

PRIVACY STATEMENT

This Data Protection Policy will describe how Assessment Analytics, Inc. (AAI) processes and discloses the personal data of its employees, clients, business partners, and data obtained through marketing events, seminars, or trainings, and those obtained through the use of SHL products sold by AAI and the access of AAI's website. This policy is adopted to ensure compliance with the Republic Act No. 10173 or The Data Privacy Act of 2012, its Implementing Rules and Regulations, and other relevant policies, including the issuances of the National Privacy Commission (collectively, the "Applicable Law").

All employees, consultants, and management are given the obligation and duty, to the extent of their functions, to respect and value the rights of data subjects; and to ensure that all the data that is collected from customers, clients, users, and any other data subjects is processed in accordance with law and the principles of transparency, legitimate purpose, and proportionality.

GENERAL COVERAGE

This Data Privacy Policy shall cover any and all personal data that AAI may acquire through the performance of any of its functions.

This Data Privacy Policy shall be applicable to all personnel of AAI, regardless of the nature of their employment or contractual arrangement. This agreement shall also extend to those persons who are seeking prospective employment with AAI, to consultants who may have in their possession personal data pursuant to the functions that they render, customers, and any other person or entity that may have in its possession personal data received from AAI received in any manner recognized by law or pursuant to a contract.

PURPOSE AND USE OF COLLECTED INFORMATION

As part of our operations, we obtain personal data, provide HR assessment tests and gather test results via a 3rd party outside of the Philippines. This information we collect may include the names,

address, company, position, email address, contact number, and other personal information that may be contained in the assessment test results, etc. and assessment results.

AAI requires its provider (SHL), which processes personal data and test results on our behalf and third party individual/companies, to adhere to similar or comparable data protection standards as the personal data protection legal framework in the Philippines.

For our internal hiring, including those whose functions

are outsourced, we collect, use, and process information contained in employment applications or other employment-related documents or forms submitted, via e-mail, hard copy or third party couriers, for administrative and management purposes, including but not

limited to employee recruitment, assessment of the candidate for job suitability, appraisal, promotion, career development, remuneration, health, discipline and statistical purposes. Personal data or any other information contained in employment applications and HR assessment test results shall be processed exclusively for lawful or legitimate purposes only. The collected personal data of any applicant, who may not have been hired, may be retained by AAI for purposes of future selection process.

Employees, consultants, contractors, third party services providers, and other persons or entities that may validly come into possession of personal data processed by AAI shall only process data in a reasonable manner and in accordance with the nature of their functions, for the purpose for which the personal data is collected, and only to the extent which is permitted by law or as permitted by the consent given.

Furthermore, employees, consultants, contractors, third party services providers, and other persons or entities that may validly come into possession of personal data processed by AAI shall not process personal data which is unnecessary or in excess of their assigned functions and tasks, or which may come into their possession by error or mistake. All those who come into possession of personal data processed by AAI shall have the obligation and responsibility to immediately inform AAI that such error or mistake had been made.

Our company collects this information in a transparent way and with the full cooperation and knowledge of interested parties and customer/clientele.

DISCLOSURE OF PERSONAL INFORMATION

AAI employees must keep all personal data that comes into their possession confidential and with the correlative obligation that they shall not disclose any data that may come into their possession, except when required by law. This duty of confidentiality shall extend even if the employee resigns, is terminated, or the employment is otherwise terminated.

Furthermore, personal data of the employees shall also be kept confidential. However, it may be necessary to disclose and transfer personal data to third parties to perform certain services on behalf of AAI, provided that the consent of the employee, when necessary, shall be secured, such as:

- When required to do so pursuant to a constitutional or statutory mandate;
- Insurance such as medical, accident, travel etc.;
- Travel such as airlines, travel agency, embassies;
- External Advisors such as legal firms, auditors, seminar/trainings, actuary;
- Banks.

SECURITY MEASURES

AAI maintains appropriate technical and organizational security measures to protect the security of Personal Information or data against any accidental or unlawful destruction, loss, alteration, disclosure, unauthorized access and fraudulent misuse.

To ensure data protection and privacy and compliance with Applicable Law, AAI is committed to:

- Develop transparent data collection procedures;
- Train employees in online privacy and security measures
- Develop procedures and policies to be observed by employees for the protection of data when outside of the premises)
- Build secure networks to protect online data from cyberattacks
- Establish clear procedures for reporting privacy breaches or data misuse
- Include contract clauses or communicate statements on how we handle data
- Establish data protection practices (document shredding, data encryption, password security, unique individual access ID, frequent backups, access authorization, etc.)

- Execute Non-Disclosure Agreement.

CHANGING THIS POLICY.

We may, from time to time, update this Policy. On such occasions, notice shall be posted through our website and, when permissible, other means of communications. Any modification is effective immediately upon posting on the website.