

## **Privacy Policy**

### **Introduction**

Data Analytics Ventures, Inc. (DAVI), through its Loyalty and Financial Products Division maintains the Robinsons Rewards Loyalty Program, whereby members of the Program through the use of the Robinsons Rewards Mobile App allows its members to accumulate points for purchases from various participating establishments, these points may then be used by the members to pay for their next purchase of items sold at these participating establishments.

The Robinsons Rewards Mobile App, respects your privacy and recognizes your need for appropriate protection and management of your personal data that you have directly and voluntarily entrusted us. We have developed this Privacy Policy in order to protect your personal data in accordance with the Data Privacy Act of 2012 (DPA), its Implementing Rules and Regulations (IRR), other issuances of National Privacy Commission (NPC) and other relevant laws of the Philippines.

Personal data refers to all types of personal information, sensitive personal information and privileged information. Personal information refers to “any information, whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual”.

This Privacy Policy tells you how we process (meaning, how we collect, use, share, and retain) and protect your personal data. It also tells you what steps you can take if you want us to change how we use your personal data, or if you want us to stop using your personal data.

### **Why do we collect your personal data?**

To enable us to comply and achieve our corporate policies and vision as well as to comply with regulatory requirements being observed by DAVI as an employer, controller processor and third party, it is important that the Robinsons Rewards Mobile App collects, uses, stores and retains your personal data when it is reasonable and necessary for a declared and specific purpose.

In general, we are using your data for any of the following purposes:

- For you to create the Robinsons Rewards Mobile App account and when you log-in, you will be able to:
  - Earn and redeem points via QR code with security verification
  - View point balance transaction history
  - View and update your personal information
  - Exclusive offers from Robinsons Retail stores and merchant partners
  - Save and get the most out of your shopping money with discount coupons and offers near you
- For you to subscribe/unsubscribe to our e-newsletters;

- To generate statistical insights;
- To conduct research and analysis (through surveys or polls) in order to improve customer experience/satisfaction;
- To respond to specific complaints, inquiries, requests or to provide requested information;
- To provide customer care activities, monitor our quality and security, and provide services timely and efficiently; and,
- To notify and update you (through call, text or email) about our complimentary, commercial and promotional advertisements, loyalty and rewards offers, exclusive invites, discounts, surveys, and other direct marketing that we deemed relevant and beneficial to you based on your preference and interest initially provided to us or made aware of, with which you can opt-out anytime should you prefer not to receive these notifications.
- To comply with legal and regulatory requirements or obligations; and,
- To perform such other processing or disclosure that may be required under law or regulations.

### **What type of personal data we collect?**

The common type of data collected by the Robinsons Rewards Mobile App from you generally includes the following:

- Basic personal information such as full name, home address, e-mail address, mobile, telephone, other personal contact numbers, username and password;
- Sensitive personal information such as date of birth, age, occupation, and gender; and,
- Other sensitive personal information and records such as, but not limited to, the following:
  - Fingerprint, ○ Birthday,
  - Gender,
  - Civil Status, and ○ Car Owner

Please note that you are responsible for ensuring that all such personal data you submit through the Robinsons Rewards Mobile App is accurate, complete and up-to-date.

### **Is the Robinsons Rewards Mobile App using analytics?**

When you download or use the Robinsons Rewards Mobile App we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as advertising, search results, and other personalized content.

Most mobile devices provide users with the ability to disable permissions (e.g., location services). Most likely, these controls are located in the device's settings menu. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or your device manufacturer.

### **What about the links to third-party websites?**

From time to time, we will provide links to third-party websites, or advertisements which contain links to third-party sites. These links are provided as a service to you and we do not provide any personal data to these websites or advertisers, and therefore, we will not accept responsibility for their privacy practices. These sites are operated by independent entities that have their own privacy policies which you should also review. The Robinsons Rewards Mobile App's Privacy Policy does not apply to such other sites or to the use that those entities make of your information. The Robinsons Rewards Mobile App has no control over the content displayed on such sites, nor over the measures, if any, that are taken by such sites to protect the privacy of your information.

### **Who we share your personal data with?**

As a general rule, we are not allowed to share your data to third party except in limited circumstances as noted below.

By giving your consent, you authorize the Robinsons Rewards Mobile App to disclose your personal data to accredited/affiliated third parties or independent/non-affiliated third parties, whether local or foreign in any of the following circumstances:

- As necessary for the proper execution of processes related to the declared purposes in this Privacy Policy.
- The use or disclosure is reasonably necessary, required or authorized by or under law (such as for criminal investigation, as requested by court of law).
- This means we might provide your personal data to the following:
  - Our affiliates, subsidiaries, partner companies, organizations, or agencies including their sub-contractors or prospective business partners that act as our service providers and contractors;
  - Law enforcement and government agencies;
  - All other third parties we deem necessary with which we share this personal data are required to use your personal data in a manner that is consistent with this Privacy policy.

However, these companies may only use such personal data for the purpose(s) disclosed in this Privacy Policy and may not use it for any other purpose.

### **What is our Privacy Policy regarding children?**

The Robinsons Rewards Mobile App is very sensitive to privacy issues and we are especially careful in any communications with one of our most treasured customers - children. The Robinsons Rewards Mobile App would never collect personal data from children directly, without the parent's consent.

Personal data collected from children at least 15 years of age is used solely by the Robinsons Rewards Mobile App or other entities that provide technical, fulfillment or other services to the Robinsons Rewards Mobile App. For example, such entities may provide services, such as, improving our service and fulfilling requests or administering promotions. These personal data are not sold.

Meanwhile, we urge parents to regularly monitor and supervise their children's on-line activities.

### **How we protect your personal data?**

We take reasonable steps to make sure that your personal data we collect, use or disclose are accurate, complete, and up-to-date. We strictly enforce our Privacy Policy within the Robinsons Rewards Mobile App and we have implemented technological, organizational and physical security measures to protect your personal data we hold from loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction. We put in effect safeguards such as the following:

- We keep and protect your personal data using a secured server behind a firewall, deploying encryption on computing devices and physical security controls.
- We restrict access to your personal data only to qualified and authorized personnel who hold your personal data with strict confidentiality.
- Any personal data that you provide on the Robinsons Rewards Mobile App is initially processed and stored by the Robinsons Rewards Mobile App. Using a secured connection only authorized personnel can then access and download your personal data from the Robinsons Rewards Mobile App.
- It is important for you to protect against unauthorized access to your password and to your mobile device. Be sure to sign-off when finished using a shared mobile device.

### **Where and how long do we keep your personal data?**

We reserves the right to retain and keep the information we gathered from you in our facilities located in the Philippines while you are a customer or until we no longer need it for business, tax, or legal purposes or unless you request your personal data to be deleted in the system or when your personal data may be necessary to resolve disputes, or if DAVI is required to do so by law or in good faith; provided that such action is necessary to comply with a legal obligation and/or protect and defend the rights or property of DAVI or its affiliates. If DAVI is required to retain any portion of your personal data for such purposes, it shall use reasonable efforts to limit such data to what is necessary to accomplish the particular purpose. When we dispose of your personal information, we use reasonable procedures to destroy it or make it unreadable (such as shredding or by wiping electronic data). Once deleted, your personal data will no longer be searchable or included in anonymous searches and will be completely removed from all the storage location.

### **What if there are changes in our Privacy Policy?**

From time to time, it may be necessary for the Robinsons Rewards Mobile App to change this Privacy Policy. If we change our Privacy Policy, we will post the revised version here and will take effect immediately, so we suggest that you check here periodically for the most up-to-date version of our Privacy Policy. Rest assured, however, that any changes will not be retroactively applied and will not alter how we handle previously collected personal data without obtaining your consent, unless required by law.

### **How you can access, correct and update the personal data we have about you?**

To exercise your rights which include right to access, modify, erase and object to processing your personal data within a reasonable time after such request or should you have any inquiries, feedbacks on this Privacy Policy, and/or complaints to Robinsons Incorporated, you may reach us through our "Contact Us" menu in this mobile app, through a written letter or through an email to our Data Protection Officer (DPO).

Our contact details are as follows:

Data Protection Officer

Data Analytics Ventures, Inc.

30th floor, Cyberspace Gamma, Topaz & Ruby Roads, Ortigas Center, Pasig City, Philippines

Office: 63 8991-4714

Email address: [dpo@davi.com.ph](mailto:dpo@davi.com.ph)

You may also lodge a complaint before the National Privacy Commission (NPC). For further details, please refer to NPC's website: <https://privacy.gov.ph/mechanics-for-complaints/>.

Our decisions to provide such access or consider any request for correction, erasure and objection to process your personal data as it appears in our records are always subject to any exceptions under applicable and relevant laws and/or the DPA, its IRR and other issuances of NPC.

To cover for the cost of verifying a request for information and locating, retrieving, reviewing and copying any material requested, we may charge you minimal and reasonable fees based on administrative costs we incurred.

*This Privacy Policy was last amended on 17th of February 2020.*