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## FELCO Data Privacy Policy

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### 1. Privacy Statement

**Firefly Electric & Lighting Corporation (FELCO)**, including its subsidiaries, affiliates, and related companies, collect, process and store personal data when you avail of its products and services (including its websites and mobile applications), participate in their events, apply for a job with them, or enter into any contract (“Services”), provided that you have given your express consent.

This policy has been prepared to better serve any individual who avails himself of any of the Projects, Employment, Products, and Services of FELCO. This can be explained by informing them on how their personal data are being collected, used and secured by FELCO.

Please read FELCO’s Privacy Policy carefully to get a clear understanding of how the company uses, protects, or otherwise handles your personal data in accordance with **Republic Act No. 10173, or the Data Privacy Act of 2012**, and its Implementing Rules and Regulations (collectively, the “**Data Privacy Act**”).

Additional information on the FELCO Privacy Policy shall be provided on the FELCO website.

### 2. Collection of Personal Data

FELCO collects information you directly provide. Examples of direct provisions include instances when you supply information:

- a. attend or participate in any of its events,
- b. respond to a survey,
- c. register, create or modify your accounts in any of its websites and/or mobile applications,
- d. contact customer support,
- e. apply for a job with them (employment),
- f. enter into any contract with them or otherwise communicate or interact with FELCO (the “Event”).

The following personal data may be collected: your name, age, date of birth, nationality, civil status, mailing address, email address, phone number, Passport No. (if applicable), Tax Identification Number (if applicable) or any other government-issued ID Nos.,

occupation, company/office information or any other personal details to help you with your experience. Similar information will be collected from your spouse or persons you authorized to transact with the company on your behalf.

### **3. Use and Processing of Personal Data for Customers and Company Data**

FELCO may use and process collected personal data to allow your Field Sales Personnel to assist in complying with the requirements of your account, or for you to participate in the Event, other similar events to be held by FELCO, including the publication of your name should you win the same, and other discounts, promos, sales, advertisements, marketing activities and commercial communications of FELCO, including direct marketing, and job application or employment. At all times, your personal data shall not be used or processed for any purpose that is contrary to law, morals, or public policy.

### **4. Sharing of Personal Data**

FELCO may share personal data between and among the entities comprising the same to enable them to provide you personalized Services. If and when it becomes necessary, a data sharing agreement shall cover any sharing of data between and among the FELCO and/or its Field Sales Personnel, vendors, consultants, marketing partners, and other service providers. FELCO may also share information in accordance with any order from any relevant government agency as provided by law.

Personal information controllers may invoke the principle of privileged communication over privileged information that they lawfully control or process. Subject to existing laws and regulations, any evidence gathered on privileged information is inadmissible.

Confidential information may be shared by the information controllers granting that there is a Data Sharing Agreement & consent.

### **5. Storage and Protection of Personal Data**

FELCO shall exert effort in securing your data in both its physical and digital form.

## 6. Your Rights under the Data Privacy Act

As a data subject, you are entitled to:

- a. Be informed whether personal information pertaining to him or her shall be, are being or have been processed
- b. Be furnished the information indicated hereunder before the entry of his or her personal information into the processing system of the personal information controller, or at the next practical opportunity.
  - i. Description of the personal information to be entered into the system;
  - ii. Purposes for which they are being or are to be processed;
  - iii. Scope and method of the personal information processing;
  - iv. The recipients or classes of recipients to whom they are or may be disclosed;
  - v. Methods utilized for automated access, if the same is allowed by the data subject, and the extent to which such access is authorized;
  - vi. The identity and contact details of the personal information controller or its representative;
  - vii. The period for which the information will be stored; and
  - viii. The existence of their rights, i.e., to access, correction, as well as the right to lodge a complaint before the Commission.

Any information supplied or declaration made to the data subject on these matters shall not be amended without prior notification of data subject: *Provided*, that the notification under subsection (b) shall not apply should the personal information be needed pursuant to a subpoena or when the collection and processing are for obvious purposes, including when it is necessary for the performance of or in relation to a contract or service or when the necessary or desirable in the context of an employer-employee relationship, between the collector and the data subject, or when the information is being collected and processed as a result of legal obligation;

- c. Reasonable access to, upon demand, the following:
  - i. contents of his or her personal information that were processed;
  - ii. Sources from which personal information were obtained;
  - iii. Names and addresses of recipients of the personal information;
  - iv. Manner by which such data were processed;
  - v. Reasons for the disclosure of the personal information to recipients;
  - vi. Information on automated processes where the data will or likely to be made as the sole basis for any decision significantly affecting or will affect the data subject;
  - vii. Date when his or her personal information concerning the data subject were last accessed and modified; and

- viii. The designation, or name or identity and address of the personal information controller;
- d. Dispute the inaccuracy or error in the personal information and have the personal information controller correct it immediately and accordingly, unless the request is vexatious or otherwise unreasonable. If the personal information have been corrected, the personal information controller shall ensure the accessibility of both the new and the retracted information and the simultaneous receipt of the new and the retracted information by recipients thereof: *Provided*, that that third parties who have previously received such processed personal information shall be informed of its inaccuracy and its rectification upon reasonable request of the data subject.
- e. Suspend, withdraw or order the blocking, removal or destruction of his or her personal information from the personal information controller's filing system upon discovery and substantial proof that the personal information are incomplete, outdated, false, unlawfully obtained, use for unauthorized purposes or are no longer necessary for the purposes for which they were collected. In this case, the personal information controller may notify third parties who have previously received such processed personal information; and
- f. Be indemnified for any damages sustained due to such inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal information.

## 7. Changes to the Privacy Policy

FELCO may change this Privacy Policy from time to time. If FELCO makes any significant change in the collection, use, and protection of personal data, FELCO will provide you notice through the Services or by some other means, such as email. It is encouraged that you periodically review the Privacy Policy in the FELCO website for the latest information.

## 8. Contacting Us

If there are any questions regarding this privacy policy, you may contact our Data Protection Officer with the following contact details:

- a. Title/Designation: Data Protection Officer
- b. Postal Address: 7th floor Zen Offices Bldg., 1111 Natividad Lopez st. Ermita, Manila
- c. Telephone Number: 789-1000

d. Email Address: [dpo@fireflyelectric.com](mailto:dpo@fireflyelectric.com)

## 9. Consent

Your consent/authorization shall be valid for a **period of ten (10) years** from the date such was given or such longer period as may be required by applicable law or when necessary as provided by the Data Privacy Act, or unless you have expressly withdrawn such consent/authorization.

Thank you,

FELCO Data Protection Officer