

PRIVACY NOTICE

GRAMANS GROUP OF COMPANIES (hereinafter referred to as “GRAMANS”), including its subsidiaries, affiliates, and related companies, upholds the privacy rights of all individuals and is dedicated to the responsible handling of personal data. Our commitment is to strictly adhere to Republic Act No. 10173, the Data Privacy Act of 2012, and its relevant implementing rules and regulations, as respect for your privacy is paramount to our operations. GRAMANS collects, processes, and stores your personal data when you utilize our products and services (including our website), apply for employment, or enter into a contract with us. This privacy notice serves as a general statement on its data processing activities, informing Data Subjects about the Personal Data processed and the purpose and scope of this processing.

WHY WE COLLECT YOUR PERSONAL DATA

To fulfill our service commitments and manage our business operations, GRAMANS employs specialized software where we collect and store your information. When we process your personal data, we do so under the following legal bases and for the purposes set out:

- To verify your identity for security purposes and prevent unauthorized access to your personal information;
- To manage the security of our business operations. We may process your personal data to conduct IT security operations, to manage our assets, and for the purposes of business continuity, disaster recovery, and internal audits.;
- To establish and manage our relationship with you, allowing us to consistently deliver our services. When you apply for any of our services, we collect your personal data to validate your identity. This is necessary for billing purposes and the collection of fees pertaining to the products and services you utilize from us;
- To contact you about your account, billing, and important service updates;
- To provide the services requested;
- To continuously nurture our relationship with you. We collect and process your personal data in relation to your use of our services to help us manage your account, provide you with aftersales customer care, and investigate and resolve your service-related requests and concerns;

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- To continuously improve our products and services; and
- In adherence to any case provided by law.

Personal data must be processed fairly, lawfully, adequately and not excessive in relation to the purposes for which they are collected and processed.

WHEN WE DISCLOSE YOUR PERSONAL DATA

GRAMANS may share personal data between and among the entities comprising the same including its subsidiaries, affiliates, and related companies to enable them to provide you personalized Services. If and when necessary, a data sharing agreement shall cover any sharing of data between and among authorized persons of GRAMANS, consultants, including its subsidiaries, affiliates, and related companies. In some instances, we may be required to disclose your personal data in accordance with any order from any relevant government agency as provided by law. We ensure that all information we disclose will be kept private and strictly confidential, and shall be utilized exclusively for legal purposes, as mandated by the Data Privacy Act and other relevant statutes.

HOW WE PROTECT YOUR PERSONAL DATA

GRAMANS has instituted policies and procedures which intend to protect personal data which it has collected and continues to collect. We take your privacy seriously by strictly following our internal policies within GRAMANS and have implemented technical, organizational, and physical security measures that ensure your personal information remains protected from unauthorized or fraudulent access, alteration, disclosure, misuse, and other unlawful activities. These include securing any document containing personal data, requiring the execution of non-disclosure agreements by its employees, consultants, vendors, suppliers and contractors, among others. 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 retain your data only for as long as it is needed to provide our services, fulfill legitimate business goals, or comply with legal requirements.

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- In certain instances, we may keep your information for special cases that will require the exercise or defense of legal claims for a maximum retention period of ten (10) years after the termination of your service to satisfy legal and regulatory standards;
- We limit data processing according to the declared, specified and legitimate purposes;
- We restrict access to your information only to qualified and authorized personnel who are trained to handle your information with strict confidentiality;

WHAT ARE YOUR RIGHTS AS A DATA SUBJECT

You are accorded specific rights concerning your personal data under the Data Privacy Act of 2012 (Republic Act No. 10173). You are entitled (subject to the circumstances, conditions, and exceptions stipulated in applicable law) to:

- a) Request access to the personal data we process about you (Right to Access): This right entitles you to confirmation of whether we hold your personal data and, if so, to obtain information regarding that data and a copy of the personal data itself;
- b) Request a rectification of your personal data (Right to Rectify): This right entitles you to have your personal data corrected if it is determined to be outdated, inaccurate, or incomplete;
- c) Request the erasure of your personal data (Right to Erasure): This right entitles you to request the deletion of your personal data. This applies, for example, in situations where your personal data is no longer necessary to achieve the legitimate business purpose for which it was originally used or processed;
- d) Request the restriction of the processing of your personal data (Right to Restriction): This right entitles you to request that we limit the processing of your personal data to specific, constrained circumstances, such as only with your explicit consent;
- e) Right to object to the processing of your personal data (Right to Object): This right allows you to oppose the processing of your personal data, particularly in situations where we process it for activities such as direct marketing; or
- f) To the extent that the processing of your personal data is based on your consent, you possess the right to withdraw that consent at any time.

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To exercise any of these rights, the data subject may contact our Data Privacy Officer using the details provided below. Likewise, the data subject may request for and accomplish the prescribed **Data Subject Access Request Form** (Please note that in certain instances, we may request supporting documents or proof before implementing any requested changes to your personal data.)

UPDATES TO OUR PRIVACY STATEMENT

Because your privacy is our priority, we may update our Privacy Statement and practices to comply with changes in applicable laws, comply with government and regulatory requirements, and to adapt to new technologies and protocols. These updates or changes highlight the rigorous security protocols we use at GRAMANS to prevent fraud and misuse of your data.

In the event of major updates to this notice, we will notify you promptly. Whenever it is legally necessary to do so, we will also seek your express consent to ensure your continued agreement with our updated data processing practices.

CONTACT US

Please take time to read about the GRAMANS GROUP OF COMPANIES Privacy Policy available at <https://www.gramansgroup.com/> to know more about:

- The information we collect from you;
- The purpose for collecting and processing your personal data;
- The parties with whom we may disclose and share your personal data;
- The data security measures in place to protect you against risks;
- The right you have as data subjects under the DPA;
- The period your information will be processed and retained; and
- The disposal or deletion of your personal data.

For inquiries regarding our privacy policy and the processing of your personal data, as well as any concerns or complaints regarding data privacy, please contact:

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DATA PROTECTION OFFICER

Gramans Group of Companies

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