

PRIVACY NOTICE

Introduction

As part of the day-to-day business of GHL Group (“GHL”, “we”, “us”, or “our”), we collect your Personal Information when you apply to opt for any of our products and/or services or communicate with us. In return, we may use this information to provide you with our products or services, maintain our records or send you relevant information.

GHL values privacy and we are committed to protecting all your Personal Information (as defined below), in accordance with the relevant laws (including the Data Privacy Act of 2012), this Privacy Notice and our terms and conditions. For the avoidance of doubt, unless the context requires otherwise, the words used in this Privacy Notice shall have the same meanings stipulated in the terms and Conditions.

This Privacy Notice describes our practices regarding the Personal Information we collect through your application form opting for any of our products and/or services (“Application Form”) or through your communication with us on any of our Customer Care Line or your download and use of any of our mobile device application (the “App”) or your use of or access to our website (the “Site”) (either or collectively, the “Platform”) for opting our products and/or services and physically or functionality available at or through the Platform (collectively, together with the Platform, the “Services”).

This Privacy Notice explains:

- the type of Personal Information we collect and how we collect it;
- how we use your Personal Information;
- the parties that we disclose the Personal Information to; and
- the choices we offer, including how to access and update your Personal Information.

By using the Services, you agree to the terms of this Privacy Notice and you will be deemed to have consented to the collection, use, and disclosure of your Personal Information in accordance with this Privacy Notice.

What Kind of Personal Information We Collect and How We Collect It

“Personal Information” means any information that relates directly or indirectly to you, allows someone to identify you, including, for example, your name, address, telephone number, e-mail address, information about your transactions in relation to the Services such as your financial information, account activities as well as any other non-public information about you that is associated with or linked to any of the foregoing data or any other information relevant to your application for the Services arising from your transaction(s) with us.

“Anonymous Information”, means, data that is not associated with or linked to your Personal Information including, aggregated information. Anonymous Information does not, by itself, permit the identification of individual persons.

In order to enable us to provide you the Service we may need to and/or may be required to

collect, record, hold, use, disclose and store (i.e. “process”) Personal Information, and Anonymous Information, including, but not limited to:

- (a) Information you provide to us through your relationship with us, including but not limited to, information provided by you when using the Services, when taking part in customer surveys, competitions and promotions. Examples include:
 - Personal Information from you, such as your first and last name, profile picture, photos or avatar, gender, age, ethnicity, marital status, educational level, interests, hobbies, precise location-based information, e-mail and mailing addresses, phone numbers, device ID numbers, and passwords when you create an account for our Services (“Account”), and any other information you directly give us through the Services (including, but not limited to messages that you send through the Services);
 - Personal Information to establish your financial standing, creditworthiness and/or suitability for any of our Services that you have applied for;
 - Information you disclose through your interactions with us;
 - Information necessary for us to provide the Services;
 - Information such as files and messages that you store using your Account;
 - Information from written communications when you provide us feedback or contact us e.g. your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply;
- (b) Information you provided through any other contact with our affiliates which shall include our holding companies, subsidiaries, any associated companies or related companies, including any company as a result of any restructuring, merger, sale or acquisition (“Affiliates”);
- (c) Information obtained from analysis of your payment and/or other transactions/services within our group of companies (us and our Affiliates);
- (d) Information collected by our employees or authorized representatives or through technology via the Platform; For example:
 - Information from you as provided in the Application Form or through our Customer Care Line.
 - Information from you, including your web browser type, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, user profiles, and/or a date/time stamp for your visit, and, with respect to your mobile phone, the unique device identifier.
 - Information from third party service providers, with your consent, which may include your profile content or other types of personally identifiable information.
 - Cookies and URL information to gather information regarding the date and time of your visit and the information for which you searched and viewed. “Cookies” are small pieces of information that a website sends to your computer’s hard drive while you are viewing a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on the Platform. Persistent Cookies can be removed by following web browser’s directions.

- Information from corresponding technologies used in connection with mobile phones, including the unique device identifier, to record date, time, search and viewing information related to your mobile phone.
 - Information about how you use and interact with the Platform and the Services via third party analytics services such as Google Analytics (<https://www.google.com/analytics>) or Google AdSense (<https://www.google.com/adsense>). Such third-party analytics services may use Cookies to gather information such as the pages you visited, your IP address, a date/time stamp for your visit and the sites that redirected you to the Platform.
- (e) Information from third parties including but not limited to, employers, joint Account holders, authorized representatives, industry/financial related associations, government agencies, statutory authorities, law enforcement agencies, retailers, social networks and fraud prevention agencies or other organizations.
- (f) Information from Credit Reporting Agencies/Credit Bureaus. Information from such other sources which you have given your consent to disclose information relating to you and/or where not otherwise restricted.
- (g) Information collected from you about others in situations where you decide to invite a third party to create an Account. We will collect your Personal Information and the third party's names and e-mail addresses in order to send an e-mail and follow up with the third party. Where you have provided Personal Information relating to other individuals (such as your family and dependents) to us for the purpose of using the Services, you represent and warrant that you are authorized to provide their Personal Information to us and the Personal Information given are correct. You also represent and warrant that you have obtained their consent for their Personal Information to be processed and used in the manner as set forth in this Privacy Notice. We have the right to terminate the Services provided if the permission is withdrawn by any of the third parties.

How We Use Your Personal Information

- (a) For general use or collected through the Application Form or through our Customer Care Line or by technology. In addition to the purposes stated above, we may use your Personal Information either to respond to requests that you make, or to aid us in serving you better, whether or not through technological means, for one or more of the following purposes:
- to assess your request and provide the Services;
 - to verify your financial standing and credit worthiness through credit reference/reporting checks;
 - to facilitate the creation of and secure your Account on our network;
 - to identify you as a user in our system;
 - to provide improved administration of our Services;
 - to notify visitors about updates to our Services;
 - to promote our Services; or products, services and special offers of third parties whose products and services we think may be of interest to you;
 - to improve and customize the quality of experience when you interact with our Services;
 - to update, consolidate, and improve the accuracy of our records;
 - to send you a welcome e-mail and to verify ownership of the e-mail address provided

- when your Account was created;
 - to send you administrative e-mail notifications, such as security or support and maintenance advisories;
 - to respond to your inquiries or other requests;
 - to send offers and promotional materials related to our Services and for other marketing purposes;
 - to track user-specific information on what pages' users access or visit;
 - to improve and customize the quality of experience when you interact with the Platform, and the Services;
 - for our day-to-day operations and administrative purposes including account management, billing and collection, audits, reporting and investigations;
 - for the purposes of enforcing or defending our legal rights and/or obtaining legal advice including to recover any debt owing to us;
 - to assist in the prevention, detection or investigation of crime or possible criminal activities or for the administration of justice;
 - for any other purpose that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities;
 - for security and internal audit purposes;
 - for such other purposes as may be directed or consented to by you;
 - for the purpose of execution, garnishment, attachment, and other methods of implementing a judgment, award or order of competent public authority, in relation to the Service; and
 - for all other purposes in relation to or incidental to the above.
- (b) **Creation of Anonymous Information.** We may also anonymize or aggregate your Personal Information by excluding information (such as your name) that make the data personally identifiable to you. The Anonymous Information may be used to personalize the Services, including directing certain advertisements to make them more relevant to you or to analyze request and usage patterns so that we may enhance the content of the Services and improve the Platform navigation or for any related market research purposes, either internally or through third parties.

Disclosure of Your Personal Information

Subject to any laws (including regulations, guidelines and/or obligations) applicable to us and our Affiliates (whether in or outside the Philippines) by opting for the Services, you consent to the disclosures of your Personal Information as described below and elsewhere in this Privacy Notice:

- (a) *Business Partners and Third-Party Service Providers.* We may share your Personal Information with our business partners and third-party service providers who may be located within or outside the Philippines (i) to provide you with the Services; (ii) to conduct quality assurance testing; (iii) to facilitate creation of accounts; (iv) to provide technical support; and/or (v) to provide other services. These business partners and third-party service providers may not be required to use your Personal Information other than to provide the Services.
- (b) *Affiliates.* We may share some or all of your Personal Information with our Affiliates, in

which case we will require our Affiliates to honor this Privacy Notice.

- (c) We Do Not Share Personal Information with *Advertisers*, but we do, however, allow advertisers to request that their advertisements are directed at certain users (e.g., users in a certain geographic location, or age, gender and/or with certain interests). In the event that you interact with certain advertisements, the advertisers (or the company which the advertiser works with, for example, its advertising agency or an advertising network) may determine certain characteristics about you.
- (d) *Third Party directed or consented to by you*. We may share your Personal Information with any persons directed by or consented to by you.
- (e) *Professional Advisors*. We may share your Personal Information with our professional advisors including but not limited to legal advisors, tax advisors, financial advisors, auditors, insurance brokers etc.
- (f) *Debt Collectors/Debt Collecting Agencies, Regulatory Agencies, or Consultant*. We may use or disclose your Personal Information to any debt collectors/debt collecting agencies, regulatory agencies, or consultant of GHL, as GHL in its absolute discretion deems necessary in terms of any action taken for the purpose of enforcement of any right of GHL under the terms and conditions for the relevant products and/or services.
- (g) *Credit Reporting Agency/Credit Bureau, Bank and/or Financial Institution(s)*. We may disclose your Personal Information to any credit reporting agency/credit bureau, bank and/or financial institution(s).
- (h) *Government agencies, statutory authorities, law enforcement agencies under law*. We may disclose your Personal Information to any government agencies, statutory authorities, and/or law enforcement agencies.
- (i) *Other Disclosures*. Regardless of any choices you make regarding your Personal Information, we may disclose Personal Information if we believe in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on us; (c) to protect or defend our rights or property or users of the Services; and/or (d) to investigate or assist us in preventing any violation or potential violation of the laws, this Privacy Notice, or the terms and conditions for the relevant products and/or services. We may also be required to transfer your personal data outside of the Philippines for the purposes and to such third parties stated in this Privacy Notice.

Third Party Websites

When you click on a link or, in case of smartphone and mobile device, do such other actions as requested to connect to any other website or location, you will leave the Services and be redirected to another site and another entity may collect Personal Information or Anonymous Information from you. We have no control over, do not review, and cannot be responsible for, these external websites or their content. This Privacy Notice do not apply to these external websites or their content, or to any collection of data after you click on links or do such other

actions to connect to these external websites.

Retention and Security of Your Personal Information

We place great importance on ensuring the security of your Personal Information and shall endeavor to regularly review and implement up-to-date technical and organizational security measures to safeguard the confidentiality and security of all your Personal Information. This includes contractual agreements with relevant third parties, whereby we shall endeavor to procure them to incorporate our standards as a minimum. Your Personal Information will also be retained in compliance with this Privacy Notice and/or the terms and conditions of your agreements for the duration of your relationship with us, for such period as may be necessary to protect our interests as may be deemed necessary, where otherwise required by the law or relevant regulation. We may require you to enter a password to access your Account information, and you should not disclose this to anyone.

Disclaimer: No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we use reasonable efforts to protect your Personal Information, we cannot guarantee its absolute security.

Your Rights to Access and Correct Your Personal Information

- (a) Choices. We offer you choices regarding the collection, use, and sharing of your Personal Information. Nevertheless, should you decline to provide any Personal Information that is essential to us to enable us to process your application/request (for example for the registration), we may not be able to process your application/request or provide you with this Service.
 - GHL and the Affiliates will periodically send you e-mails or messages that promote the use of the Services or offers which we believe may be important and beneficial to you. When you receive promotional communications from us by various channels, including telephone, e-mail, electronic/mobile message, facsimiles or post, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the “unsubscribe” instructions provided in the e-mail you receive, by terminating your Account or use of the Services by sending us a clear and legible image of your signed request in writing, together with your name and Account number to ph_helpdesk@ghl.com with the e-mail subject “Do not wish to receive marketing material”.
 - Despite your indicated e-mail preferences, you may not opt-out of communication related to the terms and conditions of the Services, including any updates to our terms and conditions or Privacy Notice unless you deactivate the use of the Services.
- (b) Changes to Personal Information. You may change your Personal Information in our possession or control through your profile within your Account to ensure that such Personal Information held by us is not inaccurate, incomplete, misleading or not up-to-date. To do so, please send us a clear and legible image of your signed request in writing, together with your name and Account number to ph_helpdesk@ghl.com with the e-mail subject “Update Personal Information”. We reserve the right to decline requests that jeopardize the security and privacy of the personal information of others

as well as requests that are impractical or not made in good faith. Additionally, it is important to note that system-recorded Personal Information is not editable. When we delete any information, it will be deleted from the active database, but may remain in our archives. To the extent permitted by law, we may also retain your information for fraud prevention or similar purposes required by laws.

What If Personal Information Provided by You Is Incomplete?

Where indicated (for example, during first-time sign-in for an Account and applying for our Services), it is obligatory to provide your Personal Information to us in order to enable us to process your application for an Account, or for us to provide you with our Services. Should you decline to provide such obligatory Personal Information, we may not be able to process your application and/or provide you with our Services.

Disclaimer: The accuracy and completeness of your personal data depends on the information you provide. We assume that the information you have provided is accurate, up to date and complete unless you inform us otherwise.

Revisions to Privacy Notice

We may review and update this Privacy Notice from time to time to reflect changes in the laws, in our business practices, procedures and structure, and the community's changing privacy expectations. The latest version of the Privacy Notice will be made available on the Platform.

Where we consider, at our sole discretion, that the revisions made on the Privacy Notice are substantive, notice of such revisions will be provided on the Platform or by such other means of communication deemed suitable by us, for example, by sending you an e-mail to the last e-mail address you provided to us. Please note that at all times you are responsible for updating your Personal Information and to provide us with your most current e-mail address. In the event that the last e-mail address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the e-mail containing such notice will nonetheless constitute effective notice of the changes described in the notice.

If you do not agree to the changes in our use of your Personal Information, you must notify us immediately and deactivate your Account or cease the Services with us. Continued use of our Services, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

Should you have any query in relation to this Privacy Notice or how we handle your personal data, you may send your queries in writing to ph_helpdesk@ghl.com or call at +632-77449445.

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