

PRIVACY POLICY

INTRODUCTION

Prime Orion Philippines, Inc. and its subsidiaries (collectively referred to as “Prime Orion”, “we”, “us” or “our”) recognize the importance of protecting your Personal Information. This is one way of sustaining our stakeholders’ trust in the company, and our products and services. Our privacy policy describes how we collect, protect and manage information from you through our websites, information systems and processes.

Prime Orion respects the confidentiality of Personal Information and is committed to comply with the Philippine Data Privacy Act of 2012. We value data privacy rights and strive to ensure that all personal information collected from our customers, vendors, partners, employees, associates and other stakeholders, are processed in adherence to the general principles of transparency, legitimate purpose and proportionality.

This Privacy Policy explains:

- What information we collect and why we collect it
- How we use that information and to whom we may disclose it
- The choices available to our stakeholders for them to manage their personal information
- How we safeguard personal information

By providing Prime Orion with your personal information in the use of any of our products and services as described in this Privacy Policy, you have explicitly authorized and consented to our collection, use, access, transfer, storage and processing of said personal data.

PERSONAL INFORMATION WE COLLECT

Personal information is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context.

1. CONSENT

By providing your Personal Information or by buying/availing of our products and services, you confirm your agreement to the terms and conditions contained in this Privacy Policy. Your rights under this Privacy Policy will be upheld when invoked by your lawful heirs or assigns.

2. PERSONAL INFORMATION

As part of our dealings with you, we may collect your personal data, including but not limited to:

- Your name, gender, civil status, date of birth, address, telephone or mobile numbers, email address, mailing address, proof of identification and any other information relating to you which you have provided us, in submission of any form, and as a result of our interaction with you either online or offline
- Your credit history, bank account and credit card information that you provide us in availing of our products and services
- Your employment history, education background, resume and income information when you apply for a job with us

- Information about your visit and use of our websites, digital platforms, and mobile apps, including but not limited to social media profile information, IP Addresses, your browsing behavior within and throughout our digital assets, and session lengths, that are collected by our website analytics tools and cookies that we may place on your computer. You may disable the use of cookies on your browser at any time.
- Your social media behavior when you tag, mention, or post photographs of any development of Prime Orion and its subsidiaries publicly on any social media account (e.g. Facebook, Twitter, Instagram, LinkedIn, etc.)
- Your work-related information regarding your company, your ownership and participation when you apply for vendor accreditation.

3. COLLECTING PERSONAL INFORMATION

We may collect and store your Personal Information in a variety of ways:

- When you purchase or avail of any of our products, services, promos, activities, and events
- When you interact with our lease or sales agents, reservation officers or specialists, through email, phone, chat services or face-to-face meetings.
- When you submit information through manual forms, and online forms on our digital assets (i.e. website)
- When you visit our premises with CCTV surveillance camera that are used for safety and security of our shoppers, guests, employees, and other visitors of our malls, offices, hotels, and resorts
- When you provide personal information in relation to inquiries, requests, and complaints
- When you respond to surveys, promotions, and other marketing and sales initiatives
- When you submit a job application
- When we receive references from third parties or our business partners (i.e when you have been referred by them)
- When you submit your personal information to us for any other reason

4. PERSONAL INFORMATION OTHER THAN YOURS

When you disclose to us another person's personal information (i.e your dependent, spouse, children and/or parents) you attest that consent has been obtained from that person to disclose and process personal information in accordance with this policy.

USE AND DISCLOSURE OF PERSONAL INFORMATION

1. USES OF YOUR PERSONAL INFORMATION

Prime Orion collects, uses and discloses your Personal Information for the following purposes:

- Provide you with product and services that you have requested, including customer support
- Enhance your customer experience by delivering product services that match your preference and needs
- Communicate relevant services, advisories, responses to your queries, requests and complaints
- Provide information about our products and services which may be of interest to you
- Comply with the requirements of the law and legal proceedings such as court order, comply with legal obligations, prevent imminent harm to the public, and to ensure public security, safety or order
- To prevent, detect and investigate crime, including fraud and money-laundering, and to analyze and manage other commercial risks
- Process information for statistical, analytical and research purposes

2. OTHER USES BY NATURE OF OUR DEALINGS

Aside from the general uses mentioned previously, we may use your personal information depending on your dealings with us in any of the following manner:

a. WHEN YOU INQUIRE ABOUT OR PURCHASE A PROPERTY

- To conduct appropriate due diligence checks
- To register your inquiry and address any follow-up calls
- To prepare all necessary sales documentation and any other documentation as may be requested
- To perform all financial processes related to the sale such as the set up of down payment, amortization or financing and perform other actions necessary or desirable in the implementation of our contract
- To manage all administration of unit turn over activities
- To communicate all advisories and changes in relation to the sale
- Any other purpose relating to any of the above

b. WHEN YOU APPLY TO BECOME A MERCHANT OR TENANT IN ANY OF OUR PROPERTIES FOR LEASE

- To conduct appropriate due diligence checks
- To register and process your application
- To prepare leasing documentation and any other documents as may be required
- To perform financial transactions such as the processing of rental payments and perform other actions necessary or desirable in the implementation of our contract
- To communicate any advisories, or changes in the terms and conditions related to your lease contract
- Any other purpose relating to any of the above

c. WHEN YOU ARE A VENDOR, A PROSPECTIVE VENDOR OR A CONTRACTOR

- To conduct appropriate due diligence checks
- To evaluate your proposal and to conduct corresponding background checks
- To assess your viability as a vendor and process your accreditation
- To communicate with you about matters relating to our required products and services
- To perform other actions necessary or desirable in the implementation of our contract
- Any other purpose relating to any of the above.

d. WHEN YOU APPLY FOR EMPLOYMENT OR BECOME OUR EMPLOYEE

- To conduct appropriate background investigation and reference checks and pre-employment medical examination and interviews , communicate with you the status of your candidacy.
- To be able to process your compensation, allowances, expense reimbursement and monitor your attendance and leaves;
- To enroll you in our benefit programs which may include health insurance, medical insurance, retirement plan and social security;
- To assist you in your professional development through performance management, career development, seminar, workshops and training
- To make you part of our employee engagements such as events, activities, and employee survey, incentives and discounts offered - subject to approval of management.
- To comply with our obligations under the law as required by government organizations and local government units;

- To Facilitate , upon separation with the company , your exit interview , clearances, and other procedures necessary to process your final pay
- Any other purpose relating to any of the above

e. WHEN YOU ARE OUR SHAREHOLDER

- To administer the relationship such as identification verification including identity of your nominated proxy
- Communicate the company's performance including products and services as well as changes in policies, terms and conditions through various medium applicable
- Any other purpose relating to any of the above

3. DISCLOSURE OF YOUR PERSONAL INFORMATION

a. We may disclose your personal information to the following as reasonably necessary depending on the product and service concerned:

- Our Employees and officers,
- Professional advisers such as lawyers and auditors
- Insurers and credit providers
- Banks, credit card companies and their respective service provider
- Suppliers or subcontractors, third party service providers , consultants that have been contracted by Prime Orion to provide financial, technical, architectural, administrative services such as information technology, payroll, accounting, sales administration, procurement, training , background investigation and other services
- Any third party businesses offering goods and services or sponsor contest or other marketing and promotional programs, where you have provided your consent.

b. We may likewise disclose your personal information as reasonably necessary and for the purpose set out in this policy to any of the following :

- Members of our group of companies or our subsidiaries and affiliates;
- Our parent company, Ayala Land, Inc., and ultimate parent company, Ayala Corporation, including all its subsidiaries and affiliates;
- Our joint venture and alliance partners;

c. We may disclose your personal information:

- To the extent that we are required to do so by applicable law and/or rules and regulations;
- In connection with any ongoing or prospective legal proceedings;
- To the buyer or prospective buyer of any business or asset that we are contemplating to sell;
- To the clients and/or customers availing of our products and services;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of such personal information where, in our reasonable opinion, such court or authority would be reasonably and is likely to order the disclosure of such personal information.
- Any company with which we share information about you for the above purposes is contractually required to comply with confidentiality standards, undertake to respect any individual's right to privacy and comply with the Data Privacy Act. We also require that these organizations use this information only for our purposes and follow our reasonable directions with respect to this information. This includes organizations which handle or obtain Personal Information as service providers for Prime Orion.

RETENTION AND DISPOSAL OF YOUR PERSONAL INFORMATION

We will retain documents (including electronic documents) containing your personal data:

- to the extent that we are required to do so by law;
- to the extent required by or pursuant to our contract;
- if we believe that the documents may be relevant to any ongoing or prospective legal proceedings in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

Thereafter, your personal information shall be disposed or discarded in a secure manner that would prevent further processing, unauthorized access, or disclosure to any other party or the public.

ACCESSING AND UPDATING YOUR PERSONAL INFORMATION

1. ACCESSING YOUR PERSONAL INFORMATION

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be subject to the supply of appropriate evidence of your identity .

- We may withhold personal information that you request to the extent permitted by law.
- You may instruct us at any time not to process your personal information for marketing purposes
- In practice, you will either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

2. UPDATING YOUR PERSONAL INFORMATION

If the personal information that we hold about your needs to be corrected or updated, Prime Orion shall make all reasonable efforts to ensure that data collected is current, complete and accurate. If you need to access, correct and/or update your personal information, you may send the request to corporate.popi@primeorion.com.ph or get in touch with the customer support team of the product or services that you availed.

As part of our security measures, we will contact you and conduct the necessary verification measures to process your request. Once we have implemented the necessary corrections, we shall then notify you that your request has been processed and completed.

3. WITHDRAWAL OF CONSENT

If you wish to withdraw your given consent for any or all purposes set out in this Policy, you may send your detailed request to corporate.popi@primeorion.com.ph. Depending on the nature of your consent withdrawal, Prime Orion may no longer be in a position to continue to provide products and services to you.

PROTECTING YOUR INFORMATION

1. PROTECTING INFORMATION YOU SUBMIT ONLINE

We take precautions to protect your information. When you submit sensitive information via any of our official website(s), information is protected both online and offline. Wherever we collect sensitive information (such as credit card data), this passes our payment gateway which encrypts and transmits the data to us in a secure way. All our critical websites undergo security scanning and penetration testing to reduce our websites' vulnerability against cyber security attacks. While we employ all necessary precautions to safeguard your information, the Internet is not 100% secure so we cannot

guarantee that information we collect or store will be protected from unauthorized access and thereby used in a manner that is inconsistent with this Privacy Policy.

2. HOW WE SAFEGUARD YOUR PERSONAL INFORMATION

We maintain physical, technical and organizational safeguards to protect your personal information against loss, theft, unauthorized access, disclosure, copying, use or modification. We also put in effect safeguards such as:

- Using secured servers behind advance threat protection appliances, firewalls, encryptions and other security tools
- We limit access of your personal information to those who are qualified and authorized to process them. All such persons, wherever they are located, are required by us to protect the confidentiality and privacy of your personal information in a manner consistent with our privacy policies and practices.
- Our information system/infrastructure undergo regular security vulnerability and penetration testing to ensure your personal information is properly protected.

THIRD PARTY WEBSITES

Our websites may contain hyperlinks and details of third-party websites . We have no control over, and are not responsible for, the privacy policies and practices of third parties. We therefore advise you to study their privacy policies. Once you leave our website, you should check the applicable privacy policy of the third-party website to determine how they will handle any information they collect from you.

COOKIES AND SIMILAR TECHNOLOGIES

A cookie is a small file which asks permission to be placed on your computer's hard drive. If you allow the use of cookies through your browser, the file is added and the cookie helps us analyze and identify browsing behavior within our digital assets. Cookies allow web applications to respond to you as an individual. The web application can customize its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website in order to properly respond to customer needs . We only use this information for statistical analysis purposes, after which the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. We may use your browsing behavior to develop promotional offers, products, and services that we feel are beneficial to you.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. However, doing this may prevent you from taking full advantage of the website.

MANAGEMENT AND SECURITY

A Data Privacy Officer for Prime Orion and corresponding Compliance Officers of Privacy for our subsidiaries have been appointed to manage and safeguard the handling of your Personal Information in compliance to the Philippine Data Privacy Act of 2012 or RA 1017 and this Policy. Prime Orion Management is committed to ensure that its Privacy Management Program is constantly reviewed, monitored and enhanced. Prime Orion regards personal information breaches very seriously.

POLICY FOR CAMERA SURVEILLANCE

Prime Orion and its subsidiaries use a CCTV system in capturing images and videos of employees, mall goers, hotel and resort guests and visitors to monitor security, crime and emergency incidents or situations within the premises. The CCTV data is stored in secure locations, accessed by authorized Prime Orion and subsidiary personnel for legitimate purposes and may be shared with appropriate authority for investigatory purposes.

Individuals identified on the CCTV system have the right to ask for access to footage subject to confirmation and approval of Prime Orion / subsidiaries' Management.

UPDATES TO THE POLICY

Prime Orion will amend this Privacy Policy from time to time. Prime Orion may also update this policy to apply changes due to new laws and regulations affecting the data privacy act, as well as changes in our business operations and environment. Any update will be posted on the Prime Orion corporate website with a date stamp so that you are informed of the latest Policy update.

HOW TO CONTACT US

For any comments, questions , or requests relating to this Privacy Policy or complaints for violation of your rights under this Privacy Policy, you may get in touch with:

Prime Orion Philippines, Inc.

corporate.popi@primeorion.com.ph.

+(632) 884 1106

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