

BPI Securities Corporation Data Privacy Statement

Maintaining your privacy is an important part of the products and services that we provide. This Privacy Statement, hereafter referred to as "Statement", explains how we collect, protect, use, and share information when you access websites and/or apply for and avail of our services.

This Statement outlines the general practices of the BPI Securities Corporation ("BSC") in relation to our processes and content which are made available through our website. This Statement also covers the privacy practices for our customers who apply for and obtain services for our brokerage products.

Our Privacy Practices

The privacy practices described in this Statement are primarily intended for individuals in the Philippines and are designed to comply with the Data Privacy Act of 2012 (R.A. 10173) and its implementing rules and regulations. When accessing our website and/or availing of our services from outside the Philippines, you acknowledge and agree that your information may be transferred to and processed in the Philippines following legal and regulatory standards for data protection that may differ from your current or home jurisdictions.

What We May Collect from You

When you apply for or avail of any service that BSC offers or when you interact with our employees, authorized representatives, and service providers, we collect your personal data which may include among others:

- your name and personal particulars such as contact details, address, birthdate, education;
- specimen signatures;
- government ID details;
- financial information (such as source of income, expenses, balances, investments, tax, insurance, financial and transaction history, income, etc.)
- employment details;
- business interests and assets;
- images via CCTV and other similar recording devices and processes which may be observed when visiting our offices and/or using our other facilities;
- voice recordings of our conversations with you.



We may, as and when necessary, seek to verify or augment this information with third-party entities including government regulators, judicial, supervisory bodies, tax authorities or courts of competent jurisdiction and, in the process, gain additional information about you.

In the course of availing our products and services, we also collect information about your transactions and dealings which include your account activities and movements.

When you access our website, we may provide information about us as well as information regarding our products and services. While using our website, we may collect non-personal information such as those provided by your device which may include the IP address, internet provider, operating system, browser type and version, and other machine identifiers.

We may also collect, use and keep your personal opinions or comments made known to us via feedback or responses to surveys or any other interaction that you had with our employees, authorized representatives and service providers.

How We Use Your Information

We use the information collected to deliver and provide the services that you have availed to:

- approve, facilitate, administer and process applications and transactions;
- respond to queries, requests and complaints and improve how we interact with vou:
- send you statements, notices and other such documents necessary for continued use of our services;
- conduct studies and researches for the purpose of reviewing, developing and improving our services;
- perform profile analysis, behavioral modeling and analytics to understand needs, preferences and market trends to be able to improve and recommend suitable products and services;
- reach out to you regarding products and services information, including offers, promotions, rewards and for personalizing your experience with our various touchpoints such as BPI branches, call center, social media, telemarketing, email, messaging and other channels;
- perform certain protective safeguards against improper use or abuse of our products and services including fraud prevention;
- determine the effectiveness of our marketing efforts and initiatives;
- comply with our operational, audit, administrative, risk management processes, policies and procedures, the terms and conditions governing our products, services, facilities and channels, legal and regulatory requirements of



government regulators such as the Bangko Sentral ng Pilipinas & Securities and Exchange Commission, judicial, supervisory bodies, tax authorities or courts of competent jurisdiction, as to the same may be amended or supplemented from time to time.

- comply with applicable laws of the Philippines and those of other jurisdictions including the United States Foreign Account Tax Compliance Act (FATCA), the laws on the prevention of money laundering including the provisions of Republic Act No. 9160 (Anti-Money Laundering Act of 2001, as amended (AMLA) and the implementation of know your customer and sanction screening checks;
- comply with legal and regulatory requirements such as submission of data to the Capital Markets Integrity Corporation (CMIC) and its implementing rules and regulations responding to court orders and other instructions and requests from any local or foreign authorities including regulatory, governmental, tax and law enforcement authorities or other similar authorities;
- perform other such activities permitted by law or with your consent.

How We May Share Your Information

We may share your personal data with our affiliates and third parties, under an obligation of confidentiality.

- We may share personal data with various units within BPI Securities Corporation
 to better understand the way you use our products and services. This will allow
 us to improve our services and offer you opportunities to obtain such other useful
 products and services that may deliver greater value to you.
- We may share information with our parent bank and affiliates to likewise offer you additional products and services that we believe you might find interesting.
- We may share with third parties that we engaged to support us in delivering our services to you. These may involve anonymous or aggregated information to help improve our services and content.
- We may also engage third parties to help us operate our business. These include support in:
 - o complying with legal requirements such as court orders
 - o account servicing and execution of transaction;
 - addressing fraud, security or technical issues, to respond to an emergency or otherwise to protect the rights, property or security of our customers or third parties;
 - o to carry out all other purposes set out above.



Further, if you are, become, or apply to become a client of any of our parent and affiliates, BPI Securities Corporation, its parent and affiliate/s concerned has the option, but not the obligation to, rely upon, use, and share your relevant personal and/or account information for any of the following purposes:

- 1. To facilitate your account opening or application with the concerned subsidiary/ies or affiliate/s;
- 2. To validate, consolidate or update your customer information records and/or credit history;
- 3. To provide consolidated billings, deposit or investment summaries or other reports as you may request;
- 4. To send you reminders, announcements, promotions, offers, invitations and other notifications;
- 5. To enroll you in loyalty or similar client-oriented programs of the BPI Group of Companies;
- 6. For research purposes or to design banking, financial, securities and investment or other related products or services for your use;
- 7. For promotional and/or marketing activities of BPI Securities Corporation or of the concerned parent or affiliate/s; and/or
- 8. To comply with a legal obligation to which BPI Securities Corporation or the concerned parent or affiliate/s is subject.

We may transfer, store, and/or process your personal data outside the Philippines. In doing so, we will comply with the Data Privacy Act and its implementing rules and regulations

We wish to assure you that we do not, and will not, sell personal data to any third parties. All our engagements with third parties shall be fully compliant with our obligation of confidentiality imposed on us under the applicable agreements and/or terms and conditions or any applicable laws that govern our relationship with you.

How We Protect Your Information

We fully recognize the value of your personal data particularly as it may include sensitive personal information such as your gender, government-issued IDs, etc. Appropriately, we strive to maintain the confidentiality, integrity and availability of your personal data by employing physical, technological and procedural safeguards. We train our employees to properly handle your information. Whenever we engage other companies to provide services for us,



we require them to protect personal data aligned with our own security standards.

How Long Do We Keep Your Information

Your personal data shall be retained for as long as the purpose for which it was collected, and such other purposes that you may have consented to from time to time, remains in effect and until such time as it is no longer required nor necessary to keep your information for any other legal, regulatory, or business purposes.

You have rights

In respecting your rights to privacy, you may opt to tell us:

- 1. to inform you of what we do with your personal information;
- to provide you with information that we currently have about you, subject to restrictions applied to us as a bank and a company operating in the Philippines by certain laws and regulations, in an easy-to-access format and easy-to understand language;
- not to send you marketing materials via email or SMS, not to share your information with our subsidiaries and affiliates or with other companies that we have business with provided that such information is not critical nor required by applicable laws and regulations in maintaining, providing and completing the products or services that you have availed from us;
- 4. not to process your personal information upon withdrawing consent, unless processing is legally required;
- 5. to remove and dispose your personal information from our records, as allowed by applicable laws and regulations;
- 6. to update any personal information upon your advice;
- 7. to electronically move, copy, or transfer it securely through available means.

We may charge a fee for processing your request/s for access and/or update. Such a fee depends on the nature and complexity of your request. Information on any processing fee will be made available to you prior to making the request.

You may lodge a complaint regarding our use of your personal information and be assured that we will address your concerns promptly. Should we fail to do so, you may address any complaint to our regulators, particularly the <u>Markets and Securities</u> <u>Regulation Department of the Securities and Exchange Commission, the Capital Markets Integrity Corporation,</u> and the <u>National Privacy Commission</u>, consistent with the rights granted to you under applicable laws and regulations.



How to Contact Us

For any queries, clarifications, or requests on any aspect of this Statement, the exercise of your rights pertaining to your personal data or to provide any feedback that you may have about our processing of personal data, please visit our office. You may also e-mail us at bpitrade@bpi.com.ph or call our hotline at (02) 8580-4000 which is manned during business hours (8:30AM to 5:30PM).

You may also write our Data Protection Officer at:

DATA PROTECTION OFFICER

BPI Securities Corporation 23rd Floor, Ayala Triangle Gardens Tower 2, Paseo De Roxas corner Makati Avenue, Makati City 1229 Philippines



Changes to Our Privacy Statement

We may modify or amend this Privacy Statement from time to time to keep up with any changes in relevant laws and regulations applicable to us or how we collect, use, protect, store, share, or dispose of your personal data. Any relevant updates will be posted on the BPI Trade website.

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Account Name:	
Date:	
With my/our full conformity:	
Signature over Printed Name	Signature over Printed Name
Account Holder/Authorized Signatory 1	Account Holder/Authorized Signatory 2
Signature over Printed Name	Signature over Printed Name
Account Holder/Authorized Signatory 3	Account Holder/Authorized Signatory 4



