

FULL PRIVACY POLICY NOTICE (GENERAL)

Nissan Cagayan de Oro Distributors Incorporation (“NCDODI”) and Southern Peninsula de Mindanao Motors Incorporated (“SPDMMI”) is committed to protect the privacy and rights of NCDODI & SPDMMI stakeholders by compliance with the Data Privacy Act of 2012 (Republic Act 10173), its Implementing Rules and Regulations and through data privacy and protection policies that NCDODI & SPDMMI has adopted internally.

The objective of this policy is to disclose how NCDODI & SPDMMI collects, uses, retains and disposes the personal information of the Data Subjects. This policy outlines our practices and security measures to ensure the Data Subjects that appropriate guidelines are in place in handling his/her personal information.

Collection of Personal Data

NCDODI & SPDMMI is responsible for collecting the personal data of the Data Subject in the ordinary course of the Company business.

During this process, Data Subject may disclose necessary information by completing forms through paper and/or electronic format. When collecting personal data, NCDODI & SPDMMI will ensure that Data Subject:

- Knows the collection activities prior to collection of personal data.
- Understand why the personal data is needed, what the personal data will be used for and what the consequences are if he/she decides not to give consent to processing;
- Gives consent by written, electronic or recorded means.

Personal Data collected by NCDODI & SPDMMI include, but are not limited to:

- Contact information (e.g., name, addresses, phone numbers, e-mail address, emergency contact information for all stakeholders)
- Sensitive personal information (e.g., date of birth, marital status, family records, birthplace, nationality, race, gender, religion, health records, educational background, social security numbers, licenses, photographs and other visual images, if necessary)
- Employment Information (e.g., previous employment, performance, compensation, benefits, industrial relations records of Team Members)
- Financial Information (e.g., bank account details, and any other financial details)
- Transaction Information (e.g., information about payment to and from, payment date and /or time, payment amount, and any other details of services or products provided to or received from NCDODI & SPDMMI)
- Technical Information (e.g., Internet Protocol address, browsing details, and any other technical information used on the system website)

Use of Personal Data

Uses of personal data by NCDODI & SPDMMI include, but are not limited to:

- Identity verification and confirmation
- Recruitment and employment relationship
- IT Management
- Compliance with regulatory obligations
- Protection of interests
- Fraud detection
- Corporate transactions
- Risk Management
- Customer relationship management
- Business operations, services and products improvement
- Communication and marketing

Retention and Disposal of Personal Data

NCDODI & SPDMMI will retain personal data for only as long as necessary for legitimate business purposes, which are consistent with the Data Privacy Act and other related laws and regulations. Personal data will be retained, shared, updated and disposed according to this Privacy Policy and internal records management and security procedures. After such a period or NCDODI & SPDMMI are no longer legally obliged to retain your personal data, NCDODI & SPDMMI will archive, delete or destroy such personal data without further notice.

NCDODI & SPDMMI will keep personal data as accurate, complete and up-to-date as necessary for the purpose for which it is processed. The Data Subject is responsible for updating NCDODI & SPDMMI with the latest and accurate personal data.

Security

NCDODI & SPDMMI employs adequate organizational, physical and technical security measures such as password protection, encryption, firewalls and other controls, to ensure and preserve the confidentiality, integrity and availability of personal data. Only authorized persons from NCDODI & SPDMMI have access to an employee's personal data. Team Members who misuse any data are subject to disciplinary action.

Sharing and Disclosure

Your personal data may also be processed and shared by NCDODI & SPDMMI with its in accordance to the purposes stated upon collection of your personal data.

The personal data may also be shared by NCDODI & SPDMMI with its branches, subsidiaries, agents, representatives, or third-party service providers, either of NCDODI & SPDMMI or its branches, pursuant to the relevant data sharing agreement with NCDODI & SPDMMI & branches, subsidiaries, affiliates, agents, representatives, or third-party service providers, for any of the following purposes:

- (i) implement transactions which you request, allow or authorize,

- (ii) offer and provide new or related products, marketing & promotional activities, special campaigns and services of NCDODI & SPDMMI, its branches or third parties,
- (iii) conduct customer satisfaction survey,
- (iv) understand our customers better
- (v) comply with NCDODI & SPDMMI and its branches' internal policies and reporting obligations to governmental authorities under applicable laws
- (vi) and related activities.

We take reasonable precautions to ensure non-affiliated third parties and affiliates, to whom we disclose personal data are aware of our Privacy Policy and will treat the data in a similarly responsible manner. NCDODI & SPDMMI will maintain the confidentiality and secrecy of all personal data that come to its knowledge and possession, even after resignation, termination of contract, or other contractual relations. Personal data under the custody of NCDODI & SPDMMI shall be disclosed only pursuant to a notarized request by third party and written release approval of the same from Data Subject and only to authorized recipients of such data.

Rights of the Data Subject

Subject to applicable laws and regulations thereof, data subjects may have the following rights in relation to their Personal Data that NCDODI & SPDMMI holds. If the data subject wishes to make a request to exercise their rights, the data subject may communicate with the contact details indicated in "Data Protection Officer" section below.

▪ Right to be informed

As a data subject, you have the right to be informed about the processing of your personal data, including its purpose, scope, and method. You should be made aware of any automated decision-making or profiling, and the techniques used for these processes. The description of the personal data to be entered into the system, the recipients or classes of recipients of such data, the storage period, and your rights as a data subject should also be communicated to you.

▪ Right to access

As the data subject, you have the right to access, upon reasonable demand, the processed personal data, including the sources from which they were obtained, the recipients' names and addresses, the processing methods, the reasons for disclosure, any details about automated processes, the date of last access and modification, and the contact information of NCDODI & SPDMMI's data protection officer. NCDODI & SPDMMI may refuse your request if permitted by law or a court order, particularly if fulfilling the request would adversely affect the rights and freedoms of others.

▪ Right to object

As the data subject, you have the right to object to the processing of your personal data if it relies on your consent or legitimate interest.

If there are significant changes or amendments to the information provided in the consent form, privacy notice, or similar communication, you may request NCDODI & SPDMMI to cease processing your personal data. In such cases, you should be notified and given an opportunity to object and/or withdraw consent if you had previously consented to such processing.

You can also object to the processing of your personal data for direct marketing, profiling, or in cases of automated data processing where your personal data will, or is likely to, be the sole basis for any decision significantly affecting you.

- Right to rectification

The data subject is entitled to dispute any inaccuracies or errors in their personal data and request NCDODI & SPDMMI to rectify them within a reasonable timeframe.

NCDODI & SPDMMI reserves the right to refuse the data subject's request for rectification if it is evidently unfounded, vexatious, or deemed unreasonable. Requests may be declined if they serve no genuine purpose other than to harass, cause annoyance, or disrupt the delivery and execution of services.

- Right to erasure or blocking

As the data subject, you have the right to request NCDODI & SPDMMI to suspend, withdraw, or order the blocking, removal, or destruction of your Personal Data from NCDODI & SPDMMI's filing system, including both live and backup systems.

You may exercise your right to erasure or block upon discovering and providing substantial proof of any of the following:

1. Your personal data is incomplete, outdated, false, or unlawfully obtained.
2. Your personal data was used for an unauthorized purpose.
3. Your personal data are no longer necessary for the purpose/s for which NCDODI & SPDMMI collected it.
4. Your personal data concerns private information that is prejudicial to you, unless justified by freedom of speech, of expression, or of the press, or otherwise authorized.
5. You object to the processing, and there are no other applicable lawful criteria for processing.
6. The processing is unlawful.
7. The Personal Information Controller (PIC) or Personal Information Processor (PIP) violated your rights.

NCDODI & SPDMMI's PIC may deny your request for erasure or blocking, wholly or partly, when your personal data is still necessary in any of the following instances:

1. Fulfilment of the purpose/s for which the data was obtained.
2. Compliance with a legal obligation that requires personal data processing.
3. Establishment, exercise, or defense of any legal claim.

4. Legitimate business purposes of the PIC, consistent with the applicable industry standard for personal data retention.

5. To inform the public on matters that have an overriding public interest or concern, considering constitutionally guaranteed rights and freedoms of speech, expression, or press, whether the personal data pertains to a public figure, and other relevant considerations where personal data are processed with expectations of further processing.

6. As provided by existing laws, rules, and regulations.

- Right to lodge a complaint

If you, as the data subject, believe that your personal information has been misused, maliciously disclosed, improperly disposed of, or that any of your data privacy rights have been violated, you have the right to lodge a complaint about our practices in the collection, use, and disclosure of your Personal Data. You can do so using the contact details provided in the "Inquiries and Complaints" section below.

- Right to damages

Data subjects are entitled to indemnification for any damages resulting from inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of their personal data by NCDODI & SPDMMI, considering any violation of their rights and freedoms as data subjects.

- Right to data portability

Data subjects have the right to request from the PIC a copy of their personal data and/or have it transferred from one PIC to another, in an electronic or structured format commonly used, unless it is technically impossible due to NCDODI & SPDMMI 's restrictions.

Request Access by Written Letter Requesting to see their data

Employees and personnel can inquire about their personal data handling by formally writing a request letter to the Data Protection Officer. For complaints, email nissancdo.dpo@gmail.com, allowing three business days for a response; if none, formally write a complaint letter for confirmation of receipt.

Data Protection Officer

If you have any questions about this Privacy Policy, you may send your queries to:

Data Protection Officer
Nissan Cagayan de Oro Distributors, Incorporated,
Elipe Park, Kauswagan Road
Kauswagan, Cagayan de Oro City

Email Address: nissancdo.dpo@gmail.com

Please use the following subject format: Personal Data Inquiry

Updating of Privacy Policy

NCDODI & SPDMMI reserves the right to amend this Privacy Policy at any time, consistent with applicable law. In such case, an updated version of the Privacy Policy will be posted. If NCDODI & SPDMMI is required to use personal data in a manner different from that stated at the time of collection, NCDODI & SPDMMI will notify the Data Subject, who will have a choice as to whether or not his/her personal data can be used in such a way.

Consent

In accordance with the provisions of the Republic Act 10173, I understand that my consent is necessary for the company to process any supplied information. This would ensure the appropriate management of any information that would support and promote my business relationship with NCDODI & SPDMMI.

I hereby confirm that I have fully read and understood this Data Privacy Policy and that by providing my personal information as stated above, I hereby consent to the collection, use, storage, disclosure, transfer, sharing and general processing of my personal information as described above to the parties listed herein.