## PRIVACY NOTICE FOR EMPLOYEES

This Privacy Notice informs you about our policy regarding employees' personal data that we, the PRIMEX Management, collect, use, or otherwise process.

PRIMEX commits to keeping your personal data private and protected. We respect your right to privacy and aim to comply with the requirements of all relevant privacy and data protection laws, particularly the Data Privacy Act of 2012 (DPA). As in the case of the National Privacy Commission (NPC), we also seek to protect your personal privacy and the free flow of information, especially when pursuing our legitimate interests and when necessary to carry out our responsibilities as a management consultancy firm.

# Information We Collect, Acquire, or Generate

We collect, acquire, or generate your personal data in many forms. They may consist of written records, photographic and video images, digital material, and even biometric records.

When you provide your personal and sensitive information, we collect, among others: (1) directory information, like your name, email address, telephone number, and other contact details; (2) data about your personal and professional background, such as your employment history, and other relevant circumstances, previous schools attended, and academic performance; and (3) and any or all information obtained through interviews and/or during verbal conversations.

# How We Use Your Information

To the extent permitted or required by law, we use your personal data to pursue our legitimate interests as a management consultancy firm, including a variety of administrative and procurement activities and/or purposes of project activities. For example, we may use the information we collect for purposes such as:

- 1. Maintenance of employees' records and use in SSS, PHIC, HDMF and insurance policies;
- 2. Evaluating CVs/resumes for inclusion in an expression of interest or bid;
- 3. Establishing and maintaining employee information systems;
- 4. Management of human resources and supervision of work conduct;
- 5. Performance evaluation;
- 6. Verification of personal and special information for credit card and loan applications;
- 7. Insurance applications;
- 8. Compiling and generating reports for statistical and research purposes; and
- 9. Sharing marketing and promotional materials in corporate functions, events, projects, and activities.

We consider the processing of your personal data for these purposes to be necessary for the performance of our contractual obligations to you, for our compliance with a legal obligation, to protect your vitally important interests, including your life and health, for the performance of tasks we carry out in the public interest (e.g., public order, public safety, etc.), or for the pursuit of the legitimate interests of PRIMEX or a third party. We understand that the DPA imposes stricter rules for the processing of sensitive personal information and privileged information, and we are fully committed to abiding by those rules.

If we require your consent for any specific use of your personal data that is not mentioned in the purposes above, we will collect it at the appropriate time.

Please note further that we will not subject your personal data to any automated decision-making process without your prior consent.

# How We Share, Disclose, or Transfer Your Information

To the extent permitted or required by law, we may also share, disclose, or transfer your personal data to other persons or organizations to uphold your interests and/or pursue our legitimate interests as management consultancy firm. For example, we may share, disclose, or transfer your personal data for purposes such as:

- Reporting and/or disclosure of information to the NPC and other government bodies or agencies (click <u>here</u> to access list of government agencies), when required or allowed by law;
- Complying with court orders, subpoenas, and/or other legal obligations;
- Conducting internal research or surveys for purposes of institutional development;
- Publishing academic achievements and success, including honors lists and names of awardees in websites, social media sites, and publications;
- Sharing your academic accomplishments or honors and co-curricular or extra-curricular achievements with schools you graduated from or were previously enrolled in, upon their request;
- Use of photos, videos, and other information in order to promote the company, including its activities and events, through marketing or advertising materials, such as brochures, website posts, newspaper advertisements, physical and electronic bulletin boards, and other media;
- Livestreaming of company events; and
- Publication of communications with journalistic content and social media sites.

## How We Store and Retain Your Information

Your personal data are stored and transmitted securely in a variety of paper and electronic formats, including databases that are shared between PRIMEX's different units or offices. Access to your personal data is limited to PRIMEX personnel who have a legitimate interest in them for the purpose of carrying out their contractual duties. Rest assured that our use of your personal data will not be excessive.

Unless otherwise provided by law or by appropriate company policies, we will retain your relevant personal data for historical and statistical purposes. Where a retention period is provided by law and/or a company policy, all affected records will be securely disposed of after such period.

## Your Rights with Respect to Your Personal Data

We recognize your rights with respect to your personal data, as provided by the DPA. If you wish to exercise any of your rights, or should you have any concern or question regarding them, this Notice, or any matter involving the University and data privacy, you may contact the company's Data Protection Officer at:

Email: dpo@primexinc.org

Landline: +63 2 86339052

Website: www8.primexinc.org

Address: 502 & 504 Manila Luxury Condominium, Pearl Drive, Ortigas Center, Barangay San Antonio, Pasig City 1605 Philippines