AG&P INDUSTRIAL 1900
Always Forward

PRIVACY NOTICE

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Atlantic Gulf and Pacific Co. of Manila, Inc. (AG&P) (the "Company," "we," "our," or "us") respects your privacy and is committed to processing personal data in accordance with Republic Act No. 10173, or the Data Privacy Act of 2012 ("DPA"), its Implementing Rules and Regulations ("IRR"), and applicable issuances of the National Privacy Commission ("NPC"). We observe the principles of transparency, legitimate purpose, and proportionality and process personal data fairly, lawfully, securely, and only to the extent necessary for specified and declared purposes.

This Privacy Notice explains the nature, purpose, extent, method, and timing of our collection and other processing of personal data obtained through our websites, online forms, portals, applications, and official social media pages (collectively, the "Online Platforms"), as well as the recipients or classes of recipients, retention practices, security measures, and your rights as a data subject. Separate or supplemental privacy notices may apply to particular services, transactions, events, or activities and will be presented at or before the relevant collection of personal data.

1. Who We Are

AG&P is the personal information controller responsible for personal information processed through the Online Platforms. Our principal office is in the Philippines.

2. How We Obtain Personal Information

We may collect personal data directly from you when you submit an online form, create an account, register for an event, request information or support, apply for an opportunity, subscribe to communications, upload content, or otherwise communicate with us. We may also collect technical and usage data automatically through cookies and similar technologies and, where lawful and relevant to a declared purpose, receive personal data from our affiliates, service providers, business partners, authorized representatives, and publicly available sources. If you provide personal data relating to another individual, you represent that you are authorized to do so and have provided any notice or obtained any consent required by law.

3. Personal Information We May Collect

- Identity and contact details, such as your name, company, position, postal address, email address, and telephone number;
- Account and authentication details, such as username, password or other credentials, and account preferences;
- Information contained in inquiries, comments, feedback, correspondence, form submissions, and uploaded content;
- Technical and usage information, such as IP address, device identifiers, browser type, operating system, pages visited, referring pages, access dates and times, cookie identifiers, and interactions with the Online Platforms;
- Marketing, communications, and cookie preferences;
- Sensitive personal information or privileged information only when specifically required for a declared purpose and when a lawful basis under the DPA applies; and
- Other personal data that is adequate, relevant, suitable, necessary, and not excessive in relation to the purposes stated in this Notice or a supplemental notice.

4. Purposes and Lawful Bases for Processing

We may process personal information to:

- Operate, administer, secure, and improve the Online Platforms;
- Create and manage accounts and provide requested content, services, or support;
- Respond to inquiries, requests, complaints, and other communications;
- Process registrations for events, webinars, campaigns, or other activities;
- Analyze use of the Online Platforms and develop more relevant content, features, and services;
- Send marketing or promotional communications and provide personalized content, where you have consented or where otherwise permitted by law;
- Detect, investigate, and prevent fraud, misuse, security incidents, and violations of applicable terms;
- Protect our rights, property, personnel, users, and the public; and
- Comply with legal, regulatory, contractual, audit, and reporting obligations.

For personal information, processing may be based on one or more criteria under Section 12 of the DPA, including consent; necessity to perform a contract with you or take steps at your request before entering into a contract; compliance with a legal obligation; protection of vitally important interests; response to a national emergency or fulfillment of a public authority's lawful functions; or pursuit of our legitimate interests or those of a third party, unless overridden by your constitutional rights and freedoms. Sensitive personal information and privileged information are processed only under the specific conditions allowed by Section 13 of the DPA or other applicable law. Where we rely on consent, it will be freely given, specific, informed, evidenced by written, electronic, or recorded means, and as easy to withdraw as to give; withdrawal will not affect processing already lawfully undertaken before withdrawal. Refusal or withdrawal of consent may affect only the optional service or feature that depends on that consent.

5. Sharing and Disclosure

Where reasonably necessary and permitted by law, we may share personal information on a need-to-know basis with:

- AG&P subsidiaries, affiliates, and related entities;
- Service providers supporting website hosting, information technology, cybersecurity, analytics, communications, customer relationship management, events, and other business functions;
- Business partners or event sponsors where relevant and after appropriate notice or consent;
- Professional advisers, auditors, insurers, and financial institutions;
- Government agencies, regulators, courts, law-enforcement authorities, and other parties where disclosure is required or permitted by law; and
- A purchaser, successor, or transferee in connection with a merger, reorganization, sale, or transfer of all or part of our business or assets.

We do not sell, rent, or trade personal data. We disclose only personal data that is necessary for a specified and legitimate purpose. We remain accountable for personal data under our control, including data transferred to or processed by a personal information processor. We require processors and other recipients, through appropriate contracts or other lawful arrangements, to process personal data only on documented instructions or for authorized purposes; observe confidentiality; implement reasonable and appropriate security measures; assist in handling data-subject requests and security

incidents; and return, delete, destroy, or anonymize personal data when no longer required, subject to law.

6. International Data Transfers

Personal data may be transferred to or accessed by affiliates, service providers, or business partners outside the Philippines when necessary for a declared purpose. AG&P remains accountable for personal data under its control and will use lawful transfer mechanisms and reasonable safeguards appropriate to the risks, which may include data-transfer or outsourcing agreements, contractual clauses, access restrictions, encryption, due-diligence reviews, and requirements for recipients to provide a comparable level of protection. Additional information on applicable transfer safeguards may be requested from the Data Protection Office, subject to lawful confidentiality restrictions.

7. Links to Other Websites and Platforms

Our Online Platforms may contain links to third-party websites or services. We are not responsible for their content, security, or privacy practices. We encourage you to review the applicable privacy notice before providing personal information to a third party.

8. Cookies and Similar Technologies

We may use cookies, pixels, tags, local storage, and similar technologies to operate our websites, remember preferences, understand website performance, improve functionality, measure campaigns, and provide relevant content or advertising. Cookies may be session-based or persistent and may be placed by us or by approved third parties.

- **Strictly necessary cookies** support essential website functions and security.
- **Performance or analytics cookies** help us understand how visitors use the website.
- **Functional cookies** remember choices and improve website features.
- **Targeting or advertising cookies** may be used to measure campaigns and present more relevant advertising.

Strictly necessary technologies may be used without consent where they are essential to provide a service you request, maintain security, or comply with law. We will seek prior consent for non-essential cookies and similar technologies when consent is the applicable lawful basis. Consent choices must be specific, informed, freely given, and capable of being withdrawn through the cookie settings made available on the website. Withdrawing consent does not affect the lawfulness of processing performed before withdrawal. The cookie preference center should identify the technologies currently in use, their providers, purposes, data collected, and duration. Browser controls may also be available, but disabling certain technologies may affect website functionality.

9. Security Measures

We implement reasonable and appropriate organizational, physical, and technical security measures based on the nature of the personal data, the risks presented by the processing, the size and complexity of our operations, current data-protection practices, and the cost of implementation. These measures may include governance and access controls, confidentiality obligations, personnel training, secure configuration, encryption or pseudonymization where appropriate, logging and monitoring, vulnerability and incident management, business continuity, and periodic review of safeguards. We maintain procedures for assessing and responding to security incidents and personal data breaches. When a breach meets the legal threshold for notification, we will notify the NPC and affected data subjects within the period and in the manner required by the DPA, its

IRR, and applicable NPC issuances, subject to legally permitted delay. No Internet transmission or storage system can be guaranteed to be completely secure.

10. Retention and Disposal

We retain personal data only for as long as necessary to fulfill the specified and declared purposes, establish or exercise legal claims, comply with legal, regulatory, contractual, audit, and reporting obligations, or pursue legitimate business purposes consistent with the DPA. Retention periods are determined with reference to the purpose of processing, the nature and sensitivity of the data, applicable limitation and statutory periods, and our records-retention policies. When retention is no longer justified, personal data will be securely deleted, destroyed, or anonymized so that it can no longer be associated with an identifiable individual. If immediate deletion from backup or archival systems is not technically feasible, the data will be isolated from further use and deleted in accordance with the applicable secure-deletion cycle.

11. Your Rights as a Data Subject

Subject to the conditions, limitations, and exceptions under applicable law, you may exercise the following rights in relation to your personal data:

- **Right to be informed** whether personal data relating to you will be, are being, or have been processed, including the information required by the DPA and its IRR before entry into the processing system or at the next practical opportunity;
- **Right to object** to processing, including processing based on consent or legitimate interest, subject to lawful grounds for continuing the processing;
- **Right to access** the personal data processed about you and information concerning its sources, recipients, manner of processing, reasons for disclosure, and relevant automated processes, where applicable;
- **Right to rectification** of inaccurate or erroneous personal data, unless the request is vexatious or otherwise unreasonable;
- **Right to erasure or blocking** when the statutory grounds are present, including unlawful, outdated, false, incomplete, or improperly obtained data, subject to lawful retention obligations;
- **Right to data portability** for personal data processed by electronic means in a structured and commonly used format, when the legal requirements apply;
- **Right to damages** for injury sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of personal data; and
- **Right to file a complaint** with the National Privacy Commission.

To exercise a right, contact the Data Protection Office using the details below and describe your request with sufficient information for us to locate the relevant records. We may request reasonable proof of identity or authority to protect you and other data subjects from unauthorized disclosure. An authorized representative may submit a request upon presentation of appropriate authority. We will acknowledge, evaluate, and act on requests within the periods required by applicable law, explain any lawful denial or limitation, and provide information on available remedies. Rights may also be transmitted to lawful heirs and assigns in the circumstances provided by the DPA.

12. Children’s Privacy

Our Online Platforms are intended for a general or business audience and are not designed to solicit personal data from children. If an activity is directed to or is likely to be accessed by children, we will present information in clear, age-appropriate language and obtain verifiable consent from a parent or legal guardian where required by law, taking into account the child’s best interests and evolving capacity. If we learn that a child’s personal data was collected without an applicable lawful basis or required authorization,

we will restrict processing and take reasonable steps to delete or otherwise lawfully address the data. A parent, guardian, or concerned individual may contact the Data Protection Office regarding such processing.

13. Contact Information

For questions about this Notice, requests to exercise your data-subject rights, withdrawal of consent, objections to processing, or concerns or complaints regarding our handling of personal data, please contact the Data Protection Office using the details below. To help protect your privacy and security, please do not include sensitive personal information in an email unless it is necessary for us to address your request.

Data Protection Office
Email: dpa.inquiry@agpglobal.com

14. Updates to This Notice

We may revise this Privacy Notice periodically to reflect changes in our practices, technologies, services, or legal and regulatory requirements. Any revised Notice will be posted on the relevant Online Platform and will state the date on which the changes take effect. Where required by law or appropriate in view of the nature of the changes, we will provide additional notice or obtain consent. We encourage you to review this Notice periodically to remain informed about how we process and protect personal data.