

Privacy Notice

NTT DATA Payment Services Sdn. Bhd. (formerly known as GHL Systems Sdn. Bhd.), together with all our related corporations as defined under the Companies Act 2016, and any other entities within the NTT DATA Group for which NTT DATA Payment Services Sdn. Bhd. provides management oversight and strategic direction as the regional headquarters, now and in the future (the “**Group**”), respects the privacy of individuals with regard to their Personal Data. NTT DATA Group refers to NTT DATA Group Corporation and its consolidated subsidiaries.

This Notice applies to all relevant entities within the Group operating in the Philippines, including but not limited to the following:

1. NTT DATA Payment Services Philippines, Inc., GHL Philippines Financing Services Inc., and NTT DATA Electronic Payments Philippines Inc.; and
2. iPay88 Philippines, Inc.

This Privacy Notice (“Notice”) is issued in accordance with the Personal Data Protection Act 2010 (“**PDPA**”) and outlines our policies and principles in handling your personal information, signifying our commitment to respect, maintain, protect and safeguard the privacy. Please note that the PDPA will operate concurrently with any other legislative and regulatory frameworks which may be applicable to the Group. This means that where personal data is processed in or in connection with other jurisdictions outside of Malaysia, the relevant data protection law of such jurisdiction (separate from the PDPA) may apply concurrently with the PDPA. If this Notice is accessed or applied outside of Malaysia where another data protection framework (aside from the PDPA) is applicable, then such data protection framework (in addition to the PDPA) will also be complied with.

This Notice applies to individuals who engage with the Group, including those who use our services, interact with us through our websites, online payment gateways, or any other websites owned or operated by the Group (“**Websites**”). By doing so, you consent to the processing of your Personal Data by the Group and all persons involved in the provision of services by the Group.

Collection of Personal Data

1. “**Personal Data**” refers to information about you that you have provided to the Group, such as your name, address, telephone number, identity card number, email address, personal preferences, and any information that may identify you that has been or may be collected, stored, used and processed by the Group from time to time.

2. Generally, we collect your Personal Data in the following ways:

- a) when you submit forms relating to any of our products or services, or submit any online queries;
- b) when you register for or use any of our services on the Websites;
- c) when you interact with our customer service officers or any of our staff;
- d) when you use or purchase our services or products;
- e) when you establish any online accounts with us;
- f) when you request that we contact you;
- g) when you respond to our request for additional Personal Data;
- h) when you ask to be included in an email or other mailing list;
- i) when you respond to our promotions or other initiatives;
- j) when you respond to our market surveys;
- k) when you submit a job application or a scholarship application;
- l) when we receive references from business partners and third parties, for example, where you have been referred by them;
- m) when you submit your Personal Data to us for any other reason; and
- n) when you browse our Websites.

3. The provision of your Personal Data is voluntary. However, if you do not provide your Personal Data, we may not be able to communicate with you or provide you with the services you require.

Purposes of Processing

4. To meet your needs and provide you with the products and services that you require, you hereby agree that the Group may collect, retain, and process your Personal Data for the below-stated purposes, which include but are not limited to:

- a) communicating with you;
- b) sending updates on events, promotions, marketing materials and information of our future expansions;
- c) conducting research on your preference or performing statistical and analysis of your behaviour to better understand your needs;
- d) facilitating cross-selling, marketing, promotions and offering of products and services of the Group and its alliance partners; and/or
- e) making such disclosures as may be required by law.

5. If you do not consent to the Group processing your Personal Data for the purposes listed above, please notify us using the contact details as stated below in Paragraph 14.

Disclosure to Third Parties

6. The Group may provide access to or disclose your Personal Data for the purposes stated above to third parties, which include but are not limited to:

- a) other divisions or entities within the Group;
- b) our joint venture or alliance partners;
- c) our agents, contractors, service providers and advisers who have been contracted to provide us with administrative, financial, research, operational or other services such as telecommunications, information technology, data entry, payment, payroll, training, market research, storage and archival;
- d) any business partners offering goods and services or sponsorships or other promotional programmes, whether in conjunction with us or not, and where permitted by applicable laws;
- e) insurers or insurance investigators and credit providers;
- f) the Credit Bureau, or in the event of default or disputes, any debt collection agencies or dispute resolution centres;
- g) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving the Group;
- h) our professional advisers such as auditors and lawyers;
- i) relevant regulators, government authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority;
- j) anyone to whom we transfer or may transfer our rights and obligations, including, for example, where we obtain the services of a third party organisation to handle any aspect of the processing of your Personal Data for the purposes notified to you in accordance with this Notice;
- k) banks, credit card companies and their respective service providers; and
- l) any other party as may be consented to by you, as specified by you or as may be notified to you by us in subsequent notices.

Confidentiality & Privacy Principles

7. Personal Data held by the Group will be kept confidential in accordance with our Group Personal Data Protection Policy and this Notice, pursuant to applicable law that may from time to time be in force.

8. We only collect personal information that we believe is relevant and necessary to understand your requirements.
9. We will only use your personal information to provide you with improved products and services.
10. We will not disclose your personal information to any external organisation unless we have your consent, are required by law, or have previously informed you.
11. All staff and any third parties with permitted access to your information are specifically required to observe our confidentiality obligations.
12. All reasonable efforts and practical steps are made to ensure that any Personal Data held is kept up-to-date and is protected against any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration, or destruction.

Retention of Personal Data

13. We may retain your Personal Data for as long as it is necessary for the purposes for which it has been collected, up to seven (7) years, unless otherwise permitted by applicable law or in order to defend legal claims.

Right of Access to Personal Data and Inquiries

14. Subject to any exceptions under applicable laws, you may at any time hereafter request access to, or correction or rectification of your Personal Data that is inaccurate, incomplete, misleading or not up-to-date, or seek further information from the Group on Personal Data and this Notice by contacting the relevant Data Protection Officers:

NTT DATA Payment Services Philippines, Inc., GHL Philippines Financing Services Inc., and NTT DATA Electronic Payments Philippines Inc.

Name: Colleen F. Dilla

Address: 6F One Corporate Plaza Building, 845 Arnaiz Avenue, Legaspi Village, 1224 Makati City, Philippines.

Email: pdpaph@ghl.com

Tel. No.: +63 917 835 5593

iPay88 Philippines Inc.

Name: Jojet S. Hermono

Address: 26F Yuchengco Tower, RCBC Plaza, 6819 Ayala Avenue, 1227 Makati City, Philippines.

Email: dpo@ipay88.com.ph

Tel. No.: +63 908 206 0973

15. Where we rely on your consent to use your Personal Data, you have the right to withdraw that consent at any time. This withdrawal will, however, not affect the lawfulness of processing based on your consent before your withdrawal. If you withdraw your consent to any or all purposes, and depending on the nature of your request, we may not be in a position to continue to provide you with our products or services.
16. The Group reserves the right to charge you a reasonable fee for processing any data access request.

17. In the event of any conflict between the English version and versions in other languages, the English version shall prevail. The Group has the right to modify, update, or amend the terms of this Notice at any time by placing the updated Notice on its Websites. Continuing communication or use of the Group services shall signify your acceptance of the Notice, unless you inform us otherwise.