

Digido Finance Corp.

PRIVACY POLICY

Digido Finance Corp. (DIGIDO) recognizes the importance of data protection and security of personal and sensitive information that we collect from you, our valued clients in accordance with the Data Privacy Act (RA 10173), its Implementing Rules and Regulations (IRRs), as well as National Privacy Commission Issuances.

DIGIDO may ask you to provide certain information by which you can be personally identified when using our website and/or mobile applications, communication with our employees or authorized representatives. We are giving you the assurance that any and all information collected in such manner will only be used in accordance with the terms in this Privacy Policy. This Policy informs you of our privacy practices and describes the way we may collect, use, protect, store, disclose, and dispose information.

Users (hereinafter referred to as “User”, individually, and “Users”, collectively) of the website UnaPay.com.ph (hereinafter referred to as “Website”) are provided with the appropriate technical resources so that, prior to the voluntary completion of User Data, Users can access this Privacy Policy and any other relevant information on the Protection of User Data.

This Privacy Policy is applicable to any User of the aforementioned Website, Mobile application that may be developed by DIGIDO, so Users are advised to review it periodically for updates that are implemented on a regular basis.

The User is advised to read this Privacy Policy intently. After reviewing the terms and conditions herein, User is given the choice to agree or disagree to such terms and conditions. Note that disagreeing to the terms and conditions would mean that DIGIDO cannot proceed with the processing of your loan application, any transaction or availment of any of its services.

Please be guided accordingly.

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.

Digido Finance Corp.

d. **Data Subject / User** – 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, 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.

f. **User Data** – refers to the Personal, Sensitive or Privileged Information of a Data Subject/ User.

The processing of personal, sensitive and privileged information is generally prohibited to be processed without User's consent.

PERSONAL / SENSITIVE INFORMATION WE MAY COLLECT:

- a. Full name
- b. E-mail address
- c. Social Media account details
- d. Gender
- e. Birthday
- f. Telephone/ mobile number
- g. ID type and number
- h. Politically Exposed Person Status Declaration
- i. Residential Address
- j. Employment Status and Position
- k. Company / Business Name, Address and Contact Number
- l. Monthly Income
- m. Business Permit Details
- n. Name of relatives and contact number
- o. Name of co-workers and contact number
- p. Bank Name
- q. Bank Account number

I. General terms

- a) This Privacy Policy is valid in relation to all User Data received by DIGIDO from the natural person holding such User Data at the time of using or attempting to use the services of DIGIDO, including contracting loans.
- b) User accepts this Privacy Policy through the use of the DIGIDO website, mobile app, and communication with employees and authorized representatives of DIGIDO and gives consent for the collection, processing, use, storage and transmission of the User's Data in the formats prescribed by the applicable Philippine laws and regulations as well as this Privacy Policy.

Digido Finance Corp.

- c) The User agrees that DIGIDO, directly or through its Partners, may collect, retrieve, process, use and store User Data such as name, age, photographs, fingerprints, other biometric data (e.g., facial recognition and voice recognition), mobile number/s, mobile phone usage data, employment details, income, financial data, financial profile, credit standing, loan payment history, and other information required by DIGIDO in its application form. The User consents to the collection of his/her User Data from the User her/himself, or from other personal information controllers such as, but not limited to, telecommunications companies (e.g., Globe, PLDT, Smart, Sun Cellular, etc.), utility companies (e.g., Meralco, Maynilad, etc.), government agencies (e.g., SSS, GSIS, NSO, BIR, etc.), credit bureaus (e.g., CIC, NFIS, etc.), remittance companies (e.g., Palawan Express, Cebuana Lhuillier, etc.), insurance providers (e.g., Sun Life Grepa Financial Inc., Insular Life, etc.) for credit scoring purposes and for the purposes stated under the heading Purposes of User Data Processing. The User Data such as mobile number, email address, and address, will be shared to a credit scoring service provider for credit investigation, credit scoring, data analytics, and data profiling, which includes the regular updating of the User's credit score. The User Data secured may also be used for direct marketing of products and services of Partners of DIGIDO.
- d) The purpose of this Privacy Policy is to respect the Users' rights to the User Data in relation to the collection, use and processing of such User Data by DIGIDO.

II. User Data

1. Collection of User Data is done through several sources:

- a. by virtue of the registration on the Website or Mobile Application;
- b. upon completing the loan application form or availment of services thru Website and/or Mobile App;
- c. by virtue of communication with DIGIDO employees or representatives;
- d. by virtue of credit reports and data; and
- e. by virtue of navigation through the Website or Mobile App.

2. User Data are both Personal and Non-Personal Information:

- a. **Personal Information** is any information from which the identity of a User can be reasonably and directly ascertained, or when put together with other information would directly and certainly identify an individual, such as name, gender, date of birth, address, telephone/mobile number, email address, proof of identification, etc. It also includes information about:
 - i. the User that would help DIGIDO evaluate the User's credit standing such as spouse details, financial details, business details, and other data points whenever applicable;
 - ii. the location of the User's device, whether desktop, laptop, or mobile devices, as used to access the Website and/or Mobile App; and

Digido Finance Corp.

- iii. the User's navigation experience when accessing the Website to see activities done in the Website, the pages visited, and the sequence thereof.
- b. **Non-Personal Information** is any information that does not identify the User individually, and includes statistical and analytical data, and anonymous and aggregate reports.
- c. The User may also be requested to update Personal Information from time to time. Should the User be unable to supply the required Personal Information, DIGIDO may be unable to provide the User with requested products and services and updates on the latest offerings. The User may also be unable to participate in DIGIDO events, promotions or other activities.
- d. Depending on the Users' device or Internet browser settings, when Users access the Website and electronically communicate with DIGIDO, DIGIDO may use cookies, web beacons, small data text files or similar technologies to identify the Users' devices and record the Users' preferences, with the Users' consent.
- e. The User has the duty to inform DIGIDO of any change in the information provided, in order to keep it updated and avoid errors.

III. Purposes of User Data Processing

User Data may be treated, collected, used and processed by DIGIDO among others for the following purposes:

- a.) Verify the User's identity;
- b.) Manage the provision of services being offered, such as processing the loan application or rendering the loan credit decision, among others;
- c.) Evaluate the User's credit standing through external credit report providers and bureaus;
- d.) Contact the User;
- e.) Contact the User's indicated references in the event that the User cannot be contacted;
- f.) Transfer the loan proceeds;
- g.) Manage, collect and recover User's outstanding loan either thru DIGIDO or external collection agencies, lawyers or third party service providers;
- h.) Update the information regarding the loan granted;
- i.) Enhance the User's customer experience and improve, develop and determine customized products to meet customer preferences and needs;
- j.) Send commercial or marketing communications on the products and services;
- k.) Improve the service and contents of the service through statistical analysis and market research;
- l.) Abide by any safety, security, public service or legal requirements and processes;
- m.) Process information for statistical, analytical, and research purposes; and
- n.) Any other purpose expressly provided in the Loan Application Form and/or in the General Conditions as well as in the Promissory Note / Disclosure Statement.

DIGIDO also uses the User's Personal Information to the extent necessary to comply with the requirements of the law and legal process, such as a court order; to comply with legal obligations; or to prevent all damages to public security, safety or order.

Digido Finance Corp.

DIGIDO also uses the User's Non-Personal Information for statistical, analytical, and research purposes to create anonymous and aggregate reports.

User consents to the above Purposes and for DIGIDO to maintain the User Data provided even when the loan application has not been accepted, in order to ensure compliance with legal obligations and avoid duplication in the new applications treatment.

DIGIDO outsources or contracts the processing of User Data to third parties, such as but not limited to the following parties: vendors, service providers, partners or other telecommunications operators, to fulfill any of the above purposes. These parties are only authorized to use User Data for such contracted purposes. These parties may have access to User Data for a limited time under reasonable contractual and technical safeguards to limit their use of such information. DIGIDO requires these parties to protect User Data in compliance with this Privacy Policy, the Data Privacy Act, its IRR as well as the NPC Issuances.

IV. Your Rights as Data Subjects

We recognize and take seriously our responsibility to protect the User Data you entrust to us from loss, misuse, or unauthorized access. Here is a summary of your data protection rights:

- a. Right to access your personal data
- b. Right to request restriction of access
- c. Right to limit and prevent disclosure
- d. Right to amend or update personal data
- e. Right to authorize other uses
- f. Right to receive notice of privacy breaches
- g. Right to destruction of personal data
- h. Right to lodge a complaint with the National Privacy Commission (NPC), provided that complaints shall first be raised to DIGIDO's Data Protection Officer (DPO) for appropriate remedial measures prior to the filing of complaints with the NPC.

If you would like to make a request to access, review, or correct the data collected about you, please contact our DPO. (Contact details are provided below). We reserve the right to charge an appropriate fee for complying with your request where allowed by applicable law, and/or to deny you request where, subject to DIGIDO's discretion, if request is considered unfounded, excessive, or otherwise unacceptable under the law.

V. Retention of User Data

DIGIDO shall retain your User Data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. When we no longer require your User Data, DIGIDO or our service providers will securely delete and/or archive the information.

VI. Third-Party Links and Other Companies / Organizations

Links to other websites (i.e. third-party links) may appear on which have its own privacy policy and are understood as accepted by clicking on them. This Privacy Policy does not apply to such third-party links that may appear on the Website. The responsibility of DIGIDO with regard to the User's Data extends only to the Website proper. This Privacy Policy also does not regulate the data processing activities of other companies and organizations that advertise DIGIDO's services.

VII. Anti-Money Laundering and Credit Information System Act Compliance

a.) The Anti-Money Laundering Act (hereinafter referred to as "AMLA"), as amended, requires all Covered Persons to obtain, verify, and record information that identifies each person who applies for a loan.

b.) Being a Covered Person under the AMLA, DIGIDO will ask for the User's full name, address, date of birth, place of birth, citizenship, business, tax identification number, Social Security System or Government Service Insurance System numbers, and other information that will allow DIGIDO to identify the User.

c.) DIGIDO may also ask to see the User's driver's license, passport, or other competent evidence of identity bearing the User photograph and signature in order to comply with AMLA and other applicable laws and regulations.

d.) The Credit Information System Act (here referred to as "CISA") in line with its mandate to establish a central repository of credit information of individuals requires the collection and submission to the Credit Information Corporation the basic credit data of a borrower which is composed of positive and negative information about a borrower provided to a submitting entity.

VIII. Contact Details

For any concerns regarding the processing of User's Data, the duly-designated Data Protection Officer of DIGIDO may be contacted, as follows:

Address: Unit A, Murphy Center, 205 Bonny Serrano Road, Socorro Quezon City,
Second District, Philippines
Phone Number: (02) 7621-4168
Email Address: care@unapay.com.ph
Website: UnaPay.com.ph