

DATA SUBJECT RIGHTS FORM

CIBI Information Inc., respects the rights of data subjects under the Data Privacy Act of 2012. Data subjects may exercise their rights by filling out the Request for Implementation of Rights Form. **Please be informed that the exercise of these rights is not absolute and are subject to guidelines stated below.**

Each of the rights listed below may be exercised by submitting this request at CIBI Head Office in Makati City in person or by proxy, as well as by e-mail to **dpo@cibi.com.ph**. Please complete in block letters and tick "X" where necessary. Fields marked with * are required for the application to be processed.

In person

Proxy (a copy of the SPA shall be enclosed)

Subject's Data:

Name*: _____
(first name, middle name, surname)

Date of Birth*: _____
(day) (month) (year)

Address for correspondence*: _____
(Unit no., Building name, Street no., City, Zip code)

Mobile no: _____ Email: _____

With regard to:

Right of access

Right to erasure or blocking

Right to object

Right to update/correct

Right to data portability

Description of the request*:

(Please describe your request. In order to help you even more, we would like to know the reason for it.)

Preferred way for the feedback on the request*:

- In writing to the correspondence address In writing in CIBI's head office
- Other _____
(please describe)

DATE:
SIGNATURE:

Guidelines

A. Fees

CIBI may charge a "reasonable fee" to comply with a subject access request for the administrative costs of complying with the request if:

- it is manifestly unfounded or excessive; or
- a data subject requests further copies of their data following a request.

CIBI should base the reasonable fee on the administrative costs of complying with the request. If CIBI decides to charge a fee, the data subject should be contacted promptly and inform them. CIBI do not need to comply with the request until CIBI have received the fee. Alternatively, CIBI may refuse to comply with a manifestly unfounded or excessive request.

B. Responding To A Request

CIBI must comply with a request without undue delay and at the latest within one month of receipt of the request or within one (1) month of receipt of:

- any requested information to clarify the request;
- any information requested to confirm the requester's identity or
- a fee (only in certain circumstances)

CIBI should calculate the time limit from the day the request was received (whether it is a working day or not) until the corresponding calendar date in the next month.

C. Extension Of Time To Respond

CIBI can extend the time to respond by two (2) months if the request is complex or CIBI has received a number of requests from the data subject. CIBI must let the data subject

know within one month of receiving their request and explain why the extension is necessary.

D. Validation of Identity

If CIBI has doubts about the identity of the person making the request, CIBI can ask for more information. However, it is important that CIBI only request information that is necessary to confirm who they are. The key to this is proportionality.

CIBI needs to let the data subject know as soon as possible that CIBI needs more information from them to confirm their identity before responding to their request. The period for responding to the request begins when CIBI receive the additional information.

E. Refusal to Comply with a Request

CIBI can also refuse to comply with a subject access request if it is:

- manifestly unfounded; or
- excessive.

F. Denial of Request

CIBI must inform the data subject without undue delay and within one month of receipt of the request. CIBI should inform the data subject about:

- ✚ the reasons CIBI is not taking action;
- ✚ their right to make a complaint to NPC
- ✚ their ability to seek to enforce this right through a judicial remedy.

CIBI should also provide this information if requesting for a reasonable fee or need additional information to identify the data subject.