

Crown Asia Chemicals Corporation (CACC) being a listed corporation under the Securities and Exchange Commission of the Philippines and in compliance with Republic Act No. 10173 or the Data Privacy Act of 2012 (DPA), its Implementing Rules and Regulations (IRR) and other relevant policies, including issuance of the National Privacy Commission (NPC).

It is the policy of CACC to respect and uphold data privacy rights and to ensure that all personal data collected are processed pursuant to the general principles of transparency, legitimate purposes and proportionality as stated in the DPA.

By providing CACC with your personal information as described in this Privacy Policy, you have explicitly authorized and consented to our collection, use, access, store (keep) and process of said information. Your rights under this statement on Data Privacy Policy will be upheld when agreed by the company authorized representative.

## **INFORMATION WE COLLECT**

Personal Information are information that can be used to process verification, approve, manage, administer or effect an agreement between CACC and the client or customer.

Personal Information are processed to meet legal obligations (such as record keeping, company and product screening process) as well as to manage, detect and prevent security threats and exercise or defend legal claims.

### **1. Personal Information**

- Your name, gender, civil status, date of birth, address, contact numbers, email address, mailing address, proof of identification and other information relating to the person.
- Clearance certificates, verification for any criminal or derogatory records from local authorities such as NBI, Police and/or Barangay.
- Financial background.

### **2. Sourcing and Assessment**

- Personal Background checks / verifications
- Company Profile
- Company Organizational Chart
- Company assets and liabilities
- Company financial status
- Company office address, contact details and corporate email address.
- Company list of products or services, rates and prices
- Professional, work and educational backgrounds of representative

### 3. Contract Management

- Binding Contract
- Products & Services proposals / quotations
- Product or service proposals and agreements
- Contact Person / Authorized Representative

### 4. Product and Services Management

- Product Branding details
- Marketing Strategy
- Warehouse or Storage location
- Product Built of Material / Components
- Product and Services availability and inventory
- Product surveys and feedbacks

### 5. Order and Payment Management

- Company or Personal Bank details
- Financial status
- Purchase Order and Delivery Invoices
- Product Delivery details
- Delivery and Sales reports or statistics
- Payment procedures

### 6. Access and Security Management

- Visitor Logbook
- Photography
- Recorded material on surveillance cameras (CCTV)

## **PROTECTING PERSONAL & COMPANY INFORMATION**

CACC takes precaution to protect Personal and Company Information by means of employing physical, technical and organizational safeguards against loss, theft, unauthorized access, disclosure, copying, use or modification. CACC has put in effect safeguards such as:

1. Using secured servers behind advance threat protection appliances, firewalls, antivirus and other security tools.
2. Limit the access of clients and customers information to those qualified and authorized to process them. All such persons were required by CACC to protect and impose confidentiality and privacy in a manner consistent with CACC privacy policies and practices.

## **USE AND DISCLOSURE OF PERSONAL & COMPANY INFORMATION**

1. Only authorized CACC Personnel will have access to the Personal Information and will be disclosure to the following as reasonably depending on this concern:
  - Company Officers and authorized employees
  - Marketing Department
  - Accounting Department
  - Sales Department
  - Credit & Collection Department
  - Members of CACC Group of Companies
  - Professional Advisers (Corporate Lawyers) and Consultants
  - Bank and their respective service providers
2. Personal Information will be used but not limited to the following purposes:
  - To conduct appropriate pre-affiliation background investigation and reference checks.
  - To comply with the requirement of the law and other legal preceding and to comply with legal obligations.
  - Any other purposes relating to any of the above.

## **ACCESSING, UPDATING AND DELETION OF PERSONAL INFORMATION**

CACC is committed to protect and secure all Personal Information collected.

1. Accessing Personal Information for purposes of updating is allowed by requesting from the Marketing, Accounting, Sales or Credit & Collection Department.
2. Clients and Customers are obliged to inform CACC should there are updates on the Personal and Company Information.
3. Marketing, Sales, Accounting and Credit & Collection Departments will conduct verification on the accuracy of information provided by client or customer.
4. Accessing Client & Customer Information by other people is not allowed unless authorized or consent has been given by the concern person.
5. Withdrawal of Consent is allowed for any or all purposes set out in this policy. Request must be sent to Marketing, Accounting, Sales or Credit & Collection Department.

## **RETENTION AND DISPOSAL OF PERSONAL INFORMATION**

CACC retain documents including electronic documents containing Personal Information will be retain for a period of 10 years and may be extended for the following reasons:

- To the extent required by law, if Personal Information may be relevant to any ongoing or perspective legal proceedings in order to establish, exercise or defend legal rights.
- To the extent required by or pursuant of binding contract with the client or customer.
- If the company deems necessary for future reference for any legal purposes.

Personal Information shall be disposed or discarded in a secure manner that will prevent further processing, unauthorized access or disclosure to the public or any other party.

## **UPDATE OF DATA PRIVACY POLICY**

CACC will amend this policy from time to time and apply changes due to new laws and regulation affecting the data privacy act, as well changes in business operations and environment. Any update will be posted on the CACC Bulletin Boards and Company website.

For any comment, questions, or requests relating to this Data Privacy Policy or complaints for violation of your rights under this Data Privacy Policy, you may get in touch with:

- Marketing Department ([marketing@crownpvc.com.ph](mailto:marketing@crownpvc.com.ph)) or
- Sales Department ([sales@crownpvc.com.ph](mailto:sales@crownpvc.com.ph)) or
- Accounting Department ([accounting-dept@crownpvc.com.ph](mailto:accounting-dept@crownpvc.com.ph)) or
- Credit & Collection ([credit\\_collection@crownpvc.com.ph](mailto:credit_collection@crownpvc.com.ph))