



## POLICY ON DATA PRIVACY

Sta. Lucia Land, Inc. and its subsidiaries (SLI) 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

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;

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. Any information you submit when to our sales, account management, customer relations agents and marketing partners for update 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.

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.

### **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;
- Other uses by nature of our transactions

In addition, 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 a 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 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);
- While employed, for your performance evaluation and career development including seminars, trainings, workshops, and compliance monitoring,
- Upon separation, to process your data for the exit interview and preparation of your final pay

When you inquire about or acquire a property:

- on your obligations to SLI;
- To conduct appropriate credit investigation to assess the risk of you defaulting on your obligations to SLI;
- 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.ph](http://stalucialand.com.ph):

- 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.

### **Sharing of Personal Information**

SLI may share personal data between and amongst 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, and other service providers. SLI may also share information in accordance with any order from any relevant government agency as provided by law.

### **Personal Information Retention and Protection**

We retain your personal information:

1. To the extent necessary in keeping track of your transaction and records and 10 years after its fulfillment.
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.

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.

### **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; and
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.
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.

#### **Contact Us**

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

Data Protection Officer:	Mr.Ace Franziz D. Cuntapay
Company Address:	Penthouse Bldg. III, Sta. Lucia Mall, Marcos Highway cor., Felix Ave., Cainta, Rizal, 1990
Telephone Number:	681-7332 local 129
Email Address:	afdcuntapay@stalucialand.com.ph