

PRIVACY POLICY

Introduction

Empire East Land Holdings, Inc. (the “Company” or “EELHI”) respects your privacy, and recognizes the importance of protecting the personal information that comes into its possession. Thus, EELHI has developed this Privacy Policy in order to protect your personal information in accordance with the Data Privacy Act of 2012 (“DPA”), its Implementing Rules and Regulations (“IRR”), and other issuances of the National Privacy Commission (“NPC”), and all other relevant laws of the Philippines.

Under the DPA, 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.

This Privacy Policy discusses the following:

- a) What information we collect, why we collect it, how we use it, and to whom we may disclose it;
- b) How you may manage your personal information; and
- c) How we protect your personal information.

By providing EELHI with your personal information, you have explicitly authorized and consented to our collection, use, access, transfer, storage, and processing of said personal information.

Why do we collect your personal information?

If you are a buyer or a prospective buyer, we collect your personal information for, among others, the following purposes:

- a) To provide you with the products and services that you requested, including customer support;
- b) For communication purposes, such as providing you with information as regards your account such as, among others, your remaining balance;
- c) To comply with legal requirements;
- d) To prevent and/or detect crimes such as, but not limited to, fraud and/or money laundering;
- e) For statistical, analytical, and/or research purposes;
- f) For the conduct of due diligence;

- g) For the preparation of contracts and other documents in relation to your purchase of EELHI's product/s;
- h) To perform financial processes in relation to your purchase of EELHI's product/s;
- i) To manage the turn over of unit/s and/or lot/s to EELHI's buyers;
- j) For any other purpose in relation to those mentioned above.

If you are a tenant or a prospective tenant in any one of EELHI's commercial properties, we collect your personal information for, among others, the following purposes:

- a) To provide you with the products and services that you requested, including customer support;
- b) For communication purposes, such as providing you with information with regard to your account such as, among others, your rental payments;
- c) To provide information about other EELHI products that may be of interest to you;
- d) To comply with legal requirements;
- e) To prevent and/or detect crimes such as, but not limited to, fraud and/or money laundering;
- f) For statistical, analytical, and/or research purposes;
- g) For the conduct of due diligence;
- h) For the processing of your application to become a tenant in any one of EELHI's commercial properties;
- i) For the preparation of contracts and other documents in relation to your application to become a tenant in any one of EELHI's commercial properties;
- j) To perform financial processes in relation to your application to become a tenant in any one of EELHI's commercial properties;
- k) For any other purpose in relation to those mentioned above.

If you are a contractor or supplier, we collect your personal information for, among others, the following purposes:

- a) For communication purposes;
- b) To comply with legal requirements;
- c) To prevent and/or detect crimes such as, but not limited to, fraud and/or money laundering;
- d) For statistical, analytical, and/or research purposes;
- e) For the conduct of due diligence;
- f) To evaluate your proposal, and for the conduct of appropriate background checks;

- g) To communicate with you in relation to, among others, EELHI's requirements;
- h) For any other purpose in relation to those mentioned above.

If you are an applicant, or an employee, we collect your personal information for, among others, the following purposes:

- a) For conducting background check, including interviews, as well as to determine suitability for the position being applied for;
- b) For conducting various tests, such as, among others, aptitude tests, personality tests, etc.;
- c) For facilitating medical check-ups;
- d) For administration of employee benefits, as well as for payroll processing;
- e) For conduct of trainings;
- f) For performance assessments;
- g) For any other purpose in relation to those mentioned above.

If you are a shareholder, we collect your personal information for, among others, the following purposes:

- a) For the administration of corporation-shareholder relationship;
- b) For communicating various information, such as, but not limited to, those involving EELHI's performance;
- c) For any other purpose in relation to those mentioned above.

What type of personal information do we collect?

In the course of your transaction with our Company, we may collect personal information including, but not limited to, the following:

- a) Name, gender, citizenship, civil status, employment status, address/es, telephone number/s, employer's name, position, email address, as well as that of your spouse, and any other information relating to you which you have submitted to us in the course of your dealings with EELHI.
- b) Credit history, bank account, and any other information which will enable us to conduct due diligence.
- c) Employment history, educational background, resume, income information if you apply to work for EELHI.

How do we obtain your personal information?

We collect your personal information in many ways, such as, but not limited to, when you:

- a) Purchase any of EELHI's products;
- b) Interact with any of our agents, customer service representatives, or other employees;
- c) Give your information in making inquiries, requests, and/or complaints;
- d) Apply for employment with EELHI;
- e) Submit your personal data for any other reason.

Should you disclose to us personal information belonging to another person, you attest that his/her/their consent to this Privacy Policy has/have likewise been obtained.

With whom do we share your personal information?

EELHI may share your personal information, depending on the product or service concerned, to the following:

- a) Member companies of the Alliance Global Group, the group of companies to which EELHI belongs;
- b) EELHI joint venture partners, affiliates, and subsidiaries;
- c) EELHI employees, officers, and/or consultants;
- d) EELHI's external lawyers and/or auditors;
- e) Insurers and credit providers;
- f) Banks, credit card companies, and their service providers;
- g) Suppliers or subcontractors, third party service providers, consultants that have been contracted by EELHI to provide various services;
- h) Businesses offering marketing programs such as event sponsorships, among others;

To what extent do we share your personal information?

We may share your personal information:

- a) To the extent that we are required to do so by applicable law and/or rules and regulations;
- b) In relation to any ongoing or prospective legal proceeding;
- c) To prospective buyers or buyers of any of the assets that EELHI may want to sell;

Any company with which we share information about you for the above purposes is contractually required to: a) comply with confidentiality standards; and b) comply with the Data Privacy Act. This includes companies/organizations which handle or obtain personal information as service providers for EELHI.

How do we protect your personal information?

We have implemented technological, organizational, and physical security measures to protect your personal information from loss, misuse, modification, unauthorized or accidental access or disclosure, alteration, and/or destruction. Some of the safeguards that we have put up are as follows:

- a) Restricting access to your personal information only to qualified and authorized personnel who are instructed and trained to keep your personal information confidential;
- b) Keeping and protecting your personal information using secured servers protected by a firewall.

How long do we keep your personal information?

We will retain documents containing your personal information: a) for as long as EELHI is required by law; b) for as long as our contract with you will warrant; c) if we believe that the same is/are needed for ongoing or prospective legal proceedings.

Documents not falling under the circumstances mentioned above shall be disposed of in a secure manner to ensure that further processing, access, or disclosure to other parties may no longer be done.

Does EELHI use a CCTV system?

EELHI uses a CCTV system in capturing images and videos of employees and EELHI clients, among others, to monitor security, crime and emergency incidents or situations within EELHI's offices and projects. The CCTV data is stored in secure locations and may be accessed by authorized EELHI and subsidiary personnel for legitimate purposes. EELHI, pursuant to a legitimate request, may share CCTV images and videos with appropriate government agencies, or any other authority, for investigatory or other legitimate purposes.

Individuals identified on the CCTV system have the right to request for access to footage subject to confirmation and approval of EELHI.

How can you access, correct, and/or update the personal information you have given us?

Should you want to access, modify, erase, and/or object to the processing of your personal information, you may send your request to us through our Data Protection Officer:

Amiel Victor A. Asuncion
12/F Alliance Global Tower
36th St. corner 11th Avenue,
Uptown Bonifacio, Taguig City
(632) 554 4800 / 867 8351 loc. 2503
attyasuncion@empire-east.com

What if there are changes in EELHI's Privacy Policy?

It may be necessary for EELHI to update this Privacy Policy from time to time. Should there be any revisions to the Privacy Policy, the revised version shall be displayed on EELHI's website. The said revisions will take effect immediately, however, the same will not be applied retroactively.