

## **Privacy Notice**

**ZIAPAY INC.** respects your right to privacy. When you interact with us, you may share Personal Data with us. Personal Data refers to information that identifies you personally, alone or in combination with other information available to us (e.g., your name, contact number, e-mail address, and IP address). To ensure that your right to privacy is protected in the course of our dealings and when we process your Personal Data, we are committed to comply with the Philippines' Data Privacy Act, its Implementing Rules and Regulations, and other relevant government regulations and issuances. This Privacy Notice outlines our data privacy principles and practices. We recommend that you read this Privacy Notice to understand how we collect, use, and process your Personal Data.

### **Consent**

By using our website or providing us your Personal Data, you will be treated as having given your permission for the collection, use, and processing of your Personal Data, and accepted the policies and practices described in this Privacy Notice.

If you do not allow the collection, use, and processing of your Personal Data, kindly do not use our website or contact us.

ZIAPAY INC. may modify this Privacy Notice at any time. To update yourself of any changes in the processing of your Personal Data, you may need to regularly review this Privacy Notice.

### **Why does ZIAPAY INC. collect and process my Personal Data?**

ZIAPAY INC. collects only the Personal Data needed to effectively serve you and carry out its business operations. We may collect, use, and process your Personal Data for the following general purposes:

- (1) To conduct due diligence prior to the execution of a contract, and to facilitate the fulfillment of the terms of the contract thereafter;
- (2) To respond to your queries, complaints, and requests;
- (3) To provide information about our products and services which may be of interest to you;
- (4) To conduct research and analysis to improve customer experience;
- (5) To maintain security; and
- (6) To comply with legal, regulatory, and contractual requirements or obligations.

The use and processing of your Personal Data also depends on your transactions with us.

If you inquire about or acquire a property, or when you apply to become a tenant in any of our properties, we may collect, use, or process your Personal Data to:

- (1) Conduct appropriate credit investigation to assess the risk of transacting with you;

- (2) Administer the sale and turnover of a particular property, which may include the preparation of all documentation leading to the transfer of title, and the performance of all financial processes (reservation fees, amortization, handover fees, etc.) as a result of our transaction;
- (3) Prepare and execute the necessary contract to cover the transaction;
- (4) Update our records and keep your contact details and billing address up to date; and
- (5) Communicate any advisories, changes, and other information relevant to your contract with us.

If you are a vendor/supplier, a potential vendor, or a contractor, we may collect, use, or process your Personal Data to:

- (1) Conduct the appropriate due diligence checks;
- (2) Evaluate your proposal, including your technical, financial, and operational capacity;
- (3) Assess the viability of your proposal and process your accreditation;
- (4) Communicate any decision on such proposal and issue a Letter of Award together with the contract; and
- (5) Perform any other action as may be necessary to implement the terms and conditions of our contract.

If you want to join our workforce, we may collect, use, or process your Personal Data to:

- (1) Evaluate your suitability for employment and, with a written or expressed consent, retain your Personal Data for a maximum of ten (10) years for future job opportunities that may be of interest to you;
- (2) Communicate with you about your employment application;
- (3) When hired, to process your Personal Data, as may be necessary for your employment such as, but not limited to, payroll, benefits application, allowances and refunds processing, tax processing, retirement benefits, and other purposes that demand processing of your Personal Data (e.g., to execute business transactions directly related and/or incidental to your job, business travels, anniversaries, social activities, emergencies, and so on);
- (4) While employed, to evaluate your performance and career development;
- (5) Upon separation, to process your Personal Data for the exit interview and to prepare your final pay;
- (6) Provide assistance and account for employees in case of emergency; and
- (7) Perform such other processing or disclosure that may be required in the course of ZIAPAY INC.'s business or under law or regulations.

If you are a stockholder of ZIAPAY INC., we may use, collect, or process your Personal Data to:

- (1) Maintain and update your records with ZIAPAY INC.;
- (2) Administer your stock transactions; and
- (3) Comply with legal, regulatory, and contractual requirements or obligations.

If you are a visitor of ZIAPAY INC., we may use, collect, or process your Personal Data to:

- (1) Grant access to the premises of ZIAPAY INC.; and
- (2) Maintain the security within the premises of ZIAPAY INC..

### **What Personal Data does ZIAPAY INC. collect?**

ZIAPAY INC. may collect and process any of the following Personal Data, among others:

- (1) Your name;
- (2) Your e-mail;
- (3) Your other contact details;
- (4) Your address;
- (5) Your IP address; and/or
- (6) Any information relevant to the feedback you have provided.

Further transactions with us may require the processing of your other Personal Data, such as but not limited to the following:

- (1) Basic personal information, such as full name, nickname, home addresses/billing address/shipping address, e-mail address, contact numbers;
- (2) Financial details such as credit history, bank account, credit card, and debit card information;
- (3) Sensitive personal information, such as age, nationality, marital status, gender, health, education, and government-issued identification documents; and
- (4) Employment history.

### **How does ZIAPAY INC. collect my Personal Data?**

When you access our website and/or when you communicate/interact with us, ZIAPAY INC. may collect your Personal Data and non-Personal Data:

- *Personal Data sent to us by your web browser*

Your web browser may automatically send us Personal Data, which may include your IP address and location, or Non-Personal Data, which may include the pages you access, the operating system you use, and the name and version of your web browser. These are collected to improve your browsing experience. You may want to check your web browser to know more about the Personal Data sent to us by your web browser, and to modify your web browser settings as you see fit.

- *Personal Data collected by placing a cookie on your computer*

We may also obtain information about you by placing a cookie on your computer. This is typically done to ease navigation through our website. Cookies that may be used are of two kinds — session cookie and persistent cookie. On the one hand, a session cookie is used to place on your computer a computer-generated, unique identifier whenever you access our website. It does not identify you personally and expires as soon as you close your web browser. On the other, a persistent cookie does not expire when you close your browser, and stays on your computer, unless you delete them.

If you do not wish to receive cookies, you may modify your web browser settings to turn them off or delete them from your computer. If you reject our cookies, however, our website may not function properly.

- *Personal Data you knowingly and voluntarily provide*

We may also process the Personal Data you knowingly and voluntarily provide when you contact us. The Personal Data you provide will then be used to provide the service you requested. For instance, when you e-mail us a query, necessarily, we will collect your name and e-mail address to respond to you. We may also process the Personal Data you provide through the submission of job application form, business proposals, or property inquiry.

#### **Where does ZIAPAY INC. store my Personal Data?**

Your Personal Data is controlled by ZIAPAY INC. Inc., a company registered under Philippine laws, whose principal office is at Bldg. 156 Bonifacio St. Central Business District Subic Bay Freeport Zone, Zambales

#### **For how long does ZIAPAY INC. retain my Personal Data?**

We will retain your Personal Data for as long as necessary to fulfill the purposes outlined in this Privacy Notice and communicated to you, unless a longer period is allowed or required by law.

#### **To whom are my Personal Data disclosed?**

ZIAPAY INC. will not disclose your Personal Data to third parties without your consent. It may however share your Personal Data to its other business units. In such cases, your Personal Data will be used in a manner consistent with the purpose for which it was originally collected and to which you consented, and the Data Privacy Act, its Implementing Rules and Regulations, and all relevant regulations and issuances on privacy and data protection.

We may also share your Personal Data with third parties who perform services for us. Under such circumstances, we require our service providers to limit the use of the Personal Data we share with them in a manner consistent with the purpose for which it was originally collected and to which you consented, and the Data Privacy Act, its Implementing Rules and Regulations, and all relevant regulations and

issuances on privacy and data protection. Our service providers will not process your Personal Data for any other purposes than what we have agreed with them.

We may also share your Personal Data to unrelated third parties, upon your request, when we are legally required to do so, or when we believe it is necessary to protect and/or defend our rights, property, or safety, and those of other individuals. Nevertheless, we will take all the necessary steps to protect your Personal Data.

### **How does ZIAPAY INC. protect my Personal Data?**

The security of your Personal Data is important to us. We employ appropriate organizational, technical, and physical security measures to protect the Personal Data you provide against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use and other unlawful forms of processing.

### **What are my rights with respect to my Personal Data?**

As owner of Personal Data, you have the right to be informed of the Personal Data being or that have been processed by ZIAPAY INC., the right to gain reasonable access to your Personal Data, the right to object to the processing of your Personal Data, the right to suspend, withdraw, or order the removal or destruction of your Personal Data, the right to dispute any error in your Personal Data and have us correct it immediately, the right to obtain a copy of the Personal Data in electronic format, the right to file a complaint before the National Privacy Commission if you think your right to privacy and data protection was violated, and the right to claim damages.

### **How do I contact ZIAPAY INC.?**

If you wish to exercise any of the abovementioned rights with respect to privacy and data protection, access your Personal Data, or stop us from using or processing your Personal Data, you may e-mail us through any of the addresses provided in this website, or write to us at Bldg 156 Bonifacio St. Central Business District Subic Bay Freeport Zone, Zambales, Philippines.

The **Data Protection Officer** of ZIAPAY INC. may be reached through the following:

<i>Postal Address:</i>	Bldg 156 Bonifacio St. Central Business District Subic Bay Freeport Zone, Zambales
<i>Telephone Number:</i>	N/A
<i>E-mail Address:</i>	dpo@ZIAPAY INC..biz

You may also use any of the above means if you have queries and/or feedback about our Privacy Notice or privacy and data protection practices.