

PRIVACY POLICY

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 is committed to implementing appropriate security measures that maintain the confidentiality, integrity and availability of your personal data, according to standards provided in the data privacy act of 2012 (DPA).

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, provided that you have given your express consent. This privacy policy 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.

This Privacy Policy details the methods by which we collect, store, use, disclose, and dispose of (collectively referred to as "process") your personal data. By providing us with your personal data or executing any of our consent forms, you are explicitly authorizing GRAMANS, along with our employees, authorized representatives, related companies, and third-party service providers, to use, store, process, and share this personal data. This is done to complete your transaction, improve our services, ensure safety and security, and for other legitimate purposes.

PERSONAL INFORMATION

GRAMANS gathers information that you directly provide to us. This happens when you respond to a survey, register, create, or modify your accounts on our website and/or mobile application, contact customer support, apply for a job with GRAMANS, enter into any contract, or otherwise communicate or interact with GRAMANS. We may process this personal information, which you give directly when visiting our website or using our services. This information may include, but is not limited to:

3rd / 5th Floor CTP Alpha Tower Investment Drive,
Madrigal Business Park, Alabang, Muntinlupa City,
Philippines 1780

(632) 850 3690, (632) 842 3747, (632) 403 2947

www.gramansgroup.com

Personal Data:

- Full name (first name and last name);
- ID number, and ID Type (driver's license, passport, company ID, etc.);
- Address and address type (business or residential);
- Date of birth;
- Contact No.;
- Gender;
- Civil status.

The use of personal data shall be restricted to authorized personnel and for legitimate purposes only. In the course of the day-to-day business operations of GRAMANS, its duly authorized officers and personnel may utilize personal data, provided however, that the same is necessary in carrying out GRAMANS' legitimate purposes.

Nevertheless, the processing of sensitive personal data shall be allowed under the following circumstances:

- a) With written consent by the data subject;
- b) Necessary for the fulfillment of a contract or legal obligation;
- c) In response to national emergency, public order and safety;
- d) When the life, health or other vital interests of the data subject are involved; and
- e) In pursuit of legitimate interests.

PURPOSE

All information we collect 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. 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:

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PRIMARY PURPOSE:

- a) To verify your identity for security purposes and prevent unauthorized access to your personal information;
- b) To establish legal capacity when entering into contractual agreements, ensuring all documentation is legally binding and accurate;
- c) 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.;
- d) 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.
- e) To contact you about your account, billing, and important service updates.
- f) To provide the services requested;

SECONDARY PURPOSE:

- g) 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;
- h) For statistical and analytical purposes in support of Gender and Development (GAD) initiatives, helping us ensure equal opportunity and provide tailored services that address your diverse needs;
- i) To continuously improve our products and services; and
- j) 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.

SHARING OF PERSONAL DATA

GRAMANS may share personal data between and among the entities comprising the same including its

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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. This information may include, but is not limited to:

- Full Name:
- Email Address:
- Home/Business Address:
- Contact No.:

In these cases, we ensure that your personal data is disclosed on a confidential basis, through secure channels, and only in compliance with applicable privacy laws and regulations. We will never share, rent, or sell your personal data to third parties outside of GRAMANS, except in special circumstances where you may have given your consent and as described in this Policy. Information that are matters of public interest, however, may be disclosed to the public subject to applicable laws, rules, and regulations.

At all times, your personal data shall not be used or processed for any purpose that is contrary to law, morals, or public policy.

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;

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- 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.
 - 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;

HOW WE STORE YOUR PERSONAL DATA

In line with our commitment to data security, we employ technical, organizational, and physical safeguards to ensure the integrity and confidentiality of your personal data. Your information is maintained through secure physical filing systems for hard-copy documents. Physical records (such as signed forms) are kept in secured facilities, while electronic data is hosted on protected servers, encrypted electronic databases or cloud-based platforms. Each system is monitored and designed to safeguard your information from potential security breaches or data loss.

YOUR CONSENT

GRAMANS will secure your consent prior to the collection and processing of your personal data, or as soon as practicable and reasonable in order to ensure continuation of the Services. Before you give your consent, you will be provided with an opportunity to read and review this Privacy Policy.

We do not knowingly solicit or market to individuals under eighteen (18) years of age. By utilizing our Services, you affirm that you are at least 18 or that you are the parent or legal guardian of such a minor and consent to their use of the Services. Should we become aware that we have collected personal information from users under 18 years of age, we will deactivate the corresponding account and undertake reasonable measures to promptly delete this data from our records. If you learn of any data we may have collected from a child under 18, please contact us immediately.

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RETENTION AND DISPOSAL

If you consent to the collection and processing of your personal data in accordance with the Privacy Policy, such consent shall be valid for the purpose for which they are collected or ten (10) years, whichever is shorter, or as may be required by applicable law or when necessary, as provided by the Data Privacy Act, or unless you have expressly withdrawn such consent. We retain your information only for the duration that is necessary for us to:

- a) provide you with the products and services you utilize,
- b) fulfill our legitimate business purposes,
- c) comply with all applicable laws, and
- d) address special cases that necessitate the exercise or defense of legal claims.

In all instances, the maximum retention period shall be ten (10) years following the termination of your service.

Personal data shall be disposed of or discarded in accordance with the Data Privacy Act, GRAMANS internal policies, and other applicable laws, rules, and regulations. GRAMANS shall ensure that all personal data and sensitive personal information that have reached their stipulated retention limit or are no longer necessary for the fulfillment of their specified purposes shall be securely and irreversibly disposed of or discarded.

The method of disposal shall be appropriate to the medium of the personal data and designed to prevent any possibility of data retrieval. This includes, but is not limited to:

- **Digital Data:** Secure deletion, using data erasure software to overwrite data with random patterns
- **Physical Records:** Cross-shredding, burning, or pulping.

Personal data shall be retained for no longer than necessary to fulfill the stated purposes unless a law or regulation specifically requires otherwise. Personal data no longer retained shall be disposed of and destroyed in a manner that prevents loss, misuse, or unauthorized access.

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ACCESS

Access to personal data, sensitive personal data, and privileged information of data subject shall be limited to authorized personnel. As a general rule, GRAMANS' Data Protection Officer shall, upon written request and with approval of the Chief Operating Officer, provide the data subject with access to his or her personal data within a reasonable time after such written request is made as well as to immediately address a request for correction or deletion of his or her personal data, except when such request is vexatious or otherwise unreasonable. In case of denial to access personal information, the Data Protection Officer shall give the data subject a written notice containing the reason or ground for such denial.

DATA SUBJECT RIGHTS

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

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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.

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 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.):

(SAMPLE)

DATA SUBJECT REQUEST FORM

Please provide the following details:

I. PERSONAL INFORMATION:

DATA SUBJECT (Client)

Full Name:

Contact No.:

Email:

DATA SUBJECT (Authorized Representative)

Full Name of Client:

Represented by:

Contact No. of Client:

Contact No. of Rep.:

Email:

Relationship with Client:

Note: Please provide copy of your legal authority to act. We accept a copy of the following proof of your legal authority to act on data subject's behalf: (a) A written consent sign by the data subject and dated within the last three (3) months; (b) A certified copy of Power of Attorney; or (c) Evidence of parental responsibility.

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DATA SUBJECT (Employee)

Full Name: _____

Contact No.: _____

Email: _____

Employee No.: _____

Period of Employment: _____

II. PURPOSE OF REQUEST:

REQUEST INQUIRY COMPLAINT

RIGHT TO BE EXERCISED: (please tick one box only)

Right of Access Right of Rectification Right to Erasure Others:
 Right to Restriction of Processing Right to Object to Processing

Please provide in full detail the purpose of request, inquiry, or complaint, include any proof concerning the request.
(If additional space is required, please submit an attachment).

Note: To help us process your request efficiently, please provide us detail about the personal information you are requesting access to, correction, or erasure. Please state the name, type of document, dates, file numbers, or any information to help us locate your personal data. If you are requesting for erasure or restriction of processing, please submit proof of any of the following, that your personal data is (a) out dated or incomplete, (b) being used for unauthorized purpose, (c) no longer necessary for the purpose for which they were collected, and (d) violation of your right/s.

Note: You may only complain about the mishandling of your personal information, not about another data subject's personal information. If you are complaining on behalf of someone else provide proof of your authority to do so.

Note: We will contact you for additional information, if the scope of your request is unclear or does not provide sufficient information for us to conduct a search. We will begin processing your request as soon as we have verified your identity, and have all the information we need to locate your data.

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III. PROOF OF IDENTITY OF THE DATA SUBJECT

Please provide identification that clearly shows the name, date of birth, and current address of the requester, such as a government-issued ID.

Government-Issued I.D.

Type of I.D./I.D. No.: _____

Other:

Type of I.D./I.D. No.: _____

SIGNATURE

FULL NAME (PRINTED)

DATE

PRIVACY NOTICE:

GRAMANS GROUP OF COMPANIES strictly adheres 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 gathers information that you directly provide to us. GRAMANS will collect, store, use, disclose and process your personal information for the purpose of this request. The use of personal data shall be restricted to authorized personnel and for legitimate purposes only. Personal data shall be retained for no longer than necessary to fulfill the stated purposes unless a law or regulation specifically requires otherwise. Personal data no longer retained shall be disposed of and destroyed in a manner that prevents loss, misuse, or unauthorized access.

You may read about the GRAMANS GROUP OF COMPANIES Privacy Policy available at <https://www.gramansgroup.com/> or contact the Data Protection Officer at <https://www.gramansgroup.com/> for any concern.

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For inquiries and complaints by the data subjects in relation to the exercise of their data privacy rights, the data subject shall briefly discuss the inquiry or complaint, together with contact details for reference. In the exercise of said rights, the data subject may accomplish the prescribed **Data Privacy Complaint/Inquiry Form**.

Should you believe that your data privacy rights have been violated, despite our commitment and efforts to protect your personal data, we strongly encourage you to first approach GRAMANS to seek a resolution to your complaint. Regardless, you retain the right at all times to register a complaint directly with the National Privacy Commission or to pursue a claim against us with a competent court.

UPDATES TO OUR PRIVACY NOTICE

Because your privacy is our priority, we may update our Privacy Notice 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 policy, 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;

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- 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:

DATA PROTECTION OFFICER

Gramans Group of Companies

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