

# Data Privacy Policy

## General

Axeia Group of Companies (the “Axeia Group,” “Company,” “We,” “Us,” or “Our”), is committed to protect the privacy and security of all personal and/or sensitive information (the “Personal Data”) related to its employees, customers, business partners, suppliers, contractors, and other parties that the Company will and is engaged into. For this reason, uniform practice and procedure for collecting, recording, consolidating, updating, disclosing, storing, accessing, transferring, retaining, destructing and disposing of Personal Data by the Company is hereby adopted in order to process Personal Data fairly, appropriately, and lawfully.

This Privacy Policy sets out the use, protection and control of the company over the personal data it process. The Company may change this policy from time to time by updating it in accordance with the Data Privacy Act of 2012, its Implementing Rules and Regulations, NPC Advisories and issuances and other relevant laws. The terms of this Privacy Policy apply to all persons whose personal data is processed by Axeia Group of Companies.

## Scope

This Privacy Policy applies to all data subjects whose personal data is used, collected, shared, stored, disclosed and processed by Axeia Group of Companies. However, the processing of personal information collected by third parties is subject to their own Data Privacy Policy except otherwise when processing is covered by a Data Sharing Agreement executed by and between Axeia Group and third-party service providers.

## Definition of Terms

- **“Data Subject”** – refers to an individual whose personal, sensitive personal or privileged information is processed by the organization. It may refer to officers, employees, consultants, and clients of this organization.
- **“Personal data”** - refers to all types of personal information
- **“Personal Information”** – refers to any information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual.
- **“Processing”** - refers to any operation or any set of operations performed upon personal information including, but not limited to, the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of data.
- **“Sensitive personal information”** refers to personal information:
  - (1) About an individual’s race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;
  - (2) About an individual’s health, education, genetic or sexual life of a person, or to any proceeding for any offense committed or alleged to have been committed by such person, the disposal of such proceedings, or the sentence of any court in such proceedings;
  - (3) Issued by government agencies peculiar to an individual which includes, but not limited to, social security numbers, previous or cm-rent health records, licenses or its denials, suspension or revocation, and tax returns; and
  - (4) Specifically established by an executive order or an act of Congress to be kept classified.

## **What do we collect?**

The Company collects Personal Information and Sensitive Personal Information of data subjects through our website for the purposes stated in this Privacy Policy. These include the following set of information:

- Name
- Email Address
- Civil Status
- Nationality
- Mailing Address
- Phone Number
- Birthday
- Gender
- Proof of Identification
- Bank Account Information
- Employment Information
- Educational Background
- Spouse
- Co-borrower
- Atty-in-fact
- Outstanding Credit Loan Availment

## **How do we use your personal data?**

We may use the information we collect from you when you make a purchase, surf the website, or use certain site features to provide you our services. Your personal data shall be processed for the specific purposes made known to the data subjects such as but not limited to the following:

- Loan Processing to Home Development Mutual Fund (HDMF) or any bank.
- Sending of monthly notices such as Statement of Accounts, Announcements and other related statements.
- Collecting of monthly payments through In-House Financing or other accredited Payment Partners.
- Any other applicable government agency or private corporation where personal data is necessary for the purchase of a property whether in cash or in credit.

Personal information will be retained, shared, updated and disposed according to internal policies like data privacy and other relevant record management processes and procedures to ensure high quality and secure information management.

## **How do we protect your information?**

We do not use vulnerability scanning and/or scanning to PCI standards. We do not use Malware Scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential.

In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information.

**Rights of the Data Subject:**

The data subject is entitled to the following rights:

- Right to be informed;
- Right to object;
- Right to access;
- Right to data portability;
- Right to rectification;
- Right to erasure or blocking;
- Right to damages;
- Right to file complaint.

**Do we use 'cookies'?**

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. Our site uses cookies to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services and user experience. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. You may choose to turn off all cookies or have your computer warn you each time a cookie is being sent through your browser settings. Should you do so, please take note that some features will be disabled or it may not function properly.

**We use cookies to:**

Understand and save user's preferences for future visits.

Keep track of advertisements.

Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

**If users disable cookies in their browser:**

If you turn cookies off, some of the features that make your site experience more efficient may not function properly.

**Third-party disclosure**

We take reasonable precautions to be sure that affiliates and non-affiliated third parties, to whom we disclose Personal Data are aware of our Privacy Policy and will treat the information in a similarly responsible manner. Based on information sensitivity, Non-Disclosure Agreement and/or Data Sharing Agreement shall be signed between relevant authorities. Also, we do not sell, trade, or otherwise transfer your personal information to third parties without securing first your consent. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep the personal data confidential. We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect ours rights and of others property and safety.

**Third-party links**

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites.

Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

## **DATA RETENTION**

As we are committed to comply with the Data Privacy Act of 2012 (R.A. 10173), the organization may lawfully retain your personal data under the following criteria:

1. When it is provided for by existing laws Axeia Group shall retain your personal data for ten (10) years from the conclusion of your transactions for the purpose of documentation, audit and other legitimate purpose that the company may have with any member of the Axeia Group or until the expiration of the retention limits set by applicable law, whichever comes later.
2. When it is mandated by a public authority. Axeia Group, as a home development and realty corporation, follows the rules mandated by the Housing and Land Use Regulatory Board
3. When it is necessary to pursue the above stated legitimate interest of the Controller Axeia Group, we shall also retain your personal data.

Rest assured that the company has security measures in place to protect your personal data from unauthorized access, processing, transfer or disclosure and from any alteration, modification or accidental circumstance. Your personal data will be destroyed or disposed upon expiration of the retention period.

## **Applicable Law and Rights**

The Company upholds compliance with Republic Act No. 10173 or the Data Privacy Act of 2012 (DPA), its Implementing Rules and Regulations, and other relevant policies, including issuances of the National Privacy Commission. The Company acknowledges your right to be informed, object processing, access and rectify, suspend or withdraw Personal Data, and be indemnified in case of damages pursuant to the provisions of DPA.

## **Changes to Privacy Policy**

The Company reserves the right to amend this Privacy Policy at any time, consistent with applicable law. In such case, an updated version will be posted in our Site. If we are going to use your Personal Data in a manner different from that stated at the time of collection, we will notify you, and you will have a choice as to whether or not we can use your Personal Data in such a way.

## **Contact Us**

For any queries, clarifications or requests on any aspect of this Statement, the exercise of your rights pertaining to your personal information or to provide any feedback that you may have about our processing of personal data, you may contact us through our Data Protection Officer by the details below:

### **Axeia Development Corporation**

6th Floor 611 Westar Building, Shaw Blvd., Pasig City

[privacy.axeia@gmail.com](mailto:privacy.axeia@gmail.com)

(02)8913-337 loc. 6800

### **Basic Housing Solutions, Inc.**

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(02)913-3377 loc. 6801

### **Equiland Property Management Corporation**

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