

PRIVACY NOTICE (For Borrowers)

Warm Cash Lending corporation (the "**Company**") complies and adheres to Republic Act No. 10173 or the Data Privacy Act of 2012 ("**DPA**"), its Implementing Rules and Regulations ("**IRR**"), and the issuances of the National Privacy Commission ("**NPC**") (collectively, "**Philippine Privacy Laws**"). The Company is committed to safeguarding your privacy and Personal Data. This Privacy Notice outlines how the Company collects, protects, uses, transfers, or shares your Personal Data and how the Company strives to safeguard your Personal Data.

A. Definition of Terms

As used in this Privacy Notice, the following terms are defined as follows:

1. "**Company**" refers to Warm Cash Lending corporation and its related subsidiaries, affiliates or affiliated co-operatives.
2. "**Personal Data**" refers to all types of personal information including sensitive personal information and privileged information, as defined under Philippine Privacy Laws.
3. "**Platform**" refers to the Company's online lending website and application, whether accessed through computer, mobile phone, or any other device.
4. "**Philippine Privacy Laws**" refers to the Philippine laws and regulations on data privacy including the DPA, its IRR, and issuances of the NPC.
5. "**Services**" refers to the lending services and other products offered and provided by the Company.

B. Personal Data

When you access or create an account through the Platform's online website, mobile application, or other device, or download the Platform from digital distribution platforms, you may be asked to supply or provide personal data which we will need for the verification, grant and approval of your loan application and/or the continued use, access, or availment of our Services.

In this regard, you may be asked to supply Personal Data, including but not limited to the following:

These may include, but are not limited to, the following:

1. Your name, contact details, address, birthday, age, nationality, marital status, and educational attainment;
2. Biometric information;
3. Photographs and videos (through Camera access);
4. Specimen signatures;

5. Government ID details;
6. Financial information such as income, expenses, balances, investments, taxes, insurance policies, financial and transaction history in all merchants;
7. Employment details; and
8. Business interests and assets.
9. Mobile device data and access (including network information), social media account details (might include installed mobile packages and applications) and contact list info
10. Geolocation data
11. Telecommunications usage data (including SMS, call logs and other communications data)
12. Payment transactions data

C. Purposes

While your consent may be solicited to process your personal data, we may also process personal data without your consent, such as when processing is necessary for our legitimate interests or when processing is allowed under Section 12 or Section 13 of the DPA.

In these instances, your Personal Data is processed for the following purposes (collectively, the "**Purposes**"):

These may include, but are not limited to, the following:

1. Providing the Services;
2. Approving, facilitating, administering, and processing loan applications and transactions;
3. Facilitating and responding to queries, requests, complaints, and feedback;
4. Sending statements, notices, and other documents necessary for the continued use of our Services;
5. Conducting studies and researching in order to review, develop, and improve our Services;
6. Performing profile analysis, behavioral modeling, and analytics to understand market trends including the needs and preferences of our clients in order to improve and recommend and develop our Services;
7. Determining the effectiveness of marketing efforts and initiatives;
8. Performing and adopting safeguard mechanisms against improper use or abuse of our Services including fraud prevention;
9. Complying with operational, audit, administrative, credit and risk management processes, policies and procedures, the terms and conditions governing our Services and the use of the Platform, and other regulatory requirements of government offices including but not limited the Securities and Exchange Commission and the Credit Information Corporation;

10. Facilitating business asset transactions;
11. Complying with legal and regulatory requirements such as submission of data to credit bureaus under Republic Act No. 9510 or the Credit Information System Act; and
12. Performing such other activities permitted by law or with your consent.

Moreover, we may collect other personal data that are relevant and necessary to perform our mandate of providing compliance support and data subject assistance.

D. Disclosure

In order to achieve the Purposes, we may share and disclose your Personal Data to the following parties in and/or outside the Philippines:

1. The Company's employees, personnel, agents, affiliates, and associates including the Company's auditors, financial cooperative institutions, and/or third parties related to the Company;
2. Contractors, service providers, debt collection agencies, and other agents with whom the Company may enter into agreements;
3. Government agencies, bureaus, regulators and offices;
4. Financial service providers in relation to the Services availed of from the Company;
5. Other parties as may be authorized and/or consented by you.

E. Retention Period

The Company will retain Personal Data for as long as necessary for its purposes, including compliance with legal and reportorial requirements under Philippine laws.

Should a user be inactive for ten (10) years or more, the user's personal information will be deleted from the database.

F. Methods for Automated Access

The Company uses services to analyze web and mobile app traffic data, help determine our Platform's engagement, and improve our services and features. This service uses cookies.

The following web traffic data are processed for this purpose:

- IP address;
- The pages and internal links accessed in the Platform;
- The date and time you visited the site and mobile app;
- Geolocation;
- The referring site or platform (if any) through which you accessed this site;
- Your operating system;
- Web browser type; and
- Mobile app.

G. Security of Personal Data

The Company values Personal Data collected, processed, and retained from its users. The Company has adopted technical, organizational and physical measures to protect your Personal Data. We take reasonable measures to protect your information from unauthorized access or against loss, misuse, or alteration by third parties, such as the following:

While we endeavor to ensure the integrity and security of our network and systems, we do not warrant or represent that our security measures will prevent malicious third parties from illegally obtaining access to your Personal Data. In case of data breaches, we shall comply with Philippine Privacy Laws with respect to the reportorial requirements set out by the NPC.

H. Rights of Users

The Company recognizes the data privacy rights of its users under Philippine Privacy Laws which include the following:

1. The right to be informed on how the Company collects and processes its personal data;
2. The right to access your personal data that is in our possession or under our control, as well as information about the ways in which such personal data has been or may have been used or disclosed by us;
3. The right to object and withdraw consent on the collection and processing of their personal data;
4. The right to suspend, withdraw or order the blocking, removal or destruction of their personal data whenever warranted;
5. The right to rectify or correct or dispute any inaccuracy or error in the personal data processed by the Company;
6. The right to data portability through which you may obtain and electronically move, copy, or transfer your data securely for further use;
7. The right to lodge a complaint with the NPC if you believe that the Company has violated your data privacy rights; and
8. The right to claim compensation if you believe you suffered damages due to inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of personal data or for violating your rights and freedoms as a data subject.

I. Changes to the Privacy Notice

We reserve the right to make changes to this Privacy Notice. The revised version of this Privacy Notice will be posted on our website. You are advised to periodically view our website to access the most current version of the Privacy Notice.

In case of substantial changes which will affect the purpose, scope, method, and extent of our processing of your data, we shall endeavor to secure your consent.

J. Contact Information

For any queries, clarifications, or requests with regard to this Privacy Notice, the exercise of your rights under this Privacy Notice and Philippine Privacy Laws, or to provide feedback with regard to the processing of your Personal Data, please e-mail us at info@honeyloan.ph