

AEP'S PRIVACY POLICY

I. Policy Statement

Animal Empathy Philippines Inc. ("The Organization") respects the privacy rights of the data subjects under Republic Act ("Rep. Act) No. 10173, or the Data Privacy Act. This Privacy Policy (the "Policy") outlines the information (or data) which The Organization collects and how that information is/are used by it. This Policy applies to all website/s owned and/or operated by The Organization.

This Policy also instructs the data subject on what to do if the latter does not want his/her personal and sensitive personal information is collected, circulated, and/or further distributed to third parties. The data subject's internet browser and/or client software may transmit certain information to the servers that host the websites that he/she may visit. Such information may include the unique number assigned to the user's server and/or internet connection, the capabilities and features of the latter's computer, laptop, or any similar device, the geographic location, and the movement within and interaction with the website, including what web page/s the data subject may have visited at and what information the latter may have downloaded. When visiting The Organization's website, its servers may collect such information from the data subject and may use the same to collect statistics about the visitors to its website.

II. Collection of Personal and Sensitive Personal Information

The Organization collects personal and sensitive personal information to enable it to comply with its corporate policies in relation to the data subjects, who are its customers, as well as with the requirements and/or regulations imposed under the Data Privacy Act or any relevant privacy laws. As such, The Organization may collect, use, store, and/or retain any personal and sensitive personal information only as it is reasonable and necessary for a declared and specific purpose as stated in pertinent consent forms, whether in electronic or written form.

In general, The Organization may use personal and sensitive personal information for the following purposes:

- a) To provide information about the services which may be of interest to the data subject;
- b) To perform functions necessary to deliver the services and/or other products offered by The Organization;
- c) To conduct research and analysis, through surveys and/or polls to improve the organization's service;
- d) To respond to complaints, inquiries, requests from data subjects;
- e) For statistical purposes;
- f) To notify and update the data subject, through call, text, or email, about The Organization's commercial and/or promotional advertisements, and other direct

marketing that the organization deems relevant and beneficial to the data subject based on the latter's preference and/or interest initially provided to the organization or made aware of, with which the data subject may opt-out should the latter prefers not to receive these notifications;

- g) For promotional activities and/or advertisements on social media pages and/or websites owned and/or operated by The Organization;
- h) To customize The Organization's website and/or social media sites;
- i) To comply with legal and/or regulatory requirements or obligations; and,
- j) To perform such other processing or disclosure that may be required under law or regulations.

III. Auxiliary Use of Personal and Sensitive Personal Information Collected

Whenever applicable, The Organization may also use personal and sensitive personal information collected upon participation in any of The Organization's events and other marketing activities:

- a) Stores personal and sensitive personal information in the organization's database to inform and/or apprise about new promotions and/or future events;
- b) Evaluates personal and sensitive personal information to determine what promotional activities, prizes, and/or freebies would best suit to the data subject;
- c) Identifies validation when availing of discounts and/or rewards.

IV. Type of Personal and Sensitive Personal Information Collected

Any personal and sensitive personal information The Organization may have collected may include the following:

- a) Personal information such as full name, nickname, home address/billing address/shipping address, e-mail address, employment information, telephone, other personal contact numbers, username, and password;
- b) Sensitive personal information such as birth date, age, nationality, marital status, gender, health education and government-issued identification documents, including identity (ID) cards, licenses, and social security number.
- c) Financial details such as bank account, credit cards, and debit card information the data subject has provided as a result of the transaction.

The Organization shall presume that any information the data subject has submitted to it is accurate, complete, and up-to-date.

V. Manner of Collection, Acquisition, or Generation of Personal and Sensitive Personal Information

- a) Fill-up forms and other forms used in the course of the organization's business;

- b) Phone calls, emails, SMS, or verbal communication with the organization's authorized representatives;
- c) Through the organization's official website: **www.animalempathy.ph**
- d) Through accredited third parties.

VI. Web Cookies

The Organization's website/s uses cookies to analyze web traffic data from data subjects who have visited the organization's webpage. Cookies are small files being uploaded to the computer, laptop, or other similar device of the user to store information about the user's website preferences. The user has the option to stop cookie files from being downloaded to the device used.

The following are the only non-identifiable web traffic data that are collected and/or analyzed when visiting The Organization's website, which includes:

- a) Internet protocol (IP) address;
- b) Search terms previously used;
- c) The pages and internal links accessed on The Organization's website;
- d) Demographics;
- e) The date and time the data subject has visited the site, including frequency of visits;
- f) Geolocation;
- g) Operating system used; and
- h) Web browser type.

VII. Links to third-party websites

Whenever applicable, The Organization may provide links to third-party websites or advertisements that may contain links to third-party sites. These links are provided as additional services that The Organization may provide during its business. Unless covered by a data sharing agreement and/or the data subject's consent, the organization does not provide any personal and sensitive personal information to these websites or advertisers. Provided, however, that The Organization shall not accept responsibility for their privacy practices and/or regulations. These sites are owned and/or operated by independent entities that may have their own privacy policies and/or regulations, which the data subject is responsible for reviewing. The Organization's Privacy Policy does not apply to such other sites or to the use that those entities make of the data subject's personal and sensitive personal information. Considering that these entities have separate juridical identity/personality entirely different from The Organization, the latter has no control over the content displayed on such sites, nor over the measures, if any, that are taken by such sites to protect the privacy of the data subject's information.

VIII. Sharing of Personal and Sensitive Personal Information

The Organization generally does not allow sharing personal and sensitive personal information to third-party/ies, except under the following circumstances below.

By giving consent, the data subject authorizes The Organization to disclose personal and sensitive personal information to accredited/affiliated third parties or independent/non-affiliated third parties, whether local or foreign, on any of the following circumstances:

- a) As necessary for the proper execution of processes in relation to the purposes declared in this Policy; and/or;
- b) The use or disclosure is reasonably necessary, required, or as authorized by or under law, i.e. civil, criminal or administrative court action, subpoena and/or order issued by judicial or quasi-judicial body, etc.

Whenever the above scenario/s is/are present, The Organization may provide personal and sensitive personal information to the following:

- a) The Organization's affiliates, subsidiaries, partner companies, organizations, or agencies, including their sub-contractors or prospective business partners that act as the organization's service providers and contractors;
- b) Law enforcement and government agencies;
- c) All third parties, a list of which is available upon request with the Data Protection Officer at the contact details below, with which the organization shares the personal and sensitive personal information that are required to use the same in a manner that is consistent with this Policy.

However, these companies may only use such personal data for the purposes disclosed in this Policy and not for any other purpose.

The Organization undertakes to ensure that any personal and sensitive personal information it has collected, used, and/or disclosed are accurate, complete, and up-to-date. As such, the organization has implemented the required technological, organizational, and physical security measures to protect any personal and sensitive personal information it has come across from loss, misuse, modification, unauthorized or accidental access or disclosure, alteration, or destruction. In addition, the following are the safeguards that are being implemented:

- a) The company keeps and protects personal and sensitive personal information by using a secured server behind a firewall, deploying encryption on devices, and physical security controls;
- b) The company restricts and/or limits access to personal and sensitive personal information only to qualified and/or authorized personnel under strict confidentiality.
- c) Any personal and sensitive personal information that are passed on in The Organization's website is initially processed and stored in such website. Only authorized personnel can access and download such personal and sensitive personal information from its system.
- d) If the manner of payment to avail of the services of The Organization is through a credit or any other access device issued by an authorized credit and/or debit card issuer, The Organization will not reveal the entire access device number except if needed by the

appropriate issuing card company during order processing or as required under regulations imposed by the Bangko Sentral ng Pilipinas or by law.

IX. Where and How Long Personal and Sensitive Personal Information are Being Kept?

Personal and sensitive personal information that The Organization collects are stored in its facilities located in the Philippines and are retained in accordance with ISO 9001:2015 Records Management Manual, industry standards, laws, and regulations, unless such are requested to be deleted from its systems, databases, and hardcopies within a reasonable time, and subject to limitations stated in relevant laws and rules. Once deleted, such personal and sensitive personal information will no longer be searchable or included in anonymous searches and shall be completely removed from all storage locations.

X. Changes in the Privacy Policy

The Organization may revise this Policy as needed or as required under regulations imposed by the National Privacy Commission or any amendment to the Data Privacy Act.

XI. Data Subject's Rights

The following are the rights accorded to the data subjects:

- a) Right to be informed of the collection and processing of personal and sensitive personal information;
- b) Right to object to the processing of personal and sensitive personal information;
- c) Right to have reasonable access to personal and sensitive personal information;
- d) Right to rectify or correct any inaccuracy or error to personal and sensitive personal information;
- e) Right to suspend, withdraw, or order the blocking, removal, or destruction of personal and sensitive personal information;
- f) Right to obtain a copy of personal and sensitive personal information in an electronic or structured format if the same is processed by electronic means and in a structured and commonly used format; and
- g) Right to be indemnified for damages.

Inquiries, clarifications, or requests in relation to this Policy may be emailed to The Organization's Data Protection Officer at team@animalempathy.ph.