

PRIVACY NOTICE AND CONSENT FORM

We, **PROACTIS** (“the Company”, “we”, “our” or “us”), as a personal information controller (as such term is defined in Republic Act No. 10173 (2012), or the “**Data Privacy Act**”), are committed to protecting your personal data and ensuring its security, integrity, confidentiality and privacy.

1. Collection of Personal Data

In connection with your past, present and future applications, transactions, and commercial dealings with the Company, we have or will collect, record, hold, store, use, disclose and/or process (collectively referred to as “**Process**”) personal information about you. In particular, we will Process one, some, or all of the categories and/or types of personal information about you enumerated in **Annex A** hereof (collectively, “**Personal Data**”). This specifically includes birthdays and email addresses.

To the extent that you disclose to us any personal information (whether or not coming within the definition of Personal Data above) of another individual, we shall assume, without independent verification, that you have obtained such individual’s consent and that you have been specifically authorized by such individual to disclose his/her information for our Processing in accordance with the terms of this Privacy Notice.

2. Sources of Information

Your Personal Data will be obtained from the sources listed in **Annex B** hereof, where applicable, or such other sources as we may see fit from time to time.

By submitting your application, you understand that you are giving your express consent and agreeing to this Privacy Notice, and that you authorize us and such third parties as we may engage to collect and obtain Personal Data pertaining to you from the sources mentioned in **Annex B** hereof.

As the accuracy of your Personal Data depends largely on the information you provide to us, kindly inform us as soon as practicable if there are any errors in your Personal Data or if there have been changes to your Personal Data.

3. Processing

We will Process the Personal Data that you have provided to us for various lawful purposes, including but not limited to those provided in **Annex C** hereof.

4. Storage and Security

We store your Personal Data in hard and/or soft copy at and within our office premises at 24th Floor, Tower 2, Insular Life Corp. Ctr, Insular Drive, Filinvest, Alabang, Muntinlupa City 1770 and/or through the cloud service or server which may be located at or hosted from within or outside the Philippines.

Soft copy data is stored on, among others, the file server, e-mail server, the cloud, personal computers, notebooks, tapes and compact discs.

There are security policies and procedures in place which restrict access to your Personal Data to authorized personnel only, which include, among others, personnel from the information technology, human resource, administration, accounting, management and/or other employees of the Company. In any case, only personnel who have the “need to know” are permitted access. For detailed information regarding the security measures, policies and protocols implemented by the Company you may request such information through the Firm’s Data Protection Officer identified below.

We may keep the Personal Data about you and about other individuals that you provided, for a period that is not longer than necessary for the purposes indicated in Clause 3 and/or for a reasonable period of time in accordance with legal requirements following the cessation of your applications, transactions or commercial dealings with us.

5. Disclosure and Processing

In general, we will not disclose your Personal Data to any third party unless you have notified us in writing that you consent to such disclosure. If you envisage that any third party will be contacting us to request for your Personal Data, you should notify us in advance and provide your written consent for us to disclose your Personal Data.

Please note that it may be necessary for us to disclose or share your Personal Data in instances set forth in **Annex D** hereof.

Rest assured that we will only disclose the minimum amount of information which we deem necessary and will take all reasonable steps to ensure that such information is kept confidential. We will not sell, rent or trade your Personal Data.

Notwithstanding this, we may collect, use or disclose your personal information without your knowledge or consent whenever we are permitted or required by the Data Privacy Act and other applicable laws and/or regulatory requirements.

6. Access to Personal Data and Limiting Processing

You have the right to request access and/or to correct your Personal Data and/or to lodge a complaint with the Philippine National Privacy Commission and/or limit the processing thereof at any time hereafter in line with applicable law. You are also requested to promptly correct and/or amend your Personal Data to the extent you realize it is incorrect, inaccurate, or outdated.

Please address all requests and/or questions or concerns that you may have regarding the subject matter and contents of this Privacy Notice to maryjane.soliven@proactis.com

We reserve the right to change this Privacy Notice from time to time and we will duly inform you of any substantial change/s.

By submitting your application and clicking the accept button, you are agreeing to the foregoing terms and conditions without need for submission of a separate signed consent form.

ACKNOWLEDGMENT AND AGREEMENT

By submitting my application and clicking the accept button, I hereby confirm my understanding of this Privacy Notice and expressly consent to the collection, Processing, transfer, disclosure and sharing of relevant Personal Data in accordance with this Privacy Notice.

Annex A
Personal Data Collected and
Processed

- (a) general personal data: such as name, gender, date of birth, citizenship, marital status, nationality, race, religion, identification card/passport details, qualifications, photographs or other images, and voice and/or video recordings;
- (b) contact details: such as home address, home phone number and mobile number, email address, work address, work number;
- (c) government-issued identification; and
- (d) any such information as we deem necessary or appropriate from time to time in connection with your applications, transactions and commercial dealings with us.

Annex B
Sources of Personal
Data

- (a) information provided or submitted by you in your applications, transactions, and commercial dealings with the Company, or any other channel during the course of such transactions;
- (b) publicly available or publicly accessible information;
and
- (c) such other written or verbal communications or documents delivered to us by any person or third party prior to and during the course of our contractual or pre-contractual dealings with you.

Annex C
Purposes of Processing

- (a) client and customer development and relations;
- (b) recruitment and hiring;
- (c) regulatory compliance and submission of reports;
- (d) discharging obligations imposed on the Company pursuant to applications, transactions and commercial dealings; and
- (e) such other lawful purposes as we deem necessary or appropriate from time to time.

Annex D
Disclosure of Personal Information

- (a) where required by or necessary in connection with any application with any regulatory authority of competent jurisdiction, such as the Bureau of Internal Revenue, Department of Labor and Employment, Bureau of Immigration, Department of Justice, Department of Foreign Affairs, relevant local government units, including the Business Permit and Licensing Office, and other government agencies;
- (b) to discharge any legal obligation imposed on us by law;
- (c) pursuant to an order of a court of competent jurisdiction;
- (d) to our partners and service providers to enable them to perform their services that we engaged; and/or
- (e) if we deem that such disclosure is necessary to prevent or mitigate a serious and imminent threat to your life or health or the life or health of another person.