

DATA PRIVACY AND PROTECTION NOTICE

United Philippine Lines Inc. (UPL) respects and is committed to the protection of your personal information and your privacy. This Data Privacy Protection Notice (“Notice”), prepared in accordance with the Data Privacy Act 2012 (DPA 2012), sets out its personal information privacy and protection practices that are put in place to protect the personal information of individuals whom UPL deals with.

Please note that we may amend this Notice at any time without prior notice and will notify you of any such amendments via our website or by email. Please check back regularly for updated information on the handling of your personal data.

1. Definitions

For the purposes of this Notice:

- 1.1. “affiliates / partners / service providers” means related companies;
- 1.2. “personal information” and “processing” shall have the meanings as set out under the DPA 2012

2. Collection of personal information

In the course of your dealings with UPL, it will request that you provide certain personal information elements to enable us to enter into transactions with you or to deliver the necessary services and/or communications in connection with such transactions. These are necessary for our business process execution, including government reporting requirements, banking reporting requirements, delivery of notices, services, client / affiliate / partner, and/or third-party vendor relationship management, new service launches and events, planning purposes in connection with future services.

3. What kind of personal information we collect

In order for us to fulfill one or more of our obligations listed in section 2 herein, we will need to collect relevant personal information from you. The personal information collected by us may include (but is not limited to) the following:

- 3.1. Contact information such as your name, date of birth, identification documents, gender, nationality, mailing address, social media account link(s), phone number(s), fax number and email address(es);
- 3.2. Information you provide UPL regarding your personal identification documents, bank accounts, beneficiaries, dependents

4. When and how we collect your personal information

We may collect personal information directly from you when you:

- 4.1. Communicate with UPL (for example when you contact UPL for any enquiries, including by calling the UPL offices);
- 4.2. Submit your information when you electronically contact UPL;
- 4.3. Respond to any notices we send out;
- 4.4. Commence a business relationship with UPL;
- 4.5. Visit UPL’s offices; and/or
- 4.6. Provide feedback to UPL (for e.g. via our websites or in hard copy).

Other than personal information obtained from you directly (as detailed above), UPL may also obtain your personal information from third parties we deal with or who are connected with you and from such other sources where you

have given your consent for the disclosure of information relating to you, and/or where otherwise lawfully permitted.

5. Purpose of collecting personal information

Personal data you provide will be processed by us for, amongst others, the following purposes as applicable:

- 5.1. The delivery of notices or services to you;
- 5.2. In order for you to enter into the necessary agreement and/or contract with UPL and its clients;
- 5.3. Such purposes specifically provided for in any particular service or product offered by UPL;
- 5.4. Conducting customer profiling activities in connection with UPL services and related services;
- 5.5. UPL internal record keeping;
- 5.6. Enabling UPL to send you information by e-mail, telecommunication means (telephone calls or text messages) or social media about services offered by UPL Affiliates, that we think may interest you;
- 5.7. To establish and better manage any business relationship we have with you;
- 5.8. To process any communication you send UPL (for example, answering any queries and dealing with any customer service complaints and feedbacks);
- 5.9. Customer service related matters;
- 5.10. To provide you with the services you have requested; and/or
- 5.11. To notify you about benefits and changes to the features of UPL services.

6. Log Data

We want to inform you that whenever you visit our Service, we collect information that your browser sends to us that is called Log Data. This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser version, pages of our Service that you visit, the time and date of your visit, the time spent on those pages, and other statistics.

7. Cookies

Cookies are files with small amount of data that is commonly used an anonymous unique identifier. These are sent to your browser from the website that you visit and are stored on your computer's hard drive.

Our website uses these "cookies" to collection information and to improve our Service. You have the option to either accept or refuse these cookies, and know when a cookie is being sent to your computer. If you choose to refuse our cookies, you may not be able to use some portions of our Service.

8. Service Providers

We may employ third-party companies and individuals due to the following reasons:

- 8.1. To facilitate our Service;
- 8.2. To provide the Service on our behalf;
- 8.3. To perform Service-related services; or
- 8.4. To assist us in analyzing how our Service is used.

We want to inform our Service users that these third parties have access to your Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose

9. Links to Other Sites

Our Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

10. Children's Privacy

Our Services do not address anyone under the age of 13. We do not knowingly collect personal identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

11. Failure to supply personal information

The failure to supply such personal information as may be needed may:

- 11.1. Result in UPL being unable to provide you with the notices, services required by clients;
- 11.2. Affect UPL ability to effect the necessary processes relating to the supply of its services; and/or
- 11.3. Result in UPL being unable to update you on our latest services and events

12. Disclosure of your personal information

Personal data provided to UPL will generally be kept confidential but you hereby consent and authorize UPL to provide or disclose your personal information to the following categories of parties:

- 12.1. Companies and/or organizations that act as our partners, contractors and/or service providers;
- 12.2. UPL partners and affiliates for purposes that are related to the purpose for collecting and using your personal information;
- 12.3. Other parties in respect of whom you have previously given your express consent;
- 12.4. UPL's auditors, consultants, accountants, lawyers or other financial or professional advisers; and/or
- 12.5. Companies and/or organizations that assist UPL in processing and/or otherwise fulfilling transactions and providing you with services that you have required

13. Direct Marketing

UPL may use your personal information to provide you with information about its and/or an affiliate's services and/or products, which may be of interest to or benefit you, except where otherwise requested or notified by you.

14. Personal Data Integrity

UPL will take all reasonable steps to make sure that the personal information collected, used or disclosed is accurate, complete, not misleading and up-to-date.

15. Personal Data security

UPL will take all reasonable steps to protect the personal information it holds from loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction.

UPL will not keep personal information for longer than is necessary and will take reasonable steps to destroy or permanently de-identify personal information.

16. Data Transfer And Sharing

Where UPL considers it necessary or appropriate for the purposes of data storage or processing or providing any service on its behalf to you, it may transfer your personal information to another affiliate within or outside the Philippines, under conditions of confidentiality and similar levels of security safeguards.

17. Access and Correction

In accordance with the DPA 2012, UPL may, on a written request received from you, provide you with access to your personal information and consider a request for correction of that data. In such circumstances, please duly complete the Subject Access Request (SAR) located here and submit it to:

Data Protection Officer
United Philippine Lines Inc.
One Fort Santiago
Santa Clara Street, Intramuros
Manila, Philippines 1102
dataprotection@uplines.net

UPL will use reasonable endeavors to respond to your request within 14 days from UPL's receipt of your duly completed SAR.

Please note that in certain situations we may have to withhold access to your personal information, for example where UPL is unable to confirm your identity or where information requested for is of a confidential nature or in the event UPL receives repeated request for the same information. Nevertheless, UPL will notify you of the reasons for not being able to accede to your request.

If UPL does not receive any email from you within fourteen (14) days of this Notice, we shall presume that you have approved of its continued use of your personal information in accordance with this Notice. However, please rest assured that you will be able to terminate this approval at any time.

18. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. Thus, we advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately, after they are posted on this page.