



DATA PRIVACY COMPLIANCE POLICY STATEMENT

Lendell Outsourcing Solutions, Inc.

Updated **2022**

INTRODUCTION

At LENDELL, your privacy is as important to us as it is to you. We have created this policy because we want you to feel confident about the privacy and security of your personal data. We are committed to protecting the privacy of individuals that enter contracts with LENDELL. This Privacy Policy is without prejudice to specific local and or international data protection requirements and additional local privacy notices that may be posted, also on our websites, that may be included in our Contracts or that may be notified to the customer from time to time in relation to our Services.

Lendell Outsourcing Solutions, Inc. respects and is committed to maintaining the privacy of all individuals who provide personal information to us. LENDELL'S Privacy Policy governs how to deal with the collection, security, quality, use and disclosure of personal information in compliance with the Data Privacy Act of 2012 or the Republic Act No. 10173.

1. Data protection principles

The Company is committed to processing data in accordance with its responsibilities under the DATA PRIVACY ACT OF 2012.

Per DATA PRIVACY ACT OF 2012, requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;



- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the DATA PRIVACY ACT OF 2012 in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

2. General provisions

- a. This policy applies to all personal data processed by the Company.
- b. The Responsible Person shall take responsibility for the Company's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Company shall register with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Company shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the Company shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the Company must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. The Company shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Company's systems.

5. Data minimisation

- a. The Company shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. The Company shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Company shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.



8. Security

- a. The Company shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Company shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach in accordance to the governing laws.

10. CONSENT

As stated above some of our processing activities will be based on your consent. In such case, you will have the right to withdraw your consent at any time. If you withdraw your consent, we will cease to process your personal data, unless and to the extent the continued processing or storage is permitted or required according to the applicable personal data legislation or other applicable laws and regulations. Please note that the withdrawal of your consent will not affect the lawfulness of processing conducted prior to the withdrawal. Further, because of your withdrawal of your consent, we may not be able to satisfy your requests or provide you with our services.

11. RIGHTS

We reserve the right to review this Privacy Policy at any time. Where appropriate or required by law, we will notify you about the new privacy Policy by posting appropriate notice on our Services or Website or by e-mail (to the extent that we have your e-mail address). We encourage you to periodically review this Privacy Policy to stay informed about our information practices. We will indicate above the date on which this Privacy Policy was last modified.

12. COMPLAINTS

If you have any complaints about the processing of personal data carried out by LENDELL, please feel free to contact us at any time. We will review and assess your complaint and if necessary, we may contact you to obtain further information. We will always acknowledge receipt of your complaint or objection within 5 business days. We strive at processing any complaint or objection within one month. If it is not possible to decide within one month, we will inform you of the grounds for the delay and of the time at which the decision can be expected to be provided.

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Doc. No.: LOSI-0109 Code: LOSI-DPS-0109
S. No. SN-0001 V. No.: VN-0001 RV. No. RVN-0001

CONTACT INFORMATION

If you have a request or a question regarding our processing of your personal data or this Privacy Policy in general, please contact us:

LENDELL OUTSOURCING SOLUTIONS, INC.

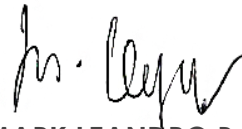
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STATEMENT APPROVED: 02-15-2022

CONRADO M. VILLENA, JR.
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