

TORRE LORENZO DEVELOPMENT CORPORATION PRIVACY POLICY

1. PRIVACY STATEMENT

This **Privacy Policy** reflects Torre Lorenzo Development Corporation and its related companies' ("TLDC Group") commitment to ensure that all personal data collected and processed by the organization and its partners in the provision of real property development and other related services. Should there be any future amendments to TLDC Group's Privacy Policy because of any changes in its personal data processing activities including any disclosures of such data, to any third party, and future developments in local and/or foreign data privacy regulations, where applicable, TLDC Group shall undertake reasonable efforts to effectively notify affected data subjects, and, where applicable, appropriately obtain their consent.

2. SCOPE

- 2.1. This **Privacy Policy** enumerates TLDC Group's organizational policy in relation to the collection and processing of all personal data.
- 2.2. TLDC Group reserves the right to amend and/or modify its Privacy Policy to comply with any future developments in local and/or foreign data privacy regulations where applicable.
- 2.3. This **Privacy Policy** applies to all personal data processing activities conducted by TLDC Group, including, but not limited to, the collection, use, storage, sharing and disposal of all personal data about the organization's customers and employees.

3. DEFINITIONS

- **Data Subject** – is defined under Section 3(c) of the Data Privacy Act as any individual whose personal information is processed.
- **Data Sharing Agreement** – is defined as the disclosure or transfer to a third party of personal data under the control or custody of a personal information controller. The term excludes outsourcing, or the disclosure or transfer of personal data by a personal information controller to a personal information processor.
- **Processing** – is defined as 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.
- **Personal Information** – is defined as 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.
- **Personal Information Controller** – is defined as a person or organization who controls the collection, holding, processing or use of personal information, including a person or organization who instructs another person or organization to collect, hold, process, use, transfer or disclose personal data on his or her behalf.
- **Personal Information Processor** – is defined as any natural or juridical person qualified to act as such under this Act to whom a personal information controller may outsource the processing of personal data pertaining to a data subject.



- **Sensitive Personal Information** – is defined as personal information (a) About an individual's race, ethnic origin, marital status, age, color, religious, philosophical or political affiliations, beliefs or opinions, and trade union membership; (b) About an individual's health, education, genetic and/or biometric data, sexual life and/or orientation., or 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; (c) Issued by government agencies peculiar to an individual which includes, but not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; (d) Specifically established by applicable local and/or foreign laws as classified;
- **Personal Data** - shall refer to all types of personal information, including those pertaining to agency personnel

4. COLLECTION AND USE OF PERSONAL DATA

4.1. Customer Personal Data

As a real property development company, we collect personal data from both prospective and current clients for purposes of business development, service delivery, the achievement of corporate objectives and business endeavors and compliance to applicable laws, rules and regulations. We collect such information directly from data subjects through our data collection forms, including the Customer Registration Form, and encode such information in our system database.

4.2. Employee Personal Data

As an organization which employs a significant number of individuals to meet our corporate objectives and business endeavors, we collect and process personal data from our employees for Administrative and Human Resource Development purposes as well as in compliance to applicable laws, rules and regulations covering government employees, including, but not limited to:

1. Identity verification;
2. Pre-qualification and post-qualification assessment
3. Processing of employment compensation and benefits
4. Internal Security
5. Compliance to regulatory requirements
6. For the protection of lawful rights and interests of the organization in internal administrative and court proceedings, or the establishment, exercise or defense of legal claims against prospectively malfeasant employees.

4.3. THE RIGHTS OF DATA SUBJECTS

TLDC Group fully recognizes that our employees, as data subjects, are accorded the following privacy rights:

- **Right to be informed**

Our customers and employees have the right to demand and be informed of the details about how and why we collect and process their personal data including its sources, recipients, methods, disclosures to third parties and their identities, automated processes, manner of storage, period of retention, manner of disposal and any changes to such processing activities before the same is undertaken.

- **Right to Object**

They have the right to object to the sharing of their data. Should there be any changes in the information provided to them under this policy, they shall be informed of such changes and their consent thereto, where applicable, obtained before such changes are implemented.

- **Right to withdraw consent anytime**

They have the right to withdraw their consent to the processing of their personal data anytime subject to any lawful basis for which such data is processed other than by consent.

- **Right to access**

They have the right to have reasonable access to their personal data, upon demand and in a machine-readable and/or data portable format.

- **Right to dispute/rectify**

They have the right to review and amend their personal data as processed by the organization should there be any inaccuracies.

- **Right to object/block/erase**

They have the right to reject further processing of their personal data, including the right to suspend, withdraw, and remove their personal data in our control which are falsely collected or unlawfully processed.

4.4. POLICY ON THE COLLECTION AND USE OF PERSONAL DATA

It is the policy of TLDC Group to:

- I. Adequately inform our customers and employees of their rights as data subjects;
- II. Ensure that our customers and employees, are fully and adequately informed of all processing activities performed by the organization with respect to their personal data including the scope, purpose and means used by TLDC Group for such processing, its sources, recipients, methods, disclosures to third parties and their identities, automated processes, manner of storage, period of retention, manner of disposal and any changes thereto before the same is implemented;
- III. Obtain the express, informed and properly documented consent of our customers and employees, where applicable, to our data processing activities. Where the processing does not require consent from our customers and employees, we endeavor, nonetheless, to fully inform our customers and employees of the bases of such processing other than consent;
- IV. Ensure that our customers and employees have the facility to reasonably exercise their rights as data subjects and that the organization can respond to such requests within reasonable time, including the provision of personal data in a machine-readable or data portable format in response to a request for information;
- V. Ensure that our customers and employees have the facility to dispute any inaccuracy or error in their personal data, to object to any changes in the manner and purpose by which their personal data is being processed, to withdraw consent where applicable, and to suspend, withdraw, block, destroy, or remove any unnecessary, falsely collected or unlawfully processed personal data;



- VI. Ensure that the personal data obtained from our customers and employees are proportional, necessary and limited to the declared, specified and legitimate purpose of the processing;
- VII. Ensure that the personal data of our customers and employees are retained for only a limited period or until the lawful purpose of the processing has been achieved;
- VIII. Ensure that the personal data of our customers and employees are destroyed or disposed of in a secure manner;
- IX. Ensure that our customers and employees have the facility to lodge complaints to TLDC Group relating to any violations to the rights of our customers and employees as data subjects and that such complaints are adequately and timely addressed.
- X. With respect to personal data collected and processed from foreign sources, we ensure that their personal data, is collected and processed in accordance with the applicable foreign law, if any.

5. PRIVACY GOVERNANCE

5.1. DATA PROTECTION OFFICER

TLDC Group takes data protection seriously and has appointed a Data Protection Officers (“DPO”) tasked to monitor compliance with any and all applicable foreign and/or local data privacy laws, rules, and regulations.

5.2. CONTACT INFORMATION

Our DPO is fully committed to protecting our customers’ and employees’ privacy rights. Should you have any concerns regarding TLDC Group’s privacy practices and policies, including requests for exercise of data subjects’ rights, you may reach the DPO through the following contact information:

Data Privacy Officer	
E-mail	dpo@torrelorenzo.com
Office Address	Manila – 2F Lapanday Center 2263 Chino Roces Avenue Extension Makati City, Philippines 1231 UK – Ground Floor, 13 Hogarth Place Earls Court, London SW5 0QT

6. PERSONAL DATA SECURITY POLICY

6.1. STORAGE OF AND ACCESS TO PERSONAL DATA

It is our policy to store both paper-based and electronic personal data in a secure data center covered by appropriate data security standards. Transfers of personal data within and without the organization shall only be made in accordance with strict security protocols and under modes of transfer compliant to the appropriate data security standards.

6.2. RETENTION AND DISPOSAL OF PERSONAL DATA

We only retain personal data for a limited period or until the lawful and legitimate purpose of the processing is achieved. To that effect, we have established procedures for securely disposing files that



contain personal data whether the same is stored on paper, film, optical or magnetic media, personal data stored offsite, and computer equipment, such as disk servers, desktop computers and mobile phones at end-of-life.

6.3. MANAGEMENT OF THIRD PARTY RISKS

a. PERSONAL INFORMATION PROCESSORS

Where any processing of personal data is outsourced to a third-party processor, TLDC Group will make sure that such third party shall be covered by the appropriate contracts that will enforce adequate data security standards under terms and conditions compliant with the requirements of both local and/or foreign law, where necessary.

b. PERSONAL INFORMATION CONTROLLERS

TLDC Group shall ensure that any disclosures or transfers of personal data to controllers shall be governed by legally-compliant data sharing agreements and in accordance with the rights of data subjects. Data subjects shall be duly informed and consent from them obtained, where applicable, before such data sharing activities are performed.

7. PERSONAL DATA BREACH

Personal Data Breach refers to a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed. Personal Data Breaches shall be subject to notification and remediation requirements.

8. HUMAN RESOURCE POLICY

TLDC Group requires its employees to undergo periodic and mandatory training privacy and data protection in general and in areas reflecting job-specific content. Likewise, it will ensure that all employees, representatives, and agents exposed to personal data pursuant to their function are adequately bound by strict confidentiality.