

## **Privacy Policy**

Effective Date: January 2021

In this Policy, the terms “we,” “us,” and “LCI” are references to Landmark Communities, Inc. The term “you” and its derivatives refer to customers, vendors, partners, employees, associates, and other stakeholders of Landmark Communities, Inc.

### **Overview**

Landmark Communities, Inc. in compliance with the Philippine Data Privacy Act of 2012. LCI respects the confidentiality of personal information and values data privacy rights.

We strive to ensure that all personal information as detailed under Section 3 (j) of the Data Privacy Act, referring to any operation or any set of operations performed in the processing of personal information collected from customers, vendors, partners, employees, associates, and other stakeholders are processed in accordance with the general principles of transparency, legitimate purpose, and proportionality.

Our privacy policy describes how we collect, protect, and manage customer information through our websites, information systems, and processes.

### **Background**

Republic Act No. 10173, also known as the Data Privacy Act of 2012 (DPA), aims to protect personal data in information and communications systems both in the government and the private sector.

It ensures that entities or organizations processing personal data establish policies, and implement measures and procedures that guarantee the safety and security of personal data under their control or custody, thereby upholding an individual’s data privacy rights. A personal information controller or personal information processor is instructed to implement reasonable and appropriate measures to protect personal data against natural dangers such as accidental loss or destruction, and human dangers such as unlawful access, fraudulent misuse, unlawful destruction, alteration and contamination.

### **Processing of Personal Data**

LCI collects the basic contact information of clients and customers, including their full name, address, email address, contact number, together with other relevant information related to cause and purpose. The reservation team attending to customers will collect such information through accomplished order forms.

**Use.** We will ensure that personal data under its custody are protected against any accidental or unlawful destruction, alteration and disclosure as well as against any other unlawful processing. The company will implement appropriate security measures in storing collected personal information, depending on the nature of the information. All information gathered shall not be retained for a period longer than five (5) year. After five (5) years, all hard and soft copies of personal information shall be disposed and destroyed, through secured means.

**Access.** Due to the sensitive and confidential nature of the personal data under our custody, only authorized representatives of the company shall be allowed to access such personal data, for any purpose, except for those contrary to law, public policy, public order or morals.

**Disclosure and Sharing.** All employees and personnel of the company shall maintain the confidentiality and secrecy of all personal data that come to their knowledge and possession, even after resignation, termination of contract, or other contractual relations. Personal data under the custody of the company shall be disclosed only pursuant to a lawful purpose, and to authorized recipients of such data.