

THE DBP LEASING CORPORATION (DBPLC) DATA PRIVACY POLICY

DBPLC is committed to protect personal data privacy and ensure that all personal data collected from all it engages with are processed according to the principles of transparency, legitimate purpose and proportionality in obedience to Republic Act No. 10173 otherwise known as the Data Privacy Act of 2012. It is the goal of DBPLC to protect personal data on the mediums or mechanisms we interact with people – through this website, in our office, on the phone, and face-to-face transactions.

We institute fair information practices as part of the commitment to product and service quality that conforms to expectations. The following are the key principles that guide this commitment:

- Ensuring the security and confidentiality of any personal data shared with us;
- Limiting the collection and use of customer data to a minimum;
- Permitting only authorized personnel to have access to that data;
- Protecting personal data in our custody from intrusions of any external organization unless we have previously informed our stakeholders in disclosures or agreements/have been authorized by the customer/required by law. For purposes of credit reporting, verification and risk management, we will only exchange information about our stakeholders with legitimate reference sources.

I. WHY WE COLLECT PERSONAL DATA/PURPOSE OF COLLECTION

In general, DBPLC collects, uses and discloses personal data for the following purposes:

- To conduct our everyday business purposes such as processing transactions and maintaining accounts including sending notices, billings, and other such documents necessary for the continued use of our products and services;
- To conduct identity verification and customer due diligence in order to comply with regulation and applicable laws of the Philippines including the prevention of money laundering (pursuant to the Anti-Money Laundering Act of 2001, as amended);
- To comply with the laws of the Philippines and applicable foreign jurisdiction;

- To comply with contractual and regulatory requirements such as the submission of data to credit bureaus, credit information companies, submission of General Information Sheet with Beneficial Ownership Page (to the Securities and Exchange Commission), and the Credit Information Corporation (pursuant to the Credit Information System Act);
- To respond to court orders, instructions and requests from local or foreign authorities including regulatory, governmental, tax and law enforcement;
- To comply with our operational, audit, administrative, credit, legal, and risk management processes, and other internal policies and procedures;
- To respond to process and handle stakeholder queries, requests, feedback, suggestions and complaints;
- To conduct studies and researches for the purpose of reviewing, developing and improving our products and services including monitoring and recording calls, meetings, and communications;
- To prevent, detect, investigate crime and manage the safety and security of our premises and services (including but not limited to conducting security clearances and carrying out CCTV surveillance).

These foregoing purposes may apply even if you have decided not to avail of our products and services or have actually terminated your availment with us.

II. WHAT WE MAY COLLECT FROM YOU

The types of personal data we collect and share depend on the product or service availed of from DBPLC. We collect your personal data when you interact with our personnel and authorized representatives through our various business units through all mediums and mechanisms. This may include, among others:

- Basic personal information like your name, date of birth, gender, marital status, and citizenship including supporting documents such as government ID details;
- Your contact details like your home address, mobile, and land line telephone numbers;
- Specimen signatures;
- Education, employment, and business details;
- Images via CCTV and other similar recording devices which may be observed when visiting our offices and/or using our other facilities;
- Voice recordings of our conversations with you;

- Financial information (such as income, expenses, balances, investments, tax, insurance, financial and transaction history, etc.);
- Business interests, assets, and credit information; and
- Account transactions, movements and interactions with third parties such as merchants.

III. HOW WE COLLECT DATA FROM YOU

There are many ways that we obtain personal data such as when filling out forms, answering calls, submitting records and official documents, conducting background and credit investigation in relation to prospective availments with us, any kind of interaction through different mediums and mechanisms.

IV. HOW WE MAY SHARE YOUR DATA

DBPLC will not share your personal data with third parties unless necessary for the above-mentioned purposes and unless you give your consent thereto. Such third parties may include DBPLC's business units, affiliates, agents, outsourced service providers, government regulators, and other third parties.

The foregoing enumerated entities are engaged for the following reasons:

- Verify personal information;
- Assist in business operations;
- Comply with legal requirements;
- Enforcing our terms of use including, among others, our rights as creditor to customers availing of our loan or credit products, or such other applicable policies with respect to the services that we provide;
- Addressing fraud, security or technical issues, to respond to an emergency or otherwise protect the rights, property or security of our customers or third parties; and
- Carrying out all other purposes set out above.

Personal data shared with third parties shall be covered by the appropriate agreement to ensure that all personal data are adequately safeguarded.

DBPLC does not, will not, sell personal data to any third party. All our engagements with third parties shall be fully-compliant with our obligation of confidentiality imposed under applicable agreements and/or terms and conditions or any applicable laws.

V. HOW WE PROTECT YOUR DATA

DBPLC strictly enforces data privacy and information security policies. It implements technological, organizational, and physical security measures to protect your personal data against loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction. We put safeguards such as the following:

- We keep and protect data using a secured server behind a firewall, deploying encryption on computing devices and physical security controls;
- We restrict access to your personal data only to qualified and authorized personnel who hold your personal data with strict confidentiality;
- We train our employees to properly handle your data; and
- We require our third parties to protect personal data aligned with our own security standards.

VI. HOW DO WE STORE AND DISPOSE YOUR PERSONAL DATA

DBPLC stores personal data in a data center (on premise and cloud) and physical document storage facilities.

It retains personal data only according to operational need and in compliance with legal and regulatory purposes. DBPLC's data retention and disposal policy is in accordance with R.A. 9470 or the National Archives of the Philippines Act and BSP regulations. In general, DBPLC shall only retain data for five (5) years after the processing relevant to the purpose has been terminated. DBPLC, however, may retain your data when necessary to establish, exercise or defend legal claims, for legitimate business purposes, or when provided by law.

VII. YOUR ROLE IN ENSURING THE COMPLETENESS, ACCURACY AND PROTECTION OF YOUR PERSONAL DATA

You should ensure that personal data submitted to us is complete, accurate, true, and correct. Failure on your part to do so may result in our inability to provide you with products and services you have requested. You should inform DBPLC immediately of any change of facts or circumstances which may render any information or personal data previously provided inaccurate, untrue, or incorrect and provide any information or documentation DBP may reasonably require for the purposes of verifying the accuracy of the updated information or personal data.

We encourage you to be vigilant in protecting your personal data by ensuring that your account details, username and password are not disclosed to others or written

somewhere accessible to others. We advise you to exercise caution in protecting yourself against phishing, skimming, and other electronic fraud.

VIII. YOUR DATA PRIVACY RIGHTS

Under the Data Privacy Act, you have the following rights:

- Right to be informed;
- Right to object;
- Right to access;
- Right to rectify or correct erroneous data;
- Right to erase or block;
- Right to secure data portability;
- Right to be indemnified for damages; and
- Right to file a complaint.

DBPLC's decisions to provide access, consider requests for correction or erasure, and address objection to process data as it appears in the Bank's official records, are always subject to applicable internal policies, relevant laws and regulation.

IX. HOW YOU MAY CONTACT US

How to contact us

For further inquiries or complaints, please visit our office at the 2nd Floor, Pacific Star Building, Sen. Gil J. Puyat Ave., cor. Makati Ave., Makati City, or call (02) 530-47915.

Data privacy requests and concerns

For data privacy requests and concerns, you may write to our Data Protection Officer at this address: DBP Leasing Corporation, 2nd Floor, Pacific Star Building, Sen. Gil J. Puyat Ave., cor. Makati Ave., Makati City 1200.

X. CHANGES TO OUR DATA PRIVACY NOTICE

DBPLC may amend this Data Privacy Notice to ensure that it is consistent with industry trends, legal and regulatory requirements applicable to how we handle your personal data. Relevant updates will be posted on this site.

XI. CONSENT

Submitting your data to DBPLC signifies that you have read and understood the above Privacy Notice and expressly consent to the processing of your personal and/or

sensitive personal information in the manner and for the purpose provided in this Notice. You understand and accept that this will include access to personal data and records submitted, which may be regarded as personal and/or sensitive personal data as provided under the Data Privacy Act of 2012.

You also authorize DBPLC to disclose your data to accredited/affiliated third parties or independent/non-affiliated third parties, whether local or foreign, in the following circumstances:

- As necessary for the proper execution of processes related to the declared purpose;
- The use or disclosure is reasonably necessary, required or authorized by or under law; and
- Provided security systems are employed to protect my data.

Consenting to this Privacy Notice, however, does not waive any of your rights under the Data Privacy Act of 2012.

For complete reference on the Data Privacy Act, please visit the National Privacy Commission website at <https://www.privacy.gov.ph/>.