

VERITÉ SOUTHEAST ASIA INC. DATA PRIVACY STATEMENT AND POLICY

OUR DATA PRIVACY COMMITMENT

Verité Southeast Asia Inc. (VSEA) respects and values data privacy rights and commits to protect all personal information we collect from our data subjects. The organization has developed and implements data privacy policies and procedures, including security measures, in compliance with the Philippines' Republic Act No. 10173 or the Data Privacy Act of 2012 (DPA); its Implementing Rules and Regulations (IRR); and other relevant issuances, mainly from the National Privacy Commission. These are also informed by international best practices.

OUR DATA PRIVACY POLICY

Aside from setting out the general principles that govern our data privacy practices, we have also developed this Privacy Policy to help our data subjects understand: (i) what personal information we collect; (ii) how we collect, hold, use, disclose, and dispose of personal information; and (iii) the purposes of such collection, holding, use, and disclosure.

This Policy is addressed and applies to our partners and stakeholders whose personal information we collect and process in connection with our operations and our projects, programs, and activities.

The term "personal information", as used in this Policy, refers to any data (whether by itself or when linked with other information) in the possession of, or likely to come into the possession of VSEA, that can be used to identify a specific living person.

This Policy does not apply to any website, product, or service of any third-party organization even if the website links to (or from) our website. We encourage everyone to review the privacy practices of any third-party organizations at all times before deciding to provide them any information.

By transacting with us, you accept the terms and conditions described in this Policy. Continued transactions with us further signifies your acceptance of this Policy.

WHAT INFORMATION WE COLLECT AND PROCESS

When you transact with us, we may collect your personal information.

The personal information we may collect and process includes:

- Personal details such as your name, address (including nearest landmarks), contact details, and signature;
- Sensitive personal information about the following:
 - Your race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;

- Your health, education, genetic or sexual life, or any proceeding for any offense committed or alleged to have been committed by you, disposal of such proceedings, or sentence of any court in such proceedings;
- Your government-issued information such as social security numbers, health records, licenses, tax returns, and the like;
- Any information established by executive order or law to be kept classified.

WHY WE COLLECT YOUR PERSONAL INFORMATION

Generally, we may collect your personal information to facilitate your transactions with the organization. In particular, we may collect personal information for the following purposes:

- To check and counter-check against other information obtained or to be obtained during an audit or assessment of your company, facility, supplier, contractor, subcontractor, or any other entity in your supply chain;
- To inform and guide the provision or delivery of consultancy, training, and other similar capacity-building programs;
- To verify, complement, or otherwise complete the information obtained or to be obtained during the conduct of studies, inquiries, or research activities, as well as manage the stakeholder engagement activities.
- To manage transactions necessary for the day-to-day operations of the organization.

HOW WE COLLECT YOUR PERSONAL INFORMATION

In accordance with the DPA and international best practices, we collect your personal information only when you provide it directly to us.

Specifically, we collect personal information from you through interviews, surveys, desk reviews, registrations, correspondences, and similar methods carried out by VSEA employees and personnel.

TO WHOM WE DISCLOSE/SHARE YOUR PERSONAL INFORMATION

Subject to the provisions of the DPA and international best practices, and with your consent, we may share, preserve, transfer, and disclose your personal information to the following:

- VSEA’s partner organizations within the Verité network, such as but not limited to Verité USA and Verité China, involved in its projects, programs, and activities;
- Partner organizations and other stakeholders in both the public and private sectors involved in its projects, programs, and activities;
- Government authorities and such entities that may have a legitimate and legal interest in the information, in response to a legal request such as a search warrant, court order or subpoena, if we believe in good faith that we are required to do so under the law; and
- Contractors engaged to provide products or services necessary for day-to-day operations of the organization.

We will share your personal information for the following purposes:

- To facilitate and manage the conduct of projects, programs, and activities that involve the participation of VSEA’s network partners, external partner organizations, and other stakeholders in both the public and private sectors
- To comply with the lawful orders, directives, or requests of government authorities;
- To facilitate the delivery of products or services provided VSEA’s contractors.

YOUR RIGHTS AS A DATA SUBJECT

As a data subject whose personal information will be or has been collected and processed by VSEA, you are entitled to the following rights, pursuant to Section 16 of the DPA, and Section 34 of its IRR:

1. Right to be informed
2. Right to object
3. Right to access
4. Right to rectification
5. Right to erasure or blocking
6. Right to damages

No personal information will be collected without your consent. If you wish to withdraw consent to the collection of your personal information, kindly give us reasonable notice to allow time to cease any and all processing.

In the event that you refuse to give consent, we will no longer process your personal information, unless:

- The personal information is needed pursuant to a subpoena;
- The collection and processing are for obvious purposes; e.g., when it is necessary for the performance of or in relation to a contract or service to which you and VSEA are parties; or
- The information is being collected and processed as a result of a legal obligation.

Any information to be provided by you will always be in clear and plain language to ensure that the information is easy to understand and access.

WHY WE RETAIN YOUR PERSONAL INFORMATION

We retain the personal information that you provide to us for many reasons, such as: (a) ensuring that transactions can be appropriately processed; (b) helping identify fraud; and (c) preserving necessary references that may be needed by the organization’s projects, programs, and activities.

There may also be residual data that will remain within our databases and other records, which will not be removed.

We retain your personal information for only as long as necessary or for as long as the purposes for collecting your personal information shall have been satisfied.

We dispose of or discard your personal information in a secure manner that would prevent further processing, unauthorized access, or disclosure to any other party, or prejudice your interests.

HOW WE PROTECT YOUR PERSONAL INFORMATION

Following the guidelines provided in the DPA and its IRR, we use organizational, technical, and administrative measures to protect your personal information within our organization which include but are not limited to:

1. **Employee Data Security Awareness and Training.** This is a basic required training program for all employees. In addition, refresher courses are conducted especially to units who handle personal information.
2. **Access Management.** We manage user access strictly with regular reviews and prompts for change passwords.
3. **Data Sharing Contracts.** When personal information is required to be shared to partner organizations, stakeholders, or service providers, this privilege is explicitly defined in a contract stating the conditions around data sharing, the limitations of usage, and the diligence required for its storage.
4. **Physical Storage.** All paper-based documents containing your personal information are kept in locked filing cabinets and/or in secure warehouses maintained by third party service providers. Digital/electronic files are kept in secure cloud storage and onsite premise computers provided and installed by VSEA.
5. **Monitoring for Security Breaches.** VSEA monitors its information systems for security breaches.

As no data transmission or storage system can be guaranteed to be 100% secure, we encourage you to contact us immediately if you have reason to believe that the security of your personal information has been compromised. Our contact details are provided below.

CHANGES TO OUR PRIVACY POLICY

VSEA reserves the right to amend, modify, or supplement this Policy at any time.

HOW YOU CAN REACH US

If you have any questions or suggestions about this Privacy Policy or would like to access or seek correction of your personal information, or if you have any complaints regarding our privacy practices, you may reach our DPO through the following contact information:

Office Address: Suite 304 CRM III Bldg., 106 Kamias Road, Quezon City, Philippines

Contact Number: +632-84260230

Email Address: vsea@verite.org

Please note that you, as the requesting party, would have to pay the reasonable costs and expenses incurred by VSEA for producing the requested information.