NATIONAL PRIVACY COMMISSION

DPO/DPS

DATA PROTECTION OFFICER

DATA PROCESSING SYSTEM

REGISTERED

"DATOS NG PILIPINO, PROTEKTADO KO!"

VALIDITY PERIOD:

08 October 2027

Atty. Johann Carlos S. Barcena

PRIVACY COMMISSIONER

PRIVACY NOTICE

THIS PRIVACY NOTICE EXPLAINS HOW PDS USES THE PERSONAL DATA COLLECTED THROUGH THE PDTC FILE UPLOAD PORTAL ("PORTAL"). PLEASE READ THIS PRIVACY NOTICE CAREFULLY. BY CLICKING "SIGN UP" OR "LOGIN", YOU ACKNOWLEDGE THAT (1) YOU HAVE READ AND UNDERSTOOD THIS PRIVACY NOTICE AND (2) CONSENT TO THE COLLECTION, USE, DISCLOSURE, STORAGE, TRANSFER AND/OR PROCESSING OF YOUR PERSONAL DATA BY PDS, FOR THE PURPOSE/S STATED IN AND UNDER THE TERMS DESCRIBED BELOW AND IN THE COURSE SUCH PERSONAL DATA IS MADE AVAILABLE.

The Philippine Dealing & Exchange Corp., Philippine Depository & Trust Corp., and Philippine Securities Settlement Corp. (collectively, "PDS") respect and value your right to privacy. We have taken the necessary steps for the protection and security of your / your client's personal information in the Portal. PDS observes continuous compliance with the Data Privacy Act of 2012 ("DPA"), its Implementing Rules and Regulations ("IRR"), issuances of the National Privacy Commission ("NPC"), and generally accepted global data protection standards.

PDS maintains the right to amend and/or modify this Privacy Notice to comply with any future developments in data privacy regulations where applicable and to reflect any changes in its policies and/or personal data processing activities.

Collection of Your Personal Information

PDS collects the following personal information only upon your express consent signified by your registration to the Portal:

- For Depository Participants (Brokers)

  PDS collects your personal information (such as but not limited to your name, office mailing address, telephone number, and email address), as your institution's designated user, to create your institution's profile in the Portal and to enable access and electronic submission of documents applicable to your institution's role as Broker Participants availing of the Name-on-Central-Depository (NoCD) Facility to hold client holdings in segregated sub-accounts.

- For Clients of Depository Participant-Brokers

  You as Depository Participant-Broker collect personal information of your own clients, as contained in the Excel file template being uploaded in the Portal, to facilitate the creation and management of the account on behalf of the client.

Client information contained in the file template includes the minimum basic information to create an account, such as full legal name (last, first and middle names), email address, place and country of residency, nationality, and tax status.

Collection and processing of client information are expressed in the Broker Certification integrated in the Portal. Said Broker Certification covers client consent and warranties given to Brokers on the collection, processing, retention, sharing, and further processing, as authorized by law, of client information to PDTC Depository, for the purpose of creation and management of the client sub-account.

Processing of Personal Information

Your personal information shall only be used for the use of the Portal to which you consent, subject to and in accordance with this Privacy Notice, the relevant Terms and Conditions governing your and/or your institution's relationship with us, the DPA and its IRR, the Securities Regulation Code, the Terms of Use of the Portal, other governing documents, and such other applicable regulations and other agreements which you may have entered with PDS.

All your personal information we collect, including anonymized demographic data, may be combined and processed to improve our products, services, and communications with you.

In all instances, PDS ensures that only authorized employees and third-party service providers who have undertaken to satisfy our stringent corporate, legal, information security, and data privacy requirements, are allowed to access and process your personal information.

We will not sell or share your personal information with any third party. We may disclose your personal information for specified purposes which in all cases are in compliance with or pursuant to PDS's legal, regulatory, or contractual obligations, as well as to:

1. Government regulatory agencies who may require PDS to provide the same in the performance of their official functions and
2. Third party service providers whom we engaged to perform business operations on our behalf and who need to process your personal information to provide these services (such as document processing or courier services).

Data Management

Storage – Your personal information provided through the Portal shall only be stored in a PDS-managed secure environment. We have established procedures to maintain the

security of your personal data and prevent unauthorized access, use, and disclosure. Technology solutions are in place (such as encryption) to enable us to enforce security controls required to protect your personal information.

Retention – PDS shall only retain your personal data obtained through the Portal for as long as we are either required or permitted to by law or as relevant for the purposes for which it was collected, and necessary: a) for the fulfillment of the declared, specified, and legitimate purposes; b) for the establishment, exercise, or defense of legal claims; or c) for legitimate business purposes including compliance with legal or regulatory requirements.

Disposal - PDS will cease to retain your personal data and securely dispose of it or remove the means by which the personal data in the Portal can be associated with you as soon as it is reasonable to assume that such retention no longer serves the purposes for which the personal data was collected and is no longer necessary for any legal or business purpose.

Personal Data Breach Management

PDS has established its personal data breach handling procedure where any security incidents that may potentially result in a personal data breach shall be immediately addressed and measures taken to mitigate negative consequences to data subjects. In the event that it is established that a personal data breach has occurred, PDS shall notify the NPC, relevant market stakeholders, and affected Customers as prescribed in the regulations.

Your Rights as Data Subject

Under the Data Privacy Act of 2012, you have the following rights:

1. Right to be informed – you may request for information as to how your personal data is being processed or have been processed by PDS in the Portal including the existence of automated decision-making and profiling systems;

2. Right to object – you may suspend the processing of your personal information, withhold consent to further processing, and remove your personal information from the Portal;

3. Right to access – you may request for reasonable access to your personal information in the Portal, which may include the contents of your processed personal information, the manner of processing, sources where they were obtained, recipients, and reason of disclosure;

4. Right to rectification – you may dispute inaccuracy or error in your personal information in the Portal and request for the correction of the information;

5. Right to data erasure or blocking – based on proof of the grounds provided in the DPA IRR, you have the right to suspend, withdraw, or order blocking, removal, or destruction of your personal data from the Portal;

6. Right to damages – as data subject, you have the right to be indemnified for any damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of personal data taking into account any violation of your rights as data subject;

7. Right to secure data portability – to the extent applicable, you have the right to obtain from PDS your personal information in an electronic or structured format that is commonly used and that allows for further use; and

8. Right to file a complaint – you may file your complaints or raise any concerns with the National Privacy Commission through www.privacy.gov.ph.

Data Protection Officer

You may contact the PDS Data Protection Officer through any of the following email addresses: pdtc-dpo@pds.com.ph, pdex-dpo@pds.com.ph or pssc-dpo@pds.com.ph.