

## Data Privacy Notice for Associates of Capital One Philippines Support Services

1. This is to formally inform you that all personal information collected from you at the point of your application, or which is subsequently collected or generated as a result of your employment with Capital One Philippines Support Services Corporation (COPSSC), such as full name, email address, residence address, phone numbers, signature, picture, fingerprints, place of birth, date of birth, age marital status, nationality, government IDs, Tax Account Number, Social Security number, employment information, academic degrees, personal and familiar references, personal information of family members, and other sensitive information such as educational, employment, criminal and medical history, will be used for such purposes as may be required in connection with your employment with us. Any personal information received from third parties, will likewise be used for the same purpose.
2. In the event that you provide us with personal information relating a third party or your family member, you acknowledge that you have the consent of such person for us to use the information for the purposes for which they were collected and for other legitimate purpose.
3. We hereby inform you that we have in place administrative, technical, personal and physical measures to protect and safeguard your information against loss, misuse, unauthorized access, theft, unauthorized modification, disclosure or destruction. We have restricted access to your personal information under its control to those associates and contractor associates who have a legitimate business need for such access.
4. The company also provides training to associates and third parties where relevant to promote awareness of COPSSC's requirements and policies surrounding protection and security of your personal information.
5. By giving us your personal information, it is understood that you consent to the transfer of such information for these purpose where applicable, to any entity that forms a direct or indirect part of our company, its subsidiaries or affiliates, as well as third parties, either local or foreign, including: a) any banking institution or other related supplier involved in the processing of payments, b) any person connected with us that is involved in service, verification, review or certification processes relating to tax and administrative matters, c) any supplier who assists us in ensuring the effective provision of the services, d) any company with which we have entered into a cooperation agreement for the purpose of promoting and providing their products and services, (for which your consent is required), e) any third party in compliance with applicable laws and/or court or administrative orders, and f) the competent authority, where required.
6. Similarly, your personal information may also be processed and shared with third parties or affiliates for the following purposes:
  - a. *Personnel Management*: including but not limited to the normal business practices related to the establishment, maintenance and termination of employment relationships. For example, the Employee's application for employment, hiring, his or her role and function in the Company, employee management and administration generally (including both during and after employment), employment verification, administering benefits, administering personal short or long-term compensation programs, conducting disciplinary proceedings, addressing labor

relations issues, processing health insurance claims, and communicating with Employee Candidates and Employees.

- b. *Operations Management*: including but not limited to establishment, performance and management of business activities of the Company. For example, maintaining and monitoring usage of internal networks and information technology systems.
  - c. *Security Management*: including but not limited to ensuring the security of COPSSC's premises and information held by the Company as well as the safety of COPSSC's Associates.
  - d. *Legal and Regulatory Compliance*: including but not limited to obtaining and releasing Associate Personal Information as required by law (e.g., tax, health and safety, antidiscrimination laws) or judicial authorization and to maintain records that can include Personal Information, such as government identifiers, information relating to sickness, maternity or parental leave, pension and retirement.
7. However, the company may still disclose your personal information to third parties other than those mentioned in items No. 5 and 6 only if required by law or legal order, to protect the interest of the company and/or its associates, if there is an emergency situation involving the health and safety of an associate, when necessary for COPSSC to perform a contractual obligation owed to an associate or for other lawful purposes, such as to establish a claim or defense, or with your consent.
  8. An Associate may be entitled to object to the sharing of his/her personal information except when the disclosure is required by law, regulations, court order, or where the transfer is necessary to perform an obligation owed to the associate, as a result of his/her employment with COPSSC. You may also withdraw your consent for the use of your personal information at any time during your employment with COPSSC.
  9. COPSSC will employ reasonable means to keep your personal information accurate, complete, up-to-date and reliable. However, it is your responsibility to inform us for whatever changes that may occur, in your personal information. Associates will be permitted to review and, where inaccurate, correct his/her personal information. However, we reserve the right to deny access to or make changes in your personal information, when doing so is disproportionate to the risk and expense required to update or correct your personal information.
  10. For the avoidance of doubt, you agree to share your personal information to any bank, employer or entity, who may conduct criminal or background investigation with us.
  11. COPSSC may also disclose your personal information to any COPSSC group of companies and their affiliates where such entities need to process your personal information for business or business efficiency purposes. COPSSC will ensure that your personal information is protected during such disclosure or transfer.
  12. COPSSC will maintain a program to ensure compliance with his policy. The Data Privacy Office is primarily responsible in implementing and overseeing the administration of this Standard. All associates whose responsibilities include processing of Associate Personal Information are required to adhere to this Privacy Notice and any implementing policies. Failure to do so is deemed a serious offence, for which disciplinary action may be taken, potentially resulting in termination of employment. Equally, the misuse of Associate Personal Information by an individual or organization

acting as agent or service provider to COPSSC is deemed a serious issue for which action may be taken, potentially resulting in the termination of any agreement.

I am executing this Data Privacy Notice willingly and voluntarily, without compulsion and intimidation from the company or from my superiors.

**HEREBY GIVING MY FULL CONSENT AND AUTHORITY**

**Signature over printed name** \_\_\_\_\_

**Date and Time** \_\_\_\_\_