

CABLE LINK & HOLDINGS CORPORATION

DATA PRIVACY MANUAL

CABLELINK aims to secure and protect personal data and information of both its subscribers and employees. The Company shall ensure at all times the confidentiality of any personal information that comes to its knowledge and possession.

This Data Privacy Manual is hereby adopted in compliance with Republic Act No. 10173 or the Data Privacy Act of 2012 (DPA), its Implementing Rules and Regulations, and other relevant policies, including issuances of the National Privacy Commission. CABLELINK respects and values your data privacy rights, and makes sure that all personal data collected from you, our clients and customers, are processed in adherence to the general principles of transparency, legitimate purpose, and proportionality.

This Manual shall inform you of our data protection and security measures, and may serve as your guide in exercising your rights under the DPA.

SCOPE OF THIS PRIVACY MANUAL

This Policy covers all Personal Information and Sensitive Personal Information gathered through our Service Application Forms, social media platform and any other application or means of procuring information that will be used and maintained by the Company, in relation to rendering the cable and internet products and services offered.

DATA PRIVACY PRINCIPLES

All Processing of Personal Data within the Company should be conducted in compliance with the following data privacy principles as espoused in the Data Privacy Act:

A. Transparency - The Data Subject must be aware of the nature, purpose, and extent of the Processing of his Personal Data by the Company, including the risks and safeguards involved, the identity of persons and entities involved in Processing his Personal Data, his rights as a Data Subject, and how these can be exercised. Any information and communication relating to the Processing of Personal Data should be easy to access and understand, using clear and plain language.

B. Legitimate purpose - The Processing of Personal Data by the Company shall be compatible with a declared and specified purpose which must not be contrary to law, morals, or public policy.

C. Proportionality - The Processing of Personal Data shall be adequate, relevant, suitable, necessary, and not excessive in relation to a declared and specified purpose. Personal Data shall be processed by the Company only if the purpose of the Processing could not reasonably be fulfilled by other means.

INFORMATION COLLECTION

The Company's collection of Personal Information is done for purposes of inquiring and subscribing to the company's services such as Cable and Internet. The company collects the following information from subscribers, non-subscriber and other visitors:

- ✓ Personally Identifiable information, which may include, but shall not be limited to, your name, e-mail address, home or work address, landline or mobile number, date of birth, your Cablelink account number;
- ✓ Anonymous demographic information, which is not unique to you, which may include, but shall not be limited to, your ZIP code, age, gender, preferences, social media platforms.

The Company's objective in collecting information is to ensure that the customers are able to reach the Company for any and all their needs in relation to the subscription.

In reaching out to our customer relations officers for any and all queries relating to the account, subscription, and technical assistance through phone calls and/or SMS, the Company reserves the right to record the communication with any subscriber or non subscriber.

DATA PROCESSING PROCEDURE

The company collects the categories of information above listed. Thereafter, the personal information gathered by the Company about you is used to operate our website and deliver the services you have requested.

The Company shall ensure at all times that only authorized personnel may gain access to information and any violation to its set procedure will be accompanied by corrective measures and remedies within the Company. The Company also reserves its right to use the available legal remedies to correct any reach of protocol and procedure.

Such procedures shall also be regularly monitored, modified, and updated to ensure that the rights of the Data Subjects are executed and that processing thereof is done fully in accordance with the Data Privacy Act, and other applicable laws and regulations.

RIGHTS OF THE DATA SUBJECT

As provided under the DPA, employees and subscribers have the following rights in connection with the Processing of their Personal Data: right to be informed, right to object, right to access, right to rectification, right to erasure or blocking, and right to damages. Employees and agents of the Company are required to strictly respect and obey the rights of the Data Subjects.

Right to be Informed

The Data Subject has the right to be informed whether Personal Data pertaining to him shall be, are being, or have been processed. The Data Subject shall be notified and furnished with information indicated hereunder before the entry of his Personal Data into the records of the Company, or at the next practical opportunity:

- a) Description of the Personal Data to be entered into the system;
- b) Basis of Processing, when Processing is not based on the consent of the Data Subject;
- c) Scope and method of the Personal Data Processing;
- d) The recipients or classes of recipients to whom the Personal Data are or may be disclosed or shared;
- e) Methods utilized for automated access, if the same is allowed by the Data Subject, and the extent to which such access is authorized, including meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the Data Subject;
- f) The period for which the Personal Data will be stored; and
- g) The existence of their rights as Data Subjects, including the right to access, correction, and to object to the Processing, as well as the right to lodge a complaint before the National Privacy Commission.

Right to Object

The Data Subject shall have the right to object to the Processing of his Personal Data, including Processing for direct marketing, automated Processing or profiling. The Data Subject shall also be notified and given an opportunity to withhold consent to the Processing in case of changes or any amendment to the information supplied or declared to the Data Subject in the preceding paragraph. When a Data Subject objects or withholds consent, the Company shall no longer process the Personal Data, unless:

- a) The Processing is for obvious purposes, including, when it is necessary for the performance of or in relation to a contract or service to which the Data Subject is a party, or when necessary or desirable in the context of an employer-employee relationship between the Company and the Data Subject; or
- b) The Personal Data is being collected and processed to comply with a legal obligation.

Right to Access

The Data Subject has the right to reasonable access to, upon demand, the following:

- a) Contents of his or her Personal Data that were processed;
- b) Sources from which Personal Data were obtained;
- c) Names and addresses of recipients of the Personal Data;
- d) Manner by which his or her Personal Data were processed;
- e) Reasons for the disclosure of the Personal Data to recipients, if any;
- f) Information on automated processes where the Personal Data will, or is likely to, be made as the sole basis for any decision that significantly affects or will affect the Data Subject, and;
- g) Date when Personal Data concerning the Data Subject were last accessed and modified.

Right to Rectification

The Data Subject has the right to dispute the inaccuracy or rectify the error in his or her Personal Data, and the Company shall correct it immediately and accordingly, unless the request is vexatious or otherwise unreasonable. If the Personal Data has been corrected, the Company shall ensure the accessibility of both the new and the retracted Personal Data and the simultaneous receipt of the new and the retracted Personal Data by the intended recipients thereof: Provided, That recipients or third parties who have previously received such processed Personal Data shall be informed of its inaccuracy and its rectification, upon reasonable request of the Data Subject.

Right to Erasure or Blocking

The Data Subject shall have the right to suspend, withdraw, or order the blocking, removal, or destruction of his or her Personal Data from the Company's filing system.

1. This right may be exercised upon discovery and substantial proof of any of the following:

- (a) The Personal Data is incomplete, outdated, false, or unlawfully obtained;
- (b) The Personal Data is being used for purpose not authorized by the Data Subject;
- (c) The Personal Data is no longer necessary for the purposes for which they were collected;

- (d) The Data Subject withdraws consent or objects to the Processing, and there is no other legal ground or overriding legitimate interest for the Processing by the Company;
 - (e) The Personal Data concerns private information that is prejudicial to Data Subject, unless justified by freedom of speech, of expression, or of the press or otherwise authorized;
 - (f) The Processing is unlawful; or
 - (g) The Data Subject's rights have been violated.
2. The DPO may notify third parties who have previously received such processed Personal Data that the Data Subject has withdrawn his or her consent to the Processing thereof upon reasonable request by the Data Subject.

HOW DO WE TAKE CARE OF YOUR PERSONAL DATA?

We store information in paper and electronic formats. The security of your personal data is important to us and we take reasonable steps to protect it from misuse. Interference, loss, unauthorized access, modification, and unauthorized disclosure by establishing and enforcing:

- Confidentiality requirements and data privacy training of our employees;
- Document storage security policies;
- Security measures to control access to our systems and premises;
- Limitation on access to personal data;
- Strict selection of third party data processors and partner; and
- Electronic security systems, such as firewalls and data encryption of our websites.

SECURITY MEASURES

Access to personal data is not given beyond what is required to render the service. A variety of tools are used, including data encryption and data loss prevention software, to securely transmit and process your data.

MODIFICATIONS TO THE POLICY

We reserve the right to modify or supplement this Privacy Policy statement at any time, and we will post the revised policy on the website. If we make material changes to the Policy that expands our rights to collect and/or use your Personal Information, we will notify you.

This Privacy Policy is effective November 2, 2019.