

DATA PRIVACY STATEMENT

PAYNAMICS TECHNOLOGIES INC. (hereinafter referred to as "PTI") treats Personal Data received in providing payments processing and related services through its website, platforms, and other means with due care and responsibility. PTI is dedicated to safeguarding all Personal Data that passes through its systems. This Data Privacy Statement ("Statement") is designed to inform and advise data subjects about the type of information that PTI collects and the purposes for which they are being processed, used, maintained and disclosed. It also aims to explain in a simple and transparent way what Personal Data PTI gathers about you and how we process it.

This Statement applies to the following:

- any and all persons involved in transaction with payment institution of PTI, including non-PTI customers such as consumers/payees of PTI merchants;
- the legal representatives and ultimate beneficial owners of all past, present and prospective PTI merchants (e.g., e-commerce websites, online retailers, etc.) and other commercial contracting parties. On this note, PTI is legally obligated to retain personal information on these persons for the duration of the contractual relationship and a reasonable period thereafter, in compliance with regulatory requirements imposed by law as well as the know-your customer policies of PTI; and
- any and all persons with access to and/or utilizes the payment platforms of PTI.

Personal Data refers to any information that tells PTI something about, or PTI can link to, the data subject. Such include, but are not limited to, the following:

- full name, date of birth, e-mail address, billing address, username, password, nationality, and country of residence;
- card/account number, card/account expiry date, CVC details, bank and/or issuer details; and
- information relating to any items purchased, including the location of the purchase, the value, the time and any remarks provided in relation to the purchase.

Processing means everything done by PTI with Personal Data such as, but not limited to, collecting, recording, storing, adjusting, organizing, using, disclosing, transferring or deleting.

PTI processes information, which includes personal and financial information, received from its merchants when the latter makes a payment or alternatively uses payment services, inquires, makes an application for, or avails of PTI's services, registers to use any of PTI's services, or communicates with PTI through electronic mail, SMS, messaging apps, a website or portal, or other similar channels and means. PTI must know certain Personal Data so that it can deliver its services and execute its duties as a payment processing institution and fulfill directly related obligations pursuant to the same. Without such data, PTI may not be able to effectively, if at all, provide its services. PTI only uses Personal Data to provide the services it is tasked and obligated to perform, and other legitimate reasons. These include:

- **Providing Payment Processing and Related Services.** PTI, as a payment solutions provider, offers a comprehensive platform that can process payment acceptance from credit and/or debit card payments, e-Wallets, electronic bank fund transfers, mobile payments, as well as non-bank over-the-counter payments, and other alternative forms of collection services to businesses. PTI also offers disbursement solutions for instant mass payouts to multiple channels available locally.
- **Handling Customer Service.** PTI may ask for feedback about products and services and share this with certain employees and/or authorized third parties to further enhance and improve its products and services offerings.
- **Customer Due Diligence.** Upon business commencement, PTI is legally required to collect Personal Data for identification and verification purposes, to assess whether PTI can accept the merchant as a customer. Also needed for this purpose would be the various contact and location information of the merchant for prompt communication.
- **Credit Risk.** PTI applies specific risk models, which may involve the use of relevant Personal Data, to assess the financial position of a customer, merchant and/or authorized third parties for revenue loss prevention or mitigation.
- **Fraud Prevention and Data Security.** PTI is responsible for protecting Personal Data controls and processes, as well as preventing, detecting, and containing security incidents and data breaches. Necessarily, PTI is legally obligated to collect, use, and store personal information on its data subjects to comply with statutory regulations against money laundering, and terrorism and proliferation financing, to name a few. PTI processes personal information to protect its assets as well as its stakeholders from fraudulent activities, such as incidents of identity theft, cybercrime, and unauthorized retrieval and/or disclosure of Personal Data. PTI may also use personal

information for profiling (e.g., name, account number, age, nationality, IP address) to quickly and efficiently detect a particular fraudulent activity and its culprit.

- **Internal and External Reporting.** PTI processes Personal Data for payment operations, and to help the management of PTI make better decisions about operations and services. PTI also processes Personal Data to comply with a range of legally mandated reporting obligations to and statutory requirements of regulatory authorities, such as but not limited to the Securities and Exchange Commission, the Bangko Sentral ng Pilipinas, the Anti-Money Laundering Council, and the National Privacy Commission.
- **Marketing.** PTI may, on its own or through authorized partners, use Personal Data obtained during its business operations for the purpose of advertising, as well as cross-selling and upselling of products and services.

PTI generally does not collect, process, or use sensitive personal information, such as those relating to health, ethnicity, or religious or political beliefs. It is only when the merchant collects payments or funds from religious or other similarly situated groups or institutions that PTI will handle such information.

PTI may be required to disclose Personal Data to its agents, subsidiaries, affiliates, business partners and other third-party agencies and service providers, as part of its regular business operations and for service delivery. Such is done on a confidential basis, through secure channels, and only in compliance with applicable privacy laws and regulations. This means we might share your information with:

- service providers, contractors, and professional advisers, who help PTI provide its products and services.
- other companies to whom you have also given consent for us to share your information with; and
- law enforcement and government agencies, when required by laws and regulations and other lawful orders and processes.

PTI shall not use, disclose, or otherwise process Personal Data for any purpose other than to perform its obligations and responsibilities arising from its business operations, and such other purposes consistent with how its merchants use and process such personal Data, all in accordance with Republic Act No. 10173, otherwise known as "the Data Privacy Act of 2012," its Implementing Rules and Regulations, and other relevant issuances by the pertinent regulating authority. PTI will never share, rent, or sell your Personal Data to third parties, except in special circumstances where you may have given your consent for, and as described in this Statement. PTI reserves the right to locate or transfer any Data received, processed, and stored as part of the performance of any part of its services to any location within or outside the Philippines.

For their part, PTI merchants may collect, use, disclose and process Personal Data from PTI and/or its third parties (who may be individuals, affiliates, or authorized subcontractors of PTI, including their employees, directors or officers) obtained pursuant to the services rendered by PTI, in relation to the operations and legitimate business of the merchant, or as may be required by law or regulation. Personal Data may be accessed by or disclosed to the employees, agents, contractors, vendors, suppliers or other relevant third parties of merchants, subject to the implementation of necessary security measures. Said third parties may likewise transfer such Personal Data to any location within the Philippines where they do business, or outside thereof subject to the execution of an agreement to that effect. PTI ensures that, when Personal Data is shared internally or with authorized third parties (i.e., banks, card associations, and other registered financial institutions), appropriate and reasonable security measures are put in place to protect it.

PTI protects Personal Data in its possession or control by implementing reasonable, appropriate organizational, physical, and technical security measures to prevent unauthorized access, use, processing, disclosure, disposal or similar risks that may affect the confidentiality, integrity, and availability thereof, aligned with the requirements of the Data Privacy Act of 2012, its Implementing Rules and Regulations, and other relevant issuances by the regulating authority.

PTI has enforced an internal framework of policies and standards to keep Personal Data safe. These policies and standards are periodically updated to comply with applicable laws and regulations, as well as market standards and industry best practices. More specifically and in accordance with data privacy laws, PTI implements reasonable and appropriate physical, technical, and organizational security measures to ensure the availability, confidentiality and integrity of Personal Data. Furthermore, PTI's employees and stakeholders are subject to confidentiality obligations and shall not disclose Personal Data unlawfully or unnecessarily, as well as periodic training with respect to best practices to protect Personal Data. In compliance with legal obligations under applicable privacy laws and regulations, relationships with authorized third-party partners/vendors/suppliers are covered by appropriate contractual arrangements. In addition to the efforts of PTI to protect Personal Data, there are certain steps data subjects are strongly advised to take, such as:

- installing and constantly updating antivirus, anti-spyware software, and using a firewall on personal computers;
- diligent safekeeping verification tokens, PINS/MPINS, as well as credit cards;
- keeping passwords strictly confidential, and using ones that are strong against guessing and brute-forcing; and
- being cautious, whether off-line or on-line, for suspicious activities, such phishing and social engineering attempts

PTI does its best to protect personal information, using a variety of security measures and technologies (including encryption measures whenever applicable and appropriate), but cannot guarantee a perfect, 100% secured transmission of information; thus, any transmission done will be at the risk of the data subject. Upon receiving Personal Data, PTI will use strict procedures and security features to try to prevent unauthorized access. PTI shall promptly inform merchants, through their appointed Data Privacy Officer (“DPO”), if at any time there is an actual or suspected breach of data privacy and security, or any actual or suspected breach or security incident involving Data. Such notification will be sent within twenty-four (24) hours from discovery of the security incident or breach. Immediately upon discovery thereof, PTI shall take all steps necessary to address, mitigate, and resolve such, and then conduct a thorough investigation thereof to ascertain the cause as well as the effect thereof. Within 24 hours from the conclusion of such investigation or the last notice sent by PTI, as a case may warrant, a report shall be prepared, available to all involved persons, detailing, among others, the findings of the investigation or any developments relating to the security incident or breach, the actions taken and recommended. PTI shall comply with all other obligations relating to data breaches in accordance with the Data Privacy Act of 2012, its Implementing Rules and Regulations, and other relevant issuances by the regulating authority.

Even upon the termination of business relationship, PTI retains Personal Data for a reasonable period thereafter for operational needs, such as transactions invoicing, tracking in case of any disputes, or as otherwise allowed or required by law. In general, and unless there is a legal basis that allows for otherwise, such retention period shall be **for five (5) years from the date of the last transaction processed by or termination of the relationship with the merchant, whichever is later**. PTI shall promptly and properly return or dispose of all Personal Data received from merchants, who may provide instructions relevant hereto, when either:

- the purposes for which they have been obtained and retained are no longer being served;
- retention is no longer necessary for legal or business purposes; or
- as otherwise notified by the MERCHANT.

PTI recognizes and respects the rights of data subjects as expressed in the Data Privacy Act. PTI acknowledges that data subjects have a right to object to the processing of their Personal Data. To the extent that the processing of Personal Data is based on consent, data subjects have the right to withdraw such consent at any time by contacting the Data Privacy Officer of PTI. This does and will not, however, affect the lawfulness of processing carried out before withdrawal of consent, or PTI’s right to continue parts of the processing based on lawful bases other than the data subject’s consent.

For more information about PTI’s data privacy policies and how PTI processes Personal Data, or in case there are queries or concerns regarding data subject rights, please course them through the contact information provided below.

Contact Person	Atty. Apple B. Cruz <i>Data Privacy Officer</i>
E-mail address	compliance@paynatics.net
Contact number	+63 2 8330 8772 +63 917 818 9414
Address	2nd Floor Pacific Star Building, Sen. Gil Puyat corner Makati Avenues, 1226 Brgy. Bel-Air, Makati City, Metro Manila

This Statement may be periodically updated to comply with legal requirements or adapt to changes in PTI processes. The updated version hereof shall be published on PTI website (<https://www.paynatics.com/>). Check this site regularly from time to time to be apprised of any news, as well as updates or changes in this Statement. PTI reserves the exclusive right to select what method/s or platform/s it deems best to effectively communicate all changes/updates to this Statement.

Last Updated: 31 July 2024