

DATA PRIVACY POLICY

Your privacy is important to us. This Policy outlines how your Personal Data will be managed in accordance with the **Data Privacy Act of 2012 (Republic Act No. 10173)** and its implementing rules and regulations.

Under the Act, TSUBAKIMOTO PHILIPPINES CORPORATION, is considered as a personal information controller.

“Personal Data” refers to any data or information about you from which you can be identified either (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

Examples of such Personal Data include:

1. Your Name, gender, age, personal telephone number(s), mailing address, email address
2. Tin number
3. Your Employment & Education background
4. Your Bank information & Credit history
5. Any other information relating to you which you have provided us in any forms you may have submitted to us., our third-party data processor or in other forms of interaction with you.

PERSONAL DATA COLLECTION METHODS

TSUBAKIMOTO PHILIPPINES CORPORATION may collect your Personal Data through the following ways:

1. When you wish to be part of our vendor pool
2. When you access our website, our third party’s website or perform an online transaction;
3. When you interact with any of our employees 7 our third-party Data Processors
4. When you submit an application to us
5. When you respond to our request for additional Personal Data;
6. When you ask to be included in an email or other mailing list;
7. When you request that we contact you;
8. When you respond to our initiatives and
9. When you submit your Personal Data to us for any other reason.

TSUBAKIMOTO PHILIPPINES CORPORATION

2404A West Tower, Philippine Stock Exchange Centre,
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Where personal data is submitted by you on behalf of another individual or concerns another individual other than yourself (or, in the case of situations where you, as a representative of your company or organization, are submitting the personal data of individuals as part of the disclosures by the company organization to us), you represent and warrant to us that all the necessary consents have been obtained from the relevant individuals and that you have retained proof of these consents, such proof to be submitted to us upon our request.

PURPOSES PERSONAL DATA COLLECTION

Personal Data is collected for purposes which you have consented to and for which we have been authorized. If we need to use your Personal Data for any purposes which you have not previously consented to, we shall seek your consent prior to using your Personal Data for the new purpose.

The Personal Data gathered arising from your business relationship with TSUBAKIMOTO PHILIPPINES CORPORATION as a vendor / Service Provider are for the following purposes;

- To conduct due diligence / background checks in compliance with TSUBAKIMOTO PHILIPPINES CORPORATION's practices.
- For the purposes of being considered to supply products and services with TSUBAKIMOTO PHILIPPINES CORPORATION
- To evaluate the products and services provided to TSUBAKIMOTO PHILIPPINES CORPORATION.

PERSONAL DATA DISCLOSURE AND/OR TRANSFER

Personal Data is disclosed and/or transferred to Third Party service providers who will conduct data collection, due diligence or background checks that are mandated by TSUBAKIMOTO PHILIPPINES CORPORATION and for purposes of managing, operating, administering and running our business and for our business and legal purposes:

In addition, we disclose Personal Data in the following circumstances:

- When we are required to do so by law;
- In response to a request from law enforcement authorities or other government officials;

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- In order to comply with a court order or direction from a government agency or regulatory authority ordering the disclosure of the Personal Data; and
- Where the disclosure is necessary for investigations or legal proceedings.
- In any other analogous or similar circumstances

PERSONAL DATA PROTECTION AND SECURITY

TSUBAKIMOTO PHILIPPINES CORPORATION requires that the parties to whom the Personal Data is transferred to must implement adequate or substantial levels of Personal Data protection. We also require that these parties only process Personal data strictly for purposes for which we engage them for and the purposes that we have described or with other purposes for which consent has been sought and obtained.

PERSONAL DATA RETENTION

TSUBAKIMOTO PHILIPPINES CORPORATION and its Third Party Provider only retains Personal Data for as long as the retention is required for the purposes for which we collected the Personal Data, the purposes described in this Policy and for our business and legal purposes. Generally, we do not retain Personal Data for a period of longer than five (5) years after the original purposes for which the Personal Data was collected have ceased to be applicable, unless required by law, or other mandatory directions by court or government authorities or for purposes of legal proceedings or other similar proceedings or investigations.

WITHDRAWAL OF CONSENT

If you wish to withdraw your consent to any use or disclosure of your Personal Data as set out in this Data protection Policy, please contact us.

Please note that if you withdraw your consent to any or all use or disclosure of your Personal Data, depending on the nature of your request, we may not be in a position to continue any business relationship with you. Such withdrawal may also result in the termination of any agreement you may have with us. TSUBAKIMOTO PHILIPPINES CORPORATION's legal rights and remedies are expressly reserved in such event.

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ACCESS AND CORRECTION OF YOUR PERSONAL DATA

You may request access to or make corrections to your Personal Data records, the TSUBAKIMOTO PHILIPPINES CORPORATION and/or its third-party provider will bear the cost of updating your personal information. Please submit your request to our Data Protection Officer via email for us to proceed.

CONTACT US

If you have any questions or comments about this Policy, you may contact the following personnel:

TSUBAKIMOTO PHILIPPINES CORPORATION
Point of Contact
Ms. Sheena Marie Pineda
sheena@tsubaki.ph

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