

POLICY ON DATA PRIVACY

Sta. Lucia Land, Inc. (SLI) and its subsidiaries respect your privacy and recognize the need for appropriate measures to protect and manage your personal data entrusted to us. Our Privacy Policy follows, and is consistent with, the Data Privacy Act of 2012 (DPA), its Implementing Rules and Regulations (IRR), other issuances of National Privacy Commission (NPC), as well as other relevant laws of the Philippines. This Privacy Policy aims to provide information on how we collect, use, manage, and secure your personal information. Any information you provide to us indicates your express consent to our Privacy Policy.

Personal information refers to any information whether recorded in a material form or not, 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.

By using our online account and for giving us your personal information, you accept and consent to, the practices described in this Privacy Notice. If you do not agree, please do not use our sites or give us any personal information.

PERSONAL INFORMATION COLLECTION

Personal Information refers to any information from which the identity of an individual is apparent or can be reasonably and directly ascertained, or when put together with other information would directly and certainly identify an individual.

In the performance of our services, or as part of our transactions and dealings, we collect your personal information, through online or offline interactions, which may include, but are not limited to, the following:

1. Your name, nationality, civil status, gender, age, birthdate, ID details, unique identifiers, email address, residence, office, and mailing address, phone numbers, visual recordings, and other information, as part of our transactions and dealings with you.
2. Your resume, which includes personal details and your educational background and employment history, when you seek employment with us.
3. Your credit card information, when you avail of our products and services.
4. Your company information, performance, history, and financial and capital, when we engage in business transactions or you partner with us.
5. Your browsing and social media behavior, when you browse into our website and tag or mention us on your social media accounts. Below are the sites officially used by SLI:

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|--------------------|---------------------|
| Official website: | stalucialand.com.ph |
| Facebook account: | Sta.LuciaLand,Inc. |
| Instagram account: | staluciaofficial |
| Twitter account: | stalucialandph |
| Youtube account: | Sta. Lucia Land |
| Wikipedia: | Sta. Lucia Land |

6. Information about your visit and use of our websites and digital platforms, including but not limited to social media profile information, IP addresses, your browsing behavior within and throughout our digital assets, and session lengths that are collected by our website analytics tools and cookies that we may place on your computer. You may disable the use of cookies on your browser at any time;

7. Any information you submit when to our sales, account management, customer relations agents and marketing partners for the updating of your records or information; in relation to your inquiries or requests; when you participate in our survey, discount, event information and prize promotion; when you refer a person to verify the information you provided to us; or any other event or activity that may be similar or related to any of the foregoing.

We may also collect information pertaining to you from other third-party sources to whom you have disclosed and consented to the further processing or disclosure of your information, including information aggregators and networking sites, for the purposes of providing you with our products.

PROCESSING OF PERSONAL DATA

A. Ways we collect your personal information

We may collect and store your personal information in a variety of ways:

- When you purchase or avail any of our products, services, promos, activities, and events, you will be asked to complete/fill-up Buyer's Information Sheet (BIS) Form and to submit requirements such as, but not limited to, ID's, Proof of Billing, Marriage Certificate if married, Birth Certificate, Declaration of Citizenship, Certificate of Residency and Consent Form;
- When you interact with our sales or customer care agents, reservation officers and specialists through email, phone, chat services, or face-to-face meetings;
- When you submit information through manual forms, and online forms on our digital assets (i.e., websites), or contact us through any of our social media accounts (i.e., Facebook, Twitter, LinkedIn, etc.);
- When you visit our premises with CCTV surveillance camera that are used for safety and security of our employees, clients, guests and other visitors of our offices, subdivisions and clubhouse. SLI and its subsidiaries use a CCTV system in capturing images and videos of employees, clients and visitors to monitor security, crime and emergency incidents or situations within the premises. The CCTV data is stored in secure locations, accessed by authorized SLI personnel for legitimate purposes and may be shared with appropriate authority for investigatory purposes. Individuals identified on the CCTV system have the right to ask for access to footage subject to confirmation and approval of SLI/subsidiary's management;
- When you provide personal information in relation to inquiries, requests, and complaints;
- When you respond to surveys, promotions, and other marketing and sales initiatives;
- When you submit a job application, you will be asked to fill-up application form and to submit requirements such as, but not limited to, ID's, Certificate of Employment, NBI Clearance, Medical Clearance, Resume/CV, SSS, PhilHealth and TIN;
- When you are referred to us by third parties or business partners; and
- When you submit your personal information to us for any other reason.

When you provide information other than your own, you certify that you have obtained the consent and authority of the owner of such information (such as your parents, spouse, children, dependent, or any other person) to allow us to disclose and process such information.

You are responsible for ensuring that all data, whether personal information, sensitive personal information or privileged information, you submit to SLI is accurate, complete and up-to-date.

B. Use of Personal Information

To enable us to comply with our corporate policies in relation to our customers as well as with the requirements under the Data Privacy Act, it is important that we collect, use, store and retain your personal data only as is reasonable and necessary for a declared and specific purpose stated in the pertinent consent forms.

In general, the purposes for which we collect and use your data may be:

- To perform functions necessary to deliver the services, goods and other products offered by SLI;
- To conduct due diligence (e.g. to check credit risk and vendor accreditation) prior to the execution of a contract (sale, lease, etc.), as well as collect necessary personal information to facilitate the fulfillment of the terms of the contract thereafter;
- To respond to customer, investor and/or vendor enquiries, complaints and requests;
- To provide customer care activities, monitor quality and security, and provide services timely and efficiently;
- To inform (through telephone call, SMS or email) about project updates, new residential and commercial launches, as well as complimentary, commercial and promotional advertisements;
- To conduct research and analysis (through surveys or polls) in order to improve customer experience/satisfaction and generate statistical insights,
- To comply with legal and regulatory requirements or obligations and perform such other processing or disclosure that may be required under any law or regulation;
- To prevent, detect, and investigate of crime, including fraud and money-laundering, and analysis and management of other commercial risks;
- Other uses by nature of our transactions

In addition, apart from the general uses mentioned above, we may use your personal information depending on your transactions with us in any of the following means:

When you want to become a part of our team:

- To consider and evaluate your suitability for employment and, with your written or expressed consent, retain your personal information for a maximum of 5 years for future job opportunities that may be of interest to you;
- To conduct appropriate background investigation, reference checks, pre-employment medical examinations and interviews;
- To communicate with you about your employment application;
- When hired, to process your data necessary for your employment such as, but not limited to, payroll, benefits application, allowances and refunds processing, tax processing, retirement benefits, and other purposes that demand processing of your personal data (e.g., to execute business transactions directly related and/or incidental to your job, business travels, anniversaries, social activities, emergencies, and so on);
- To enroll in our benefit programs which may include health insurance, medical insurance, and social security;
- Compliance with our obligations under the law as acquired by government organizations and local government units;
- While employed, for your performance evaluation and career development including seminars, trainings, workshops, and compliance monitoring;

- Making you part of our employee engagement activities and programs such as events, employee surveys, and incentives and discounts offered subject to approval of management;
- Upon separation, to process your data for the exit interview and preparation of your final pay;

When you inquire about acquiring property:

- To conduct appropriate credit investigation to assess the risk of you defaulting on your obligations to SLI;
- To register your inquiry and addressing any follow-up calls
- To administer the sale and the turnover of a particular unit which necessarily includes the preparation of all documentation leading to the transfer of title, and perform all financial processes (reservation fees, amortization, handover fees, etc.) as a result of our transaction;
- To execute contract or provide information/services concerning the trading, brokerage, leasing, management and other incidental operations of real estates;
- To update our records and keep your contact details and billing address up to date;
- To provide safety and security to the unit owners, tenants and employees of tenants/unit owners; and,

When you apply to become a tenant or merchant in any of our properties for lease:

- To evaluate the interest of a party in a commitment to lease a space;
- To conduct appropriate credit investigation to assess the risk of you defaulting on your obligations to SLI;
- To prepare lease contract and other documentations as may be required and necessary in the consummation of the contract;
- To perform all relevant financial transaction such as processing of security deposits, advanced rental payments, monthly rental payments and other incidental charges included in our contract;
- To provide safety and security to the unit owners, tenants and employees of tenants/unit owners;
- To communicate any advisories, or changes in the terms and condition related to your lease contract.

When you are a vendor/supplier, a potential vendor, or a contractor:

- To conduct the appropriate due diligence checks;
- To evaluate your proposal including your manpower, technical and operational capacity;
- To assess the viability of your proposal and process your accreditation;
- To communicate any decision on such proposal and issue a letter of award together with the contract;
- To perform any other action as may be necessary to implement the terms and conditions of our contract.

When you visit our official website at stalucialand.com:

- To personalize your viewing experience in our websites, managed by third-party service providers, we are using/sending cookies or web beacons are used to store your preferences and settings; enable you to send us inquiries and request for price quotation on our properties and analyze how our websites and online services are performing.

C. Personal Information Retention and Protection

We retain your personal information:

1. To the extent necessary in keeping track of your transaction and records 10 years after its fulfilment.
2. If you have existing contract with SLI, the information will be retained all throughout the contract period and 10 years after its completion.
3. For statistical, research and other purpose specifically authorized by law.

Data collected will be retained in accordance with retention limit set by our standards, industry standards and laws and regulations, unless you request your data to be deleted in our database. Hard copy files are stored safely in storage rooms secured by lock and keys and access is restricted to authorized personnel only. Also SLI digitize hard copy files to provide better organization and monitoring of data, digital back-up or data retrieval, easier access, provide more efficient procedure in sending out notices, save spaces from cabinets and data rooms, reduce costs of printing and courier expenses, and reduce carbon footprint.

To maintain the integrity and confidentiality of your personal information, we put in place organizational, physical and technical security measures to protect your personal information, such as:

1. Use of secured servers, firewalls, encryptions and other latest security tools.
2. Limited access to personal information to those duly authorized processors. All transfers are made after complying with the established confidentiality policy and practices in place.
3. Maintain a secured server operating environment by performing regular security patch update and server hardening.

D. Sharing of Personal Information

SLI may share personal data between and among its subsidiaries, parent company and affiliates to enable them to provide you personalized services. SLI may also share personal data with vendors, consultants, marketing partners, and other service providers who need access to such information to carry out work on behalf of SLI. If and when it becomes necessary, a data sharing agreement shall cover any sharing of data between and among the SLI Group and/or its vendors, consultants, marketing partners, joint venture partners and other service providers. SLI may also share information in accordance with any order from any relevant government agency as provided by law.

E. Disclosure of Personal Information

Disclosure of Personal Information is dependent on the product and service concerned and purpose set out in this policy. Only Personal Information the Company deemed necessary to fulfill legitimate purpose of a transaction is disclosed/shared to other parties.

We may disclose your personal information to the following parties:

- Our employees and officers;
- Professional advisers such as lawyers and auditors;
- Insurers and credit providers;
- Banks and their respective service providers;

- Suppliers or subcontractors; third-party service providers; consultants that have been contracted by SLI to provide financial, technical, architectural, administrative, and support services such as information technology, payroll, accounting, sales administration, procurement, training, background investigation;
- Any third-party business offering goods and services or sponsor contest or other marketing and promotional programs, where you have provided your consent;
- Members of our group of companies or our subsidiaries, affiliates, marketing companies and property management companies;
- Our Company's subsidiaries and affiliates; and
- Our joint venture and alliance partners

F. Legal and Statutory compliance

- To the extent that we are required to do so by applicable laws, rules, and regulations;
- In connection with any ongoing or prospective legal proceeding;
- To the buyer or prospective buyer of any business or asset that we are contemplating to sell;
- To clients and customers availing of our products and services;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of such personal information where, in our reasonable opinion, such court or authority would be reasonably and is likely to order the disclosure of such personal information;
- Any company with which we share information about you for the above purposes is contractually required to comply with confidentiality standards, undertake to respect any individual's right to privacy, and comply with the Data Privacy Act. We also require that these organizations use this information only for our purposes and follow our reasonable directions with respect to this information. This includes organizations which handle or obtain personal information as service providers for SLI.

G. International Data Transfers and Internet Policy

Personal information that you publish or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by parties other than those mentioned.

H. Accessing and Updating Your Personal Information

You may instruct us to provide you with any personal information we hold about you, subject to providing us with appropriate evidence of your identity.

I. Accessing your personal information

- We may withhold personal information that you request to the extent permitted by law.
- You may instruct us at any time not to process your personal information for marketing purposes.
- You will be asked to expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for the same purpose.

If the personal information that we hold about you needs to be corrected or updated, SLI shall make all reasonable efforts to ensure that data collected is current, complete and accurate.

J. Updating your personal information

- If you need to access, correct, and update your personal information, you may send a request to **dataprotection@stalucialand.com.ph** or get in touch with the customer support team of the product or services that you availed.
- As part of our security measures, we will contact you and conduct the necessary verification measures to process your request. Once we have implemented the necessary corrections, we shall then notify you that your request has been processed and completed.

K. Withdrawal of Consent

If you wish to withdraw the consent you've given for any or all purposes set out in this policy, you may send your detailed request to dataprotection@stalucialand.com.ph. Depending on the nature of the withdrawal of consent, SLI may no longer be in a position to provide products and services to you.

We take precautions to protect your information. When you submit sensitive information via any of our official websites, such information is protected both online and offline.

L. Protecting the information you submit online

All our critical websites undergo security scanning and penetration testing to reduce their vulnerability to cyber-attacks. While we employ all necessary precautions to safeguard your information, the internet is not 100% secure, so we cannot guarantee that information we collect or store will be protected from unauthorized access and used in a manner that is inconsistent with this privacy policy

We maintain physical, technical, and organizational safeguards to protect your personal information against loss, theft, unauthorized access, disclosure, copying, use, or modification. We also implement safeguards such as:

How we safeguard your personal information

- The use of secured servers behind advanced threat protection appliances, firewalls, encryptions and other security tools;
- Limiting access of your personal information to those who are qualified and authorized to process them. All such persons, wherever they are located, are required to protect the confidentiality and privacy of your personal information in a manner consistent with our privacy policies and practices; and
- Regular security vulnerability and penetration testing of our information system and infrastructure to ensure your personal information is properly protected.

M. Disposal and Destruction of Personal Data

Files that contain personal data, whether such files are stored on paper, film, optical or magnetic media will be destroyed upon reaching the retention period set by our standard, industry standards and laws and regulations, unless you request your data to be deleted in our database. Files will be disposed through shredding and physical destruction to make sure that data will be unreadable (for paper) or irretrievable (for digital records).

Upon the expiration of identified lawful business purposes or withdrawal of consent, the Company must take reasonable steps to securely destroy or permanently de-identify or anonymize personal information if it is no longer needed. Data may be anonymized, or pseudonyms used, as deemed appropriate and as may be applicable, to prevent unique identification of an individual.

When you request your personal data to be deleted, you may send a request to **dataprotection@stalucialand.com.ph** or get in touch with the customer support team of the product or services that you availed. SLI may reject request for destruction if SLI is requested/ordered to disclose your personal information to the Department of Human Settlements & Urban Development, the Human Settlements Adjudication Commission, the Anti-Money Laundering Council, the Bureau of Internal Revenue and/or the National Privacy Commission or upon requests of any tribunal or lawful orders of the court. A notice containing the personal information disclosed to regulatory bodies will be sent to the data subject.

Third Party Websites

Our websites may contain hyperlinks and details of third-party websites. We have no control over and are not responsible for the privacy policies and practices of third parties. We therefore advise you to study their privacy policies. Once you leave our website, you should check the applicable privacy policy of the third-party website to determine how they will handle any information they collect from you.

Extent of Automated Access

Due to the sensitive and confidential nature of the personal data under the custody of the company, only the client/data subject and SLI authorized representatives, shall be allowed to access such personal data, for any purpose, except for those contrary to law, public policy, public order or morals.

Personal information contained in the BIS form are uploaded to the E-Realty System and can be viewed only by responsible personnel.

Access to data subject's file is covered in SLI's Buyer's File Security and Access Policy. Any employee who seeks to access the Buyer's Files shall present a duly accomplished Borrower's Slip/ Buyer's File Access Clearance to the designated custodian/s from the Sales Department stationed at the receiving area of the Stock Room. Entries made by the employee concerned on the Borrower's Slip shall be verified and signed by his/her Department Head or DPO, as the case may be. No employee shall be allowed access to the Buyer's File without presenting a duly accomplished and verified Borrower's Slip/ Buyer's File Access Clearance.

Cookies and Similar Technologies

A cookie is a small file which asks permission to be placed on your computer's hard drive. If you allow the use of cookies, the file is added to your browser, helping us analyze and identify browsing behavior within our digital assets. Cookies allow web applications to respond to you as an individual. The web application can customize its operations to your needs, likes, and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website in order to properly respond to customer needs. We only use this information for statistical analysis purposes, after which the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. We may use your browsing behavior to develop promotional offers, products, and services that we feel are beneficial to you.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies; however, doing so may prevent you from taking full advantage of the website.

Management and Security

A Data Protection Officer for SLI and corresponding Compliance Officers of Privacy for our subsidiaries have been appointed to manage and safeguard the handling of your personal information in compliance with the Philippine Data Privacy Act of 2012 (R.A. 1017) and this Policy. SLI is committed to ensure that its Privacy Management Program is constantly reviewed, monitored, and enhanced. SLI regards personal information breaches very seriously.

Data Privacy Risks

- Employees/File Custodians may share, grant access to, lose, or mishandle valuable data, either by accident or because they are not aware of security policies.
- Information shared to third parties may be lost and used in malicious processing.
- Phishing; Employees may accidentally click a malicious link which attackers can compromise their device or gain access to a corporate network.
- Loss of digital data due to computer viruses and/or ransomware.
- Loss of data by catastrophe like fire, typhoons, earthquake etc.

SLI shall implement reasonable and appropriate physical, technical and organizational measures for the protection of personal data. Adopting and implementing security measures aim to maintain the availability, integrity and confidentiality of personal data and protect them against natural dangers such as accidental loss or destruction, and human dangers such as unlawful access, fraudulent misuse, unlawful destruction, alteration, and contamination.

Your Rights under the Data Privacy Act

As a data subject, you have the following rights under the Data Privacy Act:

1. You have the right to be informed of the collection and processing of your personal data, the purpose for which they will be processed, among others. Thus, you are required to read this privacy policy before giving your consent to the collection and processing of your personal data. If you have questions, please do not hesitate to ask us questions or clarifications and you may also contact our Data Protection Officer;
2. You have the right to object to the processing of your personal data. If you object, please notify our Data Privacy Officer otherwise the assumption is that you have provided your consent. In case you withhold consent, we note that we may continue collecting and processing the personal data when it is necessary for the performance of or in relation to a contract or service to which you are a party;
3. You have the right to have reasonable access to your personal data by notifying our Data Protection Officer;
4. You have the right to rectify or correct any inaccuracy or error in your personal data by submitting your request for rectification or correction to our Data Protection Officer;
5. You have the right to suspend, withdraw or order the blocking, removal or destruction of your personal data in accordance with the requirements of the Data Privacy Act. Please notify our Data Protection Officer if you wish to exercise this right;

6. You have the right to be indemnified if you incur damages due to inaccurate, incomplete, outdated, false unlawfully obtained or unauthorized use of your personal data; and
7. You have the right to lodge a complaint before the National Privacy Commission of the Philippines.

We may periodically update or amend our Privacy Policy in order to adhere to new and existing laws affecting the DPA, including any change or improvement we establish to secure your personal information. Any updates or changes shall not alter how we handle previously collected personal data without obtaining your consent, unless required by law.

INQUIRIES AND COMPLAINTS

Contact Us

For any comment, question or complaint regarding this Privacy Policy, you may contact our Data Protection Officer at:

| | | |
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| Data Protection Officer | : | Ace Franziz D. Cuntapay |
| Company Address | : | Penthouse Bldg. 3, Sta. Lucia Mall, Marcos Highway cor. Felix Ave., Cainta, Rizal |
| Telephone Number | : | +632 8681-7332 local 129 |
| Email Address | : | dataprotection@stalucialand.com.ph |