**Data Privacy Notice**

Effective: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**. collectively known as **Alturas Group of Companies (AGC),** its respective subsidiaries, affiliates, associated companies, and jointly controlled entities are committed to protecting your personal data. We ensure that all systems and activities involving the collection and processing of your personal data are performed in accordance with the Data Privacy Act of 2012 (‘the Act’), its Implementing Rules and Regulations (‘IRR’), and other relevant policies, including issuances from the National Privacy Commission.

**l. Scope**

This Privacy Notice **(“Notice”)** applies to individuals who interact with *ALTURUSH* services as customers, vendors/suppliers, partners (riders/drivers and merchant partners), contractors and service provider **(“You”).**

**ll. Service Description**

**Alturas Group of Companies (AGC**) is primarily engaged in variety of services including wholesale and retail of general merchandise with mall operation, supermarket, cinemas and food chains, agriculture, hatchery, manufacturing, and resort operations.

We collect your personal data from various channels including:

***DISTRIBUTION websites***. Consumer-directed websites operated by or for ALTURUSH, including sites that We operate under our own domains/URLs and mini-sites that We run on third party social networks such as Facebook (“**Websites**”).

***DISTRIBUTION mobile sites/apps***. Consumer-directed mobile sites or applications operated by or for*DISTRIBUTION*, such as smartphone apps.

***E-mail, text and other electronic messages***. Interactions with electronic communications between you and *DISTRIBUTION*.

***Offline registration forms***. Printed or digital registration and similar forms that We collect via, for example, postal mail, in-store demos, contests, sampling activities, and other promotions, or events.

***Advertising interactions***. Interactions with our advertisements (e.g., if you interact with on one of our ads on a third party website, we may receive information about that interaction).

***Data from other sources***. Third party social such as Facebook and Google, market research (if feedback not provided on an anonymous basis), third-party data aggregators, *DISTRIBUTION* promotional partners, public sources and data received when we acquire other companies.

**lll. Personal Data Collected**

We collect and process your personal in accordance with the Data Privacy Act of 2012 and with the specific purposes outlined in this Notice. Depending on how you interact with *DISTRIBUTION*, these data may include:

Personal Data:

1. Name
2. Birthday
3. Address
4. Contact Details including Mobile and Home Phone Numbers
5. Store name
6. DTI Certificate Number
7. Barangay Clearance
8. Email Address
9. Senior Citizen/PWD ID

Sensitive Personal Data:

1. Age
2. Health Condition

We may also collect aggregated information such as details of traffic data, computer or mobile device details, operating system, and browser type. This information does not identify any individual but is used for statistical purposes and improvement of our website.

**lV. Purposes of Personal Data Collected**

We collect your personal data from various channels both online and offline for the following purposes:

1. To process and ship your orders;
2. To inform you of our goods and services;
3. To respond to your inquiries sent through different channels such as our websites, mobile app, email, and social media accounts.

**V. Third-Party Sharing**

We will only share your personal data when required by applicable laws and/or in response legal proceedings.

If we need to disclose your personal data to our partners and affiliates, we will ensure that they are contractually bound by Data sharing Agreements (DSA) and/or Outsourcing Agreements.

**Vl. Security of Your Personal Data**

We take reasonable, legal, and adequate organizational, physical, and technical measures to keep your personal data confidential and secure.

**People who can access your Personal Data.** Your personal data will be processed by our authorized staff or agents, on a need-to-know basis, depending on the specific purposes for which your personal have been collected.

**Measures taken in operating environments.** We store your Personal Data in operating environments that use reasonable security measures to prevent unauthorized access. We follow reasonable standards to protect Personal Data.

**Vll. Retention**

We retrain your personal data for a minimum of (enter years), or if necessary, to satisfy its declared purposes. Also, we may retain certain information for regulatory compliance or as required by applicable laws.

**Vll. Your rights**

In accordance with the Act, we allow to exercise the following rights:

1. **Right to Be Informed**. We will inform you on how we collect and use your personal data through this Notice.
2. **Right to Access or Obtain a Copy of your Personal Data**. You have the right to access and obtain a copy of your personal data in physical or electronic format, subject to our review and approval. You may send a request through our email address, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
3. **Right to Object**. You have the right to object if the personal data processing is based on consent our legitimate interest, subject to evaluation and approval. We may also retain your personal data for legal and compliance purposes.
4. **Right to Erasure or Blocking**. You have the right to erasure or withdraw your consent upon discovery and substantial proof that the personal data are incomplete, outdated, false, unlawfully obtained, used for unauthorized purposes, or are no longer necessary for the purposes which they were collected.
5. **Right to Rectification**. You have the right to rectify or correct any inaccuracies in your personal data.
6. **Right to file a complaint and be indemnified**. If you feel that your personal has been breached and we are unable to resolve it satisfactorily, you have the right to file a complaint before the National Privacy Commission (NPC). You may also claim compensation for any damages sustained due to such inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of personal information, upon judgement of the Law.
7. **Transmissibility Rights**. You may assign your rights as a data subject to your legal assignee or lawful heir, provided that legal evidence such as Special Power of Attorney is presented.

*If you wish to exercise any of the rights, you may send on email request to* [*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*](mailto:dpo@alturasbohol.com) *or call us at (038) 501-3000, between 8-5 PM, Mondays-Fridays.*

**lX. Changes to this Notice**

We reserve the right to make changes to this Notice at any time. We highly encourage you to visit our websites or mobile apps to ensure that you are informed of the latest policies related to your personal data.

**X. Contact Us**

For any questions, inquiries, or complaints on how we process your personal data, you may reach us through email at [\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_](mailto:dpo@alturasbohol.com) or call us at (038) 501-3000, between 8-5 PM, Mondays-Fridays.

Data Privacy Officer:

[\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_](mailto:dpo@alturasbohol.com)

3F AGC Corporate Center

Dao, Dampas, Tagbilaran city, Bohol

(038)501-3000, local 1120, (038) 501-3015

**COOKIE NOTICE**

We collect cookies to give you the best online experience.

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used make websites work, or to work more efficiently, as well as to provide reporting information.

Why do we use cookies?

We collect aggregated information such as details of traffic data, computer or mobile devices details, operating system, and browser type. This information does not identify you but is used for statistical purposes and improvement of our website.

**DATA PRIVACY CONSENT**

I understand that by clicking “I Agree”, I am giving my full consent to Alturas Group of Companies (AGC), its respective subsidiaries, affiliates, associated companies, and jointly controlled entities, its partners, and service providers – to collect, process, and store any personal data I may provide herein for a minimum period of (enter years) or as required by applicable laws and regulations.

Further, I acknowledge that the collection and processing of my data are necessary for the purposes outlined in the Privacy Notice. I am fully aware that AGC allows me to exercise my rights as a data subject, and requests are subject to evaluation and approval.