

CIBI Data Privacy Policy

CIBI Information Inc., recognizes the importance of data protection and security of personal, sensitive and privileged information that we collect from you, our valued clients, and third party data source partners in accordance with the Data Privacy Act of 2012. This privacy policy informs you of our privacy practices and further describes the way we may collect, use, protect, store, disclose and dispose of information; including those which also may be collected through third-party providers, data source partners, websites, applications and/or any other online activity.

I. DEFINITION OF TERMS

- a. **Personal Information** refers to any information, whether recorded in material form, 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.
- b. **Sensitive Personal Information** refers to personal information about an individual's race, marital status, age, color, and religious, philosophical, or political beliefs; health, education, genetic information, sexual life or involvement of a person in a legal proceeding. It may also include social security numbers, health records and licenses, pin codes and account numbers.
- c. **Privileged Information** refers to any form of data, which, under the Rules of Court and other pertinent laws constitute privileged communication.
- d. **Data subject** – refers to an individual whose personal, sensitive or privileged information is processed.
- e. **Processing** – refers to any operation or any set of operations performed upon personal, sensitive and privileged information 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.

The processing of personal, sensitive and privileged information are generally prohibited to be processed without your consent.

II. PERSONAL INFORMATION WE MAY COLLECT

The personal data we may collect from you or from your authorized representative are the following, but not limited to:

A. Hiring and Recruitment

- a. Applicants Name
- b. Address
- c. Contact Number
- d. Sex
- e. Birthdate
- f. Place of Birth
- g. Citizenship
- h. Civil Status
- i. Religion
- j. Age
- k. Height
- l. Weight
- m. Government Numbers
- n. Family Background
- o. Educational Background
- p. Employment History

B. CIBI Employment

- a. Employees Name
- b. Address
- c. Contact Number
- d. Sex
- e. Birthdate
- f. Place of Birth
- g. Citizenship
- h. Civil Status
- i. Religion
- j. Age
- k. Height
- l. Weight
- m. Government Numbers
- n. Family Background
- o. Educational Background
- p. Employment History

C. Clients

- a. Contract
 - i. Authorized signatories name
 - ii. Valid IDs such as
 - 1. TIN
 - 2. Passport
 - 3. Drivers License
 - 4. SSS
- b. Resume or Application form
 - i. Subject Name
 - ii. Birthdate
 - iii. Gender
 - iv. Civil Status

- v. SSS Number
- vi. Address
- vii. School Details such as
 - 1. School Name
 - 2. Course
 - 3. Date Graduated
- viii. Character References such as
 - 1. Name of Character Reference
 - 2. Contact Number or email
- ix. Employment History
 - 1. Employers Name
 - 2. Inclusive dates
 - 3. Position
- c. Business Accreditation Application Form
 - i. Company Name
 - ii. Address
 - iii. Contact Number
 - iv. Email Address
 - v. Contact Person or Owners Name
 - vi.

D. Social Media Profile and/or postings and information.

- a. LinkedIn
- b. Websites
- c. Facebook

Any other personal information appearing from other publicly available sources.

III. MEANS TO COLLECT

We may collect your information in several ways:

1. Client endorsements

- For those clients who are availing the following services
 - a. Identity Verification
 - b. Educational verification
 - c. Character verification
 - d. Residence or Address verification
 - e. Employment Verification
 - f. Business Verification
 - g.
- For those companies who signed an agreement with CIBI
 - o Commercial Agreement
 - o Partnership agreement

2. Website and Facebook

- When you message and inquire in Facebook or CIBI website for a service quotation and product information you will be asked to provide personal information such as your name, e-mail address, location (region and city) and mobile number. We may collect information through online automated methods including the use of cookies, web beacons and IP addresses.
- When you inquire through our website, CIBI will use your personal data you have provided, to reach you, only if you have expressed the desire to have a product discussion with us.
- CIBI has contracted third party partners to conduct these product discussions and we necessarily share relevant data about you to these partners only for the purpose of responding to your request for a product/service overview.

3. Mobile Applications and Portals

When you download or inquire through our mobile applications, you will be asked to provide personal information prior to processing your inquiries.

3. Events

- On each event hosted or co-hosted by CIBI may require registrants to sign-up in a registration sheet Registrants will be required to provide their name, email address, location, and contact number will be asked for purposes as indicated in this Privacy Policy.

4. Data source partners

- We may collect information through our data source partners where the appropriate data sharing agreements are executed and signed.

5. Third party service providers

Our third party providers may collect information about you from character references, former employers, educational institutions, courts, local agencies and regulatory bodies.

6. Recruitment Application Forms

Upon intent to apply for any vacancies in CIBI, an application form will be filled up by the potential candidate which may include

7. Employment Data Sheet and 201 Records

Upon hiring and employment, the following data will be requested such as Diploma, Transcript of Records, Employment Certificate, NBI clearance, Health clearance, SSS No, TIN, Pag-Ibig number, Philhealth Number.

IV. PURPOSE OF PROCESSING

Personal information may be used by CIBI for the following purposes:

1. Service Delivery

Upon client engagements, CIBI shall request certain personal, sensitive and privilege information of individuals from the client in order to deliver the services availed of from CIBI.

2. Verification

- Customer interface
- In processing of inquiries and payments for your availment of CIBI services and after-sales services;
- In confirming your identity, and protecting you against malicious use of information;
- For promoting quality assurance, including callouts for product, service satisfaction purposes, and receiving and processing of customer feedback;
- For conducting research, including updating of records, invitation to focus group discussions, surveys, satisfaction index and similar studies;
- For strengthening marketing activities, including promotional offers of services, and new product introductions; and
- For customer profiling intended for product developments.

4. Website

To fulfill your requests and respond to your queries such as:

- Availment of services ;
- Attending to feedbacks, comments and suggestions;
- Informing you of changes, improvements and introduction of services and after-sales services;
- Subscription to newsletter and other marketing information including but not limited to events, promos, and offerings;
- To improve web analytics, for purposes of optimizing web usage and for market research

5. Facebook

To fulfill your requests and respond to your queries such as:

- Service availments;
- Attending to feedbacks, comments and suggestions;
- Informing you of changes, improvements and introduction of services and after-sales services
- Subscription to newsletter and other marketing information including but not limited to events, promos, and offerings.

6. Events

- Personal information collected will be used for post event evaluation. This will also be used for remarketing provided that the registrant has voluntarily accepted the consent of receiving newsletter and other marketing information.

V. USE AND DISCLOSURE OF PERSONAL INFORMATION

Your personal data shall be used and disclosed for the following, but not limited to;

a. **CLIENTS.** Personal data may be shared with clients in their availment of CIBI services in the pursuit of legitimate interests such as:

- Due Diligence - where clients want to conduct further and necessary corporate due diligence on customers, potential customers and business partners, which may include consolidating official watch lists, sanction lists, crime watch and 'do not do business with lists'.
- Fraud Detection and Prevention – where clients want to prevent fraud by validating the genuineness and authenticity of the declarations made by an individual.
- Risk Assessment – where clients need to risk assess potential customers to determine what products or services they can offer and the terms of services.
- HR Background Checks – where clients wish to process personal data to undertake background vetting of people as applicants or to whom it has given job offers. This may include but not limited to asking for references from previous employers and validating educational credentials.

GOVERNMENT. As compensation for services, we may use your personal data to perform accounting, auditing, billing, reconciliation, and collection activities.

b. **OPERATION.** We may use and disclose your personal data in conducting our verification, and KYC processes. Operational activities include review of accuracy and completeness. In cancelling of transaction, personal data will be used for verification. If ownership of our organization should change, your personal data may be disclosed to the new entity.

c. **THIRD PARTY SUPPLIER OR BUSINESS PARTNER.** In connection with business operations we are acquiring the services of third parties performing activities for or in our behalf whom we may share and disclose your personal information.

d. **BUSINESS OPERATION.** We may use your personal data for business purposes to provide the services you avail, to inform you about our products

and services and to manage our sites and other services. We may also use your personal data for analysis, audits, crime/fraud monitoring and prevention, security, developing new products and/or services, testing, enhancing, improving or modifying our services, identifying usage trends, determining the effectiveness of our promotional campaigns, and operating and expanding our business.

- e. **PERSONAL REPRESENTATIVE.** We may disclose your personal data to your duly authorized personal representative. For example, the parent or legal guardian of a minor is considered as personal representative
- f. **LEGAL ACTIONS or LAW ENFORCEMENT.** We may disclose your personal data when required by the law and/or government authorities, such as in the course of legal proceedings such as receipt of subpoena from the court of law.
- we may also disclose certain personal data as we believe is required, necessary, or appropriate under the following: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal processes and/or respond to requests from competent public and government authorities including public and government authorities outside your country of residence; (c) to enforce our terms and conditions; (d) to protect our operations and those of any of our affiliates; (e) to protect our rights, privacy, security, safety, and physical and intellectual property, and/or rights of our affiliates, you, or others; and (f) to allow us to pursue available remedies or limit the damages that we may sustain.
- g. **OTHER ACTIVITIES.** To perform other activities consistent with this Notice.

We do not sell your personal data to marketing companies outside of our organization.

We generally process your personal data only for those purposes that we have transmitted or communicated with you. If we use it for other (closely related) purposes, additional data protection measures will be implemented, if required by law.

VI. YOUR RIGHTS

We recognize and take seriously our responsibility to protect the personal data you entrust to us from loss, misuse or unauthorized access. The following is a summary of your rights regarding your personal data:

- Right to access your personal data with us
- Right to request restriction of access
- Right to limit and prevent disclosure
- Right to amend or update personal data
- Right to authorize other uses
- Right to receive notice of privacy breaches
- Right to request destruction of personal data

VII. MANAGE YOUR PERSONAL DATA

If you would like to correct, update, delete, or request access to the personal information that you have provided to us, you may contact our Data Protection Officer.

We encourage you to keep your personal settings and personal data complete and current.

VIII. STORAGE OF PERSONAL DATA

We have a Records Retention Policy and abide with other laws that provide higher privacy protection such as RA10173 .

The information we collect may be stored and processed in servers in our Head Office in Makati City, Philippines and wherever our service providers have facilities around the globe and in accordance with local laws.

IX. RETENTION PERIOD

We will retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law. We retain the personal data we collect only if we need it to support justifiable business requirements or when our lawful purposes for using the information are still relevant. When we no longer require personal data we or our third party suppliers will securely delete and/or archive the information.

X. CHANGES TO THIS PRIVACY NOTICE

Our products and services are dynamic and the form and nature of the services may change from time to time without prior notice to you. For this reason, we reserve the right to change or add to this privacy notice from time to time and will post any material revisions on our websites.

We will post a prominent notice on our privacy notice page to notify you of any significant changes to this privacy notice, and will indicate at the top of the notice when it was most recently updated. We encourage you to check back often to review the latest version.

The new privacy notice will be effective upon posting. If you do not agree to the revised notice, you should alter your preferences. By continuing to access or make use of our services after the changes become effective, you agree to be bound by the revised privacy notice.

XI. CONTACT US

If you have questions or concerns about our privacy practices, you can send an email to our Data Protection Officer listed below. Please include your contact information and a detailed description of your request or privacy concern.

Email: dpo@cibi.com,ph

I have read and hereby understood the above privacy statement and freely give my consent to the processing of my personal data.

☐ Agree

☐ Disagree

Date: _____

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