



PRIVACY POLICY

INTRODUCTION

Orchard Property Marketing Corporation (OPMC), a subsidiary of Sta. Lucia Land Inc., respects your privacy and recognizes 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.

Personal data refers to all types of personal information, sensitive personal information and privileged information. Personal information refers to “any information, whether or not recorded in any form, from which the identity of an individual is apparent or can reasonably and/or directly be ascertained by the entity holding the information, or, when put together with other information, would directly and certainly identify an individual”.

This Privacy Policy pronounces how OPMC process (how it collects, uses, shares, and keeps) and protect your personal data. It also provides the steps that you can take should you wish for any change in how we use your personal data, or if you want us to stop using your personal data.

Why do we collect your personal data?

To enable us to comply with our corporate policies in relation to our buyers 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.

Generally, the purposes for which we collect and use your data may be:

- To perform functions necessary to deliver the properties offered by OPMC:
 - To process booking and to conduct due diligence for, and execution of, our sale transaction.
 - To respond to inquiries, requests and complaints efficiently and timely;
 - To improve customer service through feedbacks
 - To inform (through telephone call, SMS or email) about account and project updates, upcoming new projects, latest promotions and other events
- To facilitate online transactions and communicate through interactive user platforms for buyers and prospective buyer’s queries (e.g. live chat, etc.)
- 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 relating to any of the above.



In addition, we may also use your personal information depending on your transactions with us in any of the following means:

- When you apply for a position in our company:
 - 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 buy a property:
 - on your obligations to OPMC and SLRDI or SLLI and, OPMC and Joint Ventures;
 - To conduct appropriate credit investigation to assess the risk of you defaulting on your obligations to OPMC and SLRDI or SLLI ,and OPMC and Joint Ventures;
 - To administer the sale and the turnover of a particular property which necessarily includes the preparation of all documentation leading to the transfer of title, and perform all financial processes (reservation fees, amortization, turnover fees, etc.) as a result of our transaction;
 - To update our records and keep your contact details and billing address up to date;
- When you apply to become a Seller for OPMC
 - To evaluate and verify validity of license and other required documents for accreditation;
 - To communicate schedules of trainings, seminars, and other activities related to sales;
 - When you make a sale or achieved your sales quota, to process release of commissions and sales incentives (services, travel, vehicle, etc.)
- When you visit our website at www.opmc.ph:
 - To allow you to send us inquiries and request for project information and price quotation.



What type of personal data do we collect?

The common type of data collected by OPMC includes the following:

- Basic personal information, such as full name, home addresses/billing address/shipping address, e-mail address, employment information, telephone, other personal contact numbers;
- Sensitive personal information, such as age, nationality, marital status, gender, education and government issued identification document which includes, but not limited to identity (ID) cards, licenses, social security, TIN number and passport number;
- Employment record, such as educational background, employment history, certifications, trainings attended, resume and income information of your previous jobs;
- Financial details such as credit history, bank account, credit card, and debit card information you have provided as a result of our transaction.
- Health declaration forms following guidelines imposed by the local and national government, including the Department of Health and Tourism, in detection and prevention of spread of infectious diseases.

You are responsible for ensuring that all data, whether personal information, sensitive personal information or privileged information, you submit to OPMC is accurate, complete and up-to-date.

How we collect, acquire or generate your data?

We collect data when you:

- Submit a job application;
- Submit a proposal and/or business-related documents;
- Fill-out our forms and submit necessary documents;
- Submit information through any form on our website or contact us through any of our social media accounts;
- Purchase any of our properties, avail of promos;
- Respond to surveys, promotions, and other marketing and sales initiatives;
- Provide personal information in relation to inquiries, requests, and complaints
- Disclose your personal information through telephone calls, emails, SMS or verbal communication with our authorized representatives.
- Cameras, including CCTV and thermal scanners.

Sharing of Personal Information

OPMC may share personal data between parent companies (Sta. Lucia Realty Development Inc. or Sta. Lucia Land Inc.) and Joint Venture Partners to enable them to provide you personalized services. OPMC may also share personal data with consultants and service providers who need access to such information to carry out work on behalf of OPMC. If and when it becomes necessary, a data sharing agreement shall cover any sharing of data between and among OPMC, Joint Venture Partners, and service providers. OPMC 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 5 years after its fulfillment.
2. If you have an existing contract with OPMC, the information will be retained all throughout the contract period and 5 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, please note that we may continue collecting and processing the submitted 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.

Should you need to access, modify, erase and/or object to any processing of personal, sensitive or privileged data that you have provided to us. You may contact our Data Protection Officer with the following information:

- **Email Address:** dpo@opmc.ph
- **Address:** Unit 708 West Tower, Philippine Stock Exchange Centre, Exchange Road, Ortigas Center, Pasig City, 1605
- **Phone No.:** (02) 8635-4946

We may periodically update or amend our Privacy Policy in order to adhere to new and existing laws affecting the Data Privacy Act, 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.

Website Privacy Policy

INTRODUCTION

This Website Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information when you use the service and tells you about your privacy rights and how the law protects you.

We use your personal data to provide and improve our service. By browsing our website, you agree to the collection and use of information in accordance with this Website Privacy Policy.

DEFINITIONS

The following definitions shall have the same meaning regardless of whether they appear in singular or in plural. For the purposes of this Website Privacy Policy:

- **Company** (referred to as either “OPMC”, "the Company", "We", "Us" or "Our" in this Agreement) refers to Orchard Property Marketing Corporation.
- **Country** refers to: Philippines
- **Device** means any device that can access the service such as a computer, a cellphone or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service** refers to the website.
- **Service Provider** means any natural or legal person who processes the data on behalf of the company. It refers to third-party companies or individuals employed by the company to facilitate the service, to provide the service on behalf of the company, to perform services related to the service or to assist the company in analyzing how the service is used.
- **Usage Data** refers to data collected automatically, either generated by the use of the service or from the service infrastructure itself (for example, the duration of a page visit).
- **Website** refers to Orchard Property Marketing Corporation, accessible from <https://www.opmc.ph/>.
- **You** means the individual accessing or using the service, or the company, or other legal entity on behalf of which such individual is accessing or using the service, as applicable.

COLLECTING AND USING YOUR PERSONAL DATA

Why do we collect your personal data?

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- To facilitate online transactions and communicate through interactive user platforms for buyers and prospective buyer's queries (e.g. live chat, etc.)
- 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 relating to any of the above.

Types of Data Collected

I. Personal Data

While using our service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to:

- Basic personal information, such as full name, country of residence, e-mail address, telephone, other personal contact numbers or social media account name;
- Employment record, such as educational background, employment history, certifications, trainings attended, and resume jobs for job application purposes.

You are responsible for ensuring that all data, whether personal information, sensitive personal information or privileged information, you submit to OPMC is accurate, complete and up-to-date.

II. Usage Data

Usage Data is collected automatically when using the service.

Usage Data may include information such as your Device's Internet Protocol address (e.g., IP address), browser type, browser version, the pages of our service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.



When you access the service by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit our service or when you access the service by or through a mobile device.

III. Cookies

A cookie is a simple text file that is stored on your computer or mobile device by a website's server and only that server will be able to retrieve or read the contents of that cookie. Each cookie is unique to your web browser. It will contain some anonymous information such as a unique identifier and the site name and some digits and numbers. It allows a website to remember things like your preferences. Using our website will result in us placing cookies on your computer in the 3 categories set out below:

- **Strictly necessary:** These cookies are essential to enable you to move around the website and use its features, such as accessing secure areas of the website; many of the functions on our website will not work properly, or at all, if you do not allow these cookies to be used. We may therefore be unable to provide many of the services you may wish to request unless you accept the use of these cookies.
- **Performance:** These cookies collect information about how visitors use a website, for instance which pages visitors go to most often. These cookies do not collect information that identifies a visitor: all information these cookies collect is aggregated and is therefore anonymous. The information is only used to improve how the website works.
- **Functionality:** These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features (for example, remembering changes you have made to text size and fonts).

RETENTION OF YOUR PERSONAL DATA

All data collected digitally from the Website Contact Us form, Website Zendesk Chat, and Website Online Application will be retained by the company for a maximum of six (6) months from the date of accomplishment of forms and shall be deleted from all databases, hard drives and on mobile storages upon expiration.

TRANSFER OF YOUR PERSONAL DATA



Your information, including personal data, is processed at the OPMC's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

Your consent to this privacy policy followed by your submission of such information represents your agreement to that transfer.

The company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and no transfer of your personal data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

DISCLOSURE OF YOUR PERSONAL DATA

OPMC may share personal data between parent companies (Sta. Lucia Realty Development Inc. or Sta. Lucia Land Inc.) and Joint Venture Partners to enable them to provide you personalized services. OPMC may also share personal data with consultants and service providers who need access to such information to carry out work on behalf of OPMC. If and when it becomes necessary, a data sharing agreement shall cover any sharing of data between and among OPMC, Sta. Lucia Realty Development Inc., Sta. Lucia Land Inc, Joint Venture Partners, and service providers. OPMC may also share information in accordance with any order from any relevant government agency as provided by law.

SECURITY OF YOUR PERSONAL DATA

The security of your personal data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

CHILDREN'S PRIVACY

Our service does not address anyone under the age of 18. We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us. If we become aware that we have collected personal data from anyone under the age of 18 without verification of parental consent, we take steps to remove that information from our servers.

LINKS TO OTHER WEBSITES

Our service may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.



We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

CONTENT OF WEBSITE

All information and content are checked for accuracy and legitimacy before being live on our website.

MANAGEMENT OF WEBSITE

OPMC uses third-party service providers, agents, affiliates and partners to perform functions such as creative design, marketing, analytics, programming, site maintenance, providing customer service, etc., on our behalf. These entities have access to the personal information needed to perform their functions and are contractually obligated to maintain the confidentiality and security of any personal information collected from the website. They are restricted from using, selling, distributing or altering these data in any way other than to provide the requested services to the website.

CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are subject to approval of DPO and effective when they are posted on this page.

CONTACT US

Should you need to access, modify, erase and/or object to any processing of personal, sensitive or privileged data that you have provided to us. You may contact our Data Protection Officer with the following information:

Email Address:	dpo@opmc.ph
Address:	Unit 708 West Tower, Philippine Stock Exchange Centre, Exchange Road, Ortigas Center, Pasig City, 1605
Phone No.:	(02) 8635-4946