

## **Privacy Policy**

This Privacy Policy is meant to inform and help all users understand what information we collect, why we collect it, and users can update, manage, export, and delete your information.

When you use our services, you agree to the collection and use of your personal information in relation to this policy. The Personal Information that we collect is use to provide better and improved services to all our users such as the Loan Application Services. The information that we collect, and how that information is used, depends on how you use or services, and how you manage your privacy controls.

The Personal Information that we collect shall not be used or share with anyone except as described in this Privacy Policy.

Legazpi Savings Bank, Inc. seriously commits itself to the protection of your privacy rights. This Privacy Policy reflects our commitment to ensure that data subjects from whom we collect and process personal data about, are adequately informed of the organization's activities with respect to such data. In relation thereto, we endeavor to obtain your informed consent to continue processing your personal data under the terms provided hereunder.

### **Information Collection and Use**

For a better experience, while using our Service, we may require you to provide us with certain personally identifiable information, including but not limited to *Full Name, Birth Date, Address, Mobile Number and Photo of your identification cards*. We use the information we collect for the following purposes:

- To communicate with you, including sending of your loan information.
- To perform demographic and behavioural analysis to understand market's needs, wants and trends to be able to improve and recommend suitable products and services.
- Communicate with you regarding the Bank's products and services information, including offers, promotions, discounts, rewards, advisories and for personalizing your experience with our various touch points.
- Perform certain protective safeguards against improper use or abuse of our products and services including fraud prevention, abuse, security risks, and technical issues that could harm the Bank, our users, and the public.

- Comply with our operational, audit, administrative, credit and risk management processes, policies and procedures, the terms and conditions governing our products, services, facilities and channels, Legazpi Savings Bank, Inc's rules and regulations, legal and regulatory requirements of government regulators, judicial and supervisory bodies, tax authorities or courts of competent jurisdiction, as the same may be amended or supplemented from time to time.
- Comply with applicable laws of the Philippines and those of other jurisdictions including the United States Foreign Account Tax Compliance Act (FATCA), the laws on the prevention of money laundering including the provisions of Republic Act No. 9160 (Anti-Money Laundering Act of 2001, as amended (AMLA) and the implementation of know your customer and sanction screening checks.
- Comply with legal and regulatory requirements such as submission of data to credit bureaus, credit information companies, the Credit Information Corporation (CIC) (pursuant to RA No. 9510 and its implementing rules and regulations), responding to court orders and other instructions and requests from any local or foreign authorities including regulatory, governmental, tax and law enforcement authorities or other similar authorities.
- Perform other such activities permitted by law or with your consent.

Further, if you are, become, or apply to become, a client of our parent company and any of our subsidiaries and affiliates, Legazpi Savings Bank, Inc., its parent company and the subsidiary/ies and/or affiliate/s concerned have the option, but not the obligation to, rely upon, use, and share your relevant personal and/or account information for any of the following purposes:

- To facilitate your account opening or application with the concerned subsidiary/ies or affiliate/s;
- To validate, consolidate or update your customer information records and/or credit history;
- To provide consolidated billings, deposit or investment summaries or other reports as you may request;
- To send you advisories, reminders, announcements, promotions, offers, invitations and other notifications;
- To enroll you in loyalty or similar client-oriented programs of the Legazpi Savings Bank, Inc.;

- For research purposes or to design banking, financial, securities and investment or other related products or services for your use;
- To comply with a legal obligation to which Legazpi Savings Bank, Inc. or the concerned subsidiary/ies or affiliate/s is subject.

### **Third Parties**

Under an obligation of confidentiality, we allow access to personal data to authorized third-party service providers / vendors / suppliers / subcontractors / consultants who provide outsourced functions including, within or outside the Philippines, among others:

- Cloud storage facilities/systems to meet the company's storage management requirements;
- Credit Investigation;
- Collections;
- Marketing;
- Internet & Mobile applications; and
- Other outsourcing functions as approved by its Board of Directors.

The Company remains responsible over the personal data disclosed to such third parties. As such, we ensure that such third parties are contractually obligated to comply with the requirements of the Data Privacy Act of 2012 ( RA 10173) and its implementing rules and regulations and shall process your data strictly in accordance with the purposes enumerated above. You may request for additional information on the identities of these parties from the Office of the Data Protection Officer provided below.

We also disclose relevant and necessary personal data to government regulatory agencies in accordance with reportorial requirements established by law.

We do not share or disclose your personal data to unauthorized third parties without your consent unless we are legally required to do so.

### **How We Protect Your Data**

Legazpi Savings Bank recognized how valuable your personal information particularly information that we collected in opening an account, with these;

- LSB employees are regularly trained and familiarize on how to properly handle client's data.

- Access to client's data is limited to authorized LSB employees only.
- System security is deployed and regular updated to properly monitor any intrusion or unusual behaviour that may damage the system or the data.
- All data are encrypted and store on a secure Data Center
- Appropriate back-up and disaster recovery program are in place.

## **How Long Do We Keep Your Data**

We keep your data only for as long as is necessary for the fulfillment of the declared, specified, and legitimate purposes mentioned above and such other purposes you may have consented to over time, remains in effect and until such time that it is no longer required or necessary to keep your information for any other business, legal, and regulatory purposes.

We dispose of your data in a secure manner that would keep from being further processed and/or accessed by unauthorized parties in accordance with the organization's retention and disposal policy.

## **User Rights as a Data Subject.**

1. **The Right to be Informed** – This policy honors your right to be informed of whether personal data pertaining to you will be, are being, or were processed, including its disclosure to third parties, if any. As you will see above, we endeavored: i) to provide you with a description of the personal data we collect and process pursuant to purposes enumerated above; ii) to obtain your consent; iii) to explain the scope and method of the collection and sharing; and iv) the recipients of the personal data collected and shared;
2. **The Right to Object** - You have the right to object to the sharing of your data. Should there be any changes in the information provided to you in this policy, you shall be informed of such changes and your consent thereto shall be obtained before such changes are implemented.
3. **The Right to Withdraw Consent Anytime** - You have the right to withdraw your consent to this policy anytime.

4. **The Right to Access, Rectification, Erasure and/or Blocking** - You have the right to request for a copy of any personal data we hold about you, including the sources from which such data was collected and to whom the same is shared, if any. You may ask it from us through the contact information provided below and we will provide it in a machine-readable format. You have the right to have it corrected or revised if you think it is inaccurate or incomplete, subject to the submission of sufficient proof establishing the same. You have the right to suspend, withdraw or order the blocking, removal or destruction of your personal data should you a) discover that it is incomplete, outdated, false, unlawfully obtained, used for an unauthorized purpose, no longer necessary for the abovementioned purposes; b) withdraw your consent thereto; or c) discover violations of your right as a data subject.

We may charge a fee for processing your request/ for access, and/or updates. Such fee depends on the nature and complexity of your request. Information on the fees shall be made available to you prior to making your request.

### **Log Data**

We want to inform you that whenever you use our service and that in case of an error in the System, we collect data and information (through authorized third party products) through your device called "Log Data". This Log Data may include information such as your device Internet Protocol ("IP") address, device name, operating system version, the configuration of the system when utilizing our service, the time and date of your use of the service, and other statistics.

### **Cookies**

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory.

This service does not use these "cookies" explicitly. However, the System may use authorized third party code and libraries that use "cookies" to collect information and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this service.

## **Service Providers**

We may employ third-party companies ("third-parties") and individuals for the following purposes:

- To facilitate our Service;
- To provide the Service on our behalf;
- To perform Service-related services; or
- To assist us in analyzing how our Service is used.

We provide these third-parties access to your Personal Information for the effective performance of their assigned task on our behalf, based on our instructions and in compliance with our Privacy Policy and other appropriate confidentiality and security measures.

## **Security**

We value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. In the event that we detect something risky and we think that you should know about, we will notify you and help guide you through steps to stay better protected. However, remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

## **Children's Privacy**

These Services do not address anyone under the age of 7. We do not knowingly collect personally identifiable information from children under 7. In case we discover that a child under 7 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

## **Changes to This Privacy Policy**

We may modify and update our Privacy Policy from time to time to keep up with the changes in relevant laws and regulations applicable to us and to how we collect, use, protect, store, share, or dispose of your personal information. Be advised to review this page periodically for any changes.

## Contact Us

If you have any questions or suggestions about our Privacy Policy, and our personal data processing activities please reach us through the following contact information [c3@legazpibank.com.ph](mailto:c3@legazpibank.com.ph).

You may also write or email our

<b>Data Privacy Officer</b>	
Email	dpo@legazpibank.com.ph
Office Address	738 Building, Rizal Street, Old Albay District, Legazpi City 4500 Philippines