

DATA PRIVACY POLICY

Finance Technologies Inc.

Statement of Privacy Policy

Finance Technologies Inc. (“Company”), its assigns, employees, and related companies/affiliates/subsidiaries, fully respects your right to privacy. As such, the Company is completely and sincerely committed to preserve and protect your Information we collected. We wanted to assure you that the Company is at the forefront of implementing and complying with the “Data Privacy Act of 2012” (Republic Act No. 10173).

Please take the time to read this Policy explaining how we collect, store, process, protect, and the way we use all types of information we collect from or generate about you every time you access, download, browse, or register with the PitaCash service, the Company’s website, and other related platforms.

PRIVACY NOTICE

TYPES OF PERSONAL AND SENSITIVE INFORMATION COLLECTED

Whenever a user accesses, downloads, browses, or registers with PitaCash, or upon the user’s application to avail the loan facility or any products and services of the Company, the following personal and sensitive information (“personal data”) may be collected from the user or data subject:

- 1) Information of the user or borrower such as full name, gender, date of birth, marital status, education level, number of children, residence address, email address, phone number, and information of nearest family member or relative who can be contacted for emergency cases;
- 2) Financial account information such as main source of income, monthly income, additional sources of income, employment information or own business information, bank account details, and credit history;
- 3) Company information, if employed such as employment position, payroll, company’s contact number and address;
- 4) Identity information (such as SSS, Philhealth, or Pag-ibig) and/or proof of any government issued identification with photo attached;
- 5) Photographic data such as selfie photos;
- 6) Contact information of the client’s reference and/or guarantor, his/her name, address, mobile/telephone numbers, email, and his/her connection with the client;
- 7) Other technical and network information such as traffic and usage information, about the phone device (operating system), real time location, time zone setting, and any other information, which are not deemed sufficient to determine your identity or which upon the approval of the user, to be reported to the server to customize and enhance the user’s experience of the application, as well as to

detect and fix any future technical problems of the mobile application.

WAYS OF COLLECTING PERSONAL DATA

These personal and sensitive information may be collected through the following means:

- 1) When the user downloads and accesses the PitaCash mobile application;
- 2) As part of the User's registration and loan application, the user voluntarily provided information and/or submitted documents to completely avail the Company's products or services;
- 3) When the Company or its affiliates seek information from third parties, if necessary, such as family members or relatives, employer, bank or other financing companies in connection with loan application or other products and services availed by the user;
- 4) When the user interacts or agrees to be contacted by the Company's representatives or be included in the mailing list of the Company for promotions and verification purposes;
- 5) When the user participate in surveys or promo or contest through the Company's platform;
- 6) Personal data collected from publicly available sources including but not limited to social media, websites, and similar resources; and
- 7) Information collected using cookies, web beacons, general log information, mobile and browser information, device identifier, and other similar technologies.

For the purpose of legitimate interest pursued by the Company, it may resort to other legitimate and lawful means of investigation especially in cases where the user or customer's primary contact details are not and/or no longer accessible for the purpose it is intended. The Company may utilize the use of:

- 1) Social media platform; and
- 2) Other messaging applications (e.g. Viber etc.).

Note, however, that the employment of these platforms shall be strictly for the sole purpose of probing the contact details of the customer and not for any other purposes.

PURPOSE OR USE OF COLLECTION AND PROCESSING

The Company collects, processes, uses, discloses, stores and retains personal data of its users mainly for processing of loan application, and for the following purposes:

- 1) To identify the loan applicant/user;
- 2) To validate the personal data provided;
- 3) To conduct background check of the applicant/user, and determine the eligibility to obtain a loan under the applicable terms;
- 4) To contact users whether by email, text message/SMS, phone calls, via social media, field visits, or other automated means, in relation to their registered account/s as well as for promotions, offers, loyalty programs, rewards, and other marketing promotions about the Company's other financial products and services;

- 5) To contact users inviting them to participate in customer satisfaction or market surveys;
- 6) To respond to questions or inquiries that of the user and other customer service requests;
- 7) To process the loan application and secure transaction process safely;
- 8) To analyze data and generate credit scores and update loan history;
- 9) To conduct investigations relating to disputes, payment, suspected illegal activities or fraud;
- 10) For collection of loans, and payout through remittance or bank account or digital wallet;
- 11) For its market research and customer satisfaction analysis to improve, enhance, and develop better products and services but only anonymized information. Anonymized information refers to data which has been stripped of all identifiers or indicators which can lead to its association with any particular individual; and
- 12) To comply with legal and regulatory requirements such as submission of credit data bureaus, credit information companies, the Credit Information Corporation (CIC) (pursuant to R.A. No. 9510).

We guarantee that the information we collect will be relevant, adequate and not excessive for the purposes for which it is collected and we shall process your personal information in a manner consistent with the purposes for which it was originally collected or to which you have subsequently consented.

PROTECTION OF PERSONAL DATA COLLECTED AND STORED

The Company is committed to maintain all types of security measures including organizational, technical, and physical to prevent unauthorized access, disclosure, and destruction of the personal and sensitive information we collected from the users. All personal data and information collected and were disclosed by the data subjects by reason of their application will be uploaded and stored on our server.

The Company will not share your personal data with third parties unless necessary and unless you give your consent thereto. Such third parties may include our subsidiaries, affiliates, agents, outsourced service providers and government-regulating bodies.

The information collected from the mobile application shall be transferred using a JWT token and stored in a secured and closed database maintained by the Company's service provider which may be located outside the Philippines. Inputting of user information in the application as well as the exchange of information between the server and mobile application are encrypted using Hypertext Transfer Protocol Secure (HTTPS). The Company's computers gaining access to your personal data from the database use security protection such as firewalls, anti-virus, anti-malware, and data encryption. These computers which also store your personal data gained from the database can be accessed only by authorized and trained employees of the Company.

Although we maintain reasonable safeguards to protect the confidentiality, security and integrity of your information, the Company, however, shall not be responsible for breaches of security beyond our reasonable control. More so, we shall not be held accountable or legally liable for any data breach, misuse, disclosure or unlawful sharing due to the fault of its users' failure to protect and secure their username and password or some other form of negligence. We ask you to also protect your personal data with caution and care.

RETENTION OF THE PERSONAL DATA

In general, we shall retain your personal data for the duration of the activities and transactions in connection with the products and services availed in the mobile application, and/or such period of time required for legal and regulatory purposes.

Nonetheless, for those users who did not avail any products or services or whose loan application are not approved, the Company shall maintain their information for a period of seven (7) years reckoned from the last login. Thereafter, upon notification to the user, it shall be tagged for deletion or archiving, as the case may be.

For those users whose loans are approved and received the loaned money from the accredited centers, the Company shall maintain their information for a period of seven (7) years reckoned from the time the obligation is extinguished unless a longer period is required by law or contract, in which case, it will be retained for such period.

Moreover, we may retain copies of your personal information for the purpose of determining users continuing obligations or as may be required by any government agency to prevent fraud, identity theft, anti-money laundering, terrorist financing, and other similar causes which are consistent with Philippine and international laws and of the public good. You may still exercise your rights as a data subject as provided herein including the right to deletion of your personal information.

Please note that the act of uninstalling the mobile application does not in any way cancel existing loan obligations, and must be repaid in accordance with the terms of the loan agreement.

DESTRUCTION OF PERSONAL DATA

All physical personal data records cleared for destruction by our Data Privacy Officer (DPO) shall be shredded using industry grade equipment. While the electronic copies tagged for deletion, in accordance with the retention policy of the Company and approval of the DPO, shall be permanently deleted from the database and Company's computers. The backup copies shall also be permanently deleted.

SHARING OF PERSONAL DATA

As a general rule, the Company will not disclose your personal and sensitive information. However, we deem it necessary to share your data to the following:

- 1) Customer service and collection department to address complaints and/or concerns as well as to effect collection of loan;
- 2) Our marketing representatives only to offer our products and services;
- 3) Our employees in-charge of profiling or screening in order to process and approve the applicant/user's loan;
- 4) Banks, digital wallets, remittance centers, and/or billing companies authorized by the user to provide support for disbursement of money to approved loan applicants and repayment of loan;
- 5) Third parties we hire to perform the following support services: (i) for credit investigation, credit scoring, and data analytics; (ii) collection of data for automated processing of the loan; (iii) to manage the accuracy of "know your customer/borrower information" or conduct further background information of the users; and (iv) to collect overdue payments, if applicable. These third parties are required to use the personal information we share with them only to perform services on our behalf and to treat your personal information in compliance with all applicable privacy and data protection laws;
- 6) We may share anonymized information for analytics to the developer of the mobile application for service maintenance and to better improve the product and its offerings;
- 7) We may also share your personal information after conducting legal due diligence and belief in good faith if such disclosure is necessary:
 - (i) to comply with a law, regulation, order, or other legal process by court of competent jurisdiction, or by government agencies such as credit bureaus or regulatory agencies, and fraud prevention agencies for purposes of credit investigation, submission of credit data or information, fraud prevention, intellectual property infringement, money laundering, or other crimes; and (ii) to protect our rights or for the public welfare or as public interest may warrant; or (iii) under similar circumstances. If such an event occurs, we will take appropriate steps to protect your personal information.

In case we cannot grant your request for a higher loan or we do not meet any of your service demands, we may endorse you to our business affiliates or partners or offer their products and services. Nonetheless, we shall get your consent first prior to it.

All data processing, subcontracting, or data sharing agreements will be in accordance with the requirements under the Data Privacy Act Of 2012 and other applicable laws and regulations. To the extent that such processing, subcontracting, or data sharing requires notice or consent, the Company will provide or request for such notice and/or consent, in each case, as may be deemed necessary, prior to any processing or sharing of the Personal Data.

RIGHTS OF USERS

The Company respects the rights of the user under the Data Privacy Act of 2012:

- 1) **The right to be informed** whether personal information pertaining to him or her shall be, are being or have been processed, the scope and data of the processing, and to be informed of the identity of the data controller, including the existence of automated decision-making and profiling;
- 2) The **right to object** to the processing of his or her personal information, including processing for direct marketing, automated processing or profiling. The data subject will also be given the 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.
- 3) The **right to reasonable access**, upon demand, the following: (i) contents of his or her personal data that were processed; (ii) sources from which personal data were obtained; (iii) names and addresses of recipients of the personal data; (iv) manner by which such data were processed; (v) reasons for the disclosure of the personal data to recipients, if any; (vi) information on automated processes where the data will, or is likely to, be made as the sole basis for any decision that significantly affects or will affect the data subject; (vii) date when his or her personal data concerning the data subject were last accessed and modified; and (viii) The designation, name or identity, and address of the personal information controller.
- 4) The **right to rectification or the right to dispute the inaccuracy or error** in the personal data and have the personal information controller correct it immediately and accordingly, unless the request is vexatious or otherwise unreasonable. If the personal data has been corrected, the personal information controller shall ensure the accessibility of both the new and the retracted information and the simultaneous receipt of the new and the retracted information 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.
- 5) The **right to suspend, withdraw or order the blocking, removal or destruction of his or her personal data** from the personal information controller's filing system.
- 6) The **right to damages**, or to be indemnified for any damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal information, taking into account any violation of his or her rights and freedoms as data subject.
- 7) The **right to obtain from the personal information controller a copy of data processed by electronic means** and in a structured and commonly used format for further use by the data subject.
- 8) 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 the rights as enumerated in the immediately preceding section.
- 9) The **right to lodge a complaint** with the National Privacy Commission in case privacy has been breached.

INQUIRIES AND COMPLAINTS

If you have any questions or concerns regarding our Privacy Notice, or if you want to inquire or request for information regarding any matter relating to the collection or processing of your respective personal data, or you wanted to exercise your rights as provided by this Privacy Notice or by the Data Privacy Act of 2012, you can contact our designated Data Privacy Officer at –

Ladylynne Flores
Data Protection Officer
Finance Technologies Inc.
privacy@pitacash.ph

CHANGES ON OUR DATA PRIVACY NOTICE

This Data Privacy Notice is in effect as of July 7, 2022, as amended.

All users also hereby acknowledge the right of the Company to change or amend this Notice from time to time as we deem fit and necessary even without your knowledge and conformity. The Company may notify its users of any changes through the email address provided or by posting a notice in its mobile application. We encourage all users to check this Policy on a regular basis.

ACCEPTANCE OF THE PRIVACY NOTICE

By clicking the “Continue” button, the user confirms having read and understood and gives his/her consent to abide to the foregoing Privacy Notice. You also agree that the collection, storage, processing (including for purposes of development of a credit score and user profiling) and disclosure of the information you have provided or will provide to third parties.

[To read more on the Data Privacy Act of 2012, you may visit the National Privacy Commission website at <https://www.privacy.gov.ph/>]