

# PRIVACY STATEMENT

## Our Privacy Commitment

Curo Teknika, Inc., respects our customers' fundamental right to privacy, and we commit to take great care in safeguarding your personal data. Curo Teknika has developed a Privacy Policy that aims to ensure that we adopt and observe appropriate standards for personal data protection in compliance with Republic Act No. 10173 or the Data Privacy Act of 2012 and its implementing rules and regulations.

While our Privacy Policy sets out the general principles that govern the collection, use, and disclosure of our customers' personal information, we have also developed this Privacy Commitment to inform you more specifically about our privacy practices.

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## Why we collect your personal information

As customers of Curo Teknika, we collect and maintain some basic information about you. We do so only for the following purposes:

- To create and nurture a relationship with you, so that we can continuously provide you with our services. For example, when you apply for any of our services, we collect personal information about you that will allow us to validate your identity and credit history for purposes of billing and collection of fees for the products and services that you avail from us.
  - To improve our products and services. We collect, use, process, and analyze how you use our products and services so that we can understand how to improve them for your benefit.
  - To understand your needs and preferences so that we can serve you better. Maintaining a record of the products and services that you avail from us allows us to gain a better insight of the kinds of offers that would be relevant to your preferences. From time to time, we may send you product recommendations that we think will interest you.
  - To continuously improve our business and operations. we analyze customer usage of our products and services to help us manage your account, provide customer care activities, monitor the quality and security of the products and services, train our staff, and plan for future growth. In all cases, we ensure to aggregate and anonymize this information so that you are never identified as an individual.  
*\* Aggregating simply means presenting information in segments or categories like industry groups; anonymizing means removing information that can personally identify you from the data*
  - We perform such other processing or disclosure that may be required to comply with pertinent laws, rules, or regulations.
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## Where we get these information

There are several ways we collect information about you.

### Information that you personally give us.

Most of the personal information we have are those that you have given us yourself. You provide us personal information when you:

- Apply for our services through Subscription Agreements, and other similar or related documents through our Sales representatives;
- Register for an account on our services;
- Get in touch with us to ask about something, file a complaint or request for service;
- Take part in our research and surveys;
- Become our Partner, Vendor, Contractor or Supplier; and/or
- When you apply for a job with us.

### Information we collect during our relationship with you

We also collect information as you use our products and services, like when you:

- Contract a service with us;
- Use our network, facilities and services;
- Use our apps, websites, and self-service channels and portals; and/or
- Join our events or loyalty programs.

### Information we collect from other sources

We also collect personal information about you through other activities such as our market research initiatives, when you contract a service with us, when you visit and use our websites, and from our subsidiaries, affiliates, third-party business partner, and from other sources to whom you have given your consent for them to share your information with us.

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## When we disclose personal information

There are a variety of circumstances where we may need to share some of the information that you have provided to us. In these cases, we ensure that your personal information is disclosed on a confidential basis, through secure channels, and only in compliance with the Data Privacy Act.

We will never share, rent, or sell your personal information to third parties outside of Curo Teknika except in special circumstances where you may have given your specific consent for, and as described in this policy.

In some instances, we may be required to disclose your personal information to our agents, subsidiaries, affiliates, business partners and other third-party agencies and service providers as part of our regular business operations and for the provision of our products and services. This means we might share your information with:

- Our service providers, contractors, and professional advisers who help us provide our products and services. This includes partner companies, organizations, or agencies, and

their sub-contractors. For example: our couriers for bill delivery and our customer contact centers for our pre- and post-sales hotline operations;

- Our Subsidiaries and Affiliates with whom you have also signed-up with. We do so only for the improvement of each other's business and operations. For example: we share information about your credit standing to facilitate your service applications with them, resulting in faster approvals;
- Other companies to whom you have also given consent for us to share your information with; and
- Law enforcement and government agencies, but only when required by laws and regulations and other lawful orders and processes.

For a list of our partners, please visit <https://www.epldt.com/company/subsidiaries/>

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## Third Party Technologies we are using

Curo Teknika uses Google Analytics to analyze web traffic data, collect standard internet log information, and details of visitor behavior patterns. Data generated is not shared with any other party. Web traffic data collected and analyzed includes:

- User Visits
- Behavior Flow
- Geographic Locations
- Sessions by Device
- Sessions by Browser & OS

Read more about Google's Privacy Policy here:

<https://www.google.com/policies/privacy/>

Curo Teknika uses Fabric as a mobile platform with modular kits that can be mixed and matched to build the best apps. Fabric (and Google) are a data processor and processes personal data on behalf of Curo Teknika and Curo Teknika apps. Data generated is not shared with any other party. Below are the kits that Curo Teknika uses:

- Crashlytics for weight crash reporting solution – crash reports
- Answers for real-time statistics on how Curo Teknika apps are being used - active user numbers, session length, stability rating, retention, user behavior and engagement.

Read more about Fabric for Android's Data Privacy here:

<https://docs.fabric.io/android/fabric/data-privacy.html>

Curo Teknika uses SurveyMonkey for creating customer surveys in relation to Curo Teknika Products and Services. All survey data created on SurveyMonkey is owned by Curo Teknika

and is treated by SurveyMonkey as private data (except if Curo Teknika have made the surveys available via a public link). Aside from personal information listed above, other data collected and analyzed includes:

- Survey Respondents' IP Address, Date & Time of Use
- Survey Responses

Read more about SurveyMonkey's Privacy Policy here:  
<https://www.surveymonkey.com/mp/policy/privacy-policy/>

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## How we protect your personal information

The integrity, confidentiality, and security of your information are important to us. That's why we strictly enforce our Privacy Policy within Curo Teknika and have implemented technical, organizational, and physical security measures that are designed to protect your information from unauthorized or fraudulent access, alteration, disclosure, misuse, and other unlawful activities. These are also designed to protect your information from other natural and human dangers.

We also put in effect the following safeguards:

- We keep and protect your information using a secured server behind a firewall, encryption and security controls;
- We keep your information only for as long as necessary for us to (a) provide the products and services that you avail from us, (b) for our legitimate business purposes, (c) to comply with pertinent laws, and (d) for special cases that will require the exercise or defense of legal claims;
- We restrict access to your information only to qualified and authorized personnel who are trained to handle your information with strict confidentiality.
- We undergo regular audits and rigorous testing of our infrastructure's security protocols to ensure your data is always protected;
- We promptly notify you and the National Privacy Commission, when sensitive personal information that may, under the circumstances, be used to enable identity fraud are reasonably believed to have been acquired by an unauthorized person;
- We let you reach out to us in order to update your information securely to keep our records accurate.

Curo Teknika will not collect, use, or disclose your personal information for any purpose other than those identified in this Commitment, your Service Agreement or our Terms of Service, and any other purpose that you may have given your consent for.

For greater clarity, unless you provide specific consent, we will not:

- Share your personal information with or sell it to our business partners and third-party service providers; or
- Use your personal information to enable third-party targeted advertisements.

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## What your choices are

You are afforded certain rights in relation to your personal data under the Data Privacy Act. We would like to ensure that we have your consent to continue to collect, use, and disclose your personal information for the purposes that we have identified. At the same time, we want you to know that you do have choices and can object or withdraw your consent and/or edit your consent preferences at any time.

If you wish to have access to your personal information in our records; or you think that such personal information we have of you is incomplete, not up-to-date, or otherwise inaccurate, you may get in touch with our Data Protection Officer through the contact details provided below. In some instances, we may request for supporting documents or proof before we effect any requested changes to your personal information.

Christopher de los Santos  
ePLDT, L.V. Locsin Building, Makati Avenue, Makati City  
[dataprivacyofficer@epldt.com](mailto:dataprivacyofficer@epldt.com)

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## **What happens when there are changes in our Policy**

From time to time, we may update our privacy policy and practices to comply with changes in applicable laws, to comply with government and regulatory requirements, to adapt to new technologies and protocols, to align with industry best practices, and for business purposes.

You will always be provided notice if these changes are significant and, if we are required by law, we will ensure to obtain your updated consent.

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