

Privacy Notice

I. Introduction



FIC Marketing, Inc. (“**FICM**”), a subsidiary of D&L Industries, Inc., values and is committed to the protection of Personal Information that you have directly or voluntarily entrusted us. This Privacy Notice (“**Notice**”) explains the collection, processing and disclosure of your Personal Information pursuant to the Republic Act No. 10173, also known as the “**Data Privacy Act of 2012**”.

This Notice describes our practices in connection with the information that we or our service providers collect through this Website or Web property (including, for example, a mobile Web site or application) operated and controlled by us from which you are accessing this Privacy Statement.

By using this Website, you are agreeing to the use and sharing of your information with our subsidiaries and affiliates as described in this Privacy Notice.

This Notice may be amended from time to time in order to comply with applicable laws and regulations. We will notify you of any changes by posting the new Privacy Policy on this Website. These changes are effective immediately, after they are posted here.

II. Collection of Personal Information

This Website only collects personal information that is specifically and voluntarily provided by customers, suppliers, and the general public who wish to get in touch with us, to enable us to enter into transactions with you or to deliver the necessary goods, services and/or communications in connection with such transactions. These are necessary for our business process execution, including delivery of notices, services and/or products, customer or channel partner and/or third-party relationship management, new product launches and events, planning purposes in connection with future products, including promotional events with our subsidiaries and channel partners.

What personal information we collect

The personal information collected by us may include, but is not limited to, the following:

- a. Contact information such as your name, identification documents, gender, nationality, mailing address, phone number(s), fax number and email address(es);
- b. Your personal interests and preferences to help us tailor offerings on our products and/or services which would suit you best;

- c. Online and electronic interactions with us, including FICM websites, FICM applications, or FICM branded pages on third-party social networks (e.g. Facebook);
- d. Information you provide us regarding your marketing preferences; and/or
- e. CCTV or camera visual recordings when you visit our office premises or participate in any of our events.

We do not usually seek sensitive information (e.g., data relating to race or ethnic origin, religious beliefs, criminal record, physical or mental health, or sexual orientation) from visitors. We will, where necessary, obtain your explicit consent to collect and use of such information.

When and how we collect your personal information

We may collect personal information directly from you when you:

- a. Communicate with us through our digital platforms (e.g. websites, mobile applications, social media pages) or by calling us;
- b. Participate in any of our surveys or promotional offers;
- c. Respond to any marketing materials we send out;
- d. Commence a business relationship with us (applicable to channel partner or third-party vendors);
- e. Visit our offices;
- f. Submit a job application;
- g. Provide information in relation to inquiries, requests, complaints and/or feedback.

Other than personal information obtained from you directly (as detailed above), we may also obtain your personal information from third parties we deal with or who relate to you and from such other sources where you have given your consent for the disclosure of information relating to you, and/or where otherwise lawfully permitted.

Purpose of collecting your personal information

The information we collected will be processed for the following purposes as applicable:

- a. Providing customer care and enhancing customer satisfaction, including but not limited to, resolving complaints, dealing with and/or responding to requests and inquiries;
- b. To keep you informed of promotions, discounts, and/or events;
- c. To establish and better manage any business relationship we have with you;
- d. To enhance our products and services;
- e. For internal record keeping, including but not limited to administration, processing, and matching any Personal Information held which relates to you for any of the purposes listed herein;
- f. Conducting marketing and customer profiling activities in connection with our services and related products
- g. For recruitment purposes;

- h. For information and security purposes, including but not limited to managing and administrating e-mail, handling and investigating any security related issue, vulnerability, and/or incidents;
- i. To comply with legal and regulatory requirements or obligations; and
- j. To perform such other processing or disclosure that may be required under law or regulations.

III. Disclosure to Third Parties

If and when necessary, your Personal Information may be disclosed to the following third parties:

- a. Authorized agents, contractors and third-party service providers who provide services to FICM for any of the Purposes mentioned above;
- b. External professional advisors and auditors;
- c. Governmental departments and authorities; and/or
- d. Any affiliated companies of FIC Marketing, Inc.

IV. Log information, cookies and web beacons

When you navigate this website, depending on your settings, we may collect standard internet log information including your IP address, browser type and language, access times, images and other log information related to your activities performed in accessing our websites. To ensure that this Website is well managed and to facilitate improved navigation, we or our service providers may also use cookies (small text files stored in a user's browser) or Web beacons (electronic images that allow this Website to count visitors who have accessed a particular page and to access certain cookies) to collect aggregate data.

Use the options in your web browser if you do not wish to receive cookie(s) or if you wish to set your browser to notify you when you receive cookie(s). Click on the "Help" section of your browser to learn how to change your cookie preferences. If you disable all cookies, you may not be able to take advantage of all the features of this website.

V. Security of Personal Information

We will take all reasonable steps to protect the personal information we hold from loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction.

We will not keep personal information for longer than is necessary and will take reasonable steps to destroy or permanently de-identify personal information.

VI. Rights to Access, Correction and Withdrawal

To exercise your rights which include right to access, correction and withdrawal to processing your personal data within a reasonable time after such request or should you have any inquiries, feedbacks on this Privacy Notice, and/or complaints to FICM, you may reach us through our "Contact" or "Inquiry " menu in our websites, through a written letter or through an email to our Data Protection Officer (DPO).

Our contact details are as follows:

Data Protection Officer

FIC Marketing, Inc.

65 Calle Industria, Bagumbayan, Quezon City.

Telephone No.: +632 635 0680

Email: dpo@dnl.com.ph

Our decisions to provide such access or consider any request for access, correction and withdrawal to process your personal information as it appears in our records are always subject to any exceptions under applicable and relevant laws and/or the DPA, its IRR and other issuances of NPC.

Please note that in certain situations we may have to withhold access to your personal information, for example where we are unable to confirm your identity or where information requested for is of a confidential commercial nature or in the event we receive repeated request for the same information. Nevertheless, we will notify you of the reasons for not being able to accede to your request.

We reserve the right to charge a reasonable administrative processing fee for retrieving your personal information records. This fee is needed for verifying, locating, retrieving, reviewing and copying the information requested as well as any other associated costs and expenses that may arise from conducting such retrieval.