

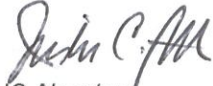
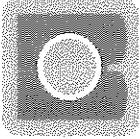
 BenguetCorp	<b>BENGUET CORPORATION</b>	Document No : HRA-P003-2018
	<b>DATA PRIVACY POLICY</b>	Revision No. : 03
Effective Date : April 1, 2018		
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## A. INTRODUCTION

The Data Privacy Policy is adopted in compliance with Republic Act No. 10173 or the Data Privacy Act of 2012 (DPA), its Implementing Rules and Regulations (IRR), and other relevant policies, including issuances of the National Privacy Commission (NPC).

It aims to protect personal data in information and communications systems both in the government and the private sector, and ensure that entities or organizations processing personal data establish policies, and implement measures and procedures that guarantee the safety and security of personal data under their control or custody, thereby upholding an individual's data privacy rights.

## B. OBJECTIVE

Benguet Corporation respects and values individual's data privacy rights and makes sure that all personal data collected are processed in adherence to the general principals of transparency, legitimate purpose and proportionality. The Policy serves as a guide for ensuring the compliance by Benguet Corporation and its subsidiaries with the DPA, its IRR, and other relevant issuances of NPC. It also encapsulates the privacy and data protection protocols that need to be observed and carried out within the organization for specific circumstances (e.g., from collection to destruction), directed toward the fulfillment and realization of the rights of Data Subjects.

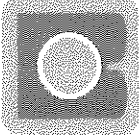
## C. POLICY STATEMENT

Benguet Corporation and its Subsidiaries (BC Group or the Company) are committed to protect the privacy rights of individuals on personal information pursuant to the provisions of Republic Act No. 10173 or the Data Privacy Act of 2012, and its Implementing Rules and Regulations. All employees and officers are enjoined to comply with and to share in the responsibility to secure and protect personal information collected and processed by the Company in pursuit of legitimate purposes.

### C.1 General Privacy Policy Statements

1. BC adheres to the general principles of transparency, legitimate purpose and proportionality in the collection, processing, securing, retention and disposal of personal information.
2. The employees or third parties whose personal information is being collected shall be considered as data subjects for purposes of these policies.
3. Data Subjects shall be informed of the reason or purpose of collecting and processing of personal data.
4. The Data Subjects shall have the right to correct the information especially in cases of erroneous or outdated data, and to object to collection of personal information within the bounds allowed by privacy laws.
5. The Data Subject has the right to file a complaint in case of breach or unauthorized access of his personal information.
6. The Company shall secure the personal information of employees and third parties from whom personal information is collected and shall take adequate measures to secure both physical and



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digital copies of the information.

7. The Company shall ensure that personal information is collected and processed only by authorized personnel for legitimate purposes of the Company.
8. Any information that is declared obsolete based on the internal privacy and retention procedures of the Company shall be disposed of in a secure and legal manner.
9. Any suspected or actual breach of the BC Data Privacy Policy must be reported to any member of the Data Privacy Team in accordance with the procedure provided in this policy.
10. Data Subjects may inquire or request for information from the Data Privacy Team, regarding any matter relating to the processing of their personal data under the custody of BC, including the data privacy and security policies implemented to ensure the protection of their personal data pursuant to this policy.

#### **D. SCOPE AND LIMITATIONS**

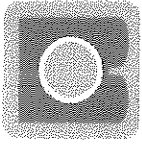
This policy applies to all departments of the Company, employees regardless of the type, officers and third parties, whose information (applicants for employment and former employees, contracting parties, clients, customers are required to be kept and secured by the Company. The data covered by this policy is limited to personal information as defined under Section 3 (l), of the Data Privacy Act, collected and processed by the Company.

This Manual contains the Company's data protection and security measures, and may serve as guide in exercising one's rights under the DPA.

#### **E. DEFINITIONS**

1. **Personal Data Breach** – refers to breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed
2. **Company** refers to Benguet Corporation and its Subsidiaries;
3. **Consent of the Data Subject** – The data subject has given his or her consent, specific to the purpose prior to the processing, or in the case of privileged information, all parties to the exchange have given their consent prior to processing.
4. **Data Privacy Act or DPA** refers to Republic Act No. 10173 or the Data Privacy Act of 2012 and its implementing rules and regulations;
5. **Data Privacy Officer or DPO** refers to the Officer designated to monitor and ensure the implementation of the Data Privacy policies of BC and its subsidiaries. The DPO automatically becomes the head of the Data Privacy Team.
6. **Data Privacy Team** refers to the group of persons designated to respond to inquiries and complaints relating to data privacy and to assist in the monitoring and implementation of the Data Privacy policy of the Company. It is composed of the Data Privacy Officer, the Document and Information Controller

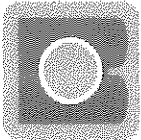


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and the DP Coordinators in the sites.

7. **Data Sharing** – is the disclosure or transfer to a third party of personal data under the custody of a personal information controller or personal information processor. In the case of the latter, such disclosure or transfer must have been upon the instructions of the personal information controller concerned. The term excludes outsourcing, or the disclosure or transfer of personal data by a personal information controller to a personal information processor.
8. **Data Subject** refers to an individual whose Personal Information, Sensitive Personal Information, or Privileged Information is processed. It may refer to employees, officers, consultants, retainers, clients and customers of this Company.
9. **Document and Information Controller** refers to the Officer or person designated as such to manage and control documents and information. He is instructed to implement reasonable and appropriate measures to protect personal data against natural dangers such as accidental loss or destruction, and human dangers such as unlawful access, fraudulent misuse, unlawful destruction, alteration and contamination.
10. **Personal Data** collectively refers to Personal Information, Sensitive Personal Information, and Privileged Information;
11. **Personal Information** refers to any information, whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual;
12. **Processing** refers to any operation or set of operations performed upon Personal Data including, but not limited to, the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of data. Processing may be performed through automated means, or manual processing, if the Personal Data are contained or are intended to be contained in a filing system;
13. **Privileged Information** refers to any and all forms of Personal Data, which, under the Rules of Court and other pertinent laws, constitute privileged communication;
14. **Security Incident** is an event or occurrence that affects or tends to affect data protection, or may compromise the availability, integrity and confidentiality of Personal Data. It includes incidents that would result to a personal data breach, if not for safeguards that have been put in place;
15. **Sensitive Personal Information** refers to Personal Data:
  1. About an individual’s race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;
  2. About an individual’s health, education, genetic or sexual life, or to any proceeding for any offense committed or alleged to have been committed by such individual, the disposal of such



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proceedings, or the sentence of any court in such proceedings;

3. Issued by government agencies peculiar to an individual which includes, but is not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and
4. Specifically established by an executive order or an act of Congress to be kept classified.

## **F. PROCESSING OF PERSONAL DATA**

### **F.1 Data Collection Procedures**

1. The DPO, with the assistance of HR and any other departments of the Company responsible for the Processing of Personal Data, shall document the Company's Personal Data Processing procedures.
2. The DPO shall ensure that such procedures are updated and that the consent of the Data Subjects (when required by the DPA or other applicable laws or regulations) is properly obtained and evidenced by written, electronic or recorded means. Such procedures shall also be regularly monitored, modified, and updated to ensure that the rights of the Data Subjects are respected, and that Processing thereof is done fully in accordance with the DPA and other applicable laws and regulations

### **F.2 Use of Personal Data**

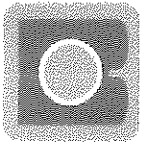
3. Personal data collected shall be used by the Company for documentation purposes.

### **F.3 Data Retention**

4. Subject to applicable requirements of the DPA and other relevant laws and regulations, Personal Data shall not be retained by the Company for a period longer than necessary and/or proportionate to the purposes for which such data was collected.
5. The DPO, with the assistance of HR and any other departments of the Company responsible for the Processing of Personal Data, shall be responsible for developing measures to determine the applicable data retention schedules, and procedures to allow for the withdrawal of previously given consent of the Data Subject, as well as to safeguard the destruction and disposal of such Personal Data in accordance with the DPA and other applicable laws and regulations.

### **F.4 Access**

6. Due to the sensitive and confidential nature of the personal data under the custody of the Company, only the client and the authorized representative of the Company shall be allowed to access such personal data, for any purpose except for those contrary to the law, public policy, public order or morals.

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## F.5 Disclosure and Sharing

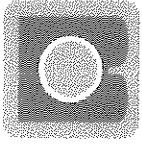
7. All employees and personnel of the company shall maintain the confidentiality and secrecy of all personal data that come to their knowledge and possession, even after resignation, termination of contract, or other contractual relations. Personal data under the custody of the company shall be disclosed only pursuant to a lawful purpose, and to authorized recipients of such data.

## G. ORGANIZATIONAL SECURITY MEASURES

### G.1 Organizational Measures

1. Conduct of Privacy Impact Assessment (PIA)
2. Data Protection Officer
  - a. Data Protection Officer (“DPO”) shall be appointed by the Company.
  - b. The DPO is responsible for ensuring the Company’s compliance with applicable laws and regulations for the protection of data privacy and security. The DPO’s functions and responsibilities shall particularly include, among others:
    - 1) Monitoring the Company’s Personal Data Processing activities in order to ensure compliance with applicable Personal Data privacy laws and regulations, including the conduct of periodic review to ensure that all the Company’s data privacy policies are adequately implemented by its employees and authorized agents;
    - 2) Acting as a liaison between the Company and the regulatory and accrediting bodies, and is in charge of the applicable registration, notification, and reportorial requirements mandated by the Data Privacy Act, as well any other applicable data privacy laws and regulations;
    - 3) Developing, establishing, and reviewing policies and procedures for the exercise by Data Subjects of their rights under the Data Privacy Act and other applicable laws and regulations on Personal Data privacy;
    - 4) Acting as the primary point of contact whom Data Subject may coordinate and consult with for all concerns relating to their Personal Data;
    - 5) Formulating capacity building, orientation, and training programs for employees, agents or representatives of the Company regarding Personal Data privacy and security policies;
    - 6) Preparing and filing the annual report of the summary of documented security incidents and Personal Data breaches, if any, as required under the Data Privacy Act, and of compliance with other requirements that may be provided in other issuances of the National Privacy Commission.



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### 3. Duty of Confidentiality

All data subjects will be asked to sign a Non-Disclosure Agreement. All data subjects with access to personal data shall operate and hold personal data under strict confidentiality if the same is not intended for public disclosure.

### 4. Conduct of trainings or seminars to keep personnel, especially the Data Protection Officer updated vis-à-vis developments in data privacy and security

BC shall sponsor a training on data privacy and security as often as needed. For personnel directly involved in the processing of personal data, management shall ensure their attendance and participation in relevant trainings and orientations.

### 5. Review of Privacy Manual

### 6. Recording and documentation of activities carried out by the DPO or by the Company.

## G.2 Data Privacy Principles

### 7. All Processing of Personal Data within the Company should be conducted in compliance with the following data privacy principles as espoused in the Data Privacy Act:

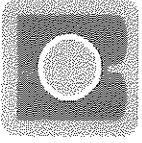
- a. Transparency –The Data Subject must be aware of the nature, purpose, and extent of the Processing of his or her Personal Data by the Company, including the risks and safeguards involved, the identity of persons and entities involved in Processing his or her Personal Data, his or her rights as a Data Subject, and how these can be exercised. Any information and communication relating to the Processing of Personal Data should be easy to access and understand, using clear and plain language.
- b. Legitimate purpose – The Processing of Personal Data by the Company shall be compatible with a declared and specified purpose which must not be contrary to law, morals, or public policy.
- c. Proportionality –The Processing of Personal Data shall be adequate, relevant, suitable, necessary, and not excessive in relation to a declared and specified purpose. Personal Data shall be processed by the Company only if the purpose of the Processing could not reasonably be fulfilled by other means.

## G.3 Collection

### 8. Adequate records of the Company's Personal Data Processing activities shall be maintained at all times. The DP, with the cooperation and assistance of all the concerned business and service units involved in the Processing of Personal Data, shall be responsible for ensuring that these records are kept up-to-date. These records shall include, at the minimum:

- a. Information about the purpose of the Processing of Personal Data, including any intended future Processing or data sharing;

*A.*

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- b. A description of all categories of Data Subjects, Personal Data, and recipients of such Personal Data that will be involved in the Processing;
- c. General information about the data flow within the Company, from the time of collection and retention, including the time limits for disposal or erasure of Personal Data;
- d. A general description of the organizational, physical, and technical security measures in place within the Company; and
- e. The name and contact details of the DPO, Personal Data processors, as well as any other staff members accountable for ensuring compliance with the applicable laws and regulations for the protection of data privacy and security.

**G.4 Management of Human Resources**

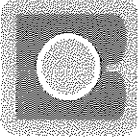
- 9. The DPO, with the cooperation of the Company’s Human Resource (HR) Division, shall develop and implement measures to ensure that all the Company’s staff who have access to Personal Data will strictly process such data in compliance with the requirements of the Data Privacy Act and other applicable laws and regulations. These measures may include drafting new or updated relevant policies of the Company and conducting training programs to educate employees and agents on data privacy related concerns.
- 10. The DPO will ensure that Company obtains the employee’s informed consent, evidenced by written, electronic or recorded means, to:
  - a. The Processing of his or her Personal Data, for purposes of maintaining the Company’s records.
  - b. A continuing obligation of confidentiality on the employee’s part in connection with the Personal Data that he or she may encounter during the period of employment with the Company. This obligation shall apply even after the employee has left the Company for whatever reasons.

**H. PHYSICAL SECURITY MEASURES**

- 1. The DPO, with the assistance of HR and the Information and Technology (IT) group and Document Controller (DC), shall develop and implement policies and procedures for the Company to monitor and limit access to, and activities in, the offices of HR, as well as any other departments and/or workstations in the Company where Personal Data is processed, including guidelines that specify the proper use of, and access to, electronic media.
- 2. The design and layout of the office spaces and work stations of the above-mentioned departments, including the physical arrangement of furniture and equipment, shall be periodically evaluated and re-adjusted in order to provide privacy to anyone Processing Personal Data, taking into consideration the environment and accessibility to unauthorized persons.
- 3. The duties, responsibilities, and schedules of individuals involved in the Processing of Personal Data shall be clearly defined to ensure that only the individuals actually performing official duties shall be in the room or work station, at any given time. Further, the rooms and workstations used in the





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Processing of Personal Data shall, as far as practicable, be secured against natural disasters, power disturbances, external access, and other similar threats.

## I. TECHNICAL SECURITY MEASURES

1. The DPO, with the cooperation and assistance of IT, shall continuously develop and evaluate the Company's security policy with respect to the Processing of Personal Data. The security policy should include the following minimum requirements:
  - a. Safeguards to protect the Company's computer network and systems against accidental, unlawful, or unauthorized usage, any interference which will affect data integrity or hinder the functioning or availability of the system, and unauthorized access.
  - b. The ability to ensure and maintain the confidentiality, integrity, availability, and resilience of the Company's data processing systems and services.
  - c. Regular monitoring for security breaches, and a process both for identifying and accessing reasonably foreseeable vulnerabilities in the Company's computer network and system, and for taking preventive, corrective, and mitigating actions against security incidents that can lead to a Personal Data breach.
  - d. The ability to restore the availability and access to Personal Data in a timely manner in the event of a physical or technical incident.
  - e. A process for regularly testing, assessing, and evaluating the effectiveness of security measures.
  - f. Encryption of Personal Data during storage and while in transit, authentication process, and other technical security measures that control and limit access thereto.

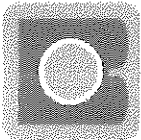
## J. RIGHTS OF THE DATA SUBJECT

1. As provided under the DPA, Data Subjects have the following rights in connection with the Processing of their Personal Data: right to be informed, right to object, right to access, right to rectification, right to erasure or blocking, and right to damages. Employees and agents of the Company are required to strictly respect and obey the rights of the Data Subjects. The DPO, with the assistance of Division HR shall be responsible for monitoring such compliance and developing the appropriate disciplinary measures and mechanism.

### J.1 Right to be Informed

2. The Data Subject has the right to be informed whether Personal Data pertaining to him or her shall be, are being, or have been processed.
3. The Data Subject shall be notified and furnished with information indicated hereunder before the entry of his or her Personal Data into the records of the Company, or at the next practical opportunity:
  - a. Description of the Personal Data to be entered into the system.



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- b. Purposes for which they are being or will be processed, including Processing for direct marketing, profiling or historical, statistical or scientific purpose.
- c. Basis of Processing, when Processing is not based on the consent of the Data Subject.
- d. Scope and method of the Personal Data Processing.
- e. The recipients or classes of recipients to whom the Personal Data are or may be disclosed or shared.
- f. Methods utilized for automated access, if the same is allowed by the Data Subject, and the extent to which such access is authorized, including meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the Data Subject.
- g. The identity and contact details of the DPO.
- h. The period for which the Personal Data will be stored.
- i. The existence of their rights as Data Subjects, including the right to access, correction, and to object to the Processing, as well as the right to lodge a complaint before the National Privacy Commission.

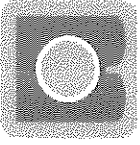
## J.2 Right to Object

- 4. The Data Subject shall have the right to object to the Processing of his or her Personal Data, including Processing for direct marketing, automated Processing or profiling. The Data Subject shall also be notified and given an opportunity to withhold consent to the Processing in case of changes or any amendment to the information supplied or declared to the Data Subject in the preceding paragraph.
- 5. When a Data Subject objects or withholds consent, the Company shall no longer process the Personal Data, unless:
  - a. The Personal Data is needed pursuant to a subpoena.
  - b. The Processing is for obvious purposes, including, when it is necessary for the performance of or in relation to a contract or service to which the Data Subject is a party, or when necessary or desirable in the context of an employer-employee relationship between the Company and the Data Subject.
  - c. The Personal Data is being collected and processed to comply with a legal obligation.

## J.3 Right to Access

- 6. The Data Subject has the right to reasonable access to, upon demand, the following:
  - a. Contents of his or her Personal Data that were processed.
  - b. Sources from which Personal Data were obtained.

*A*

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- c. Names and addresses of recipients of the Personal Data.
- d. Manner by which his or her Personal Data were processed.
- e. Reasons for the disclosure of the Personal Data to recipients, if any.
- f. Information on automated processes where the Personal Data will, or is likely to, be made as the sole basis for any decision that significantly affects or will affect the Data Subject.
- g. Date when Personal Data concerning the Data Subject were last accessed and modified.
- h. The designation, name or identity, and address of the DPO.

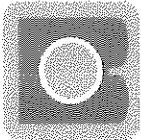
#### **J.4 Right to Rectification**

7. The Data Subject has the right to dispute the inaccuracy or rectify the error in his or her Personal Data, and the Company shall correct it immediately and accordingly, unless the request is vexatious or otherwise unreasonable.
8. If the Personal Data has been corrected, the Company shall ensure the accessibility of both the new and the retracted Personal Data and the simultaneous receipt of the new and the retracted Personal Data by the intended recipients thereof, provided that recipients or third parties who have previously received such processed Personal Data shall be informed of its inaccuracy and its rectification, upon reasonable request of the Data Subject.

#### **J.5 Right to Erasure or Blocking**

9. The Data Subject shall have the right to suspend, withdraw, or order the blocking, removal, or destruction of his or her Personal Data from the Company's filing system.
10. This right may be exercised upon discovery and substantial proof of any of the following:
  - a. The Personal Data is incomplete, outdated, false, or unlawfully obtained.
  - b. The Personal Data is being used for purpose not authorized by the Data Subject.
  - c. The Personal Data is no longer necessary for the purposes for which they were collected.
11. The Data Subject withdraws consent or objects to the Processing, and there is no other legal ground or overriding legitimate interest for the Processing by the Company:
  - a. The Personal Data concerns private information that is prejudicial to Data Subject, unless justified by freedom of speech, of expression, or of the press or otherwise authorized.
  - b. The Processing is unlawful.
  - c. The Data Subject's rights have been violated.
12. The DPO may notify third parties who have previously received such processed Personal Data that the Data Subject has withdrawn his or her consent to the Processing thereof upon reasonable request by the Data Subject.



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#### **J.6 Transmissibility of Rights of Data Subjects**

13. The lawful heirs and assigns of the Data Subject may invoke the rights of the Data Subject to which he or she is an heir or an assignee, at any time after the death of the Data Subject, or when the Data Subject is incapacitated or incapable of exercising his/her rights.

#### **J.7 Data Portability**

14. Where his or her Personal Data is processed by the Company through electronic means and in a structured and commonly used format, the Data Subject shall have the right to obtain a copy of such data in an electronic or structured format that is commonly used and allows for further use by the Data Subject.

15. The exercise of this right shall primarily take into account the right of Data Subject to have control over his or her Personal Data being processed based on consent or contract, for commercial purpose, or through automated means.

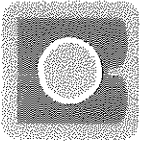
16. The DPO shall regularly monitor and implement the National Privacy Commission's issuances specifying the electronic format referred to above, as well as the technical standards, modalities, procedures and other rules for their transfer.

### **K. DATA BREACHES & SECURITY INCIDENTS**

#### **K.1 Data Breach Notification**

1. All employees and agents of the Company involved in the Processing of Personal Data are tasked with regularly monitoring for signs of a possible data breach or Security Incident.
2. In the event that such signs are discovered, the employee or agent shall immediately report the facts and circumstances to the DPO within twenty-four (24) hours from his or her discovery for verification as to whether or not a breach requiring notification under the Data Privacy Act has occurred as well as for the determination of the relevant circumstances surrounding the reported breach and/or Security Incident.
3. The DPO shall notify the National Privacy Commission and the affected Data Subjects pursuant to requirements and procedures prescribed by the DPA.
4. The notification to the National Privacy Commission and the affected Data Subjects shall at least describe the nature of the breach, the Personal Data possibly involved, and the measures taken by the Company to address the breach.
5. The notification shall also include measures taken to reduce the harm or negative consequences of the breach and the name and contact details of the DPO. The form and procedure for notification shall conform to the regulations and circulars issued by the National Privacy Commission, as may be updated from time to time.



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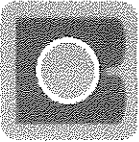
## K.2 Breach Reports

6. All Security Incidents and Personal Data breaches shall be documented through written reports, including those not covered by the notification requirements.
7. In the case of Personal Data breaches, a report shall include the facts surrounding an incident, the effects of such incident, and the remedial actions taken by the Company.
8. In other security incidents not involving Personal Data, a report containing aggregated data shall constitute sufficient documentation.
9. These reports shall be made available when requested by the National Privacy Commission. A general summary of the reports shall be submitted by the DPO to the National Privacy Commission annually.

## L. OUTSOURCING AND SUBCONTRACTING AGREEMENTS

1. Any Personal Data Processing conducted by an external agent or entity (third-party service provider) on behalf of the Company should be evidenced by a valid written contract with the Company
2. Such contract should expressly set out the subject matter and duration of the Processing, the nature and purpose of the Processing, the type of Personal Data and categories of Data Subjects, the obligations and rights of the Company, and the geographic location of the Processing under the contract.
3. The fact that the Company entered into such contract or arrangement does not give the said external agent or entity the authority to subcontract to another entity the whole or part of the subject matter of said contract or arrangement, unless expressly stipulated in writing in the same contract or evidenced by a separate written consent/agreement of the Company.
4. The subcontracting agreement must also comply with the standards/criteria prescribed by the immediately preceding paragraph.
5. In addition, the contract and the subcontracting contract shall include express stipulations requiring the external agent or entity (including the subcontractor) to:
  - a. Process the Personal Data only upon the documented instructions of the Company, including transfers of Personal Data to another country or an international organization, unless such transfer is required by law.
  - b. Ensure that an obligation of confidentiality is imposed on persons and employees authorized by the external agent/entity and subcontractor to process the Personal Data.
  - c. Implement appropriate security measures.
  - d. Comply with the Data Privacy Act and other issuances of the National Privacy Commission, and other applicable laws, in addition to the obligations provided in the contract, or other legal act with the external party.

*A.*

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- e. Not engage another processor without prior instruction from the Company provided that any such arrangement shall ensure that the same obligations for data protection under the contract or legal act are implemented, taking into account the nature of the Processing.
- f. Assist the Company, by appropriate technical and organizational measures, and to the extent possible, fulfill the obligation to respond to requests by Data Subjects relative to the exercise of their rights.
- g. Assist the Company in ensuring compliance with the Data Privacy Act and other issuances of the National Privacy Commission, taking into account the nature of Processing and the information available to the external party who acts as a Personal Information Processor as defined under the Data Privacy Act.
- h. At the choice of the Company, delete or return all Personal Data to it after the end of the provision of services relating to the Processing: Provided, that this includes deleting existing copies unless storage is authorized by the Data Privacy Act or other applicable laws or regulations.
- i. Make available to the Company all information necessary to demonstrate compliance with the obligations laid down in the Data Privacy Act, and allow for and contribute to audits, including inspections, conducted by the Company or another auditor mandated by the latter.
- j. Immediately inform the Company if, in its opinion, an instruction violates the Data Privacy Act or any other issuance of the National Privacy Commission.

#### M. EFFECTIVITY

This policy shall take effect upon approval date. The policy shall be reviewed and revised whenever necessary as a result of changes in the its content. Exception to any of the above policies shall be approved by the President.

#### N. CHANGE HISTORY

Version No.	Date	Change		Author
		Policy	Particular	
1	April 1, 2108	Data Privacy Policy	New	DA Tongco/DA Mejia

