	<b>Strategic Information Management Software Solutions Corp.</b>		Doc. Title & Cont. No.	902010 Data Privacy Statement.docx
			Rev. No.	0
	<b>ISO 9001-2015 Quality Management</b> sales@simss.com.ph; www.simss.biz;		Effective Date	July 1, 2023

## DATA PRIVACY STATEMENT

### PURPOSE AND SCOPE

Strategic Information Management Software Solutions Corp. ("SIMSS") holds a deep regard for your privacy and the confidentiality of your account details in our possession. This Data Privacy Statement ("DPS") provides you, our valued consumer, with information about how we gather, employ, safeguard, and manage your personal information within our application systems. We uphold the principles of data privacy, which encompass: (1) legitimate purpose – processing data with your consent and in accordance with legal or contractual obligations; (2) transparency – keeping you informed about all activities concerning your data; and (3) proportionality – collecting only the necessary data for the intended purpose.


This Data Privacy Statement ("DPS") is relevant to various individuals and entities within our customer base, including: (1) existing, former, and potential customers, whether they are individuals or corporations; and (2) non-client individuals or entities, such as recipients or senders of payments related to SIMSS products and services, visitors or those making inquiries at our physical offices and online platforms, ultimate beneficial owners, directors, or representatives of corporate clients, as well as other individuals engaged in using SIMSS products and services, irrespective of whether the transactions are historical or ongoing.

### COLLECTION OF YOUR PERSONAL AND SENSITIVE PERSONAL DATA

Personal Data pertains to any information that can uniquely identify or be linked to an individual. Conversely, Sensitive Personal Data encompasses attributes that can differentiate, characterize, or categorize an individual, including details like gender, address, email, contact numbers, and organizational user names. We gather your Personal and Sensitive Personal Data when you register, enroll, or utilize our SIMSS products and services, or communicate with us regarding them. Additionally, we acquire this information through your authorized organization, whether it's a private corporation or a government entity. We may also procure your details from other sources, such as publicly accessible platforms, governmental bodies, and various registries, primarily for identity validation and adherence to regulatory requirements set forth by relevant government authorities.

### KINDS OF DATA WE PROCESS

1. **Customer Identification Data:** This pertains to the Personal Data and Sensitive Personal Data of Company Personnel that we gather during your product and service registration. It includes details like your complete legal name, gender, permanent and current addresses, tax identification number, and other government-issued IDs. Additionally, it encompasses your mobile and home numbers, photograph, resume, school records, emergency contact information, office contact particulars, company name, job position or rank, office address, and any other information necessary for your web and/or mobile application subscription.
2. **Data of Customer's Suppliers and Customers:** This encompasses the data of Company Suppliers and Customers' customers, including Sensitive Personal Data of their users. We gather this information when you enroll or register for our products and services. It covers details like the logos and images of Suppliers and Customers, full legal names, gender, permanent and current addresses, tax identification numbers, and other government-issued IDs. Additionally, it includes mobile and home numbers, office contact information, company names, job positions or ranks, office addresses, and any other relevant information required for web and/or mobile application subscriptions.

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1. **Transactional Data:** This pertains to information associated with your Company Data for diverse transactions, encompassing tasks like creating information, managing stock, executing transactions, and producing reports. It covers the following: (1) Usernames and Passwords for Company Personnel Subscriptions, actions such as assigning, adding, and removing Customer Users, updates to your subscription account passwords, as well as transaction details like reference numbers, dates, times, and preparer information; (2) Data generated from interactions through official channels like social media, contact centers, web, and mobile platforms; (3) Records of card-based purchases or transactions managed by our third-party collection agency and the SMART ASP hosting and Cloud storage services; and (4) Additional variations of customer account numbers, payments, and your engagements with us.
2. **Behavioral Data:** This pertains to your actions online, segmentation of customers and suppliers, usage patterns and receipt of our offerings, the internet protocol addresses associated with the devices you employ to access our applications, interests and preferences you disclose to us, and customer behavior that we gather as part of our due diligence efforts to thwart fraudulent activities and adhere to government cybersecurity regulations.
3. **Sensitive Personal Data of Company, Suppliers, and Customers:** We might necessitate certain Sensitive Personal Data from companies, suppliers, and employees as follows: (1) civil status, date of birth, gender, photograph, when you seek subscription services from us; (2) for the purpose of establishing employee, supplier, and customer profiles in our system, government-issued identification numbers, emergency contact person details; or (3) any information essential for, or related to, the subscription agreement or the application process for subscription services.
4. **Relevant Individuals:** With your consent, we have the potential to gather data concerning company subscription users, employees, suppliers, and customers, which is termed as Consumer data. Consumer data pertains to details gathered from individuals who engage with company products, services, websites, apps, or platforms


## DATA PROCESSING

Data Processing refers to any activity related to the gathering, recording, arrangement, storage, updating, modification, retrieval, consultation, utilization, merging, blocking, deletion, or elimination of Consumer Data.

We engage in Consumer Data processing solely for valid reasons and with a legal foundation, such as your agreement to adhere to this Data Privacy Statement upon application and submission of duly signed terms and conditions and application forms, in alignment with the terms and conditions of the product or service you enrolled in, and in accordance with legal and regulatory mandates. We ensure that only authorized employees and third-party service providers, who meet rigorous criteria for risk management, governance, information security, and data privacy, are authorized to manage your data.

## Data Storage

We utilize third-party managed environments, such as cloud and hosting service providers, to securely and encryptedly store and host Consumer Data. This is achieved through SmarterASP, situated in a world-class data center in the United States and Europe. This setup ensures optimal efficiency, maintenance, safety, and privacy, while also delivering the fastest possible speeds using high-quality bandwidth providers for our application services.

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### Data Access

Control over Consumer Data access is meticulously managed following a hierarchical structure. This signifies that solely individuals with authorization from the Authorized Company Officer are permitted to retrieve Information, Stock Management details, Transaction records, and generated reports related to Consumer Data. This authorization adheres to the principle of proportionality, which guarantees that authorized users are restricted to accessing Consumer Data, information, and transaction records essential to their specific roles and objectives within the context of utilizing application products and services.

### Data Use

#### Data Profiling

We perform automated processing of Consumer Data to evaluate certain personal aspects relating to consumer buying behavior, Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

### Customer Engagement


We utilize the contact information you've shared with us to establish communication regarding your association with us. This encompasses various activities tied to offering application products and services. These activities encompass a wide range of tasks, including but not limited to tasks like creating and editing information, managing stock, handling transactions, generating reports, authorizing transactions, printing and distributing transaction reports, providing customer service, conducting surveys, sharing blogs and articles, executing promotional campaigns, presenting documents such as product brochures, and overseeing incentive and loyalty programs.

You might receive emails, social media, mobile notifications, phone calls, or articles and blog posts pertaining to improvements in products and services, as well as reminders concerning account security.

We employ the contact information you have provided to reach out to you for the purpose of verifying the identity or authority of their representatives. This verification process is crucial when these individuals or representatives get in touch with SIMSS or when SIMSS needs to establish contact with them. This verification is essential to facilitate the execution of service requests, address inquiries, or follow instructions coming from verified representatives.

We might additionally get in touch with you to facilitate communication with an actual or potential assignee of Service Users Agreement, Quotations, or someone participating in or transferring Account Subscription rights concerning the Data Subject. This communication serves to assess or finalize a transaction that is intended to be the focus of the assignment, transfer, participation, or sub-participation. In cases where a reorganization leads to a change in assignees within the User Agreement or quotation, SIMSS will be duly informed when applicable.

We may also contact you to get your consent to enable us to provide product related services and support, including, without limitation, provision of Network Administrator details or Authorized Person acting as an intermediary/Nominee in connection with participation and management of Users of the application. You have the right to opt out from these forms of communication with you or choose another means through which we can contact you.

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### Marketing

We might utilize your information to distribute campaigns promoting commercial products and services that we believe would capture your interest and prove to be pertinent and valuable to you. Our objective is to cultivate a more tailored connection with you by furnishing offers that align with your business requirements, thereby maximizing the utility of the application.

We analyze how you use the application to understand its effectiveness and relevance.

It is important to note that you retain the prerogative to retract your consent or opt out of receiving personalized offers at any time.

### Due Diligence and Regulatory Compliance

We might utilize your Consumer data for tracking your payments, we create reports about your account subscription payments and updates.

When you ask us to upgrade your subscription, add more cloud storage data, or include more users and services, we use your account details.

We handle Consumer Data according to legal rules and the requirements of Philippine Data Privacy acts and other regulations. This includes supporting government initiatives, projects, and programs, and helping other financial institutions collect debts from subscription charges.

### Business Insights

In the context of the Philippines, we conduct data analysis and reporting utilizing your Consumer Data to support both our team and yours in making more informed decisions.

We examine your behavioral data, how you engage with our products and services, and our communications with you. This assists us in conducting business risk assessments, control and compliance reviews, internal audits, or facilitating external audits. The goal is to enhance our understanding of areas where improvements and advancements can be made.

Additionally, we analyze transactional data carried out through our third-party service providers and partners. This collaborative effort helps us identify ways to collectively enhance our offerings for your benefit.

### Data Quality

In adherence to the provisions set forth by the Data Privacy Act and its related regulations in the Philippine setting, we will handle your Consumer Data while upholding the standards for data quality.

To enhance the quality of the Consumer Data we have, we may acquire supplementary information about you from both private entities and government-controlled agencies.

Furthermore, we might reach out to you to verify the accuracy and integrity of the information we hold in our data processing systems. This approach ensures that the data we manage remains precise and reliable.


### Protection and Security

We handle Consumer Data with the objective of safeguarding your account against cybercrime, identity theft, fraud, and financial crimes.

To ensure account security, we utilize your Customer, Suppliers, Employees Personal Data, and other Transactional Data to create profiles that help identify any unusual or suspicious activity associated with your subscription account.

In this process, we might deploy artificial intelligence and machine learning technologies to promptly detect any suspected fraudulent actions occurring in real-time on your account.

In cases where potential fraudulent activities are detected, we might take measures like password resets or temporary holds on your online subscription account. These actions are implemented to shield you from potential harm.

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Furthermore, for various purposes such as record-keeping, quality assurance, customer service, training, investigation, litigation, and prevention of fraud, we may record calls and electronic communications involving Relevant Individuals and Users.

### **SIMSS Remedies and Verification**

We might utilize Consumer Data to uphold the rights of SIMSS and/or any of its affiliates and subsidiaries, along with its employees, officers, and directors, whether through enforcement actions or defense strategies, including the collection of outstanding amounts.

### **Comparable uses**

We might utilize Consumer Data for similar transactions and/or purposes closely related to or directly associated with them.

### **Data Retention**

Records will be retained for a period of five (5) years starting from the transaction date, unless specific laws or regulations mandate a different duration. If a longer retention period is stipulated by such laws or regulations, that longer period will be followed.

Regarding transactional data and reports that require preservation, they shall be maintained for a duration of five (5) years. Any data retention charges exceeding the allowable 2GB storage will be covered by the company on an annual basis.

We retain your data for as long as it's needed: a) to achieve legitimate objectives, or once processing for those objectives has ceased; b) for the establishment, execution, or protection of legal claims; or c) for valid business reasons, all of which adhere to the stipulations of the data privacy act.

### **Data Disposal**


Once the designated retention period has lapsed, we securely dispose of personal data to ensure that further processing, unauthorized access, or disclosure to any other entity is prevented.

Consumer Data is subject to specific data retention requirements and limitations as mandated by regulatory directives. The right of Consumers to request Data Deletion hinges on these data retention prerequisites and constraints. To opt out of receiving advertisements and notifications, kindly contact SIMSS's Data Protection Officer at sales@simss.biz. Upon submitting the completed Do Not Contact Form, your request will be processed. We will inform you about the scope and implications of your request. It's essential to recognize that your data has already undergone processing and sharing in alignment with this Data Privacy Statement before your Do Not Contact Request. We will also communicate your Request to relevant third-party recipients and subsequently update you regarding these third parties.

### **DATA SHARING AND PURPOSE**

By granting your consent for the processing of your Consumer Data with us, you are also granting your agreement to assist us in fulfilling our obligations to Third Party Hosting and Cloud Storage Providers. Furthermore, with your explicit written and/or electronic consent, we may share Consumer Data externally with our partners. This sharing is aimed at offering value-added services that you might deem valuable and relevant, enhancing your subscription account experience.

To ensure the safeguarding of Consumer Data, we adhere to standardized model clauses recommended by the National Privacy Commission for contractual and value-added service data sharing agreements. The following disclosures are required by governmental entities and other regulatory authorities:

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We reserve the right to divulge your Consumer Data to our partners who collaborate with us to deliver services and jointly communicate with you about topics of potential interest.

Via our internet-based payment platform, which facilitates sending and receiving payments electronically, digital technologies and the internet are harnessed to streamline communication, information exchange, and interactions. Through this platform, you have the capability to direct other mobile financial technology apps to initiate payments or receive incentives and refunds.

While conducting our business, we might share your Consumer Data with authorized individuals such as sales agents, brokers, advisors, contractors, or third-party service providers. These individuals offer various services to SIMSS, including administration, mailing, telemarketing, direct sales, debt collection, collecting agents and more. This helps us manage different aspects of our operations effectively.

We reserve the right to share the data you provide to us with affiliated entities, which include Luce Global Environmental Health and Safety Specialist Inc. (LGEHSSI) and Synergylift Services Inc. (SSI). Such data sharing occurs periodically and aligns with the purposes delineated in the prevailing SIMSS Privacy Data Statement. Furthermore, this sharing is conducted in accordance with legal obligations encompassing laws, regulations, governmental requisites, treaties, agreements, policies, and legal procedures, including inquiries, audits, and investigations.

It is important to emphasize that this practice remains applicable irrespective of the existence of any non-disclosure agreement.

#### **Recipients of Data in Assignment/Involving Relevant Individuals**

Your Consumer Data may also be disclosed by us to facilitate the assessment or completion of a transaction related to the transfer, participation, or sub-participation of SIMSS's rights concerning the Data Subject, Relevant Individuals, or any other party with a stake. This pertains to actual or prospective assignees of the Customer, or entities undertaking a role as participant, sub-participant, or transferee in relation to SIMSS's assets or business.

Furthermore, your data may be shared with any party that offers or proposes to provide a guarantee or third-party security to ensure the fulfillment of obligations of the Data Subject or any Relevant Individual.

#### **RIGHTS OF THE CONSUMER**

Under the Data Privacy Act of 2012, you have the following rights:


**Right to Information** – You hold the prerogative to request comprehensive information concerning the processing or historical processing of your Personal Information by SIMSS.

**Access Rights** – Upon submitting a written request, you are entitled to request reasonable access to your Personal Information. This includes potential access to the details of your processed personal information, the methods of processing, the origins from which they were sourced, the parties to whom they have been disclosed, and the grounds for such disclosures.

**Right to Challenge** – You possess the authority to contest inaccuracies or errors found within your Personal Information stored within SIMSS application systems. This can be undertaken through our technical support representatives.

**Right to Rectify** – You have the right to request that SIMSS rectify any Information and/or Personal Data pertaining to you that is found to be inaccurate.



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**Right to Object** – You retain the authority to halt, retract, and expunge your Personal Information from specific future processing upon your request. This encompasses your entitlement to decline participation in any commercial communication or advertising initiatives conducted by SIMSS.

**Right to Data Deletion** – Subject to reasonable justifications and in accordance with relevant laws and regulations, you are entitled to suspend, withdraw, or request the blocking, elimination, or eradication of personal data concerning company suppliers and customers from the SIMSS's records. This is done without prejudicing SIMSS's ongoing processing activities for commercial, operational, legal, and regulatory reasons.

**Right to Data Portability** – You hold the entitlement to acquire your company suppliers' and customers' and personnel Personal Information from SIMSS in an electronic or organized format that conforms to common industry practices and facilitates its subsequent utilization.

**Right to Compensation for Damages** – In your capacity as a data subject, you possess the full entitlement to receive just compensation for any losses incurred because of a breach of your privacy rights through the misuse, inaccuracy, falsehood, unlawfulness, or unauthorized utilization of your information.

**Right to Lodge a Complaint** – You have the option to formally lodge your complaint or raise any concerns with our Data Protection Officer at email, dpo@simss.com.ph. Alternatively, you may choose to bring your matter to the attention of the National Privacy Commission through the official website privacy.gov.ph.

#### **CONTACT OUR DATA PROTECTION OFFICER**

For inquiries and concerns, you may address them to SIMSS's Data Protection Officer at Jasmin St. B9 L6 Rodriguez Village, Lawa, Calamba City or through email at sales@simss.biz