

## DATA PRIVACY POLICY

Welcome to PLDT Enterprise Connected, an exclusive online community composed of PLDT Enterprise customers hosted by Vision Critical Communications PTY Limited on [www.pldtenterpriseconnected.com](http://www.pldtenterpriseconnected.com) ("Website"), on behalf of PLDT ("Us", "We", or "Our").

At PLDT, We draw inspiration from you, our customers, and in the data that you entrust to us to better our services and to ensure that your business reaches its full potential. As such, your privacy is of utmost importance and We are committed to protecting the personal information and/or sensitive personal information that you may provide us through the Website (however accessed and/or used, whether via personal computers, mobile devices, or otherwise). When you create an account on the Website and use the same, you can be confident that any personal information and/or sensitive personal information you share with Us will only be used by Us. Your individual responses will be kept confidential and never linked to your personal information without your expressed permission.

As a condition for becoming a member of PLDT Enterprise Connected and participating in the activities on the Website, you permit PLDT and its [subsidiaries, affiliates](#), and [subcontractors](#) to process and/or disclose personal data that may be classified as Personal Information or Sensitive Personal Information under Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012, in order to undertake activities that may include, among others, the following:

1. Conducting analysis for purposes of research and marketing initiatives, including the generation of anonymized or non-personally identifiable location and mobility data to show footfall, location patterns, crowd density, and other information that may be relevant for marketing purposes;
2. Managing your account, providing customer care activities, monitoring the quality and security of the network, training our staff, and providing the services to you in a timely and efficient manner;
3. Generating statistical insights based on usage/network information to assist the Government in planning for healthcare, disaster, and other similar initiatives;
4. Credit scoring programs and initiatives, including but not limited to providing information to the Credit Information Corporation in furtherance of the objectives of Republic Act No. 9501, otherwise known as the Credit Information System Act;
5. Sending commercial and promotional advertisements, loyalty and rewards offers, surveys, customer-care, and after sales communications, and other broadcast push messages;
6. Sharing your personal data with third-party content providers or other third-party services for which you sign up; and
7. Such other processing or disclosure that may be required under law or regulations.

As a member of the PLDT Enterprise Connected online community, you are free to choose whether or not to participate in a survey, forum, or online discussion. You are also free to choose not to answer any specific question and to discontinue participation at any time. This Privacy Policy applies only to information collected using the Website. Together with the Terms and Conditions, this Privacy Policy sets forth the general rules and policies governing your use of the Website.

## **ACCEPTANCE OF TERMS OF THE PRIVACY POLICY AND CONSENT TO THE USE OF YOUR PERSONAL INFORMATION**

### **Personal Information and Sensitive Personal Information**

"Personal information" means any information from which the identity of an individual is apparent or can be reasonably and directly ascertained, or when put together with other information, would directly and certainly identify an individual. This would include, among others, your name, postal address, telephone number, and e-mail address. "Sensitive personal information", includes, among others, any personal information about an individual's race, ethnic origin, marital status, age, color, and religious, philosophical, or political affiliations, and personal information issued by government agencies peculiar to an individual such as social security numbers, health records, licenses, or tax returns. For the purpose of this Privacy Policy, both personal information and sensitive personal information shall be referred to as "Personal Information".

In addition, Personal Information does not include information used in its aggregate form such that it is impossible to identify personal information or the identity of to whom such information pertains. Data that you provide whenever you access and use the Website that is not linked in any way to your Personal Information or your identity and is aggregated with other participant data, is not considered to be Personal Information. For example, provided We remove any connection to your name or other personally identifiable information, We are free to use data you may provide about your thoughts and opinions on technology, etc., in combination with other aggregate data provided by other participants. The Website will not collect any Personal Information about you, unless you voluntarily choose to provide it to Us (e.g., by completing a questionnaire or participating in surveys). If you do not want your Personal Information collected, please do not submit it to Us, and remember to use only the publicly accessible portions of the Website.

When you create an account on the Website and complete the initial questionnaire, you will be required to furnish Us with the following information, some of which may be considered as Personal Information or Sensitive Personal Information:

- Demographic information, including gender, age, birthday, location of workplace, and mobile number;
- Specific information, including your role in the company/business, role in deciding telecom/ICT subscription for the company, and other similar information.

When you participate in individual surveys, We will collect information in order to get a better sense of your opinions about technology and products or services may be of interest to your business. We also collect feedback and comments you provide to Us, and any other Personal Information You voluntarily provide.

## **Non-Personal Information**

Non-personal information is any information that is impossible to personally identify you, as well as Personal Information or Sensitive Personal Information that has been de-identified or information that has been rendered anonymous. We obtain non-personal information about you from information that you provide Us, either separately or together with your Personal Information or Sensitive Personal Information. We also automatically collect certain non-personal information from you when you access the Website, including, but not limited to, IP addresses (or some other unique identifier for the particular device you use to access the Internet), the type of browser you are using, the third party website from which your visit originate, the operating system you are using, the domain name of your Internet Service Provider, the search terms you use on the Website, the specific web pages you visit, and the duration of your visits.

## **Our Use of Your Personal Information, Sensitive Personal Information, and Non-Personal Information**

We use the Personal Information or Sensitive Personal Information you provide through your participation in the Website primarily for market research purposes. Subject to your agreement to receive emails from the Website, We may also use this information to later contact you for a variety of reasons, including providing you with promotional information for PLDT's products or those of PLDT's subsidiaries and other affiliated companies, or to send periodic e-mails asking for your views on various technology issues and ideas. Certain Personal Information or Sensitive Personal Information (i.e., as may be provided when you sign up for the Website) you provide in your profile will be used by Us to help us understand your opinions in order to assist us in determining which studies are more suitable for your participation. But such information will never be used in any way to target you for particular marketing or solicitation activities.

Otherwise, your information and opinions are used in non-personally identifiable aggregate form with other participant data to conduct both quantitative and qualitative market research. We reserve the right to share the information obtained, including, but not limited to, aggregate data, with other members of the [PLDT Group of Companies](#) ("PLDT Group") to equip the PLDT Group with a better understanding of its customers' product and service needs, and to learn how to best design, develop, and package products and services to meet those needs. We may likewise provide information to the government in the event a lawful demand is made.

As the Website is operated by Vision Critical Communications (US), Inc., on behalf of PLDT, please note that your Personal Information or Sensitive Personal Information will be shared with Vision Critical Communications (US), Inc. There may also be instances where your Personal Information or Sensitive Personal Information will be shared with other third party vendors performing functions on our behalf. Vision Critical Communications (US), Inc. and our vendors agree to use this information only to carry out PLDT's requests and in accordance with PLDT's instructions, as well to take the appropriate measures to secure and protect your privacy in relation to such information.

Any Personal Information you provide Us outside of your participation in the Website, such as the information you provided when you created an account on the Website, will be used only for the purposes set out in this Privacy Policy and will not be shared or sold to third parties without your prior approval. We may use a variety of technologies, now and hereafter devised, that automatically collect certain non-personal information whenever you visit or interact with the Website. We collect IP addresses for purposes of system administration, to report non-personal aggregate information to others, and to track the use of the Website. It is not Our practice to link IP addresses to anything personally identifiable, thus,

while your session will be logged, your identity will remain anonymous to us unless we feel it is necessary to achieve the purposes of the Website or to fulfill a government request, to conform with legal requirements, to protect Our legal rights or property, or in an emergency to protect the health and safety of the Website's users or the general public. The non-personal information may be used in a variety of ways, including to help analyze site traffic, understand customer needs and trends, carry out targeted promotional activities, and to improve our services. We may use your non-personal information by itself or aggregate it with information we have obtained from others. We may share your non-personal information with our affiliated companies and third parties to achieve these objectives and others, but remember that aggregate information is anonymous information that does not personally identify you.

### **Information Storage, Access, Sharing, and Disclosure**

The Personal Information collected is stored on a secure, password-protected server throughout your membership in the online community, provided that you are still employed by the same company, and for a maximum period of five (5) years thereafter. Only authorized personnel, including the authorized personnel of Vision Critical Communications (US), Inc. and third party providers, shall have access to your Personal Information. Individuals who will have access to the Personal Information will be required to keep your information confidential and shall be held accountable for their actions. Unless We are able to obtain your permission or the disclosure is required by law, We shall only share the Personal Information provided by you through the Website with Our affiliates and business partners or to third-party organizations engaged by Us to act on Our behalf.

We reserve the right to disclose your information to the extent authorized by government statutes. We reserve the right to disclose your personal information to Our authorized representatives or legal advisers (if requested in writing), Our dealers, related companies, professional advisers, including its accountants, auditors, and lawyers, government and regulatory authorities and other organizations, as required or authorized by law, and organizations who manage Our business and corporate strategies, including those involved in a transfer/sale of all or part of Our assets or business (including accounts and trade receivables) and those involved in managing Our corporate risk and funding functions (e.g. securitization). Our business partners shall be bound to uphold the same standards of security and confidentiality that We have committed to you under this Privacy Policy, and these business partners shall only use your information to carry out their specific business obligations to Us and to provide you with Website related services. Owing to the nature of the internet, We cannot guarantee and have no control over the public or third-party network through which you send your Personal Information to the Website.

### **Contests and Promotions**

We may offer contests and other promotions through the Website for registered users. By joining a contest or promotion, you are agreeing to the official rules that govern that contest or promotion, which may contain specific requirements of you, including allowing Us and the sponsor(s) of the contest or promotion to use your name, voice, and/or likeness in advertising or marketing associated with the contest or promotion. If you choose to enter a contest or promotion, your information may be disclosed to third parties or the public in connection with the administration of such contest or promotion, including, without limitation, in connection with winner selection, prize fulfillment, and as required by law or permitted by the contest's or promotion's official rules.

## **Public Forums**

The Website will have chat rooms, message boards, bulletin boards, or similar public forums where you and other users of the Website can communicate. The protections described in this Privacy Policy do not apply when you provide information (including Personal Information or Sensitive Personal Information) in connection with your use of these public forums. We may use Personal Information, Sensitive Personal Information, and non-personal information about you to identify you with a posting in a public forum. Any information you share in a public forum is public information and may be seen or collected by anyone, including third-parties that do not adhere to our Privacy Policy. We are not responsible for events arising from the use or distribution by other parties of any information you choose to publicly post or share through the Website.

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## **What can you do if you want to limit the use to which we put your personal information?**

You are always free to choose whether or not to participate in a survey, free to choose not to answer any specific questions, and free to discontinue participation in the Website at any time. You can refuse to consent to our collection, use, processing, storage, or disclosure of personal information or sensitive personal information about you for the Website. You may also withdraw your consent to any further collection, use, processing, storage, or disclosure of information about you in respect of the Website at any time by choosing to delete your account and terminating your membership in the Website.

## **Changes to this Privacy Policy**

We reserve the right to modify or supplement this Privacy Policy statement at any time. If We make any material change to this Privacy Policy, We will update the Website to include such changes and post a notice on the Website's home page with a link to the updated Privacy Policy. Please read any such notice and the new policy statement. We will seek your consent if we want to use your personal information or sensitive personal information for purposes other than those you have agreed to previously.

## **Additional Information**

You are entitled to certain rights in relation to the Personal Information and Sensitive Personal Information that may be collected from you, including the right to access, correction, and to object to the processing, as well as the right to lodge a complaint before the National Privacy Commission in case of violation of rights as data subject.

You may consult the PLDT Enterprise Data Privacy Officer at [DPO@pldt.com.ph](mailto:DPO@pldt.com.ph) for any concerns regarding your Personal Information or Sensitive Personal Information.