



# PRIVACY POLICY PHILIPPINES

## Our Commitment

Allegis Global Solutions (Philippines) Corporation and our related entities ("**Allegis**", "**we**" or "**us**") are committed to providing you with the highest levels of professional service. This includes protecting your privacy as we understand the importance of privacy of your personal data.

This Privacy Policy sets out how we collect, hold, use, and disclose your personal data. By visiting our website, requesting our services, applying for a job with us, or otherwise providing us with your personal data, you will need to consent to your personal data being collected, held, used, and disclosed as set out in this Privacy Policy.

This Privacy Policy applies to all individuals (including our clients, the individuals whose personal data is collected from clients or other third parties, job applicants and prospective employees) who provide us with their personal data.

## What personal data do we collect?

We collect personal data (including sensitive information, for example, your health information) that is necessary for us to provide you with the services you request, manage your requests, and improve our business. Such personal data usually includes your name, date of birth, address, email, and telephone numbers. In addition, we may collect the following personal data:

- **For recruitment purposes:** your previous work history, performance appraisals, qualifications, information about incidents in the workplace, health information, personal history, opinions from referees, information in relation to absences from work due to leave, illness or other causes and our assessment of you as a prospective candidate for recruitment including any psychometric or skills testing.
- **For payroll purposes:** your employment details, Tax Identification Number, bank account details, and other ancillary information that is required to fulfil contractual, legislative, filing, and reporting obligations (including the payment of salary and wages).

## How do we collect personal data?

Before we collect and process personal data, we will ask for your consent as evidenced by written, electronic, or recorded means. We will also notify you of our purpose for processing your personal data.

Where possible, we collect your personal data directly from you, for example in person, over the telephone, by email, when you set up an account with us or complete one of our online or hard copy forms or attend a group session at one of our assessment centers. We may record or listen to telephone calls between you and our consultants in order to improve our services. If you do not wish to have your

telephone call recorded or listened to, please indicate this to the Allegis personnel with whom are you speaking. When this occurs, you have the chance either to end the call, or to ask to be transferred to another line where monitoring or recording does not take place (if this is available).

In most situations, we will also obtain your personal data from third parties such as our clients, your referees, educational institutions, and current and former employers.

For the provision of payroll services, we collect your personal data from your employer who has contracted Allegis to provide payroll services.

We may also automatically collect certain information when you visit our website, some of which may personally identify you. Such information includes the type of browser you are using, the type of operating system you are using, your IP address, and how you use our website.

If you would like to access any of our services on an anonymous basis, please let us know in writing. If this is possible and lawful, we will take reasonable steps to comply with your request. However, if you choose not to provide us with your personal data we may not be able to provide you with the services or assistance you require, including arranging suitable interviews for you.

If you provide us with personal data about another individual, before doing so you:

- must tell that individual that you will be providing their personal data to us and that we will handle their personal data in accordance with this Privacy Policy;
- must provide that individual with a copy of (or refer them to) this Privacy Policy; and
- warrant that you have that individual's consent to provide their personal data to us in accordance with the relevant laws.

## Why do we collect personal data and how do we use it?

We collect your personal data and use it for the declared and specified purpose for which it was provided to us. We may also use your personal data for other related legitimate and legal purposes (and, in the case of sensitive information, only for specific and directly related purposes which you have consented to) or as permitted or required by law. Such purposes include:

- providing our clients and/or you with our services;
- facilitating placement operations and recruitment opportunities for job applicants, including assessing your application for employment with prospective employers and verifying your information;
- providing you with further information about the recruitment opportunities or services you requested;

- conducting surveys of job applicants in relation to the services we provide;
- providing you with information about Allegis and its activities that are of relevance to you (if you have consented to receive this);
- how you use our website so that Allegis can improve its business;
- in the payroll context, fulfilling contractual commitments to provide payroll services for our clients. The information collected from our payroll clients is used solely for the purpose of payroll processing; and
- any other purpose identified at the time of collecting your personal data for which you are notified separately.

### **When do we disclose your personal data?**

Any personal data you provide to us may be disclosed, if appropriate, to third parties, for the purpose of facilitating placement operations, verifying your details, providing payroll services, marketing our services, and managing our business. Such third parties may include:

- any of our related entities, affiliates, and agents;
- our clients, including your prospective employers and external organizations seeking labor;
- educational institutions and background screening providers to verify your qualifications;
- your referees and current and former employers;
- our third-party service providers, contractors, and suppliers (such as our IT service providers for hosting databases);
- our professional advisors including our accountants, auditors, and lawyers; and
- any other third parties notified to you at the time of collecting your personal data.

It is also possible, though unlikely, that we might be forced to disclose personal data in response to legal process or when we believe in good faith that the law requires it, for example, in response to a court order, subpoena, or a law enforcement agency's request.

We will only disclose your sensitive information (for example, health information) for the purposes for which it was initially collected, other directly related purposes or purposes to which you otherwise consent.

### **Do we send personal data overseas?**

In order to fulfil our contractual obligations, we may send your personal data to our data processing and storage centers, which may be located outside of the Philippines (such as in the United States of America, the United Kingdom, Australia, Malaysia, and New Zealand). Your personal data may be accessed by members of the Allegis Group in APAC. We will take reasonable steps to ensure that the overseas recipient complies with the relevant law and this Privacy Policy (for example by putting in place appropriate contractual arrangements with the recipient to safeguard your privacy).

### **Accuracy, access to, and correction of your personal data**

We will take reasonable steps to ensure that the personal data that we hold is accurate, complete, and up to date. Please contact us using the contact details below if your details have or are about to change, or if you wish to otherwise update or correct your personal data.

We will, on request, provide you with access to the personal data we hold about you unless otherwise required or permitted by law. If we deny access to your personal data we will set out our reasons for doing so.

If you would like to access your personal data, please make your request in writing addressed to our Privacy Officer using the contact details below and provide proof of your identity. To access your payroll information, you can contact your employing entity's Human Resources department or Privacy Officer.

Allegis shall recognize and observe the other rights and freedoms you may have under the relevant laws and regulations.

### **Security of your personal data**

We will take reasonable steps in accordance with relevant laws and regulations, to secure your personal data that we collect and hold.

For example, electronic information is protected by various security measures and access to information and databases are restricted to authorized personnel that need access to the information in order to perform their duties. All electronically captured job applicant and client data are passed through a secure site using encryption technology to ensure your personal data is protected if it is sent over the internet.

However, security measures are never completely successful and, despite the measures we have put in place, we cannot fully guarantee the security of your personal data. It is your responsibility to ensure you protect your personal data (for example, by protecting any usernames and passwords) and should notify us as soon as possible if you become aware of a security breach.

### **Complaints**

If you wish to make a complaint about a breach of this Privacy Policy or the privacy principles under the Data Privacy Act of 2012, you can contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint as well as any supporting evidence and/or information.

We will refer your complaint to our Privacy Officer who will investigate the issue within a reasonable time frame, which is usually 30 days but may be longer if the matter is complex. Our Privacy Officer will determine the steps (if any)

that we will undertake to resolve your complaint. Such steps may include discussing the options for resolving the complaint with you, notifying relevant employees the subject of a complaint and seeking their input or escalation to our General Manager.

We will contact you if we require any additional information from you and will notify you in writing of the outcome of our investigation. If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the National Privacy Commission via <https://privacy.gov.ph/>.

#### **Revisions to this Privacy Policy**

We reserve the right to revise this Privacy Policy or any part of it from time to time. Please review this Privacy Policy periodically for changes. If we make material changes to this Privacy Policy, we will notify you by putting a notice on the "Home" page of our website and require your consent if you

wish to continue to use our website, products, services, or provision of further personal data to us after notification of the changes.

#### **How to contact us**

If you would like more information about our privacy practices or have any questions in relation to this Privacy Policy, please contact our Privacy Officer using the contact details shown below:

#### **Name of Data Protection Officer**

**Data Protection Officer: Rosanno de Guzman**

**Address:** 15<sup>th</sup> Flr., Ayala 30<sup>th</sup> Corporate Center, Meralco Avenue, Ortigas, Pasig City

**Telephone:** +63 2 459 2475

**Email address:** [Apac.Privacy@allegisgroup.com](mailto:Apac.Privacy@allegisgroup.com)