

PRIVACY POLICY

To build, bridge and bond our customers, partners, community, and the nation into a whole e-commerce business ecosystem, IT Associates Corporation and its subsidiaries, E-Commerce Philippines, Inc., MSolutions Corporation and M2Cash Corporation (collectively "ITAC," "we," "us," "our") put you, our customers, first. We regard your privacy with the utmost importance.

This Privacy Policy outlines our policy in relation to the collection, use, and protection of your Customer Data to provide you with a wonderful customer experience. From time to time, we may update our Privacy Policy to reflect current changes in our policy and the law. When we do so, we will notify you via email and by posting it on our website for your information and reference.

YOUR RIGHTS AS A CUSTOMER

ITAC recognizes that you should be the ultimate decision-maker on matters that involve your Personal Information. To this end, ITAC is mindful of the fundamental right to privacy of every ITAC customer under the Data Privacy Act of 2012 (<https://www.privacy.gov.ph/data-privacy-act-primer/>).

By accepting the Terms and Conditions for the use of ITAC products and services, you expressly agree to the collection, processing, use, and sharing of your Personal Information in accordance with this Privacy Policy that will enable us to provide you with your desired ITAC products and services.

You have the right to be informed of your own Personal Information that we collect, process, use, and share provided that such request for Personal Information is not vexatious or unreasonable.

You have the right to object or withhold your consent to the collection, processing, use, and sharing of your Personal Information. However, we may be constrained to terminate your ITAC product or service as your Personal Information may be required to deliver such ITAC product or service. Without your Personal Information, we cannot provide you with updates on ITAC's latest offerings; similarly, you cannot participate in our events, promotions, or other activities.

You have the right to suspend, withdraw, or order the blocking, removal, or destruction of your Personal Information if the Personal Information is no longer necessary for the purpose or purposes for which it was collected, and for such other cases provided in the Data Privacy Act of 2012.



You have the right to seek indemnity for damages sustained, if any, due to inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of your Personal Information.

Should you feel that there has been mishandling or misuse of your Personal Information, or that any of your data privacy rights have been violated, you may email us at privacy@itac.com.ph.

COLLECTION OF CUSTOMER DATA

As part of our continuing relationship with you, we collect, process, use, and share your Customer Data in accordance with this Privacy Policy and the Terms and Conditions for the use of ITAC products and services, as may be applicable.

The Customer Data that we collect, process, use, and share are either Personal Information or Non-Personal Information:

- **Personal Information** is any information from which the identity of an individual 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 may also include information about:
 - The services provided to you, such as subscription or product licensing details, location information, and certain information about your subscription or service plans and features, as required by law;
 - The location of your device whenever it is switched on, if you subscribe to location-based services, subject to coverage limitations; and
 - Your use of our network, your Internet Protocol addresses, network performance experience, diagnostics, such as network performance issues, to help us improve our network and quality of products and services, improve your user experience, determine tailored content, create new products and services, and for other legitimate business purposes.
- **Non-Personal Information** is any information that does not identify you individually, and includes statistical or analytical data, and anonymized or aggregated reports.

USE OF CUSTOMER DATA

We may share Customer Data with our subsidiaries, affiliates, partners, and third-party service providers as part of business operations and provision of products and services.

Without limiting the generality of the foregoing, Customer Data is used to, among others:

- Provide you with your subscribed products and services, including customer support;
- Help us improve our network and quality of products and services;
- Create new products and services;
- Enhance your customer experience and determine tailored content to meet your preferences and needs;
- Communicate relevant services and/or advisories to you;
- Abide by any safety, security, public service or legal requirements and processes;
- Process information for statistical, analytical, and research purposes. The use of your information for statistical, analytical, and research purposes enables us to create anonymized and aggregated insight reports that we use to further improve your user experience and to provide new products and services;
- Create a customer portrait based on your demographic, and your behavioral, transaction, and interaction data across all products, systems, devices, and/or interaction channels, which we may use as a basis for sending you commercial and promotional alerts, personalized advertisements, financial service offers, and surveys. To be clear, should we need to share data with third parties for advertising and marketing purposes, rest assured we only share anonymized and aggregated data, and not your Personal Information;
- Comply with the requirements of the law and legal process, such as a court order; to comply with a legal obligation; or to prevent imminent harm to public security, safety, or order, collectively referred to as “Data Use Purpose.”

When required by our Privacy Policy and the law, and before we collect, process, use, or share your Personal Information for any other purpose other than enumerated above, we will ask for your consent.

You may avail of our broadcast messages relevant to you through written correspondence, text messaging, internet, or other similar means of communication. You may also change your mind anytime and stop receiving them.

When you use our website and electronically communicate with us, depending on your settings, we may use cookies, web beacons, small data text files, or similar technologies to identify your device and record your preferences, with your consent. The completeness and accuracy of your Personal Information help us improve our products and services. Thus, we encourage you to update your Personal Information from time to time.

We outsource or contract the processing of Customer Data to third parties, such as but not limited to, vendors, service providers, partners, or other telecommunications operators, to

fulfill any of the above purposes. They are only authorized to use Customer Data for such contracted purposes. They may have access to Customer Data for a limited time under reasonable contractual and technical safeguards to limit their use of such Customer Data. We require them to protect Customer Data consistent with our Privacy Policy and the Data Privacy Act of 2012, its implementing rules and regulations and policies of the National Privacy Commission.

Information may be subject to regulations different from Philippine regulations.

PROTECTION OF PERSONAL INFORMATION

We respect your privacy. We take paramount care in protecting your Personal Information. As such, we secure and protect your Personal Information with proper safeguards to ensure confidentiality and privacy; prevent loss, theft, or use for unauthorized purposes; and comply with the requirements of the law.

As Information Security threats continue to develop and evolve at such a rapid pace, we make reasonable and appropriate security arrangements and measures that use a variety of physical, electronic, and procedural safeguards to protect Personal Information. ITAC monitors network and systems to make sure risks to ITAC and your Personal Information are properly managed. We regularly review our information collection, storage, and processing practices, including physical security measures, to guard against unauthorized access to our system and unauthorized alteration, disclosure, or destruction of information we hold.

We only permit your Personal Information to be collected, processed, used, and shared by our authorized employees, contractors, and subcontractors who hold such Personal Information under strict confidentiality and in accordance with their contractual obligations and who have implemented minimum security features against data leakage, unauthorized access, or disclosure. We restrict access to information to ITAC employees, contractors, and subcontractors who need to know such information in order to process it for us, who are subject to strict contractual and technical safeguards, and who are accountable if they fail to meet these obligations.

We only give you or your authorized representative access to your Personal Information. We do not provide, sell, or share your Personal Information to anyone unless you have given your express consent. We also do not use nor share your Personal Information with content and/or information

providers without your prior request or consent. Personal Information will only be disclosed to third parties in accordance with this Privacy Policy.

We keep our records as accurate as possible. If your Personal Information is wrong, we give you ways to correct or update it. Once you have registered as our customer, you may access your account details and correct your Personal Information by contacting ITAC Customer Care ((+632 8634-4153) or the relationship manager, as may be applicable; or by visiting our website at www.itac.com.ph.

We keep your Personal Information in our business records, as may be applicable, while you are a customer, or as long as it is necessary to fulfill the purpose for which it was collected, or while it is needed by us for business, tax, or legal purposes. When disposing of your Personal Information, we take reasonable measures to ensure that it is done properly and is not accessible to the public.

We are not responsible for information, content, application, product, or service that we do not provide. But because we care for you and protect you, we take measures to fight spam, fraud, or any unauthorized messages that traverse our network. Further, we will not tolerate the use of our network that violates the law.

CONTACT US

Should you wish not to:

- Have your Personal Information disclosed or processed;
- Receive marketing alerts and promotional messages from us, our subsidiaries, affiliates, and partners, you may immediately get in touch with us through our website www.itac.com.ph or by contacting ITAC (+632 8634-4153).

For any questions or concerns, you may contact our Data Protection Officer as follows:

Data Protection Officer

IT Associates Corporation
Suite 501 5/F, West Tower
Tektite Towers
Exchange Road 1605 Pasig City
Metro Manila, Philippines
Email: privacy@itac.com.ph