



NBC (PHILIPPINES) CAR TECHNOLOGY CORPORATION

Lot 9B First Philippine Industrial Park II Special Economic Zone
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PRIVACY POLICY

I. Introduction

NBC (Philippines) Car Technology Corporation (NBP, us, our, we) respects and values data privacy rights. This Privacy Policy details how NBP uses and protects all personal data collected from employee/s, suppliers, customers other third parties, in accordance with Republic Act No. 10173 or the Data Privacy Act of 2012 (DPA, its Implementing Rules and Regulations, and other relevant policies, including issuances of the National Privacy Commission.

Personal data refers to all types of:

Personal Information – refers to 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 – refers to Personal Information:

- About an individual's race, ethnic origin, marital status, age, birthday, color, and religious, philosophical, or political affiliations;
- About an individual's health, education, genetic or sexual life of a person, or to any proceeding for any offense committed or alleged to have been committed by such person, 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, issued ID's, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns
- Those established by an Executive Order or an act of Congress to be kept classified

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

II. What information do we collect?

NBP collect personal information only by lawful and fair means and only that is reasonably necessary for, or directly related to, one or more of the NBP's functions, activities or when required by law.

The common type of data collected by the NBP generally includes the following:

- Basic personal information such as name, address, telephone number, and other personal contact details;
- Sensitive personal information such as birth date, marital status, age, religion, nationality, gender, dependents, health information, education, employment history, and government identification numbers, as well as biometric information such as full-face photographs, and other similar images; and
- Personal data in the course of your employment, such as salary and income, payroll bank account, performance ratings, disciplinary proceedings, training and development activities, medical records and certifications.

NBP only collect personal and sensitive information about Data Subject directly from him/herself only. If, however this information is collected from an indirect person other than the Data Subject, NBP must act reasonably to ensure the Data Subject consented or has been made aware of specified, and legitimate purpose and that only Personal Data that are necessary and compatible with such purpose shall be collected.

III. How do we use personal information?

NBP uses the Personal Data collected for the following matters, among others:

- A. Where the Personal Data relate to an employee—
 - Administering compensation and benefits, including government mandated benefits
 - Complying with applicable laws, rules, and regulations or requirements of lawful authorities
 - Organizational planning, including forecasting and predictive modelling
 - Data Sharing with parent company, subsidiaries, and affiliates, for the same or similar purposes listed above
 - Internal audits
 - Internal investigations
 - Employee disciplinary proceedings
 - Documentation purposes
- B. For other Data Subjects
 - Monitoring and verifying compliance with contractual undertakings (i.e. independent contractor agreements, distributor agreements, service agreements, and other similar agreements)
 - Providing services and to approve, manage, administer, or effect any transactions that may be requested or authorized
 - Collecting any amounts due and outstanding
 - Conducting credit checks and obtaining or providing credit references
 - Enforcing or defending the Group's or any Organization's rights
 - Internal operational requirements (including credit and risk management, system or product development and planning, insurance, audit, and administrative purposes)
 - Maintaining overall relationship
 - Documentation for purposes of account sign-up, providing feedback or sending relevant communication such as notifications regarding changes to Terms and Conditions and Privacy Policy, responding to customer complaints, website visits, facilitating communication when the Data Subject is referred by a current customer, and similar internal business purposes
 - Data Sharing with parent company, subsidiaries, and affiliates, for the same purposes listed above
 - Complying with applicable laws, rules, and regulations or requirements of lawful authorities
 - Documentation purposes

IV. How We Share Your Personal Information

As a general rule, we do not and will not share personal data with third parties. However, we need to make certain disclosures from time to time, such as when it is necessary for the proper execution of processes related to the above-mentioned declared purpose, or the use or disclosure is reasonably necessary, required or authorized by or under law. We may share your personal information with entities outside the NBP, including affiliates, subsidiaries, and parent company but, we shall require adherence by said third parties to similar or comparable data protection standards as required by the DPA.

V. Security

We have implemented technological, organizational and physical security measures to protect personal data from accidental or unlawful destruction, alteration, and disclosure, as well as against any other unlawful processing. Any personal data held by us or on our behalf is stored on secure storage, servers, with security measures in place to protect against accidental or unlawful destruction, alteration, and disclosure, and any other unlawful processing. The personal data disclosed by the data subject

may be accessed or processed only by authorized personnel who hold such information under strict confidentiality. Personal data being held by third parties on our behalf, we shall once more require adherence to similar or comparable data protection standards as required by the DPA to ensure the confidentiality and security of such data.

However, while we will take all reasonable measures (as required by applicable law) to protect the integrity of such information, we cannot guarantee that loss, unauthorized access or alterations, or misuse will not occur. Any data security incident or breach that comes to our knowledge will be recorded and reported as required by law. We will take all necessary and reasonable steps to address such incident or breach and mitigate any negative effect of such incident or breach. If there is strong suspicion that an incident affects the data subject's personal information, we will notify the data subject of such incident in an appropriate manner.

VI. Retaining Personal Information

We will periodically review the personal data held by us to ensure that is accurate and up to date, data subject shall let us know if such information changes so that we are not holding any inaccurate information. We will also retain personal data only for so long as it is necessary for the fulfillment of the purposes for which the data was obtained or for the establishment, exercise or defense of legal claims, or for legitimate business purposes, or as provided by applicable laws, rules, and regulations.

VII. Data Subject's Rights

Data subjects are given certain rights under the DPA, its IRR, and other NPC issuances, such as:

- Right to be informed;
- Right to object
- Right to withdraw consent;
- Right to access;
- Right to rectify or correct erroneous data;
- Right to erase or block
- Right to secure data portability;
- Right to indemnified for damages; and
- Right to file a complaint.

The decisions to provide access, consider requests for correction or erasure, and address objection to process personal data as it appears in official records, are always subject to applicable and relevant laws and/or the DPA, its IRR, and other issuances of the NPC.

VIII. Changes to this Privacy Policy

NBP reserves the right to update or modify this Policy and any Specific Privacy Statements at any time and without prior notice. Any modifications will apply only to the personal information we collect after the posting.

IX. Contact Us

Should you have any inquiries, feedback, and/or complaints, you may reach the Data Protection Officer (DPO) through the following contact details or fill in Data Privacy Inquiry form:

NBP DATA PROTECTION OFFICER (DPO)

Email add.: dpo.nbp@nbc-p.com

Tel no.: (043)779-8111 local 281 or 232

Form link:  [Data Privacy Inquiry Form](#)