

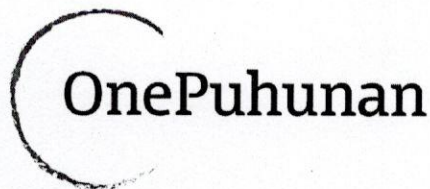


Policy No.	:	INFORMATION SECURITY POLICY 2017 - 07	
Policy Name	:	DATA PRIVACY POLICY	
Version No.	:	1.0	
Effectivity Date	:	2017 March 01	
Replaces	:	- n/a -	
Target Group	:	ALL EMPLOYEES	
Total Pages	:	2	
Approved By	:	IT HEAD	 RAMEL E. ROBLES
	:	PRESIDENT	 DANIELE ROVERE



INFORMATION SECURITY POLICY 2017-07

POLICY NAME : DATA PRIVACY POLICY

1.0 Overview

Privacy issues are sweeping the information security landscape as individuals demand accountability from corporations, organizations and others that handle their data. MicroVentures Philippines Financing Company Inc. (OnePuhunan) is committed to protect the privacy of individuals and its clients.

2.0 Purpose

The purpose of this policy is to enable MicroVentures Philippines Financing Company Inc. to:

- comply with the law (Data Privacy Act of 2012 or Republic Act No. 10173) with respect of the data it holds about individuals;
- follow good practice;
- protect staff and concerned individuals
- protect the organization from the consequences of a breach of its responsibilities.

3.0 Scope

This policy applies to employees, contractors, consultants, temporaries, and other workers at MV Philippines, including all personnel affiliated with third parties.

4.0 Policy

- MicroVentures Philippines Financing Company Inc. takes all reasonable steps to protect personal information from loss, unauthorized access, use, modification and disclosure.
- MicroVentures Philippines Financing Company Inc. does not sell, rent or trade personal information.
- Third party contractors that will be working for MicroVentures Philippines Financing Company Inc. will be bound by specific confidentiality / non-disclosure agreements. Where they may be required to deal with personal information, contractors or other third parties will be required to work within the provisions of this policy.
- Personal information stored digitally:
 - is restricted to staff who are authorized using network or other security settings and access/user rights systems such as Identity Management systems or similar. This may include "write" access to those authorized to add to or change an electronic file.
 - is deleted from the system when no longer required, which is in turn determined by reference to the Data Retention specified in the Service Level Agreements or Contracts with MicroVentures Philippines Financing Company Inc. Clients and the company's internal records retention requirement.
- Personal information stored physically is kept in a secure location (i.e., locked), accessed only by staff who are authorized. File or record containing personal information accessed or retrieved from storage, must be logged in a register recording access and return.
- MicroVentures Philippines Financing Company Inc. employees are prohibited to give personal information out to another person, over the phone, or send the personal information by facsimile or

other means of electronic communication, unless the employee is reasonably satisfied that the receiver is:

- a person to whom personal information may be disclosed; or
 - the individual to whom the personal information relates.
- MicroVentures Philippines Financing Company Inc. will not disclose personal information to third parties except under the following circumstances:
 - there is a legal requirement to release the information
 - there is an emergency situation under which an individual's emergency contact details are released to an appropriate third party agency.
- On the other hand, MicroVentures Philippines Financing Company Inc. may disclose personal information to third parties under the following circumstances with management approval:
 - the information is publicly available
 - disclosure is to the individual concerned or is authorized by the individual concerned;
 - disclosure is necessary to avoid prejudice to the maintenance of the law;
 - disclosure is necessary to prevent or lessen a serious and imminent threat to public or individual health and/or safety (note that disclosure should be to someone who can do something about it e.g. the police); and
 - the information is in a form by which the individual cannot be identified.
- While personal information may be released to Government Agencies (such as Regulating Bodies, Police, etc.), to avoid prejudice to the maintenance of the law (including the prevention, detection, investigation, prosecution and punishment of an offense), it is not the policy of the Company to provide open access to such information. There will be times when it is appropriate for these agencies to obtain a warrant from the Court, ordering release of the information.

5.0 Enforcement

Any employee found to have violated this policy will be subject to disciplinary action, up to and including termination of employment.

6.0 Revision History