to such disclosure of information as in the case of regulatory agencies, government or otherwise, which have required such disclosure from us and when the circumstance so

**Financial Institutions** 

To fulfill payments and services, we may have to share your information with correspondent banks, network payment processors (i.e. Visa, Mastercard, American Express, JCB), stockbrokers, fund managers, or portfolio service

We disclose your Customer Data with insurers, insurance brokers, or providers of deposit or credit protection or protection against all kinds of

For purposes of credit investigation, consumer reporting, or for reports of credit history, account updates and fraud prevention, we may share your data with reference agencies such as Credit Card Association of the Philippines (CCAP) and Bankers Association of the Philippines (BAP).

Value Added Services

With your express consent, we may disclose your Customer Data to our partners who collaborate with us to provide services to you and provide joint communications that we hope you find of Through our digital channels, you may instruct other mobile financial technology applications to retrieve your account information, initiate payments or cash-in from your account with us via our Application Programming Interface (API)

**Rights of Data Subjects** 

Under the Data Privacy Act of 2012, you have the following rights:

Right to be informed – you may demand the details as to how your Personal Information is being processed or have been processed by the Bank, including the existence of automated decision-making and profiling

Right to access – upon written request, you may demand reasonable access to your Personal Information, which may include the contents of your processed personal information, the manner of processing, sources where they were obtained, recipients and reason of disclosure.

Right to dispute – you may dispute inaccuracy or error in your Personal Information in the Bank systems through our contact center representatives.

Right to object – you may suspend, withdraw, and remove your Personal Information in certain further processing, upon demand, which include your right to opt-out to any commercial communication or advertising purposes from the

Right to data erasure – based on reasonable grounds, you have the right to suspend, withdraw or order blocking, removal or destruction of your personal data from the Bank's filing system, without prejudice to the Bank continuous processing for commercial, operational, legal, and regulatory purposes.

Right to data portability – you have the right to obtain from the Bank your Personal Information in an electronic or structured format that is commonly used and allows for further use.

Right to be indemnified for damages – as data subject, you have every right to be indemnified for any damages sustained due to such violation of your right to privacy through inaccurate, false, unlawfully obtained or unauthorized use of your information.

Right to file a complaint – you may file your complaint or any concerns with our Data Protection Officer and/or with the National Privacy Commission through www.privacy.gov.ph.

## Contact our Data Protection Officer

For inquiries and concerns, you may address them to UnionBank's Data Protection Officer at 33/F UnionBank Plaza, Meralco Avenue cor. Onyx Road, Pasig City or through email at dpo@unionbankph.com

**Privacy Policy** 

Effective date: September 09, 2018

CONCEPT & INFORMATION GROUP INC ("us", "we", or "our") operates the Daily Tribune website (https://tribune.net.ph/).

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. Our Privacy Policy for CONCEPT & INFORMATION GROUP INC is managed through Free Privacy Policy.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from https://tribune.net.ph/

Information Collection And Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

**Email address** 

First name and last name

Cookies and Usage Data

#### **Usage Data**

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

**Tracking & Cookies Data** 

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

Session Cookies. We use Session Cookies to operate our Service.

Preference Cookies. We use Preference Cookies to remember your preferences and various settings. Security Cookies. We use Security Cookies for security purposes.

Use of Data

CONCEPT & INFORMATION GROUP INC uses the collected data for various purposes:

To provide and maintain the Service

To notify you about changes to our Service

To allow you to participate in interactive features of our Service when you choose to do so

To provide customer care and support

To provide analysis or valuable information so that we can improve the Service

To monitor the usage of the Service

To detect, prevent and address technical issues

Transfer Of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Philippines and choose to provide information to us, please note that we transfer the data, including Personal Data, to Philippines and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

CONCEPT & INFORMATION GROUP INC will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure Of Data

Legal Requirements

CONCEPT & INFORMATION GROUP INC may disclose your Personal Data in the good faith belief that such action is necessary to:

To comply with a legal obligation

To protect and defend the rights or property of CONCEPT & INFORMATION GROUP INC

To prevent or investigate possible wrongdoing in connection with the Service

To protect the personal safety of users of the Service or the public

To protect against legal liability

Security Of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security. Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Links To Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

Changes To This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

By email: <a href="mailto:centraldesk@tribune.net.ph">centraldesk@tribune.net.ph</a>

**Data Privacy Policy** 

Introduction

Century Properties Group Inc. (CPGI) and our subsidiary, value your privacy by providing appropriate measures in protecting and managing your personal data. Our Privacy Policy follows, and is consistent with, the Data Privacy Act of 2012 (DPA), its Implementing Rules and Regulations (IRR), other issuances of National Privacy Commission (NPC), as well as other relevant laws of the Philippines.

Personal data refers to all types of personal information, sensitive personal information and privileged information. Personal information refers to "any information, whether recorded in a material from or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual".

This Privacy Notice articulates how we process (meaning, how we collect, use, share, retain and dispose) and protect your personal data. It also tells you what steps you can take if you want us to change how we use your personal data, or if you want us to stop using your personal data.

Our Purpose for Processing your Personal Data.

To allow us to comply with the our corporate policies to its employees as well as with regulatory requirements being observed by CPGI as an employer, developer, controller, processor and third party,

it is important that CPGI collects, uses, stores and retains your personal data when it is reasonable and necessary for a declared and specific purpose.

In general, we are using your data for any of the following purposes:

For Customers/Client:

When you inquire about or purchased a property:

To conduct appropriate credit investigation to evaluate the credit risk associated to your financial obligations to CPGI;

To facilitate the sale and the turnover of a particular unit which necessarily includes the preparation of all documentation leading to the transfer of title, and perform all financial processes (reservation fees, amortization, handover fees, etc.) associated to your purchased.

To execute contract or provide information/services concerning the trading, brokerage, leasing, management and other incidental operations of real estates;

To update our records and keep your contact details and billing address up to date;

To provide safety and security to the unit owners, tenants and employees of tenants/unit owners; and; When you apply to become a tenant or merchant in any of our properties for lease:

To evaluate the interest of a party in a commitment to lease a space;

To conduct appropriate credit investigation to evaluate the credit risk associated to your financial obligations to CPGI;

To prepare lease contract and other documentations required and necessary in the consummation of the contract;

To perform all relevant financial transaction such as processing of security deposits, advanced rental payments, monthly rental payments and other incidental charges included in our contract;

To ensure safety and security to our unit owners, tenants and employees of tenants/unit owners; To communicate any advisories, notice, or changes in the terms and condition related to your lease contract.

For you to provide reviews in our products and services;

For you to subscribe/unsubscribe to our e-newsletters;

To generate statistical insights;

To conduct research and analysis (through surveys or polls) in order to improve customer experience/satisfaction;

To respond to specific complaints, inquiries, requests or to provide requested information;

To provide customer care activities, monitor our quality and security, and provide services timely and efficiently; and,

To notify and update you (through call, text or email) about our complimentary, commercial and promotional advertisements, loyalty and rewards offers, exclusive invites, discounts, surveys, and other direct marketing that we deemed relevant and beneficial to you based on your preference and interest initially provided to us or made aware of, with which you can opt-out anytime should you prefer not to receive these notifications.

To conduct appropriate due diligence checks;

To evaluate your proposal including your manpower, technical and operational capacity;

To assess the viaibility of your proposal and process your accreditation;

To communicate any decision on such proposal and issue a letter of award together with the contract; perform any other action as may be necessary to implement the terms and conditions of our contract To comply with CPGI's obligations under law and as required by government organizations and/or agencies such as, but not limited to, the following: NPC, BIR, HDMF or Pag-IBIG, PhilHealth, SSS and so on:

To comply with legal and regulatory requirements or obligations; and,

To perform such other processing or disclosure that may be required under law or regulations.

Types of personal data we collect

The types of personal data that we will collect from you depends on the particular purpose and/or position for which you are submitting an application.

The common type of data collected by CPGI from you, generally includes the following:

Basic personal information, such as full name, nickname, home addresses/billing address/shipping address, e-mail address, employment information, telephone, other personal contact numbers, username and password;

Sensitive personal information, such as age, nationality, marital status, gender, health, education and government issued identification document which includes, but not limited to identity (ID) cards, licenses, social security number;

Employment record, such as educational background, employment history, certifications, trainings attended, resume and income information of your previous jobs; and

Financial details such as credit history, bank account, credit card, and debit card information you have provided as a result of our transaction.

Please note that you are responsible for ensuring that all such personal data you submit through this website is accurate, complete and up-to-date.

Our Method of Collection

We collect data when you:

Submit a job application;

Submit a proposal and/or business-related documents;

Fill-out our forms and submit necessary documents;

Submit information through any form on our digital platforms or contact us through any of our social media accounts;

Purchase any of our properties, products, or avail of services and promos;

Respond to surveys, promotions, and other marketing and sales initiatives;

Provide personal information in relation to inquiries, requests, and complaints

Subscribe to our newsletter by indicating your email address; and,

Web Analytics in our Website

This website engaged Google Analytics, a third-party service to analyze the web traffic data for us. This service use cookies or web beacons.

Cookies are small files that our website puts on your PC to store info about your preferences. Cookies can improve your browsing experience by allowing our website to remember your preferences or letting you avoid signing in each time you visit our website. If you don't want our website/mobile application to store cookies on your PC, you can block cookies. But blocking cookies might prevent some pages from displaying correctly, or you might get a message from our website/mobile application letting you know that you need to allow cookies to view that our website/mobile application.

Data generated is not shared with any other party. For you to fully enjoy your visit and browsing experience,

only non-identifiable web traffic data are collected and analyzed, including:

Your IP address,

The search terms you used,

The pages and internal links accessed on our site

The date and time you visited the site,

Geolocation,

The referring site or platform (if any) through which you clicked through to this website

Your operating system, and

Web browser type.

Use the options in your web browser if you do not wish to receive (a) cookie(s) or if you wish to set your browser to notify you when you receive (a) cookie(s). Click on the "Help" section of your browser to learn how to change your cookie preferences. If you disable all cookies, you may not be able to take advantage of all the features of this website.

Links to third-party websites

From time to time, we will provide links to third-party web sites, or advertisements which contain links to third-party sites. These links are provided as a service to you and we do not provide any personal data to these websites or advertisers, and therefore, we will not accept responsibility for their privacy practices. These sites are operated by independent entities that have their own privacy policies which you should also review CPGI's Privacy Policy does not apply to such other sites or to the use that those entities make of your information. CPGI has no control over the content displayed on such sites, nor over the measures, if any, that are taken by such sites to protect the privacy of your information. Sharing of your Data

As a general rule, we are not allowed to share your data to third party except in limited circumstances as noted below. By giving your consent, you authorize CPGI to disclose your personal data to accredited/affiliated third parties or independent/non-affiliated third parties, whether local or foreign in any of the following circumstances:

As necessary for the proper execution of processes related to the declared purposes in this Privacy Policy.

The use or disclosure is reasonably necessary, required or authorized by or under law (such as for criminal investigation, as requested by court of law).

This means we might provide your personal data to the following:

Our affiliates, subsidiaries, partner companies, organizations, or agencies including their sub-contractors or prospective business partners that act as our service providers and contractors;

Law enforcement and government agencies;

Geolocation,

The referring site or platform (if any) through which you clicked through to this website Your operating system, and

All third parties, as noted in Annex A, with which we share this personal data are required to use your personal data in a manner that is consistent with this Privacy Policy.

However, these companies may only use such personal data for the purpose(s) disclosed in this Privacy Policy and may not use it for any other purpose.

How we protect your personal data

We take reasonable steps to make sure that your personal data we collect, use or disclose are accurate, complete, and up-to-date. We strictly enforce our Privacy Policy and we have implemented technological, organizational and physical security measures to protect your personal data we hold from loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction. We put in effect safeguards such as the following:

We keep and protect your personal data using a secured server behind a firewall, deploying encryption on computing devices and physical security controls.

We restrict access to your personal data only to qualified and authorized personnel who hold your personal data with strict confidentiality.

We reveal only the last four digits of your credit card numbers when confirming an order. Of course, we transmit the entire credit card number to the appropriate credit card company during order processing. Any personal data that you provide on this website is initially processed and stored by Century Properties. Using a secured connection, only authorized Century Properties Group personnel can then access and download your personal data from this website.

It is important for you to protect against unauthorized access to your password and to your computer. Be sure to sign-off when finished using a shared computer.

Our Privacy Policy regarding children

CPGI is very sensitive to privacy issues and we are especially careful in any communications with one of our most treasured customers – children. We will never collect personal data from children directly, without the parent's or guardian's consent.

When we say "Children", we refer to person below eighteen (18) years of age or those over but are unable to fully take care of themselves or protect themselves from abuse, neglect, cruelty, exploitation or discrimination because of a physical or mental disability or condition.

In some of our advertisement and promotions we may include photo and video of children. In such instance, we always ensure that proper permits, express consent of the Parents and/or Guardian and/or the children involved were obtained. Such materials will be used to promote CPGI products only. Personal data collected from children is used solely by CPGI and its authorized entities that provide technical, fulfillment or other services to it. Consent of the Parents and/or Guardians and/or the children are obtained for this purpose as well.

The best interests of children is the paramount consideration of CPGI in all actions concerning them. Where and how long do we keep your personal data?

Century Properties reserves the right to retain your personal data in our files located in the Philippines under certain circumstances, consistent with the provision of Data Privacy in lawful processing, such as when your personal data may be necessary to resolve disputes, or if Century Properties is required to do so by law or in the good faith; provided that such action is necessary to comply with a legal obligation and/or protect and defend the rights or property of Century Properties or its affiliates. If Century Properties is required to retain any portion of your personal data for such purposes, it shall use reasonable efforts to limit such data to what is necessary to accomplish the particular purpose. If there are changes in our Privacy Policy

From time to time, it may be necessary for CPGI to change this Privacy Policy. If we change our Privacy Policy, we will post the revised version here and will take effect immediately, so we suggest that you check here periodically for the most up-to-date version of our Privacy Policy. Rest assured, however, that any changes will not be retroactively applied and will not alter how we handle previously collected personal data without obtaining your consent, unless required by law.

How you can access, correct and update the personal data we have about you?

To exercise your rights which include right to access, modify, erase and object to processing your personal data within a reasonable time after such request or should you have any inquiries, feedbacks on this Privacy Policy, and/or complaints to CPGI, you may reach us through our "Contact Us"/"Customer Service" menu in this website, through a written letter or through an email to our Data Protection Officer (DPO).

Our contact details are as follows:

Data Protection Officer Century Properties Group, Inc.

21st floor, Pacific Star Building Sen. Gil Puyat Cor. Makati Avenue, Makati City

Office: TELEPHONE NUMBER loc. 793-5500

Email address: Daniel.delacruz@century-properties.com

You may also lodge a complaint before the National Privacy Commission (NPC). For further details, please refer to NPC's website: https://privacy.gov.ph/mechanics-for-complaints/.

Our decisions to provide such access or consider any request for correction, erasure and objection to process your personal data as it appears in our records are always subject to any exceptions under applicable and relevant laws and/or the DPA, its IRR and other issuances of NPC.

To cover for the cost of verifying a request for information and locating, retrieving, reviewing and copying any material requested, we may charge you minimal and reasonable fees based on administrative costs we incurred.

This Privacy Policy was last amended on March 2020

PRIVACY NOTICE AND GENERAL CONSENT FORM

\*\*\* This document only applies to subscribers who have an originally SunTM-branded Prepaid SIM activated before October 21, 2020. For Prepaid SIMs activated on October 22, 2020 and afterwards, please refer to this link: https://smart.com.ph/Corporate/privacy. \*\*\*

Digitel Mobile Phils., Inc. ("DMPI") respects your fundamental right to privacy and we commit to take great care in safeguarding your personal data. Throughout your use of our services, we collect and maintain some basic information about you. In accordance with applicable privacy laws, we share with you the general principles that govern how we collect, use, and share your personal data, as well as our privacy practices.

Why we collect your personal data

When we process your personal data, we do so under the following legal bases and for the purposes set out below:

A. We process your personal data to perform our obligations under contract with you.

- To create and nurture a relationship with you, so that we can continuously provide you with our services. For example, we process information about your usage of our prepaid services so that we may collect fees from your load top-ups for the products that you avail from us. We also process the same usage information as a means to validate your possession of your prepaid account when you make aftersales care transactions through our hotline or stores.
- B. We process your personal data based on our legitimate interest to function effectively as a business, but we only do so when our legitimate business interests do not override your personal interests and fundamental rights or freedoms.
- To continuously improve our business and operations. For example, we analyze your usage of our network and facilities to help us manage your account, provide customer care activities, investigate and resolve your service-related requests and concerns, monitor the quality and security of the network, train our staff, and plan for future growth.
- To continuously improve our products and services. We collect, use, process, and analyze your use of our products and services so that we can understand how to improve them for your benefit. Our analysis may include some information about your usage, such as the volume and frequency of your use of our SMS, voice, and data services, and your historical locational information which we determine based on an analysis of the places where you may have used our products and services in order to generate insights on foot traffic, crowd density, and mobility patterns.
- To understand your needs and preferences so that we can serve you better. We process data to determine your usage profile by maintaining a record of the products and services that you avail from us, and by analyzing other activities such as when you participate in our market research initiatives, when you visit and transact in our stores, and when you visit and use our websites and mobile apps such as the Giga Life App and MySMART Website. We do so in order to gain a better insight about the kinds of offers that would be relevant to your preferences.
- To manage the security of our business operations. We may process your personal data to conduct IT security operations, to manage our assets, to ensure your fair use of our products and services, and for business continuity, disaster recovery, and audit purposes.
- C. We process your personal data as you avail of our products and services so that we may be able to create and offer better products and services for you, including through direct marketing. We only carry out these processing activities based on your consent.

- To send you offers, recommendations, and promotions. We process your usage profile to send you customized offers and promotions through your contact details using channels such as SMS and voice calls. This includes location-based offers that are exclusively available in areas that you may frequent.
- To elaborate your usage profile. We may also collect personal information about you from third-party sources such as our subsidiaries, affiliates, and business partners, to whom you have also given your consent for them to share your information with us. We create this enhanced usage profile about you solely to get a deeper understanding of your preferences so that we can send you even better targeted product recommendations, special offers, and promotions.
- D. We process your personal data to comply with legal requirements.
- To assist public authorities. We generate statistical insights based on your usage of our network and facilities to assist public authorities in planning for healthcare, disaster management, and other similar initiatives. When we can, we aggregate and anonymize this information so that you are never identified as an individual.
- To comply with legal requirements. We may also perform other required personal data processing or disclosure to meet other relevant legal and regulatory requirements.

When we disclose your personal data

In some instances, we may be required to disclose your personal data to our agents, subsidiaries, affiliates, business partners and other third-party agencies and service providers as part of our regular business operations and for the provision of our products and services.

This means we might share your information with:

• Our service providers, contractors, and professional advisers who help us provide our products and services. The operations of our prepaid business have been outsourced to Smart Communications Inc. ("Smart") and its sub-contractors. These include load selling, product and service development, customer care channels and activities, and our privacy operations.

In this regard, even if you see the SmartTM brand used for our originally SunTM-branded prepaid products and services, DMPI remains as the controller of your personal data;

• Our subsidiaries and affiliates with whom you have also signed-up with. We do so only for the improvement of each other's legitimate business and operations. For example: we share information with each other about your usage profile so that we can create new offers that bundle our products and services into a single subscription as we have done with rebranding our prepaid products and services from SunTM to SmartTM.

This rebranding now allows you to also avail of SmartTM products and services. Please note, however, that your usage of SmartTM products and services is subject to Smart's own terms and conditions as well as its own privacy notice: https://smart.com.ph/Corporate/privacy. For inquiries on Smart's privacy practices, you may reach out to the Smart Data Privacy Office by emailing dataprivacyoffice@smart.com.ph;

- Other companies to whom you have also given consent for us to share your information with. For example, when you sign-up for products and services offered by other companies, they may request for information from us in order for them to validate your identity; and
- Law enforcement and government agencies, but only when required by laws and regulations and other lawful orders and processes.

In these cases, we ensure that your personal data is disclosed on a confidential basis, through secure channels, and only in compliance with applicable privacy laws and regulations. We will never share, rent, or sell your personal data to third parties outside of DMPI, except in special circumstances where you may have given your consent for, and as described in this statement.

For a list of our partners, please visit https://smart.com.ph/Corporate/privacy#affiliates. How we protect your personal data

The integrity, confidentiality, and security of your personal data are important to us. That's why we strictly enforce this privacy statement within DMPI and have implemented technical, organizational, and physical security measures that are designed to protect your information from unauthorized or fraudulent access, alteration, disclosure, misuse, and other unlawful activities. These are also designed to protect your information from other natural and human dangers. We also put in effect the following safeguards:

- We keep and protect your information using a secured server behind a firewall, encryption and security controls;
- We keep your information only for as long as necessary for us to (a) provide the products and services that you avail from us, (b) for our legitimate business purposes, (c) to comply with applicable laws, and (d) for special cases that will require the exercise or defense of legal claims, and for a maximum retention period of twelve (12) years from your service's permanent deactivation;
- We restrict access to your information only to qualified and authorized personnel who are trained to handle your information with strict confidentiality;
- We undergo regular audits and rigorous testing of our infrastructure's security protocols to ensure your information is always protected;
- We promptly notify you and the National Privacy Commission, when sensitive personal data that may, under the circumstances, be used to enable identity fraud are reasonably believed to have been acquired by an unauthorized person; and
- We let you update your information securely to keep our records accurate.

What your choices are

You are afforded certain rights in relation to your personal data under the Data Privacy Act of 2012 (Republic Act No. 10173). You are entitled (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

- Request access to the personal data we process about you: this right entitles you to know whether we hold personal data about you and, if we do, to obtain information on and a copy of that personal data.
- Request a rectification of your personal data: this right entitles you to have your personal data corrected if it is found to be outdated, inaccurate, or incomplete.
- Request the erasure of your personal data: this right entitles you to request the erasure of your personal data, such as in cases where your personal data is no longer necessary to achieve the legitimate business purpose of its use or processing.
- Request the restriction of the processing of your personal data: this right entitles you to request that we only process your personal data in limited circumstances, including with your consent.
- Request portability of your personal data: this right entitles you to receive a copy of personal data that you have provided to us (in a structured, commonly used and machine-readable format). This includes requests for us to transmit a copy of such personal data to another company, on your behalf. You moreover have a right to object to the processing of your personal data, such as in cases when we process your personal data based on your consent, such as for purposes related to marketing. To the extent that the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time by contacting our Data Privacy Officer through the contact details provided below, or by accessing https://apps.smart.com.ph/privacy. Please note that this will not affect the lawfulness of the processing that was carried out before you withdrew your consent or DMPI's right to continue parts of the processing based on other legal bases than your consent. If, however, we have not provided you with another legal basis justifying the processing of your personal data in this privacy statement, we will stop the processing and delete your personal data.

To exercise any of these rights, you may get in touch with our Data Privacy Officer through the contact details provided below. In some instances, we may request for supporting documents or proof before we effect any requested changes to your personal data.

If, despite our commitment and efforts to protect your personal data, you believe that your data privacy rights have been violated, we encourage and welcome individuals to come to DMPI first to seek resolution of any complaint. You have the right at all times to register a complaint directly with the National Privacy Commission or to make a claim against us with a competent court (either in the country where you live, the country where you work or the country where you deem that data privacy law has been infringed).

**DMPI** Data Privacy Office

6799 Ayala Ave., Makati City, 1226, Philippines

Email: dataprivacyoffice@smart.com.ph

PRIVACY POLICY

Thank you for visiting our website. Please read this Privacy Notice before using our website or submitting any personal data.

Cherry Mobile cares for your privacy. At www.cherrymobile.com.ph, we respect your privacy in the online world. We practice all necessary measures to secure any personal information you give us because your privacy is important to us.

Here in our website, we assure you that we will not disclose, sell or trade any information that you sent us to third-party and outside sources for any reason. When you visit our website, we collect two kinds of data:

Active Data (e.g.: name, location, contact number, email address, password, etc.) when voluntarily submitted by users for registration, surveys, contests, email forms, etc.

Passive Data (e.g.: Browser type, IP address, page reference, etc.)

We will have records of your Internet Protocol Address, domain name, type of browser and operating system used, the date and time you visited this site and the web pages or services you accessed at this site. These items will simply help us understand what is important to our site visitors and in no way, will personally identify you to anyone.

If you use any of the email links provided on our website you are most often requesting a response from us. The information you provide in the email is used to respond directly to your questions or comments you may have. We may file your comments to improve the site, or review and discard the information at a later date.

From time to time, we might have survey questions that we will ask you to answer and contests that you will want to join. You will always have the option to skip or join a survey or contest. These surveys and contests are generally about Cherry Mobile's website, products and other services. We may ask you for your age or age range, gender and other non-personally identifiable data. No personally identifiable data is requested and the data collected is not tied to any personally identifiable data that may have been previously provided. Data gathered during the conduct of these surveys and contests are only for use by the Cherry Mobile group for the particular and relevant purposes.

We will use your personally identifiable data only for business purposes within the Cherry Mobile group which may include its communication to our affiliates and subsidiaries. We do not share personally identifiable data collected at this site with third parties except for the following circumstance We may transfer your personal data to our service provider who administers and maintains this site. These partner agencies are bound by a contractual agreement to keep your data private and secure. We may also disclose personal data if we are required to do so by law or if in our good faith judgment, such action is reasonably necessary to comply with legal process, to respond to any claims, or to protect the rights of Cherry Mobile, its customers and the public.

You may have your personal data deleted, corrected or revised by sending us an e-mail at info@cherrymobile.com.phor by sending us a letter addressed to:

The Corporate Communications Department

Cosmic Technologies, Inc.

901 Apacible cor Leon Guinto Sts.,

Ermita, Manila

Philippines

Your personal data are kept secure. Only authorized Cherry Mobile staff, affiliated companies staff, third party agents or our business partners have access to your personal data.

We do not practice "spamming". Spamming is where unsolicited e-mails are sent to recipients containing advertisement or marketing related materials without the prior consent of the recipient. Cherrymobile.com.ph has many useful links to other websites. When you link to another site, you are no longer on our website and this privacy policy will not apply. When you link to another web site, you are subject to the privacy policy of that new site.

This Privacy Notice is governed by and construed in accordance with the laws of the Philippines. You agree to submit any dispute arising out of your use of this website to the exclusive jurisdiction of the courts of the Philippines.

By providing Cherry Mobile with your personal information, by using this website and by using various products and services offered by Cherry Mobile, whether online or offline, you agree with the terms of this Privacy Policy. Furthermore, you understand that these terms may be amended from time to time. Cherry Mobile reserves the right to change this policy when we deem it necessary without any prior notice.

Thank you from all of us at Cherry Mobile and we hope you enjoy your visit and find this website useful. China Banking Corporation Data Privacy Notice

We are committed to protecting your privacy in accordance with Republic Act 10173 ("Data Privacy Act of 2012"), its implementing rules and regulations, and other applicable laws of the Republic of the Philippines. We assure you that any information you communicate to us is protected. The Bank employs a combination of organizational, physical, procedural and technical security measures to secure your personal data.

When and What Personal Information We May Collect

When you apply for, avail or use the Bank's products or services, interact with our employees and/or authorized representatives, visit our premises, and/or access our phonebanking, and/or access our online systems and mobile apps, the Bank may collect your personal information, such as but not limited to your:

name, gender, nationality, birthdate, address, civil status, education and contact details; tax identification number and other government-issued identification numbers; employment and/or business information;

financial information (such as assets, income, expenses, payments and transaction history); transaction history and account activities including dealings and interactions with third parties; specimen signature, biometrics, voice recordings and cctv footages; and other personal information authorized and mandated by law to be collected such as but not limited to Anti-Money Laundering Act of 2001 (AMLA), Bangko Sentral ng Pilipinas (BSP) Circulars, etc. In addition, we may use "Google Analytics" to collect information about the visitors accessing our websites. Google analytics collects information on the IP addresses, geolocation, frequency, pages accessed, web browser information, and previous sites accessed prior to visiting the Bank's website. The Bank may use such information to improve the performance and content of its websites.

If you provide us with any personal information relating to a third party, you represent to us that you have obtained the consent of such third party to provide us with his/her personal information for the relevant purposes.

Use and Processing of Your Personal Information

The Bank may use your personal data for various purposes, including but not limited to:

Know-Your-Customer examination/investigation or client identification related activities;

evaluating and/or processing your applications or transactions;

addressing your inquiries, concerns or complaints, and providing product and/or service related support; managing your accounts and performing other audit, administrative and operational tasks (e.g. credit and collection, customer satisfaction survey, relationship management, risk management, staff training, due diligence, system or product development and planning, insurance, safety and security management of premises and services, and general audit);

informing you about new product/services offerings and promotions by the Bank, its subsidiaries' and affiliates';

profiling, data analysis, behavioural modelling, market research, cross-selling and direct marketing; detection, prevention, investigation, and prosecution of fraud or crime;

compliance with laws and regulations governing our products and services (e.g. AMLA, BSP Circulars, Credit Information Corporation (CIC) Circulars, etc.);

performing activities that you have consented to; and

performing such other activities permitted by law;

**Data Sharing** 

The Bank ensures that only authorized personnel within the various units of the Bank has access to your personal information. Nevertheless, the Bank may share your personal information with relevant Government agencies such as BSP, Securities and Exchange Commission (SEC), CIC, Philippine Deposit Insurance Corporation (PDIC) and Bureau of Internal Revenue (BIR) as mandated by pertinent laws and regulations. In addition, with your consent, the Bank may share your information with the bank's offices, branches, subsidiaries and affiliates that are in collaboration with the bank to provide certain products and services to you, accredited third parties/vendors, credit reporting or credit reference agencies, credit protection provider, guarantee institutions, debt collection agencies, private regulatory organizations and other financial institutions, and other outsourced service providers engaged by the bank for the purposes of the bank's conduct of everyday business. Such data sharing activities shall be done in a manner that is compliant with the Data Privacy Act of 2012 and under an obligation of confidentiality.

**Data Retention** 

The Bank may retain, process, update and/or share your personal information for as long necessary for the fulfilment of the purpose for which it was collected and such other purposes that you may have consented to from time to time, or as required by pertinent laws and regulations.

**Data Privacy Rights** 

Under the Data Privacy Act of 2012, the rights of the data subject is specifically set forth in Section 16 of the said law.

You shall notify us in writing, which must be acknowledged by us, if you do not consent to any of the processing described above and/or sharing of said information with our representative officers, subsidiaries, affiliates, agents and accredited third parties/vendors, service providers, or other persons or entities that we may reasonably select.

Privacy inquiries, requests, and concerns

For your data privacy inquiries, requests or concerns, you may email our Data Protection Office at cbc.privacy@chinabank.ph or get in touch with our Contact Center via our hotline at (632) 888-55-888. WE RESPECT YOUR PRIVACY

Bounty Agro Ventures, Inc. (BAVI) is committed in ensuring that personal and sensitive personal information, including health information is handled by the appropriate departments on a strictly "for your eyes-only policy" in accordance with the Data Privacy Law of the Philippines. These departments include the following units:

**Human Resources** 

Farming and Growing

**Veterinary Care** 

**Distribution and Logistics** 

**Business Centers** 

**Trucking and Transportation** 

Marketing

Information Technology

**Legal Services** 

**Vendor Management** 

**Supply Chain Management** 

Finance and Accounting

When an individual is engaged by authorized BAVI personnel, including application for employment an individual is asked to supply information to enable processing of your specific application and for ongoing maintenance of any specific agreements with BAVI. Generally, the information BAVI collects includes:

Name

Address

Personal contact details

Place of birth

Gender

Citizenship

Disabilities

Health details

Previous employment history (for HR)

Qualifications and credentials (for HR)

Government identification details

Family members

**Emergency contact details** 

Other pertinent information as required to serve BAVI's obligations in an agreement Additional personal information may be collected during the course of an individual's engagement to manage the ongoing relationship between an individual and BAVI. Examples may include time, attendance, leave requests, medical certifications, performance appraisals, psychological examination results, annual medical examination results, pay history, bank details, etc.

In most circumstances, most information is collected directly from an individual. At the time information is collected, an individual will be advised if there are legal requirements for an individual to supply the information, for example, if such information is required for immigration or taxation purposes. In some circumstances information about an individual may be provided by third parties such as referring individuals or entitles, headhunting firms, manpower agencies, job portals. Other information such as previous employees, employers and referrals may also provide information about an individual to BAVI. If such are these cases, then the individual and these third parties have previous agreements that these third parties can provide this information to BAVI without BAVI acquiring a direct consent from the individual.

Use of Personal Information

Personal information or sensitive personal information collected, stored, processed and retained by BAVI will be used in managing processes associated with your engagement with BAVI. These activities may include, but not limited to the following:

**Employment** 

Relationship management

Recruitment, selection and appointment functions

Payroll processing

Benefits administration, including loans, government remittances, attendance, etc.

Performance management and appraisals

**Training** 

**Promotions** 

Workplace health and safety

Permits and licensing

Taxation

BAVI may also use these personal or sensitive personal information in the following circumstances:

**Customer services** 

Operational management

Management of grievances or disciplinary procedures

Recovery of debts from BAVI such as loans, advances, etc.

Life, medical or motor insurance

Overall company planning such as budgetary projections

Reportorial requirements for regulatory offices such as DOLE, Phil-Health, PAGIBIG and the Social Security Systems, the Food and Drug Administration, etc.

Storage and Security of Personal and Sensitive Personal Information

BAVI shall store each individual's personal and sensitive personal information in a combination of electronic and paper formats. BAVI's security policies and procedures along with our technical systems provide a secure environment which restricts access to authorized staff only. Our staff are regularly trained and oriented on the aspects of data privacy protection and handling to ensure proper compliance.

Disclosure of Personal Information

BAVI will only generally disclose an individual's personal information to third parties upon consent of this document based on specific purpose, which is the purpose of managing and maintaining an individual's contracting arrangements or employment agreements with BAVI, or if BAVI has informed the individual, if such purpose is outside of this specific purpose, which needs specific consent from the concerned individual via another consent mechanism. However, from time to time, BAVI may be required to disclose an individual's information in circumstances such as:

If required to do so by law. This could be required by legitimate and valid court orders, subpoenas, the Bureau of Internal Revenue, the Department of Labor and Employment, PhilHealth, PAGIBIG and the Social Security System. BAVI will not be sharing an individual's personal information to any third parties and other government agencies without informing the individual and has not given full consent to do so. If there are reasonable grounds to believe that the disclosure is necessary to prevent or lessen a serious and imminent threat to the individual and co-worker's life and health, as well as life and health and safety of the general public.

In general course of BAVI's business, your personal information may be provided to:

Our insurance providers and brokers to cover life insurance, medical and non-life insurance benefit packages

Travel providers

Permits and licensing

Reportorial requirements to government regulatory agencies.

Accessing and Accuracy of Personal Information

An individual doing business or is engaged in a contractual agreement with BAVI has the right to access his/her personal information that is held by BAVI. An individual is also entitled to request that personal information held about the individual is accurate and up to date and therefore can be amended accordingly. BAVI may also require an individual, on a regular basis, to perform an update of his/her personal information so that BAVI is ensured that BAVI is holding the individual's most updated personal information. As the accuracy of information held depends largely on the information provided, BAVI also advises and urges each individual to:

Advise BAVI immediately if there are any errors or updates in your personal information and Advise BAVI and keep BAVI updated on any immediate changes in your personal information, such as name, contact details, civil status, dependents, etc.

Employees can request to make changes to, or access their personal information held in your personnel files (201 file) by contacting the Human Resources Department.

However, employees will be required to provide a written signed request if they wish to:

Examine the contents in their personnel file or

Have any corrections made or additional material added to their file or

Request copies of certain documents from their file.

BAVI, however, reserves the right not to honor requests if such requests are deemed unnecessary or unjustifiable as well as deny providing copies of certain documents which are deemed to be the property of BAVI, such as disciplinary documents, live contracts, etc.

Access to personal files must be carried out in the presence of an authorized BAVI employee with access to such files. Files or certain documents cannot be removed from BAVI custody and documents cannot be removed from the file.

As such, withdrawal of the entire file or request for the deletion of the entire file is not allowed, for such withdrawal and deletion of the entire file while the any contract is still enforceable would only mean that BAVI cannot maintain and administer an its contractual obligations to the individual while agreement is still in force. As such, the withdrawal and deletion of the entire individual file is only allowed under specific employee file retention and disposal mechanisms as approved by BAVI and required by the Data Privacy Law.

Website Privacy Policy

Bounty Agro Ventures, Inc. (BAVI) operates the https://bountyagro.com.ph website, which provides the SERVICE.

This page is used to inform website visitors regarding our policies with the collection, use, and disclosure of Personal Information if anyone decided to use our Service, the Bounty Agro Ventures, Inc. (BAVII) website.

If you choose to use our Service, then you agree to the collection and use of information in relation with this policy. The Personal Information that we collect are used for providing and improving the Service. We will not use or share your information with anyone except as described in this Privacy Policy. The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, which is accessible at https://bountyagro.com.ph, unless otherwise defined in this Privacy Policy. Our Privacy Policy was created with the help of the Privacy Policy Template and the Online Privacy Policy Template. Information Collection and Use

For a better experience while using our Service, we may require you to provide us with certain personally identifiable information, including but not limited to your name, phone number, and email address. The information that we collect will be used to contact or identify you. Log Data

We want to inform you that whenever you visit our Service, we collect information that your browser sends to us that is called Log Data. This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser version, pages of our Service that you visit, the time and date of your visit, the time spent on those pages, and other statistics.

Cookies

Cookies are files with small amount of data that is commonly used an anonymous unique identifier. These are sent to your browser from the website that you visit and are stored on your computer's hard drive.

Our website uses these "cookies" to collect information and to improve our Service. You have the option to either accept or refuse these cookies, and know when a cookie is being sent to your computer. If you choose to refuse our cookies, you may not be able to use some portions of our Service.

**Service Providers** 

We may employ third-party companies and individuals due to the following reasons:

To facilitate our Service;

To provide the Service on our behalf;

To perform Service-related services; or

To assist us in analyzing how our Service is used.

We want to inform our Service users that these third parties have access to your Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

Security

We value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security. Links to Other Sites

Our Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Privacy of Minors

Our Services do not address anyone under the age of 18. We do not knowingly collect personal identifiable information from children under 18. In the case we discover that a person under 18 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. Thus, we advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately, after they are posted on this page.

Contact Us

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us. PRIVACY STATEMENT

**Our Privacy Commitment** 

Smart Communications, Inc. ("SMART") respects our customers' fundamental right to privacy, and we commit to take great care in safeguarding your personal data. SMART has developed a privacy statement that aims to ensure that we adopt and observe appropriate standards for personal data protection in compliance with applicable privacy laws and regulations.

While this privacy statement sets out the general principles that govern the collection, use, and disclosure of our customers' personal data, we have also developed this privacy statement to inform you more specifically about our privacy practices.

Why we collect your personal data

Throughout your use of our services, we collect and maintain some basic information about you. We do so only for the purposes and legal bases described below.

We process your personal data to perform our obligations under contract with you.

To create and nurture a relationship with you, so that we can continuously provide you with our services. For example, when you apply for any of our services, we collect personal data about you, that will allow us to validate your identity and credit history for purposes of billing and collection of fees for the products and services that you avail from us.

We process your personal data based on our legitimate interest to function effectively as a business, but we only do so when your interests and fundamental rights or freedoms do not override our legitimate interest.

To continuously improve our business and operations. For example, we analyze your usage of our network and facilities to help us manage your account, provide customer care activities, investigate and resolve your service-related requests and concerns, monitor the quality and security of the network, train our staff, and plan for future growth. We may also process your personal contact details and publish them in an internal directory listing, in order to effectively communicate with you and provide you with necessary assistance.

To continuously improve our products and services. We collect, use, process, and analyze your use of our products and services so that we can understand how to improve them for your benefit. Our analysis may include some information about your usage, such as the volume and frequWe process your personal data as you avail of our products and services so that we may be able to create and offer better products and services for you, including through direct marketing. We only carry out these processing activities based on your consent.ency of your use of our SMS, voice, and data services, and your historical locational information which we determine based on an analysis of the places where you may have used our products and services in order to generate insights on foot traffic, crowd density, and mobility patterns.

To understand your needs and preferences so that we can serve you better. We process data to determine your usage profile by maintaining a record of the products and services that you avail from us, and by analyzing other activities such as when you participate in our market research initiatives, when you visit and transact in our stores, and when you visit and use our websites and mobile apps. We do so in order to gain a better insight about the kinds of offers that would be relevant to your preferences.

To manage the security of our business operations. We may process your personal data to conduct IT security operations, to manage our assets, to ensure your fair use of our products and services, and for business continuity, disaster recovery, and audit purposes.

We process your personal data as you avail of our products and services so that we may be able to create and offer better products and services for you, including through direct marketing. We only carry out these processing activities based on your consent.

To send you offers, recommendations and promotions. We process your usage profile to send you customized offers and promotions through your contact details using channels such as SMS, voice calls, and e-mail. This includes location-based offers that are exclusively available in areas that you may frequent.

To elaborate your usage profile. We may also collect personal information about you from third-party sources such as our subsidiaries, affiliates, and business partners, to whom you have also given your consent for them to share your information with us. We create this enhanced usage profile about you

solely to get a deeper understanding of your preferences so that we can send you even better targeted product recommendations, special offers, and promotions

We process your personal data to comply with legal requirements.

To assist public authorities. We generate statistical insights based on your usage of our network and facilities to assist public authorities in planning for healthcare, disaster management, and other similar initiatives. When we can, we aggregate and anonymize this information so that you are never identified as an individual.

To comply with legal requirements. We run credit scoring programs and initiatives, including but not limited to, providing information to the Credit Information Corporation in accordance to Republic Act No. 9501 and the Credit Information System Act. We may also perform other required personal data processing or disclosure to meet other relevant legal and regulatory requirements.

How we collect your personal data

We collect your personal data from several resources.

Information you share with us

Most of the personal data we retain are information you have shared with us. You provide us with personal data when you:

Apply for our services by filling out application forms, subscription agreements, and other similar or related documents through any of our available channels (online, in our stores, or through our sales representatives);

Get in touch with us to ask about something, file a complaint or request for service;

Take part in our research and surveys; and/or

Information we collect during our relationship with you

We also collect information as you use our products and services, like when you:

Use our network, facilities and services - whether it is Mobile, Fixed, Home, or any of our other products, services, and channels;

Pay your bills or purchase add-on products and services;

Use our apps, websites, and self-service channels and portals;

Join our promos, prize raffles, or rewards & loyalty programs;

Participate in our market research activities; and

Visit and transact in our stores.

Information we collect from other sources

We may also collect your personal data, from our subsidiaries, affiliates, and business partners, to whom you have also given your consent for them to share your information with us.

For a list of these partners, please visit https://smart.com.ph/Corporate/privacy#affiliates.

When we disclose your personal data

There are a variety of circumstances where we may need to share some of the information that you have provided to us. In these cases, we ensure that your personal data is disclosed on a confidential basis, through secure channels, and only in compliance with applicable privacy laws and regulations. We will never share, rent, or sell your personal data to third parties outside of SMART except in special circumstances where you may have given your consent for, and as described in this statement. In some instances, we may be required to disclose your personal data to our agents, subsidiaries, affiliates, business partners and other third-party agencies and service providers as part of our regular business operations and for the provision of our products and services. This means we might share your information with:

Our service providers, contractors, and professional advisers who help us provide our products and services. This includes partner companies, organizations, or agencies, and their sub-contractors. For example: our couriers for bill delivery and our customer contact centers for our pre- and post-sales hotline operations;

Our subsidiaries and affiliates with whom you have also signed-up with. We do so only for the improvement of each other's legitimate business and operations. For example: we share information with each other about your usage profile so that we can create new offers that bundle our products and services into a single subscription;

Other companies to whom you have also given consent for us to share your information with. For example, when you sign-up for products and services offered by other companies, they may request for information from us in order for them to validate your identity; and

Law enforcement and government agencies, but only when required by laws and regulations and other lawful orders and processes.

For the list of our partners, please visit: https://smart.com.ph/Corporate/privacy#affiliates.

How we protect your personal data

The integrity, confidentiality, and security of your information are important to us. That's why we strictly enforce our privacy statement within SMART and have implemented technical, organizational, and physical security measures that are designed to protect your information from unauthorized or fraudulent access, alteration, disclosure, misuse, and other unlawful activities. These are also designed to protect your information from other natural and human dangers.

We also put in effect the following safeguards:

We keep and protect your information using a secured server behind a firewall, encryption and security controls;

We keep your information only for as long as necessary for us to (a) provide the products and services that you avail from us, (b) for our legitimate business purposes, (c) to comply with pertinent laws, and (d) for special cases that will require the exercise or defense of legal claims and for a maximum retention period of twelve (12) years from your service's permanent deactivation.

We restrict access to your information only to qualified and authorized personnel who are trained to handle your information with strict confidentiality;

We undergo regular audits and rigorous testing of our infrastructure's security protocols to ensure your data is always protected;

We promptly notify you and the competent data protection authority, when sensitive personal data that may, under the circumstances, be used to enable identity fraud are reasonably believed to have been acquired by an unauthorized person;

We let you update your information securely to keep our records accurate.

What your choices are

You are afforded certain rights in relation to your personal data under applicable data privacy laws and regulations.

You are entitled (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

Request access to the personal data we process about you: this right entitles you to know whether we hold personal data about you and, if we do, to obtain information on and a copy of that personal data. Request a rectification of your personal data: this right entitles you to have your personal data corrected if it is found to be outdated, inaccurate, or incomplete.

Request the erasure of your personal data: this right entitles you to request the erasure of your personal data, such as in cases where your personal data is no longer necessary to achieve the legitimate business purpose of its use or processing.

Request the restriction of the processing of your personal data: this right entitles you to request that we only process your personal data in limited circumstances, including with your consent.

Request portability of your personal data: this right entitles you to receive a copy of personal data that you have provided to us (in a structured, commonly used and machinereadable format). This includes requests for us to transmit a copy of such personal data to another company, on your behalf.

You moreover have a right to object to the processing of your personal data, such as in cases when we process your personal data for purposes related to direct marketing.

To the extent that the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time by contacting our Data Privacy Officer. Please note that this will not affect the lawfulness of the processing that was carried out before you withdrew your consent or SMART's right to continue parts of the processing based on other legal bases than your consent. If, however we have not provided you with another legal basis justifying the processing of your personal data in this privacy statement, we will stop the processing and delete your personal data.

To exercise these rights, you may get in touch with our Data Privacy Officer through the contact details provided below. In some instances, we may request for supporting documents or proof before we effect any requested changes to your personal data.

If, despite our commitment and efforts to protect your personal data, you believe that your data privacy rights have been violated, we encourage and welcome individuals to come to SMART first to seek resolution of any complaint. You have the right at all times to register a complaint directly with the relevant supervisory authority or to make a claim against us with a competent court (either in the country where you live, the country where you work or the country where you deem that data privacy law has been infringed).

**SMART Data Privacy Office** 

6799 Ayala Ave., Makati City, 1226, Philippines

Email: dataprivacyoffice@smart.com.ph

Changes to our privacy statement

From time to time, we may update our privacy statement and practices to comply with changes in applicable laws, to comply with government and regulatory requirements, to adapt to new technologies and protocols, to align with industry best practices, and for business purposes.

You will always be provided notice if these changes are significant and, if we are required by law, we will ensure to obtain your updated consent.

This Privacy Statement is effective January 15, 2020.

Website Privacy Policy

The policies below are applicable to the Web site and affiliate sites of Smart Communications, Inc. (SMART) found at www.smart.com.ph . Please be advised that the practices described in this Privacy Policy apply only to information gathered online at our Web site. They do not apply to information that you may submit to us offline or to Web sites maintained by other companies or organizations to which we may link or may have link through us.

By visiting our Web site, you are accepting the practices described in our Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Web site.

SMART collects personal information, voluntarily submitted by visitors to the Web site, which enables us to respond to requests for publications, distribute e-newsletters, process employment inquiries and respond to requests for more information or assistance. SMART adheres to the highest standards of ethical practices in all of our operations and is dedicated to protecting the privacy of all visitors to our Web site. Except as disclosed below, we do not sell, barter, give away, rent or permit anyone outside of SMART to use your personal information.

We occasionally use third-party agents, subsidiaries, affiliates and partners to perform functions such as creative design, marketing, analytics, programming, site maintenance, providing customer service, etc., on our behalf. These entities have access to the personal information needed to perform their functions and are contractually obligated to maintain the confidentiality and security of any personal information collected from the Web site. They are restricted from using, selling, distributing or altering these data in any way other than to provide the requested services to the Web site.

We may also use or disclose your personal information if required to do so by law or in the good-faith belief that such action is necessary to

- (a) conform to applicable law or comply with legal process served on us or the Website;
- (b) protect and defend our rights or property, the Web site or our users, and
- (c) act under emergency circumstances to protect our safety and security and those of our affiliates, agents and the users of the Web site or the public in general.

SMART also collects anonymous information to help us tailor the Web site to visitor interests and concerns. We use "cookies" to help us understand which parts of our Web site are the most popular, where our visitors are going and how much time they spend there. The information that is gathered through cookies is used solely to assist in improving Web site design and function. This Web site is functional without the retention of cookies. You may elect to block cookies from this site through your browser settings. SMART strives to protect the transmission of any information submitted by visitors. SMART does not warrant that transmission of data will be completely secured, and any and all submissions are at the visitor's risk.

This Web site may contain links to sites operated by third parties. Please be advised that the practices described in this Privacy Policy do not apply to information gathered through these other Web sites. Please remember that any information that you may share in public areas, such as message boards or feedback sections, becomes public, and therefore this Privacy Policy does not apply to any information you choose to make public. Please be careful about what you disclose, and do not post any personal information that you expect to keep private.

The Web site is published in the Republic of the Philippines and is subject to laws of the Republic of the Philippines. If you are located in a country outside the Republic of the Philippines and voluntarily submit personal information to us, you thereby consent to the general use of such information as provided in this Privacy Policy and to the transfer of that information to, and/or storage of that information in, the Republic of the Philippines. SMART shall not be liable under any circumstances for damages resulting from use of information collected from visitors to the site.

SMART may change this Privacy Policy to reflect, among others, changes in the way we collect visitor information.

Questions and comments should be directed to this email address.

**Privacy Policy** 

PRIVACY POLICY We, at SKY CABLE CORPORATION (the "Company"), are committed to protecting your privacy and ensuring that you experience and enjoy our offered cable, broadband, and other value added services. The Company developed this Privacy Policy ("Policy") with the objective of ensuring compliance with the applicable privacy laws, rules and regulations of the Republic of the Philippines, including but not limited to Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012 (the "Data Privacy Act"), its implementing rules and regulations and rules, regulations and the relevant issuances of the National Privacy Commission of the Philippines ("NPC").

This Policy governs the collection, sharing, recording, updating, modification, retrieval, use, retention, and disposal of Personal Information and Sensitive Personal Information gathered from, Service Application Forms, Website and Campaign-based Registrations, and various communication channels such as phone calls and social media sites, among others.

By applying for subscription or by making inquiries regarding any of our services, accessing the Company's website (http://www.mysky.com.ph), participating in our marketing and promotional activities, availing of customer service by calling and sending a message through our website, and various social media sites, and continued use of the Company's products and services, you indicate your consent and acceptance of the terms of this Policy.

Under the Data Privacy Act, persons whose personal, sensitive or privileged information are collected, stored and processed are called "Data Subjects". Institutions which deal with these information are duty

bound to uphold the rights of Data Subjects, as well as to adhere to general data privacy principles and the requirements of lawful processing.

Thus, we hereby provide you with our Privacy Policy that will guard the safety and care of your Personal Information and Sensitive Personal Information that we gather from you.

#### TYPES OF INFORMATION COVERED BY THIS POLICY

This Policy applies to Personal Information and Sensitive Personal Information.

"Personal Information" is defined by law as any information, whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual.

"Sensitive Personal Information" is likewise referred to as personal information:

About an individual's race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;

About an individual's health, education, genetic or sexual life, or to any proceeding for any offense committed or alleged to have been committed by such individual, the disposal of such proceedings, or the sentence of any court in such proceedings;

Issued by government agencies peculiar to an individual which includes, but is not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and

Specifically established by an executive order or an act of Congress to be kept classified.

Information that does not identify or pertain to an individual person, such as anonymous, aggregated, or corporate data, is not covered by this Policy. We may collect, use and disclose such information in order to evaluate and improve and respond to the needs of our service offerings; and, communicate to our affiliates, sponsors, advertiser, service contractor; or for other purposes related to the our offered services.

## SCOPE OF THIS PRIVACY POLICY

This Policy covers all Personal Information and Sensitive Personal Information gathered through our Service Application Forms, the website (http://www.mysky.com.ph), social media platforms and any other application or means of procuring information that will be used and maintained by the Company, in relation to the rendering the cable and internet products and services offered including related auxiliary services.

## INFORMATION COLLECTION

The Company's collection of Personal Information and Sensitive Personal Information is done through the following means:

Manner of Collection

Service Application Form
Registrations through Service Application Form

Phone Call and/or SMS
Posting of a query or additional requests

#### Requests for technical assistance

Website
Creation of online account and profile
Posting of queries or additional requests
Requests for technical assistance
Registration for promos and raffles

Social Media Sites (including, but not limited to, the Facebook accounts of MySKYCable[1], SKYonDemandPH[2], skydirectph[3] and the Twitter accounts of skyserves[4], and myskyupdates[5]; and the Instagram account of myskyupdates[6]) Posting of a query or additional requests Requests for technical assistance Registration for promotional activities and raffles

Mobile and/or Tablet Applications ("app") Creation of online account and profile Posting of queries or additional requests Requests for technical assistance Registration for promos and raffles

#### Information Collected

For purposes of inquiring regarding our products and services, as well as the subscription to the same, the Company collects the following information from subscribers, non-subscribers, and other site visitors:

personally identifiable information, which may include, but shall not be limited to, your name, e-mail address, home or work address, landline or mobile number, date of birth, your Sky Cable account number or the subscription services you use or other information in relation to your Sky Cable account;

anonymous demographic information, which is not unique to you, which may include, but shall not be limited to, your ZIP code, age, gender, preferences, interests and favorites; and

information about your computer hardware and software that is automatically collected, which may include, but shall not be limited to, your IP address, browser type, domain names, access times, referring website addresses, your surfing and browsing of the website, use of the Sky Cable Applications and social media platforms, location and other information collected through cookies and other means.

The Company's objective in collecting information is to ensure that the customers are able to reach the Company for any and all their needs in relation to the subscription.

In reaching out to our customer relations officers for any and all queries relating to the account, subscription, and technical assistance through phone calls and/or SMS, the Company reserves the right to record the communication with any subscriber or non-subscriber.

In the use of our website, the Company maintains the following means in the collection of information: Log Information:

IP addresses of site visitors are only collected when transactions are made in the Company's Website, for log-in and for dispute handling purposes only. As of the date of effectivity of this Policy, the following are the Company's services that collect IP addresses of site visitors:

Pay-Per-View and Select subscription;

Online Payment;

Netflix, NBA League Pass, HBO Go subscription; and SKY On Demand PPV and Packs subscription mySKY app (Play Store and App Store)

IP addresses of site visitors are logged in a database securely stored in the cloud web server.

Information can be extracted through the content management system of the Company's Website that is protected by certain security features (i.e. secured log-in system, and restricted access or access is limited only to administrators of the Website).

# Cookies and Other Tracking Technologies:

The Website uses "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time by informing the web server that you have returned to a specific page. When you return to the Website, the information you previously provided can be retrieved, so you can easily use the Website features that you customized.

You can accept or decline cookies by modifying your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Website or the linked sites you visit.

## DATA PROCESSING PROCEDURE

The Company collects the categories of information above listed. Thereafter, the personal information gathered by the Company about you is used to operate our website and deliver the services you have requested.

The Company shall ensure at all times that only authorized personnel may gain access to information and any violation to its set procedure will be accompanied by corrective measures and remedies within the Company. The Company also reserves its right to use the available legal remedies to correct any reach of protocol and procedure.

Such procedures shall also be regularly monitored, modified, and updated to ensure that the rights of the Data Subjects are respected, and that processing thereof is done fully in accordance with the Data Privacy Act, and other applicable laws and regulations.

## USE AND SHARING OF PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION

The Company may use your Personal Information and Sensitive Personal Information for the following legitimate business purposes:

management and administrative purposes, which may include, but shall not be limited to, processing your subscription application and providing assistance and responses to queries of non-subscribers, maintenance or termination of accounts, billing, responding to your account and technical needs, and notifying you of any updates to the Company's products and services;

to undertake research and profiling activities, with the aim to better the services offered and to know the needs of the customers in terms of the services being offered and in the maintenance of their subscription; provide training to employees, service contractors and third-party agents in subscription-related queries, technical knowledge and skill, and any other related purposes of maintenance of the Company's products and services;

market research purposes and in order to aid in the continuous development of the Company's products and services, website and/or applications, which may include, but shall not be limited to the following purposes: (a) to conduct market studies or customer satisfaction surveys; (b) to personalize the Company's products and services in connection with your personal preferences and interests, and; (c) to determine which offered features of the Company's products and services are the most popular;

advertising and promotion purposes, which may include, but shall not be limited to, campaign-based registration, the use of collected information by our marketing team for promos, such as raffles, offers, incentives and other rewards if you are eligible for the same, provided that you have consented to be notified or informed of the such offers, incentives and other rewards;

account security purposes, which may include, but shall not be limited to, notifying you of any service and security issues, preventing and detecting identity fraud, privacy breach or other crimes under the laws of the Republic of the Philippines, and conducting internal audits and checking the strength of the security measures in place;

for purposes of compliance with legal and regulatory and requirements, which may include, but shall not be limited to, complying with requirements under applicable laws, rules and regulations in the Republic of the Philippines, or disclosing information to law enforcement agencies or government officials, as may be required by the said applicable laws, rules and regulations; and

for other legitimate business purposes, which business purposes shall be communicated to the subscriber, non-subscriber or visitor of the website.

The Company may share Personal Information and Sensitive Personal Information with the Company's subsidiaries, affiliates, service providers and third-party agents in order to provide and manage all the needs of the customers in the most efficient and responsive means, which will be covered by appropriate Data Sharing Agreements required under the present law.

In the event of a bankruptcy, or a merger, acquisition, joint venture or other business transaction, involving our Site and applications, Personal Information and Sensitive Personal Information may be transferred as part of the assets of the company, but will remain subject to this Policy.

Additionally, Personal Information and Sensitive Personal Information may be disclosed, without prior notice and in good faith, when necessary in order to protect or defend the legal rights or property of the Company, other related Companies or their employees, agents and contractors (including enforcement of our agreements); to protect the safety and security of other Sky Cable users or members of the public; to protect the integrity of products and services; to protect against fraud or for risk management purposes; or, to comply with the law or legal process.

The Company will not sell, rent, or share Personal Information with third parties for any reason other than those described above without first obtaining your consent.

HOW WE SAFEGUARD PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION

Safety of all Personal Information and Sensitive Personal Information collected is a top priority for the Company. The Company has implemented policies and procedures in accordance with the Data Privacy Act, related laws and issuances to provide an appropriate level of security for the Personal Information and Sensitive Personal Information that we collect, record, update, modify, retrieve, use, store and dispose. The Company requires third parties, to whom we disclose Personal Information and Sensitive Personal Information governed by this Policy, to implement similar safeguards to protect Personal Information and Sensitive Personal Information.

In case of data breach involving Personal Information and Sensitive Personal Information collected, stored, retained and used by the Company, individual notification to the persons affected will be sent electronically or in written form, in accordance with the Company's breach management protocol as required under the Data Privacy Act, related laws, and issuances.

If you have concerns about data breach involving information you have provided us, please send us an email at dpo@skycable.com or contact us at + 63 2 3449 9141.

## **ACCESS AND DELETION**

The Company gives you the option of editing, updating, modifying or removing your Personal Information and/or Sensitive Personal Information from the Company's systems, which may include any and all information shared to the Company's subsidiaries, affiliates, service providers and third-party agents.

The Company retains Personal Information and Sensitive Personal information for a period of five (5) years or as long as necessary to fulfill a legitimate business purpose, whichever is later. After this retention period, Personal Information and Sensitive Personal Information in the Company's systems will be disposed of in accordance with provisions and procedures of applicable laws.

If you need to access, correct, update, modify or delete any Personal Information or Sensitive Personal Information you have provided to the Company, please send us an email at dpo@skycable.com or contact us at + 63 2 3449 9141.

#### MODIFICATIONS TO THE POLICY

From time to time, the Company may update the Policy, as necessary and without prior notice, and will post the revised policy at its website (http://www.mysky.com.ph). If we make material changes to the Policy that expands our rights to collect and/or use your Personal Information and Sensitive Personal Information, we will notify you through the said website.

This Privacy Policy is updated as of October 16, 2019.

#### **HOW TO CONTACT US**

If you wish to inquire on the processing of your information in relation to the Company's products and services, or if you wish to modify or revoke your consent to the processing of permissions granted in relation to the Company's offered products and services, please contact us through our Data Privacy Officer at:

Business Address: 6th Floor, Eugenio Lopez Jr. Communication Center,

Mother Ignacia Street, Quezon City, Philippines
Contact No.: + 63 2 3449 9141
E-mail Address: dpo@skycable.com

 $\hbox{\hbox{$[1]$ Available online: www.facebook.com/MySKYCable}}\\$ 

[2] Available online: www.facebook.com/SKYonDemandPH

[3] Available online: www.facebook.com/skydirectph

[4] Available online: www.twitter.com/skyserves

[5] Available online: www.twitter.com/myskyupdates

[6] Available online: www.instagram.com/myskyupdates

WE'RE HAPPY TO SERVE YOU

Contact us through these touchpoints so we can help make your SKY experience even better.

CIBI Data Privacy Policy

CIBI Information Inc., recognizes the importance of data protection and security of personal, sensitive and privileged information that we collect from you, our valued clients, and third party data source partners in accordance with the Data Privacy Act of 2012. This privacy policy informs you of our privacy practices and further describes the way we may collect, use, protect, store, disclose and dispose information; including those which also may be collected through third-party providers, data source partners, websites, applications and/or any other online activity.

#### **DEFINITION OF TERMS**

Personal Information refers to any information, whether recorded in material form, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual.

Sensitive Personal Information refers to personal information about an individual's race, marital status, age, color, and religious, philosophical, or political beliefs; health, education, genetic information, sexual life or involvement of a person in a legal proceeding. It may also include, social security numbers, health records and licenses, pin codes and account numbers.

Privileged Information refers to any form of data, which, under the Rules of Court and other pertinent laws constitute privileged communication.

Data subject – refers to an individual whose personal, sensitive or privileged information is processed. Processing – refers to any operation or any set of operations performed upon personal, sensitive and privileged information including but not limited to the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of data. Processing may be performed through automated means, or manual processing if the personal data are contained or are intended to be contained in a filing system.

The processing of personal, sensitive and privileged information are generally prohibited to be processed without your consent.

# PERSONAL INFORMATION WE MAY COLLECT

The personal data we may collect from you or from your authorized representative are the following, but not limited to:

Hiring and Recruitment

**Applicants Name** 

Address

**Contact Number** 

Sex

Birthdate

Place of Birth

Citizenship

**Civil Status** 

Religion

Age

Height

Weight

**Government Numbers** 

Family Background

**Educational Background** 

**Employment History** 

**CIBI Employment** 

**Employees Name** 

Address

**Contact Number** 

Sex

Birthdate

Place of Birth

Citizenship

**Civil Status** 

Religion

Age

Height

Weight

**Government Numbers** 

Family Background

**Educational Background** 

**Employment History** 

Clients

Contract

Authorized signatories name

Valid IDs such as

TIN

**Passport** 

**Drivers License** 

SSS

Resume or Application form

Subject Name

Birthdate

Gender

**Civil Status** 

SSS Number

Address

School Details such as

School Name

Course

**Date Graduated** 

Character References such as

Name of Character Reference

Contact Number or email

**Employment History** 

**Employers Name** 

Employment inclusive dates

Position

**Business Accreditation Application Form** 

**Company Name** 

Address

**Contact Number** 

**Email Address** 

Contact Person or Owner's Name

Social Media Profile and/or postings and information

LinkedIn

Websites

Facebook

Any other personal information appearing from other publicly available sources.

MEANS TO COLLECT

We may collect your information in several ways:

Client endorsements

For those clients who are availing the following services

**Identity Verification** 

**Educational verification** 

Character verification

Residence or Address verification

**Employment Verification** 

**Business Verification** 

For those companies who signed an agreement with CIBI

Commercial Agreement

Partnership agreement

Website and Facebook

When you message and inquire in Facebook or CIBI website for a service quotation and product information you will be asked to provide personal information such as your name, e-mail address, location (region and city) and mobile number. We may collect information through online automated methods including the use of cookies, web beacons and IP addresses.

When you inquire through our website, CIBI will use your personal data you have provided, to reach you, only if you have expressed the desire to have a product discussion with us.

CIBI has contracted third party partners to conduct these product discussions and we necessarily share relevant data about you to these partners only for the purpose of responding to your request for a product/service overview.

Mobile Applications and Portals

When you download or inquire through our mobile applications, you will be asked to provide personal information prior to processing your inquiries.

**Events** 

On each event hosted or co-hosted by CIBI may require registrants to sign-up in a registration sheet Registrants will be required to provide their name, email address, location, and contact number will be asked for purposes as indicated in this Privacy Policy.

Data source partners

We may collect information through our data source partners where the appropriate data sharing agreements are executed and signed.

Third party service providers

Our third party providers may collect information about you from character references, former employers, educational institutions, courts, local agencies and regulatory bodies.

**Recruitment Application Forms** 

Upon intent to apply for any vacancies in CIBI, an application form will be filled up by the potential candidate which may include

**Employment Data Sheet and 201 Records** 

Upon hiring and employment, the following data will be requested such as Diploma, Transcript of Records, Employment Certificate, NBI clearance, Health clearance, SSS No, TIN, Pag-Ibig number, Philhealth Number

**PURPOSE OF PROCESSING** 

Personal information may be used by CIBI for the following purposes:

Service Delivery

Upon client engagements, CIBI shall request certain personal, sensitive and privilege information of individuals from the client in order to deliver the services availed of from CIBI.

Verification

Customer interface

In processing of inquiries and payments for your availment of CIBI services and after-sales services; In confirming your identity, and protecting you against malicious use of information;

For promoting quality assurance, including callouts for product, service satisfaction purposes, and receiving and processing of customer feedback;

For conducting research, including updating of records, surveys, satisfaction index and similar studies; For strengthening marketing activities, including promotional offers of services, and new product introductions; and

For customer profiling intended for product developments.

Website

To fulfill your requests and respond to your queries such as:

Availment of services;

Attending to feedbacks, comments and suggestions;

Informing you of changes, improvements and introduction of services and after-sales services Subscription to newsletter and other marketing information including but not limited to events, promos, and offerings;

To improve web analytics, for purposes of optimizing web usage and for market research Facebook

To fulfill your requests and respond to your queries such as:

Service availments;

Attending to feedbacks, comments and suggestions;

Informing you of changes, improvements and introduction of services and after-sales services Subscription to newsletter and other marketing information including but not limited to events, promos, and offerings.

**Events** 

Personal information collected will be used for post event evaluation. This will also be used for remarketing provided that the registrant has voluntarily accepted the consent of receiving newsletter and other marketing information.

USE AND DISCLOSURE OF PERSONAL INFORMATION

As a provider, we are permitted by law to make certain uses and disclosures of your personal data. Your personal data shall be used and disclosed for the following, but not limited to;

**CLIENTS** 

Personal data may be shared with clients in their availment of CIBI services in the pursuit of legitimate interests such as:

Due Diligence – where clients want to conduct further and necessary corporate due diligence on customers, potential customers and business partners, which may include consolidating official watch lists, sanction lists, crime watch and 'do not do business with lists'.

Fraud Detection and Prevention – where clients want to prevent fraud by validating the genuineness and authenticity of the declarations made by an individual.

Risk Assessment – where clients need to risk assess potential customers to determine what products or services they can offer and the terms of services.

HR Background Checks – where clients wish to process personal data to undertake background vetting of people as applicants or to whom it has given job offers. This may include but not limited to asking for references from previous employers and validating educational credentials.

#### GOVERNMENT

As compensation for services, we may use your personal data to perform accounting, auditing, billing, reconciliation, and collection activities.

#### **OPERATION**

We may use and disclose your personal data in conducting our verification, and KYC processes. Operational activities include review of accuracy and completeness. In cancelling of transaction, personal data will be used for verification. If ownership of our organization should change, your personal data may be disclosed to the new entity.

# THIRD PARTY SUPPLIER OR BUSINESS PARTNER

In connection with business operations we are acquiring the services of third parties performing activities for or in our behalf whom we may share and disclose your personal information.

BUSINESS OPERATION

We may use your personal data for business purposes to provide the services you avail, to inform you about our products and services and to manage our sites and other services. We may also use your personal data for analysis, audits, crime/fraud monitoring and prevention, security, developing new products and/or services, testing, enhancing, improving or modifying our services, identifying usage trends, determining the effectiveness of our promotional campaigns, and operating and expanding our business.

#### PERSONAL REPRESENTATIVE

We may disclose your personal data to your duly authorized personal representative. For example, the parent or legal guardian of a minor is considered as personal representative.

## LEGAL ACTIONS or LAW ENFORCEMENT

We may disclose your personal data when required by the law and/or government authorities, such as in the course of legal proceedings such as receipt of subpoena from the court of law. We may also disclose certain personal data as we believe is required, necessary, or appropriate under the following: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal processes and/or respond to requests from competent public and government authorities including public and government authorities outside your country of residence; (c) to enforce our terms and conditions; (d) to protect our operations and those of any of our affiliates; (e) to protect our rights, privacy, security, safety, and physical and intellectual property, and/or rights of our affiliates, you, or others; and (f) to allow us to pursue available remedies or limit the damages that we may sustain. OTHER ACTIVITIES

# To perform other activities consistent with this Notice.

We do not sell your personal data to marketing companies outside of our organization.

We generally process your personal data only for those purposes that we have transmitted or communicated with you. If we use it for other (closely related) purposes, additional data protection measures will be implemented, if required by law.

## YOUR RIGHTS

We recognize and take seriously our responsibility to protect the personal data you entrust to us from loss, misuse or unauthorized access. The following is a summary of your rights regarding your personal data:

Right to access your personal data with us

Right to request restriction of access

Right to limit and prevent disclosure

Right to amend or update personal data

Right to authorize other uses

Right to receive notice of privacy breaches

Right to request destruction of personal data

MANAGE YOUR PERSONAL DATA

If you would like to correct, update, delete, or request access to the personal information that you have provided to us, you may contact our Data Protection Officer.

We encourage you to keep your personal settings and personal data complete and current.

## STORAGE OF PERSONAL DATA

We have a Records Retention Policy and abide with other laws that provide higher privacy protection such as RA10173.

The information we collect may be stored and processed in servers in our Head Office in Makati City, Philippines and wherever our service providers have facilities around the globe and in accordance with local laws.

# **RETENTION PERIOD**

We will retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law. We retain the personal data we collect only if we need it to support justifiable business requirements or when our lawful purposes for using the information are still relevant. When we no longer require personal data we or our third party suppliers will securely delete and/or archive the information.

# CHANGES TO THIS PRIVACY NOTICE

Our products and services are dynamic and the form and nature of the services may change from time to time without prior notice to you. For this reason, we reserve the right to change or add to this privacy notice from time to time and will post any material revisions on our websites.

We will post a prominent notice on our privacy notice page to notify you of any significant changes to this privacy notice, and will indicate at the top of the notice when it was most recently updated. We encourage you to check back often to review the latest version.

The new privacy notice will be effective upon posting. If you do not agree to the revised notice, you should alter your preferences. By continuing to access or make use of our services after the changes become effective, you agree to be bound by the revised privacy notice.

## **CONTACT US**

If you have questions or concerns about our privacy practices, you can contact us by sending an email to our Data Protection Officer at dpo@cibi.com.ph. Please include your contact information and a detailed description of your request or privacy concern.

I have read and hereby understood the above privacy statement and freely give my consent to the processing of my personal data.

CIBI website uses cookies to ensure you get the best browsing experience. By continuing to visit this site, you agree to our Privacy Policy and accept our use of such cookies.

## PRIVACY POLICY

# **DESCRIPTION OF SERVICES**

Fresh N' Famous Foods, Inc. – Chowking ("We" or "Chowking") is the Personal Information Controller, as defined under Republic Act No. 10173 or the Data Privacy Act of 2012, responsible for ensuring the privacy of the personal information you provide through the use of this delivery website. As such Personal Information Controller, we process your personal information in accordance with the Data Privacy Act of 2012 and this Privacy Policy.

WHAT WE COLLECT

To fulfill your delivery orders, we shall collect the following information:

Full Name

**Delivery address** 

**Email address** 

Telephone Number/Cellphone Number

To be able to fulfill your orders, your name and contact information such as delivery address, email address and telephone number must be provided. However, you may opt not to provide other demographic information such as preferences and interest. If you provide these information, you understand and agree that we will use such information for purposes described below in the "What We Do With the Information We Gather" section (i.e. for direct marketing purposes).

The website stores browser level cookies for analytics and advertisement purposes. For the exhaustive list of cookies we collect, see the "Cookie Description" section below.

HOW WE COLLECT

Create Account / Register:

We collect personal information once you register and create an account with us through this website or by signing up using your Facebook or Gmail account. When you choose to create an account by linking it with an external third party service or application, such as Facebook or Gmail, this feature will not modify nor allow the access of the content of your Facebook or Gmail account. However, if you use your Facebook or Gmail account to register your account, the following shall apply:

Your Facebook or Gmail account name shall be your Account name in the website;

The e-mail address of your Facebook or Gmail account shall be used as the e-mail address for your Account.

By registering and creating an account with us, you understand and agree that we shall use your personal information in accordance with this Privacy Policy.

For registered users, we may also request for other personal information such as birthday, gender and other demographic information such as, but not limited to, preferences and interests and other information relevant to customer surveys and/or offers. If you provide these information, you understand and agree that we will use such information for purposes described below in the What We Do With the Information We Gather section (i.e. for direct marketing purposes) Order as Guest:

If you do not register/create an account but place an order with us through this website as a guest, we will ask for your full name, delivery address, e-mail address, and cellphone number but will not keep the information provided. However, we will keep your order history (identified by the order ID number sent to your email, without your corresponding personal information) for twenty-four (24) months from the time such order was placed, for recordal purposes.

Browsing:

If you simply browse through our website but without registering an account, we do not collect any of your personal information

WHAT WE DO WITH THE INFORMATION WE GATHER

We require this information for the following purposes:

to fulfill your delivery order;

to understand your needs;

to provide you with a better service, and

internal record keeping, for the following reasons:

We may use the information to improve our products and services.

We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.

From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone or mail. We may use the information to customize the website according to your interests.

For purposes of this Privacy Policy, these purposes (other than the fulfillment of your delivery order), shall be referred to as "direct marketing purposes".

We also share your information with our service providers, subsidiaries, affiliates and franchisees, to fulfill your order. From time to time, we may also share your personal information with our subsidiaries, affiliates, partners and franchisees for their use and processing in accordance with this Privacy Policy. We do not sell, distribute or lease your personal information to third parties other than those stated above, unless we have your permission or are required by law to do so.

## SECURITY STORAGE AND DISPOSAL

We are committed to ensuring that your personal information we collect and store is secure. To prevent unauthorized access, processing or disclosure of your personal information, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal information we collect online such as but not limited to data encryption and access restrictions on our databases.

We store your personal information in our secured internal database, but which may be accessed by our service providers, subsidiaries, affiliates and franchisees for delivery services. We retain your personal information as long as your account is active or as long as necessary to fulfill your delivery orders. If there is no activity within twenty-four months (24 months), we shall dispose of your personal information in accordance with the relevant privacy rules and our internal guidelines.

### LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest as indicated below. The only links outside Jollibee domain the customer can be directed to from this website are Jollibee's pages on social media:

Facebook: https://www.facebook.com/chowkingph/

Youtube: https://www.youtube.com/channel/UCw4dKg6F3LRdPfz\_yhc1rrQ

Instagram: https://www.instagram.com/chowkingph/

However, once you have used these links to leave our site, you should note that we do not have any control over these other websites. Therefore, we will not be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

#### CONTROLLING YOUR PERSONAL INFORMATION

You may choose to restrict the collection or use of your personal information in the following ways: Whenever you are asked to fill up a form on our website, any information you provide will be bound by the "What We Do With the Information We Gather" section. If you do not wish to receive any direct information or promotion, you may amend or request to opt out through our customer care email, feedback@jfc.com.ph

If you believe that any of your personal information we have is incorrect or incomplete, please write to or email us as soon as possible on the e-mail address stipulated above. We will promptly correct any reported incorrect information.

#### UPDATING THIS PRIVACY POLICY

Whenever necessary, we may, from time to time, update and/or revise this Privacy Policy. We shall inform you of any update or revision by placing the date of the latest version on top of this Privacy Policy.

INQUIRY ON THIS PRIVACY POLICY

If you have any questions regarding this Privacy Policy, or our use of your personal information, please contact us through:

The Data Protection Officer - Jollibee Foods Corporation at dpo@jfc.com.ph.

14th Floor, Jollibee Plaza, F. Ortigas Jr. Road, Ortigas Center, Pasig City, Metro Manila, Philippines 1605 In order to for us to attend to your queries expeditiously, we prefer that inquiries be made via e-mail. HOW WE USE COOKIES

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyze web traffic or lets you know when you visit a site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. If you however want to delete cookies from your browser or device we suggest that you use the option to delete cookies and other site and plug-in data, including data stored on your device from your browser settings normally found in browsing history.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may however prevent you from taking full advantage of the website.

# **COOKIE DESCRIPTION**

Facebook cookie: This will be used for third party authentication via Facebook

Analytics cookie: A first party browser-based cookie allows the site to measure audience behavior. There is no personally identifiable information stored in these cookies.

Advertising cookies: These are third party cookies (example, Facebook, Google etc) from our partners to re-target advertisements in their respective platforms.

PRIVACY POLICY Privacy Policy Last revised and effective January 2020

We respect your privacy.

International Coffee & Tea, LLC d/b/a The Coffee Bean & Tea Leaf® ("Company", "we" or "us") maintains coffeebean.com, and this Privacy Policy ("Policy") applies to information we collect when you use our websites, mobile applications and other online products and services (collectively, the "Services") or when you otherwise interact with us. This Policy does not apply to websites or services that are not owned by us and are operated by third parties.

This policy applies to all users accessing our website and may be modified from time to time. If our information practices change, we will notify you by revising the date at the top of the Policy and, in some cases, we may provide you with additional notice, such as adding a statement to our homepage or sending you an email notification. We encourage you to review the Policy whenever you access the Services or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy.

Information We Collect

## Information You Provide to Us

We collect information you provide directly to us. For example, we may collect personal information from you such as your name, email address postal address, phone number, credit card number, gender, day and month of birth, personal interests, and other such information when you visit our website, place an order online or by phone, contact us with a question or participate in a contest, promotion or survey. We maintain a record of your product interests and the purchases you make online or by phone or in-store.

We have a legitimate interest in providing account related functionalities to our users as well as receiving, and acting upon, your feedback or issues. Accounts can be used for easy checkout and to save your preferences and transaction history. We also have a legitimate interest in contacting our clients and communicating with them concerning normal business administration such as projects, services, and billing. If you participate in a promotion or survey, we have a legitimate interest in using this information to operate the survey and to understand your preferences

# Information We Collect Automatically When You Use the Services

We may combine all of this information with information about you that we acquire from our marketing partners or unrelated third parties. When you access or use our Services, we automatically collect certain information, including, but not limited to:

Transaction Information: When you place an order or make a purchase, we collect information about the transaction, such as the items ordered, the transaction amount, the payment information, the delivery address, and the order date. We use your information to perform our contract to provide you with products or services.

Log Information: We collect log information about your access and use of our website, such as your domain name, the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our Services. We have a legitimate interest in monitoring our networks and the visitors to our websites. Among other things, it helps us understand which of our services is the most popular.

Device Information: We collect information about the computer or mobile device you use to access our Services, such as the hardware model, operating system and version, unique device identifiers, mobile network information, and browsing behavior. We have a legitimate interest in identifying unique visitors and understanding how users interact with us on their devices.

Location Information: We may collect information about the precise location of your device or computer each time you access or use our mobile applications, websites, or otherwise consent to the collection of this information. For more details, please see "Your Choices" below. We have a legitimate interest in understanding our users and providing tailored services. In some contexts our use is also based upon your consent to provide us with geo location information.

Information Collected by Cookies and Other Tracking Technologies: We and our service providers use various technologies, including cookies and web beacons, to collect information about you and your interaction with our Services, including information about your browsing and purchase behavior,

Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience on these Services, see which areas and features of our Services are popular and count visits. Web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see "Your Choices" below. We have a legitimate interest in making sure our website operates efficiently, engaging in behavior-based advertising, and capturing website analytics.

# Information We Collect From Other Sources

We may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources, and link or combine that with information we collect about you. For example, if you create or log into your account through a social media site or if you associate your social media account with your Company account or with your employment application with us, we will have access to certain information from that site, such as your name, account information and friends lists, in accordance with the authorization procedures determined by such social media site.

## Use of Information

In addition to the purposes and uses described above, we use information in the following ways:

Provide, maintain and improve our Services, including your in-store and online ordering experience; Provide and deliver the products and services you request, process orders, transactions and send you related information, including confirmations and receipts;

Send you technical notices, updates, security alerts and support and administrative messages; Investigate and prevent fraudulent transactions and other illegal activities;

Respond to your comments, questions, requests and provide customer service;

Communicate with you about products, services, offers, promotions, rewards, and events offered by us and others, and provide news and information we think will be of interest to you (for information about how to manage promotional communications, please see "Your Choices" below);

Monitor and analyze trends, usage and activities in connection with our Services;

Personalize and improve the Services and provide advertisements, content or features that match user profiles or interests;

Process and deliver contest and promotion entries and rewards;

Link or combine with information we get from others to help understand your needs and provide you with better service;

Assess and respond to employment applications; and

Carry out any other purpose for which the information was collected.

Company is based in the United States and the information we collect is governed by U.S. law. By accessing or using the Services or otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S. and other countries, where you may not have the same rights as you do under local law. Where this is the case, we will take appropriate measures to protect information about you in accordance with this Privacy Policy.

Information We Share

We may share information about you with third parties for the following purposes or as otherwise described in this Policy:

With third-party vendors, consultants and other service providers who need access to such information to carry out work on our behalf;

In response to a request for information if we believe disclosure is in accordance with any applicable law, regulation or legal process, or as otherwise required by any applicable law, rule or regulation; If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of Company or others;

In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company; and With your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

# **Social Sharing**

The Services may offer social sharing features and other integrated tools (such as the Facebook "Like" button), which let you share actions you take on our Services with other media, and vice versa. Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

# Advertising and Analytics Services Provided by Others

We may allow others to serve advertisements on our behalf across the Internet and to provide analytics services. These entities may use cookies, web beacons and other technologies to collect information about your use of the Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by Company and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices.

We may also work with third parties to serve you ads as part of a customized campaign on third-party platforms (such as Facebook or Twitter). As part of these ad campaigns, we may convert information about you, such as your email address and phone number, into a unique value that can be matched with a user account on these platforms to allow us to learn about your interests and to serve you advertisements customized to your interests. Note that the third-party platforms may offer you choices about whether you see these types of customized advertisements.

# **Your Choices**

Access To Your Personal Information: You may request access to your personal information by contacting us at the address described below. If required by law, upon request, we will grant you reasonable access to the personal information that we have about you. Note that California residents may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for direct marketing. EU residents may be entitled to request a copy of your information in a portable format.

Deletion Of Your Personal Information: Typically we retain your personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law. You may request that we delete your personal information by contacting us at the address described below. If required by law we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes.

Online Tracking: Some website browsers have a "Do Not Tack" technology that transmits "Do Not Track" header to the websites you visit with information indicating that you do not want to be tracked. We currently do not respond to website browser "Do Not Track" signals.

Promotional Emails: We want to communicate with you online if you want to hear from us. If you prefer not to receive promotional information, such as information about special offers and sales events, you can let us know by "unsubscribing" from any email communication or modifying your account. Additionally, you may contact us at 1.800.832.5323.

Request correction of the personal information that we hold about you: You can review and change personal information related to your use of our website (such as your name and contact information). To access your information, simply sign-in to your account using your email address and password, and you will be able to edit your personal information in your account profile. Note that we may keep historical information in our backup files as permitted by law.

Object to processing of your personal information: You may object to our use of your personal information by contacting us at the address described below.

Revocation Of Consent: In most situations our processing is not based upon your consent. That said, if we rely on your consent to process your personal information, you may revoke your consent to such processing

Please address written requests and questions about your rights to info@coffeebean.com or call us at 1-800-832-5323. You may submit a copy of the personal information that we hold about you through our online portal.

Note that, as required by law, we will require you to prove your identity. We may conduct an identity verification by phone call or email. Depending on your request, we will ask for information such as your name, your email address, and your zip code. We may also ask you to provide a signed declaration confirming your identity. Following a request, we will use reasonable efforts to supply, correct or delete personal information about you in our files.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. We will require verification that you provided the authorized agent

permission to make a request on your behalf. You must provide us with a copy of the signed permission you have given to the authorized agent to submit the request on your behalf and verify your own identity directly with us.

If you are an authorized agent submitting a request on behalf of an individual you must attach a copy of the following information to the request:

A completed Authorized Agent Designation Form indicating that you have authorization to act on the consumer's behalf.

If you are a business, proof that you are registered with the Secretary of State to conduct business in California.

If we do not receive both pieces of information, the request will be denied.

# **Tracking Technologies**

Our website uses "cookies," which are small data files that are stored on your computer when you visit a website. Cookies enable you to shop on our website and may be used in a variety of ways to enhance or personalize your online browsing and shopping and email communication experience. We also use cookies to help determine which of our ads are shown to you on other websites.

You can set your browser not to accept cookies or to notify you when you are sent a cookie, giving you the opportunity to decide whether or not to accept it. If you do not accept cookies, however, you will not be able to access your account information or make purchases on our websites.

## **Account Information**

You may update, correct or delete information about yourself at any time by logging into your Company account. Please note, however, that we may retain certain information that you provide through our Services as required by law or for legitimate business purposes. We also may retain cached or archived copies of information about you for a certain period of time.

# Security

We take reasonable measures, including administrative, technical, and physical safeguards, to protect information about you from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction. In the event that we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

# Your California Privacy Rights

California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether certain categories of information are collected, "sold" or transferred for an organization's "business purpose" (as those terms are defined under California law). We do not sell your personal information. You can find a list of the categories of information that we collect and share here. Please note that because this list is comprehensive it may refer to types of information that we share about people other than yourself. If you would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing please submit a written request to us using the information in

the "Contact Information" section below. We do not discriminate against California residents who exercise any of their rights described in this Privacy Policy.

# Contacting Us

For questions about this Policy, to make choices about receiving promotional communications, to update your personal information or to place an order, you can contact us at: 1.800.832.5323.

info@coffeebean.com

If you are not satisfied with our response, and are in the European Union, you have a right to lodge a complaint with your local supervisory authority.

This Privacy Policy may be accessed using your browser's audio readers.

Your privacy is very important to us. Accordingly, we have developed this policy in order for you to understand how we collect, use, communicate and make use of personal information. The following outlines our privacy policy.

When accessing the https://citystatetravel.com website, Citystate Travel will learn certain information about you during your visit.

Similar to other commercial websites, our website utilizes a standard technology called "cookies" (see explanation below) and server logs to collect information about how our site is used. Information gathered through cookies and server logs may include the date and time of visits, the pages viewed, time spent at our site, and the websites visited just before and just after our own, as well as your IP address.

## **USE OF COOKIES**

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site"s computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser"s preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites. IP ADDRESSES

IP addresses are used by your computer every time you are connected to the Internet. Your IP address is a number that is used by computers on the network to identify your computer. IP addresses are automatically collected by our web server as part of demographic and profile data known as "traffic data" so that data (such as the Web pages you request) can be sent to you.

## **EMAIL INFORMATION**

If you choose to correspond with us through email, we may retain the content of your email messages together with your email address and our responses. We provide the same protections for these electronic communications that we employ in the maintenance of information received online, mail and telephone. This also applies when you register for our website, sign up through any of our forms using your email address or make a purchase on this site. For further information see the email policies below. HOW DO WE USE THE INFORMATION THAT YOU PROVIDE TO US?

Broadly speaking, we use personal information for purposes of administering our business activities, providing customer service and making available other items and services to our customers and prospective customers.

Citystate Travel will not obtain personally-identifying information about you when you visit our site, unless you choose to provide such information to us, nor will such information be sold or otherwise transferred to unaffiliated third parties without the approval of the user at the time of collection.

We may disclose information when legally compelled to do so, in other words, when we, in good faith, believe that the law requires it or for the protection of our legal rights.

## **EMAIL POLICIES**

We are committed to keeping your e-mail address confidential. We do not sell, rent, or lease our subscription lists to third parties, and we will not provide your personal information to any third party individual, government agency, or company at any time unless strictly compelled to do so by law. We will use your e-mail address solely to provide timely information about Citystate Travel. We will maintain the information you send via e-mail in accordance with applicable federal law. CAN-SPAM Compliance

In compliance with the CAN-SPAM Act, all e-mail sent from our organization will clearly state who the e-mail is from and provide clear information on how to contact the sender. In addition, all e-mail messages will also contain concise information on how to remove yourself from our mailing list so that you receive no further e-mail communication from us.

# Choice/Opt-Out

Our site provides users the opportunity to opt-out of receiving communications from us and our partners by reading the unsubscribe instructions located at the bottom of any e-mail they receive from us at anytime.

Users who no longer wish to receive our newsletter or promotional materials may opt-out of receiving these communications by clicking on the unsubscribe link in the e-mail.

## **USE OF EXTERNAL LINKS**

citystatetravel.com may contain links to many other websites. Citystate Travel cannot guarantee the accuracy of information found at any linked site. Links to or from external sites not owned or controlled by Citystate Travel do not constitute an endorsement by Citystate Travel or any of its employees of the sponsors of these sites or the products or information presented therein.

By accessing this web site, you are agreeing to be bound by these web site Terms and Conditions of Use, all applicable laws and regulations, and agree that you are responsible for compliance with any applicable local laws. If you do not agree with any of these terms, you are prohibited from using or accessing this site. The materials contained in this web site are protected by applicable copyright and trademark law.

# INTELLECTUAL PROPERTY RIGHTS

All copyrights, trademarks, patents and other intellectual property rights in and on our website and all content and software located on the site shall remain the sole property of Citystate Travel or its licensors. The use of our trademarks, content and intellectual property is forbidden without the express written consent from Citystate Travel.

## You must not:

Republish material from our website without prior written consent.

Sell or rent material from our website.

Reproduce, duplicate, create derivative, copy or otherwise exploit material on our website for any purpose.

Redistribute any content from our website, including onto another website.

## ACCEPTABLE USE

You agree to use our website only for lawful purposes, and in a way that does not infringe the rights of, restrict or inhibit anyone else"s use and enjoyment of the website. Prohibited behavior includes harassing or causing distress or inconvenience to any other user, transmitting obscene or offensive content or disrupting the normal flow of dialogue within our website.

You must not use our website to send unsolicited commercial communications. You must not use the content on our website for any marketing related purpose without our express written consent.

RESTRICTED ACCESS

We may in the future need to restrict access to parts (or all) of our website and reserve full rights to do so. If, at any point, we provide you with a username and password for you to access restricted areas of our website, you must ensure that both your username and password are kept confidential. USE OF TESTIMONIALS

In accordance to with the FTC guidelines concerning the use of endorsements and testimonials in advertising, please be aware of the following:

Testimonials that appear on this site are actually received via text, audio or video submission. They are individual experiences, reflecting real life experiences of those who have used our products and/or services in some way. They are individual results and results do vary. We do not claim that they are typical results. The testimonials are not necessarily representative of all of those who will use our products and/or services.

The testimonials displayed in any form on this site (text, audio, video or other) are reproduced verbatim, except for correction of grammatical or typing errors. Some may have been shortened. In other words, not the whole message received by the testimonial writer is displayed when it seems too lengthy or not the whole statement seems relevant for the general public.

Citystate Travel is not responsible for any of the opinions or comments posted on citystatetravel.com. Citystate Travel is not a forum for testimonials, however provides testimonials as a means for customers to share their experiences with one another. To protect against abuse, all testimonials appear after they have been reviewed by management of Citystate Travel. Citystate Travel doe not share the opinions, views or commentary of any testimonials on citystatetravel.com - the opinions are strictly the views of the testimonial source.

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HOW DO WE PROTECT YOUR INFORMATION AND SECURE INFORMATION TRANSMISSIONS? Email is not recognized as a secure medium of communication. For this reason, we request that you do not send private information to us by email. However, doing so is allowed, but at your own risk. Some of the information you may enter on our website may be transmitted securely via a secure medium known as Secure Sockets Layer, or SSL. Credit Card information and other sensitive information is never transmitted via email.

Citystate Travel may use software programs to create summary statistics, which are used for such purposes as assessing the number of visitors to the different sections of our site, what information is of most and least interest, determining technical design specifications, and identifying system performance or problem areas.

For site security purposes and to ensure that this service remains available to all users, Citystate Travel uses software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage.

# DISCLAIMER AND LIMITATION OF LIABILITY

Citystate Travel makes no representations, warranties, or assurances as to the accuracy, currency or completeness of the content contain on this website or any sites linked to this site.

All the materials on this site are provided "as is" without any express or implied warranty of any kind, including warranties of merchantability, noninfringement of intellectual property or fitness for any particular purpose. In no event shall Citystate Travel or its agents or associates be liable for any damages whatsoever (including, without limitation, damages for loss of profits, business interruption, loss of information, injury or death) arising out of the use of or inability to use the materials, even if Citystate Travel has been advised of the possibility of such loss or damages.

**POLICY CHANGES** 

We reserve the right to amend this privacy policy at any time with or without notice. However, please be assured that if the privacy policy changes in the future, we will not use the personal information you have submitted to us under this privacy policy in a manner that is materially inconsistent with this privacy policy, without your prior consent.

We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of personal information is protected and maintained.

**CONTACT** 

If you have any questions regarding this policy, or your dealings with our website, please contact us here:

https://citystatetravel.com

Citystate Travel 11 Keppel Road #09-01, ABI Plaza Singapore 089057

PRIVACY POLICY

Effective date: July 05, 2018

Citystate Travel (S)Pte. Ltd. ("us", "we", or "our") operates the citystatetravel.com website (the "Service").

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from citystatetravel.com

INFORMATION COLLECTION AND USE

We collect several different types of information for various purposes to provide and improve our Service to you.

TYPES OF DATA COLLECTED

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

**Email address** 

First name and last name

Phone number

Address, State, Province, ZIP/Postal code, City

Cookies and Usage Data

Usage Data

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

Session Cookies. We use Session Cookies to operate our Service.

Preference Cookies. We use Preference Cookies to remember your preferences and various settings.

Security Cookies. We use Security Cookies for security purposes.

**USE OF DATA** 

Citystate Travel (S) Pte. Ltd. uses the collected data for various purposes:

To provide and maintain the Service

To notify you about changes to our Service

To allow you to participate in interactive features of our Service when you choose to do so

To provide customer care and support

To provide analysis or valuable information so that we can improve the Service

To monitor the usage of the Service

To detect, prevent and address technical issues

TRANSFER OF DATA

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Singapore and choose to provide information to us, please note that we transfer the data, including Personal Data, to Singapore and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Citystate Travel (S) Pte. Ltd. will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

# **DISCLOSURE OF DATA**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

**Legal Requirements** 

Citystate Travel (S) Pte. Ltd. may disclose your Personal Data in the good faith belief that such action is necessary to:

To comply with a legal obligation

To protect and defend the rights or property of Citystate Travel (S) Pte. Ltd.

To prevent or investigate possible wrongdoing in connection with the Service

To protect the personal safety of users of the Service or the public

To protect against legal liability

**SECURITY OF DATA** 

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

# SERVICE PROVIDERS

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

# **ANALYTICS**

We may use third-party Service Providers to monitor and analyze the use of our Service.

Google Analytics Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is

shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: https://policies.google.com/privacy?hl=en LINKS TO OTHER SITES

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

CHILDREN'S PRIVACY

Our Service does not address anyone under the age of 16 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

**CONTACT US** 

If you have any questions about this Privacy Policy, please contact us:

By email: <a href="mailto:info@citystatetravel.com">info@citystatetravel.com</a>

**Privacy Statement** 

**Our Privacy Commitment** 

Cignal TV, Inc. ("Cignal TV") respects our customers' fundamental right to privacy, and we commit to take great care in safeguarding your personal data. Cignal TV has developed a Privacy Policy that aims to ensure that we adopt and observe appropriate standards for personal data protection in compliance with Republic Act No. 10173 or the Data Privacy Act of 2012 and its implementing rules and regulations. While our Privacy Policy sets out the general principles that govern the collection, use, and disclosure of our customers' personal information, we have also developed this Privacy Commitment to inform you more specifically about our privacy practices.

Why we collect your personal information

As customers of Cignal TV, we collect and maintain some basic information about you. We do so only for the following purposes:

To create and nurture a relationship with you, so that we can continuously provide you with our services. For example, when you apply for any of our services, we collect personal information about you that will allow us to validate your identity and credit history for purposes of billing and collection of fees for the products and services that you avail from us.

To improve our products and services. We collect, use, process, and analyze how you use our products and services so that we can understand how to improve them for your benefit.

To understand your needs and preferences so that we can serve you better. Maintaining a record of the products and services that you avail from us allows us to gain a better insight of the kinds of offers that would be relevant to your preferences. From time to time, we may send you product recommendations and special offers that we think will interest you.

To continuously improve our business and operations. For example, we analyze customer behaviors and patterns of consumption of our products and services, provide customer care activities, monitor the quality of our products and services and security of the facilities which we use to deliver such products and services, train our staff, and plan for future growth.

To comply with the Credit Information System Act. We run credit scoring programs and initiatives, including but not limited to, providing information to the Credit Information Corporation in accordance to Republic Act No. 9501.

To meet legal and regulatory requirements. We perform such other processing or disclosure that may be required to comply with pertinent laws, rules, or regulations.

Where we get these information

There are several ways we collect information about you. Information that you personally give us.

Most of the personal information we have are those that you have given us yourself. You provide us personal information when you:

- Apply for our services by filling out Application Forms, Subscription Agreements, and other documents customarily required to enable us to deliver our products and services to you through any of our available channels (online, in our stores, or through our Sales representatives);
- Get in touch with us to ask about something, file a complaint or request for service;
- Take part in our research and surveys;
- Become our Partner, Vendor, Contractor or Supplier; and/or

Information we collect during our relationship with you

We also collect information as you use our products and services, like when you:

- Use our facilities and services whether it is Mobile, Fixed, Home, Enterprise, or any of our other products, services, and channels;
- Pay your bills or purchase add-on products and services;
- Use our apps, websites, and self-service channels and portals;
- Join our promos, prize raffles, or rewards & loyalty programs.

Information we collect from other sources

We also collect personal information about you through other activities such as our market research initiatives, when you visit and transact in our stores, when you visit and use our websites and mobile apps such as www.cignal.tv, www.cignalplay.com, and from our subsidiaries, affiliates, and third-party business partners to whom you have given your consent for them to share your information with us.

When we disclose personal information

There are a variety of circumstances where we may need to share some of the information that you have provided to us. In these cases, we ensure that your personal information is disclosed on a confidential basis, through secure channels, and only in compliance with the Data Privacy Act.

We will never share, rent, or sell your personal information to third parties outside of the Cignal TV except in special circumstances where you may have given your specific consent for, and as described in this policy.

In some instances, we may be required to disclose your personal information to our agents, subsidiaries, affiliates, business partners and other third-party agencies and service providers as part of our regular business operations and for the provision of our products and services. This means we might share your information with:

- Our service providers, contractors, and professional advisers who help us provide our products and services. This includes partner companies, organizations, or agencies, and their sub-contractors. For example: our sales dealers, distributors and installation contractors; couriers for bill delivery; and our customer contact centers for our pre- and post-sales hotline operations;
- Our Subsidiaries and Affiliates with whom you have also signed-up with. We do so only for the improvement of each other's business and operations. For example: we share information about your credit standing to facilitate your service applications with them, resulting in faster approvals;
- · Other companies to whom you have also given consent for us to share your information with; and
- Law enforcement and government agencies, but only when required by laws and regulations and other lawful orders and processes.

How we protect your personal information

The integrity, confidentiality, and security of your information are important to us. That's why we strictly enforce our Privacy Policy within Cignal TV and have implemented technical, organizational, and physical security measures that are designed to protect your information from unauthorized or fraudulent access, alteration, disclosure, misuse, and other unlawful activities. These are also designed to protect your information from other natural and human dangers.

We also put in effect the following safeguards:

We keep and protect your information using a secured server behind a firewall, encryption and security controls;

We keep your information only for as long as necessary for us to (a) provide the products and services that you avail from us, (b) for our legitimate business purposes, (c) to comply with pertinent laws, and (d) for special cases that will require the exercise or defense of legal claims;

We restrict access to your information only to qualified and authorized personnel who are trained to handle your information with strict confidentiality.

We undergo regular audits and rigorous testing of our infrastructure's security protocols to ensure your data is always protected;

We promptly notify you and the National Privacy Commission, when sensitive personal information that may, under the circumstances, be used to enable identity fraud are reasonably believed to have been acquired by an unauthorized person;

We let you update your information securely to keep our records accurate.

Cignal TV will not collect, use, or disclose your personal information for any purpose other than those identified in this Commitment, your service agreement or our Terms of Service, and any other purpose that you may have given your consent for.

For greater clarity, unless you provide specific consent, we will not:

Share your personal information with or sell it to our business partners and third-party service providers; or

Use your personal information to enable third-party targeted advertisements.

What your choices are

You are afforded certain rights in relation to your personal data under the Data Privacy Act. We would like to ensure that we have your consent to continue to collect, use, and disclose your personal information for the purposes that we have identified. At the same time, we want you to know that you do have choices and can object or withdraw your consent and/or edit your consent preferences at any time.

If you wish to have access to your personal information in our records; or you think that such personal information we have of you is incomplete, not up-to-date, or otherwise inaccurate, you may get in touch with our Data Privacy Officer through the contact details provided below. In some instances, we may request for supporting documents or proof before we effect any requested changes to your personal information.

Cignal TV Data Privacy Officer

5th Floor Launchpad, Reliance corner Sheridan Streets, Barangay Highway Hills, Mandaluyong City, 1554

cignal data privacy @cignal tv.com.ph

What happens when there are changes in our Policy

From time to time, we may update our privacy policy and practices to comply with changes in applicable laws, to comply with government and regulatory requirements, to adapt to new technologies and protocols, to align with industry best practices, and for business purposes.

You will always be provided notice if these changes are significant and, if we are required by law, we will ensure to obtain your updated consent.

## **Privacy Notice**

Better Banking means we value and protect your personal information.

At Security Bank, it is one of our fundamental responsibilities as a financial institution to ensure that we protect the information entrusted to us by our clients and our website visitors. This is in accordance with the Data Privacy Act of 2012 (Republic Act No. 10173), its Implementing Rules and Regulations and other issuances by the National Privacy Commission, as well as globally accepted data privacy standards and regulations. We ensure the employment of proper organizational, physical and technical security measures for the protection of personal information. Furthermore, we adhere to the general principles of transparency, legitimate purpose and proportionality accorded by law as well as recognize your rights as our data subjects.

In this Privacy Notice, we explain what personal information we process, how we collect, use, share, protect and dispose personal information that we obtain from you in the course of doing business or as a user of this website.

Who we are. Security Bank shall refer to any member of the SBC Group which is Security Bank Corporation and its affiliates, subsidiaries, bank assurance companies and other related entities, and their authorized service providers, agents and representatives.

Why we collect your personal information. We collect and use personal information that is material and relevant to your banking transaction and in fulfillment of the legal or contractual obligation we have with you in order to offer you even better products and services and best adapt our business processes to your needs.

Scope of this Privacy Notice and consent for processing of personal information. This Privacy Notice applies to the personal information that we collect about you for the purposes of providing you with our services and products. We reserve the right to make changes to this Privacy Notice at any time. We encourage you to regularly review this Privacy Notice to make sure you are aware of any changes on how your personal information may be used. Our Privacy Notice is a controlling document to which you should refer if you have questions about Security Bank's privacy practices. We process and collect your personal information only with your express consent. Consent of data subject refers to any freely given, specific, informed indication of will, whereby the data subject agrees to the collection and processing of personal information about and/or relating to him or her. This shall be evidenced by written, electronic or any recorded means.

What personal information do we collect. Personal information is information from which your identity is apparent or can be reasonably and directly ascertained. This includes sensitive personal information which serves to classify or qualify you based on different parameters such as age, status, origin, affiliation, health condition and others. It also covers your government issued and kept data such as social security numbers and tax returns. We primarily collect your identification and contact details, employment details, financial or payment information, identification cards, specimen signatures among other relevant personal information so that we can process your transactions throughout the duration of the banking relationship. When logging on to SecurityBank.com and the official Security Bank Social Media accounts, which are linked in Security Bank's website footer, we collect personal information that you voluntarily submit. If you connect to Security Bank using Facebook, or another social media site, we will receive information that you authorize the Social Media Site to share your personal information with us. Any information that we collect from your Social Media Site account may depend on the privacy settings you have set with the Social Media Site. When you use Security Bank's website, your device and browser automatically provides information to us so that we are able to track and serve relevant content to you. In order to provide better service, we employ the use of "cookies". A cookie is a small

piece of information which a website stores on your web browser on your PC and can later retrieve. The cookie cannot be read by a website other than the one that set the cookie. We use cookies for a number of administrative purposes; for example, to store your preferences for certain kinds of information. Most cookies last only through a single session, or visit to our site. None will contain information that will enable anyone to contact you via telephone, e-mail, or any other means. You can set up your web browser to inform you when cookies are set or to prevent cookies from being set. However, if you choose to reject cookies, you may not be able to use some of our online services or website features. Your browser software may contain a feature which is intended to notify you of the cookie policies of the various web sites you visit.

How we use your information. Manual or automated processing of your personal information within or outside the Philippines is done in utmost confidentiality and strictly in accordance with relevant data privacy laws for the execution of your banking transaction and fulfillment of our legal and contractual obligations with you. Your information may also be processed for other legitimate business purposes and regulatory reporting requirements consistent with the banking services offered as deemed fit by Security Bank such as but not limited to providing information to governmental authorities or private entities in fulfillment of regulatory requirements or contractual arrangements, sharing information for cross-selling of products and services, profiling/data analytics and credit evaluation/reference checks, audit and account balance confirmation. The company has a legitimate interest in disclosing or transferring your personal information to a third party in the event of any business transfer such as a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.

How we share your information. In the course of doing business, Security Bank may make your personal information available within or outside the Philippines to:

Our group of companies. The Group is composed of Security Bank and its affiliates and subsidiaries reported as part of the conglomerate map/group structure as defined under BSP Circular no. 749. Access to personal information within the Group is restricted to those individuals who have a need to access the information for business purposes based on adequate internal policies on information security and data privacy.

Our business partners and service providers. We have duly accredited processors in our business partners who act as advisers, consultants, service providers, contractors, or vendors, and their authorized agents and representatives who may perform different activities on behalf of the bank. These business partners underwent a rigorous vetting process before engagement and abide by the bank's standards on data privacy and information security.

Governmental authorities and industry associations. We may disclose your information to any Authority (governmental or regulatory authority, self-regulatory body or industry association in various jurisdictions) in connection or adherence (whether voluntary or otherwise) with legal or regulatory requirements.

Cross border information sharing. Due to the global nature of the banking business, we may transfer your personal information to any of the abovementioned parties who may be located outside the Philippines. In doing so, we ensure that the cross-border transfer is secure and that we are transmitting your personal information to a country which has adequate data privacy standards before agreeing to such cross-border transfer.

How we protect your information. We safeguard the confidentiality, integrity and availability of your personal information physically or electronically by maintaining a combination of organizational, physical and technical security measures based on generally accepted data privacy and information security standards such as on access control, acceptable use, end-to-end encryption, data classification requirements, etc. We may also store your personal information with third-party data storage providers

who shall ensure that proper measures are adopted to protect your information in accordance with the bank's standards.

How long we retain your information. We keep your personal information for as long as necessary to best serve you during the duration of the relationship and in accordance with retention limits set by law once the account has been closed.

If you have issues with regards to how we process. As our valued customer, you are afforded the following rights in relation to your personal information under the Data Privacy Act which can be viewed in this link https://www.privacy.gov.ph/know-your-rights/

To be informed that your personal information will be collected and how it will be processed,

To have reasonable access to your personal information held by the bank,

To dispute any error in your personal information and have it corrected,

To have your personal information erased or blocked from our system if said information is incomplete, outdated, false, unlawfully obtained, used for unauthorized purposes or no longer necessary for the purposes for which they were collected,

To object to the processing of your personal information,

To obtain your personal information from the bank in a portable and usable format,

To lodge a complaint before the National Privacy Commission, and

To be indemnified for damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of your personal information.

Who to contact for issues. If you have any questions or requests in relation to the processing of your personal information, please do not hesitate to contact our Data Protection Officer through the following:

Email: dataprotectionofficer@securitybank.com.ph

Address: Data Protection Officer Security Bank Corporation

**Compliance Office** 

Security Bank Centre 6776 Ayala Avenue Makati CityOR call our Customer Service hotline at +632 8887-9188.

**SEAOIL'S Privacy Policy** 

Your Privacy is Important to Us

In this policy, "we", "us", "our" or "SEAOIL" means SEAOIL Philippines, Inc., "you", "your" or "yours" means the persons to whom this policy applies.

The security of your personal data is important to us. SEAOIL Philippines, Inc. has in place safeguards to protect the personal data stored with us. This policy describes how we may collect, use, disclose, process and manage your personal data.

This policy applies to any individual's personal data which is in our possession or under our control. In the event of any inconsistency between different versions of this policy, the English version shall prevail.

What Personal Data We Collect

"Personal data" is data that can be used to identify a natural person. Some examples of personal data that we may collect are:

- (a) personal particulars (e.g. name, contact details, residential address, date of birth)
- (i) personal opinions made known to us (e.g. feedback or responses to surveys);

# Usage of Your Personal Data

We may use your personal data for our core business purposes, such as:

- (a) developing and providing petroleum facilities, products or services (whether made available by us or through us)
- (b) assessing and processing applications, instructions or requests from you or our customers;
- (c) communicating with you, including providing you with updates on changes to products, services and facilities (whether made available by us or through us) including any additions, expansions, suspensions and replacements of or to such products, services and facilities and their terms and conditions;
- (d) managing our infrastructure and business operations and complying with internal policies and procedures;
- (e) responding to queries or feedback;
- (f) addressing or investigating any complaints, claims or disputes;
- (g) verifying your identity for the purposes of providing products or services;
- (m) enabling any actual or proposed assignee or transferee, participant or sub-participant of SEAOIL Philippines, Inc.'s rights or obligations to evaluate any proposed transaction;
- (n) enforcing obligations owed to us; and/or
- (o) seeking professional advice, including legal advice.

We may also use personal data for purposes set out in the terms and conditions that govern our relationship with you or our customer.

# Use of Personal Data for Marketing Purposes

By visiting our site, we assume that you understand our Cookies Policy, and Terms and Condition and consent to the use of cookies. We may use your personal data to offer you products or services, including special offers, promotions, contests or entitlements that may be of interest to you or for which you may be eligible. Such marketing messages may be sent to you in various modes including but not limited to electronic mail, direct mailers, short message service, telephone calls, facsimile and other mobile messaging services. In doing so, we will comply with the Philippine Data Privacy Act of 2012 and other applicable data protection and privacy laws.

In respect of sending telemarketing messages to your Philippine telephone number via short message service, telephone calls, facsimile and other mobile messaging services, please be assured that we shall only do so if we have your clear and unambiguous consent in writing or other recorded form to do so or if you have not otherwise made the appropriate registration of that number with the Do Not Call Registry. If we have an ongoing relationship with you and you have not indicated to us that you do not wish to receive telemarketing messages sent to your Philippine telephone number, we may send you telemarketing messages to that number related to the subject of our ongoing relationship via short message service, facsimile and other mobile messaging services (other than a voice or video call). You may at any time request that we stop contacting you for marketing purposes via selected or all modes.

To find out more on how you can change the way we use your personal data for marketing purposes, please contact us (please see visit the official SEAOIL Philippines Facebook page).

Nothing in this section shall vary or supersede the terms and conditions that govern our relationship with you.

# Disclosure and Sharing of Personal Data

We may from time to time and in compliance with all applicable laws on data privacy, disclose your personal data to any personnel of SEAOIL Philippines, Inc. or to third parties, whether located in the

Philippines or elsewhere, in order to carry out the purposes set out above. Please be assured that when we disclose your personal data to such parties, we require them to ensure that any personal data disclosed to them are kept confidential and secure.

We do not sell or otherwise disclose or transfer personal information we collect about you, except as described in this Privacy Policy. We may share, transfer or disclose your personal information with:

## Our subsidiaries and affiliates;

Third party service providers who perform services based on our instructions. These service providers are authorized to use or disclose your personal information only as may be necessary to perform services on our behalf or to comply with legal requirements.

Other third parties with your consent; and

Other third parties as allowed and limited by Republic Act No. 10173, its implementing rules and regulations, other data privacy laws, and such issuances from the National Privacy Commission ("DPA"). For more information about the third parties with whom we share your personal data, you may, where appropriate, wish to refer to the agreement(s) and/or terms and conditions that govern our relationship with you or our customer (please see visit the official SEAOIL Philippines Facebook page).

We reserve the right to transfer your personal information, so as not to unnecessarily disrupt our transactions with you, in the event we sell or transfer all or a portion of our business or assets. We will use reasonable efforts to direct the transferee to use and process your personal information in a manner that is consistent with this Privacy Policy.

We may also disclose information that is necessary to comply with any applicable law, regulation, legal process or governmental request. In addition, we may disclose any information when it is necessary to prevent physical harm or financial loss or in connection with suspected or actual illegal activity.

We may transfer, store, process and/or deal with your personal data outside the Philippines. In doing so, we will ctake reasonable steps to ensure that the recipients have a standard of protection and policies in place equal to or higher than those provided in the Data Privacy Act and its Implementing Rules and Regulations. We will ensure that appropriate levels of protection necessary to maintain the security and integrity of your personal data are in place and that any data disclosed is processed in accordance with the DPA or any other applicable law.

## Cookies and Related Technologies

Our web sites and mobile applications ("apps" or an "app") use cookies. A cookie is a small text file placed on your computer or mobile device when you visit a web site or use an app. Cookies collect information about users and their visit to the web site or use of the app, such as their Internet protocol (IP) address, how they arrived at the web site (for example, through a search engine or a link from another web site) and how they navigate within the web site or app. We use cookies and other technologies to facilitate your internet sessions and use of our apps, offer you products and/or services according to your preferred settings, track use of our web sites and apps and to compile statistics about activities carried out on our web sites and/or through our apps.

A pixel tag, also known as a web beacon, is an invisible tag placed on certain pages of our web site but not on your computer. Pixel tags are usually used in conjunction with cookies and are used to monitor the behaviour of users visiting the web site.

You may set up your web browser to block cookies which will in turn disable the pixel tags from monitoring your web site visit. You may also remove cookies stored from your computer or mobile

device. However, if you do block cookies and pixel tags, you may not be able to use certain features and functions of our web sites.

### Other Web Sites

Our web sites may contain links to other web sites which are not maintained by SEAOIL Philippines, Inc.. This privacy policy only applies to the web sites of SEAOIL Philippines, Inc. Linked sites have their own privacy notices or policies. SEAOIL Philippines, Inc. is not responsible for websites that are not owned or operated by us, we are not responsible for the linked sites' content, any use of the sites, or the privacy practices thereof.

When visiting these third party web sites, you should read their privacy policies which will apply to your use of the web sites.

## Retention of Personal Data

Your personal data is retained as long as the purpose for which it was collected remains and until it is no longer necessary for any other legal or business purposes.

# **Access and Correction**

You may request access or make corrections to your personal data held by SEAOIL Philippines, Inc.. SEAOIL Philippines, Inc. may charge a fee for processing your request for access. Such a fee depends on the nature and complexity of your access request. Information on the processing fee will be made available to you.

Please contact us (please see visit the official SEAOIL Philippines Facebook page) for details on how you may request such access or corrections.

# How to Contact Us

To contact us on any aspect of this policy or your personal data or to provide any feedback that you may have, please visit any of our branches or get in touch through our official SEAOIL Philippines Facebook page.

# Amendments and Updates of SEAOIL Philippines, Inc. Privacy Policy

We may amend this policy from time to time to ensure that this policy is consistent with any developments to the way SEAOIL Philippines, Inc. uses your personal data or any changes to the laws and regulations applicable to SEAOIL Philippines, Inc.. As a result, we may change this Privacy Policy from time to time without prior notice. Revised versions of this Privacy Policy will be posted on this page, together with an updated effective date. In some cases, we may also send an email or other communication notifying users of the changes. You should check this page periodically to see if any recent changes to this Privacy Policy have occurred. By downloading, installing, accessing, or using any of our online services after we post any such changes, you agree to the terms of this Privacy Policy as modified.

# SMC PRIVACY STATEMENT Updated: 20 September 2017

San Miguel Corporation and its subsidiaries ("SMC," "We," "us" or "our") respect your privacy and will keep secure and confidential all personal and sensitive information that you may provide to SMC, and/or those that SMC may collect from you ("Personal Data").

This privacy statement ("Statement") provides for the Personal Data we obtain, or which you may provide through this website, www.sanmiguel.com.ph ("Website"), and the standards we observe in using, processing, keeping, securing, and disclosing said Personal Data.

Please read this Statement carefully to understand how We treat Personal Data. We may update this Statement from time to time to reflect change(s) in the law and/or our internal standards. When We do so, We will notify you by posting the updated Statement in this Website for your information and reference. By accessing the Website and submitting your Concerns (defined below), or Personal Data through it, you expressly acknowledge that you have read, understood and hereby agree to all of the terms of this Statement and that you provide consent for us to:

Process your Personal Data, as provided under applicable laws, regulations, and our policies, for our subsidiaries and affiliates, contractors, service providers, and other authorized third parties' legitimate purpose/s;

Make your Personal Data available for our subsidiaries and affiliates, contractors, service providers, and other third parties.

Personal Data We Collect and Process

Our Website allows you to directly reach us and provide comments, suggestions and complaints (collectively, "Concerns") on our products and services to help us improve them. When you access our Website and submit your Concerns, We ask you to provide the following Personal Data to identify you, and enable SMC to act on your Concerns:

Full Name

E-mail address

Contact number

If you do not provide any or all of the foregoing Personal Data accurately, We may not be in the position to effectively address your Concerns.

Any additional Personal Data that you may provide through your correspondence(s) with SMC in connection with your Concerns shall also be considered and treated as Personal Data.

When you navigate through and interact with the Website, depending on your settings, We may use automatic data collection technologies (e.g., cookies, web beacons, small data text files or similar technologies) to obtain certain information about your equipment, browsing actions, and patterns, such as:

Details of your visits to the Website (e.g., traffic data, location data, logs, and other communication data, and the resources that you access and use on the Website).

Information about your computer/device and internet connection, as well as IP address, operating system, and browser type (collectively, "Collected Data").

The Collected Data are mostly statistical data but may include other Personal Data, and We may maintain or associate them with the Personal Data that We ask you to provide to SMC in connection with your Concerns.

What We Do with Personal Data and Collected Data

Upon receiving your Concerns and the accompanying Personal Data identifying you, SMC or its duly authorized third party forwards the same to the concerned SMC department. SMC may use your Personal Data to get in touch with you, in order to attend to, further inquire about, and address your Concerns. SMC may separately contact you to confirm that the concerned SMC department has acted on your Concerns, ask you for further feedback, request your participation in surveys and/or provide information on its products and services.

For the Collected Data, We use them to help us improve our Website and to deliver a better and more personalized service by enabling us to:

Estimate our audience size and usage patterns;

Store information about your preferences, allowing us to customize our Website according to your individual interests;

Speed up your searches; and

Recognize you when you return to our Website.

Retention of Personal Data and Collected Data

SMC and/or its duly authorized third party shall retain the Personal Data and Collected Data for a maximum period of five (5) years counted from the date you provide it to SMC, or when they were collected, respectively.

Disclosure and Sharing of Personal Data and Collected Data

We may disclose aggregated information about our users, and information that does not identify, or when combined with other information, does not directly and certainly identify any individual, without restriction.

We may disclose and share the Personal Data and Collected Data, subject to compliance with applicable laws and regulations, on a need to know basis, and in all cases only for legitimate business purposes, as follows:

To our subsidiaries and affiliates;

To contractors, service providers, and other third parties We engage to support our business, and who are bound by contractual obligations to keep Customer Information and Collected Data confidential, and use it only for the purposes for which We disclose it to them;

To government and law enforcement agencies and regulatory bodies;

To comply with orders of courts, government agencies, regulatory bodies, stock exchanges and with applicable laws and regulations;

If We believe disclosure is necessary or appropriate to protect the rights, property, or safety of SMC, our subsidiaries and affiliates, officers, employees customers, or other third parties;

To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of SMC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by SMC about our Website users is among the assets transferred; and

To conduct investigations of breaches of SMC's internal policies, laws and regulations, enforce appropriate sanctions and pursue legal actions if necessary.

Website Visitor Under the Age of 18

No one under age eighteen (18) ("Minors") may provide any Personal Data on the Website. SMC does not knowingly collect Personal Data from Minors. If you are a Minor, please do not use or provide any information on this Website about yourself.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies (alone or in conjunction with web beacons or other tracking technologies) to collect information about you when you use our Website. The information they collect may be associated with your Personal Data or they may collect information, including Personal Data, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Accessing and Correcting Your Personal Data

You are entitled to certain rights in relation to the Personal Data collected from you, including the right to access and correct your Personal Data being processed, object to the processing, and to lodge a complaint before the National Privacy Commission in case of violation of your rights as data subject.

You may send us an e-mail at customercare@sanmiguel.com.ph to request access to, correct and/or delete any Personal Data that you have provided to us. Please be advised, however, that We cannot delete your Personal Data without restricting or removing our ability to effectively address your Concerns. We may not accommodate a request to correct and/or delete Personal Data if We believe the same would violate any law or legal requirement or cause the Personal Data to be incorrect.

Security of your Personal Data and the Collected Data

We have implemented technical, organizational, and physical measures designed to protect the confidentiality, integrity, and availability of your Personal Data and Collected Data and secure such Data from destruction, unauthorized access, alteration, disclosure, fraudulent misuse and/or any other unlawful processing, as well as other natural and human dangers.

## **Contact Information**

Should you have any questions and/or concerns regarding this Statement, SMC's use of your Personal Data and the Collected Data, or your rights in relation thereto under the Data Privacy Act of 2012, please do not hesitate to contact the SMC Data Protection Officer at the following: dpo@sanmiguel.com.ph and (+632) 632-3007.