

PERSONAL DATA PROTECTION POLICY

BDO Unibank, Inc. (Singapore Branch)

Purpose and Disclosure of Customer Information

Purpose – BDO Unibank, Inc. (Singapore Branch), member of BDO Unibank Group (*please refer to **Annex for the list of companies***) and /or its authorised service providers will process, transfer and disclose customer information in connection with the following purposes:

- providing services and for any transaction requested or authorised by accountholder
- meeting Compliance obligations
- conducting financial crime risk management activity
- collecting amounts due from the accountholder
- conducting credit checks and obtaining or providing credit references
- enforcing or defending the Branch's or member of the BDO Unibank Group's rights
 - for internal operational requirements of the Branch or the BDO Unibank Group (including, without limitation, credit, market, operational, and technology risk management, system, or product development and planning, insurance, audit and administrative purposes);
 - maintaining the Branch's relationship with accountholder; and /or
 - any other purpose as may be in accordance with Branch's or BDO Unibank Group's general policy on collection, use and disclosure of customer information not contrary to the Personal Data Protection Act (PDPA).

Disclosure – BDO Unibank, Inc. (Singapore Branch) may as necessary and appropriate for the purpose, transfer and disclose any customer information to the following recipients wherever located (who may also process, transfer and disclose such customer information as is necessary and appropriate for the *Purpose*):

- any member of the BDO Unibank Group
- any sub-contractors, agents, service providers or associates of the BDO Unibank Group (including but not limited to mailing houses, telecommunication companies, data processing companies) and authorities
- anyone acting in behalf of accountholder, payment recipients, beneficiaries, nominees, intermediary correspondent, agent banks, clearing houses, clearing or settlement systems, market counterparties, or trade repositories withholding agents, among others
- any party acquiring an interest in or assuming risk or in connection with the services (e.g. insurers, credit protection counterparties)
- other financial institutions or credit bureaus
- any introducing brokers to whom the Branch provides introduction / referral
- in connection with any Branch business transfer, disposal, merger and acquisition; the Bank auditors and legal or other professional advisers
- any other person with the accountholders consent
- any person in connection with any of the *Purposes*

Policy Statements

BDO Unibank, Inc. (Singapore Branch)'s officers and staff collectively known as 'the branch' will ensure compliance to the PDPA. The Branch is responsible for personal data in its possession or under its control. Employees involved in personal data breach will be sanctioned according to the Bank's Code of Conduct, Section 1.3.2 – Revealing of confidential information about the Bank or about a depositor's account.

The Branch observes the 9 General Obligations:

Consent Obligation

The Branch will only collect, use or disclose personal data for purposes for which an individual has given his or her consent in writing (or has been deemed to have done so) unless such collection, usage or disclosure without the consent of the individual is required or authorized under the second, third and fourth schedules of the PDPA and/or paragraph 13.4 of MAS Notice 626: Prevention of Money Laundering and Countering the Financing of Terrorism – Banks.

Withdrawal of consent should be in writing and put to effect within 10 business days from receipt of withdrawal notice. The Branch will inform the individual of the likely consequences of withdrawing his consent upon receipt of the notice and shall not prohibit the individual from withdrawing his consent.

Purpose Limitation Obligation

The Branch will collect, use or disclose personal data about an individual only for purposes – that a reasonable person would consider appropriate in the circumstances; and that the individual has been informed of.

The Branch will not as a condition of providing product or service, require the individual to consent to the collection, use or disclosure of his/her personal data beyond what is reasonable to provide that product or service.

Notification Obligation

The Branch will notify clients of the purposes for which the Branch is intending to collect, use or disclose their personal data on or before such collection, use or disclosure unless the individual is deemed to have consented to the collection, use or disclosure; or the Branch collects, uses or discloses the data without the consent of the individual in accordance with the PDPA.

Access and Correction Obligation

The Branch will provide, as soon as reasonably possible and upon request, the personal data of an individual and information in which his/her personal data has been used or disclosed during the past year except under the circumstances set out in the Fifth Schedule of the PDPA or when provision of personal data and other information could reasonably threaten the safety, physical or mental health of the individual or another individual reveal the identity or personal data of another individual who has not consented to the disclosure be contrary to national interest.

Upon request, the Branch will correct any error or omission in an individual's personal data as soon as reasonably practicable and send corrected data to parties to which the personal data was disclosed the year before.

Accuracy Obligation

The Branch will make reasonable effort to ensure that personal data collected by or on behalf of the organisation is accurate and complete if the personal data is likely to be used to make decisions that affects the individual or disclosed to another organisation.

Protection Obligation

The Branch will make reasonable arrangement to protect personal data in its possession or under its control from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.

Retention Limitation Obligation

The Branch will cease retention of personal data or remove the means by which the personal data can be associated with particular individuals when it is no longer necessary for any business or legal purpose.

Transfer Limitation Obligation

The Branch will ensure that personal data transferred out of Singapore receives a comparable standard of protection in the receiving country/ party. Specifically, personal data recipient should be bound by legally enforceable obligations e.g. law, contract, corporate rules that will ensure that data recipients comply with the following:

- adopt security measures to ensure data protection at all times
- delete and destroy personal data that are no longer required
- prohibit against misuse and /or unauthorised disclosure
- prohibit against sub-contracting service
- report irregularity in its operation that results to any breach to PDPA
- specify measures to ensure personnel compliance with agreed obligation
- uphold the branch's right to audit and inspection

Openness Obligation

The Branch's Risk and Compliance Officer is the designated Data Protection Officer (DPO) who will:

- be the single point of contact for PDPA related matters (internal/external) including access and correction request, complaint and / or query on the branch's data protection policy and practices.
- ensure that PDPA policies and processes including complaint processes are updated with the latest regulatory requirements and aligned to BDO Unibank's data privacy framework, as and when possible
- cultivate awareness of officers and staff on the branch's data protection policies and procedures including the rights of clients over their personal data
- monitor branch's compliance to the provisions of PDPA and investigate, assess, escalate and notify data owners and enforcement agencies in both Philippines and Singapore of any breach within the prescribed notification period.
- update Personal Data Inventory and facilitate Data Protection Impact Assessment (DPIA)

The business contact information of the DPO or his delegates shall be made publicly available and the Branch's policies and procedures, including complaints handling process on PDPA related matters shall be made available upon request.

Personal Data Protection (Do Not Call Registry)

The Branch will check if a client's Singapore telephone number is listed on a Do Not Call registry within 30 days before sending any marketing message, whether in sound (including voice calls), text, visual, or other form. Marketing messages will:

- clearly reflect BDO Unibank, Inc. (Singapore Branch) as the source of marketing message; display the calling line identity of the Branch where the message is transmitted via voice call;
- include clear and accurate information on how the recipient can readily contact the Branch; and include other information and complies with conditions, if any, set out in the Personal Data Protection (Do Not Call Registry) Regulations 2013.
- Information required to be included in the marketing messages shall reasonably be likely to be valid for at least 30 days after the message is sent.

The Branch shall not, as a condition for supplying its products or services, require a client with a Singapore telephone number to give consent for the sending of marketing messages to that number or any other Singapore telephone number beyond what is reasonable to provide the products or services. Any consent given under such circumstances shall not be valid.

The requirement to check the Do Not Call Registry shall not apply to marketing messages (excluding voice/video calls) where the Branch is in an ongoing relationship with the client using the Singapore telephone number at the time of transmission and the message is related to the subject of the ongoing relationship. This exemption is subject to the following conditions:

- the message must contain a clear statement in English to inform the client that he may opt out from receiving such messages by submitting an opt-out notice to the Branch via text/facsimile message to a Singapore telephone number, short number code facility or facsimile number ("numbers") stated in the message;
- the numbers must be valid and capable of receiving any opt-out notices within 30 days of transmission; and
- the use of the numbers does not result in the client incurring any cost additional to the cost normally incurred in sending such messages.

Notice for the withdrawal of consent (including opt outs) to send marketing messages to a Singapore telephone number may be given by a client and the Branch shall cease the sending of such messages to that number within 30 days.

ANNEX

BDO Unibank Group

Philippine Subsidiaries and Affiliates

Armstrong Securities, Inc.

BDO Corporate Center
7899 Makati Avenue
Makati City 0726
+63 (2) 840-7000 (locals
32457, 32447)

Averon Holdings Corporation

6780 Ayala Avenue San Lorenzo
Village Makati City
+63 (2) 840-7000 local 33069

BDO Capital & Investment Corporation

BDO Corporate Center
7899 Makati Avenue
Makati City 0726
+63 (2) 840-7000, 878-4549,
878-4564

BDO Insurance Brokers, Inc.

43-45/F BDO Corporate Center
Ortigas 12 ADB Avenue
Mandaluyong City 1554
+63 (2) 702-6000

BDO Leasing and Finance, Inc.

39/F BDO Corporate Center
Ortigas 12 ADB Avenue
Ortigas Center
Mandaluyong City 1554
+63 (2) 688-1288

BDO Life Assurance Company, Inc.

(formerly Generali Pilipinas Life
Assurance Company, Inc.)
BDO Corporate Center
7899 Makati Avenue
Makati City 0726
+63 (2) 885-4100, 885-4200

BDO Nomura Securities, Inc.

BDO Equitable Tower
8751 Paseo De Roxas
Makati City 1226
+63 (2) 702-7878, 688-1200

BDO Private Bank, Inc.

BDO Equitable Tower
8751 Paseo De Roxas
Makati City 1226
+63 (2) 848-6300

BDO Rental, Inc.

BDO Corporate Center Ortigas
12 ADB Avenue
Mandaluyong City 1554
+63 (2) 688-1288, 840-7000

BDO Securities Corporation

BDO Corporate Center
7899 Makati Avenue
Makati City 0726
+63 (2) 840-7000, 878-4070,
840-7080, 878-4564

BDO Strategic Holdings Inc.

BDO Building
Paseo De Roxas corner
Sen. Gil Puyat Avenue Makati City
+63 (2) 840-7000

Equipark-NFC Development Corp.

Room 603, EBC Building
262 Juan Luna Street
Binondo, Manila
+63 (2) 840-7000

MMPC Auto Financial Services Corporation

38/F Robinsons Equitable Tower
ADB Avenue corner Poveda
Street Ortigas Center, Pasig City
+63 (2) 688-1253

NLEX Corporation

(formerly Manila North
Tollways Corp.)
NLEX Compound
Balintawak, Caloocan City
+63 (2) 580-8900

NorthPine Land, Inc

Units 1505-1508
15/F The Taipan Place
F. Ortigas Jr. Road
Ortigas Center, Pasig City
+63 (2) 637-1531

One Network Bank, Inc. (A Rural Bank of BDO)

ONB Center, Km. 9
Sasa, Davao City
+63 (82) 233-7727

SM Keppel Land, Inc.

12 ADB Avenue
Ortigas Center
Mandaluyong City 1554
(temporarily at Units 2203-2204
Raffles Corporate Center
F. Ortigas Road, Ortigas Center
Pasig City)
+63 (2) 570-9832

Taal Land, Inc.

12/F PSBank Center
777 Paseo De Roxas
Makati City
+63 (2) 898-8890

Foreign Subsidiary/ Affiliate

BDORO Europe Ltd.

5/F 6 St. Andrew Street
London, EC4A 3AE
United Kingdom
+44 (020) 7495-2434

Remittance
Subsidiaries/Affiliates

ASIA

BDO Remit Limited

Shops 231-234 and 237
Worldwide House
19 Des Voeux Road
Central, Hong Kong
+852 253-77148, 2525-5629,
2234-9588
Philippines: +63 (2) 840-7000
local 31030
Shop 159, G/F Lik Sang Plaza
269 Castle Peak Road
Tsuen Wan, New Territories,
Hong Kong
+852 2412-0399

Express Padala HK Ltd.

Shops 231-234 and 237
Worldwide House
19 Des Voeux Road
Central, Hong Kong
+852 253-77148, 2525-5629,
2234-9588
Philippines: +63 (2) 840-7000
local 31030
Shop 159, G/F Lik Sang Plaza
269 Castle Peak Road
Tsuen Wan, New Territories,
Hong Kong
+852 2412-0399

BDO Remit (Macau) Ltd.

Avenida de D. Joao IV
No. 2 6B Edificio China Plaza
R/C (U) Macau, SAR
+853 2837-4385, 2837-3324
Philippines: +63 (2) 840-7000
local 31031
Avenida de D. Joao IV
No. 2 6A Edificio China Plaza
R/C (V) Macau, SAR
+853 2871-4039
432 Avenida Dr. Sun Yat
Sen Edificio Wa Fong Kok,
Unit E R/C Taipa, Macau
+853 2885-5389
Philippines: +63 (2) 840-7000
local 31032

BDO Remit (Japan) Ltd.

Zenken Plaza II, 1F & 2F 3-13
Nishi-Shinjuku 1-chome
Shinjuku-ku, Tokyo
Japan 160-0023
+81 (3) 5909-0601, 5909-0602
Philippines: +63 (2) 840-7000
local 33391 and 33392

EUROPE

BDO Remit (UK) Ltd.

(Formerly CBN London Ltd.)
London
Part Lower Ground Floor,
Strand Bridge House,
138-142 Strand, London,
WC2R 1HH
+44 (20) 7462-3000

Belfast

3/F Middleton Bldg.
10 High Street
Belfast BT1 2BA
Northern Ireland
+44 (28) 9043-6580

Milan

Piazza del Duomo 17,
20121 Milan, Italy
+39 (02) 3944-0029

Rome-Ottaviano

Via Germanico 50
Rome, Italy 00192
+39 (06) 9357-0123

Rome-Termini

Via Dei Mille 30
Rome, Italy 00185
+39 (06) 4470-2878

Firenze

Via Spartaco Lavagnini 28,
50129 Firenze, Italy
+39 (055) 461-373

Paris

76/78 Avenue des Champs-
Elysees
Paris, France 75008
+33 (1) 5659-7650

CBN Remittance Center
S.A.

Barcelona

Calle Pelayo 56 4-1 08001
Barcelona, Spain
+34 (93) 412-3653

USA

BDO Remit (USA), Inc.

Daly City

350 Gellert Boulevard
Daly City, California 94015
+1 (650) 994-1625,
+1 (800) 472-3252
Philippines: +63 (2) 840-
7000 local 31033

Los Angeles

215 South Vermont Avenue
Los Angeles, California
90004
+1 (213) 386-5069

CANADA

BDO Remit (Canada) Ltd.

2004 Yonge Street
Toronto, Ontario M4S 1Z7
Canada
+1 (647) 350-1236,
+1 (647) 350-0236
Philippines: +63 (2) 8407000
local 33212

Representative Offices

ASIA

BDO Unibank, Inc.

Taipei Representative
Office

Unit D, 3/F No. 132
Cathay Cosmos Building
Sec 03, Minsheng East
Road
Songhan District
Taipei, Taiwan
+886 (2) 2545-6887
Philippines: +63 (2) 8407000
local 31020

**BDO Unibank, Inc.
Seoul Representative
Office**

23/F Seoul Finance Center
136 Sejongdaero, Jung-Gu
Seoul, South Korea 04520
+82 (2) 3783-0801, 3783-
0800
Philippines: +63 (2) 840-
7000 local 31900

**BDO Unibank, Inc.
Beijing Representative
Office**

Units 09-10, Level 24
China World Office 1
1 Jianguomenwai Avenue
Beijing, China 100004
+86 (10) 6505-7083,
6505-2713, 6505-3793

**MIDDLE EAST
BDO Unibank, Inc.
DIFC Representative
Office**

Unit 1303-B Level 13,
North Tower
Emirates Financial Towers
DIFC, PO Box 644347
Dubai
+971 (4) 279-0733