

# EQUALS By Philcode

## PRIVACY NOTICE

This Privacy Notice describes how the Equals collects and uses personally identifiable information ("Personal Information") of Data Subjects. Personal Information may be collected manually via forms or documents or collected to the Equals mobile application and the associated Uniform Resource Locators (URLs) owned or controlled by Philcode. For purpose of this Privacy Notice, the following terms shall have their respective meanings as set forth below:

"Data Subject" refers to an individual whose Personal Information is processed;

"Personal Information" refers to any information from which the identity of a Data Subject is apparent or can be reasonably and directly ascertained by a person in possession of said information, and which may include, but is not limited to, the name, date of birth, email and physical addresses, demographic information, and contact information; and

"Processing" refers to any activity conducted on the Personal Information including, but not limited to, collection, recording, organization storage, updating or modification, retrieval, consultation, use consolidation, blocking, and erasure or destruction.

Equals' privacy policy sets forth the privacy practices that are applicable to all its Personal Information processing activities. Moreover, Equals' privacy policy and guidelines shall be interpreted and applied in accordance with all the relevant laws and guidelines of the Philippines, including the Data Privacy Act of 2012 and its Implementing Rules and Regulations.

### COLLECTION OF INFORMATION

Equals may collect Personal Information of Data Subject when the Data Subject has given his or her consent. The Personal Information collected shall be processed solely in connection with the Data Subject's application for school admission or employment, access to and use of mobile application, or other transactions with Equals. All Personal Information collected may be retained by Equals until necessary to the above-mentioned purposes and in accordance with applicable laws and with the school policy.

### USE OF PERSONAL INFORMATION

Equals may collect Personal Information to be used in accordance with its declared and legitimate purpose specified and consented to by the Data Subject at the time such information is collected. Equals may also use such Personal Information to contact the Data Subject regarding its services and products, and with the Data Subject's specific consent, for official publication or posting purposes. Equals may also use the Personal Information for research and survey purposes to understand and determine the needs for the continuous improvement of its services and products.

Equals upholds the Data Subject's right to refuse, withdraw consent, or object to the use of his or her Personal Information. T.I.P. may, however, be constrained to deny the Data Subject's application for admission or employment, request, access and use of school services and other transactions.

### DISCLOSURE OF PERSONAL INFORMATION

Equals may disclose Personal Information to third parties with the consent of the Data Subject as to the purpose of the disclosure and the identity of said third parties. Equals shall ensure that the privacy policies of said third parties provide a comparable level of protection as that of Equals and are compliant with the relevant laws and guidelines of the Philippines, including Data Privacy Act of 2012 and its Implementing Rules and Regulations.

Equals may disclose Personal Information to law enforcement authorities, regulators, or other public authority in connection with any alleged violations by the Data Subject of the terms and conditions of his or her contract or agreement with Equals, violations of law, subpoena, or inquiry by a governmental authority. Equals reserves the right to report to law enforcement authorities any activity that Philcode personnel believe in good faith, to be unlawful.

### DATA SECURITY AND STORAGE

Manually collected Personal Information is stored and secured physically. Electronically collected Personal Information is stored and secured in a cloud-based storage (Firebase) hosted by a reputable provider. The electronic database is secured by the authorized service provider of Philcode.

The Data Subject shall have reasonable access, upon demand, of his or her or her Personal Information. The Data Subject shall likewise have the right to dispute any inaccuracy or error in his or her Personal Information and have Equals correct said inaccuracy or error unless the request is vexatious or otherwise unreasonable.

### LIABILITY AND EXCLUSION

Equals shall not be liable for any loss, expense or damage arising out of or in connection with the wrongful use or reliance by the Data Subject or other third party upon the information in this privacy notice.

### PRIVACY CONTACT INFORMATION

For any questions, concerns, or comments about Equals' Privacy Notice, email us at [equals.philcode.mobileapp@gmail.com](mailto:equals.philcode.mobileapp@gmail.com) or see Kevin Galo, Philcode Admin and IT Representative.