

DATA PRIVACY POLICY

I. INTRODUCTION

We at **Euro Towers International, Inc. (ETII, “the Company”, “Euro Towers”, “we”, “us” or “our”)** value privacy and are committed to protect and respect Personal Information that may be given/submitted to us as part of our ordinary course of business. Our Privacy Policy describes how we collect, use, protect and manage information we gather when our Clients buy or lease Units from any of our Projects and Properties as well as from the Brokers/Agents/Sellers who sell/market our Units. We ensure that our Privacy Policy is consistent with **Republic Act No. 10173** or the **Data Privacy Act of 2012 (“DPA”)**, its Implementing Rules and Regulations (“IRR”), other issuances of the National Privacy Commission (“NPC”), as well as other relevant laws of the Philippines.

II. PERSONAL INFORMATION THAT ARE COLLECTED

The Personal Information that Euro Towers may collect from you may include, but are not limited to the following:

- Name, age, date of birth, gender, civil status and citizenship.
- Residential Address
- Mailing and Email Address
- Landline and/or Mobile Numbers
- Social media accounts and social media behavior such as tag, mention, or post photographs of any development of Euro Towers publicly on any social media platform (i.e., Facebook, Twitter, Instagram, LinkedIn, etc.).
- Educational and professional background.
- Financial capacity, such as, but not limited to credit history and financial statements.
- Payment records.
- Government-issued Identification Numbers.
- Information about your visit and use of our websites; and
- CCTV footages

Your Personal Information that we collect are those that you voluntarily submitted to us. By submitting your Personal Information pursuant to any of your dealings with Euro Towers, you consent to the collection, use, storage and all other forms of processing of your Personal Information in accordance with this Privacy Policy.

It shall be understood that all Personal Information pertaining to any third party, such as, but not limited to, your parents, spouse, children, dependents, or relative, that you provide us shall be construed as bearing the consent of the relevant third party whose information you provide us. Such Personal Information shall be collected, stored, used and processed in accordance with this Privacy Policy.

III. PURPOSES OF COLLECTED PERSONAL INFORMATION

Euro Towers will collect, process, and use your Personal Information to allow us to communicate and assist you with your inquiries and concerns relating to our condominium projects. By having a better appreciation of your requirements and interests, we can improve and strengthen our services keeping in mind your actual needs and preferences.

Euro Towers also gathers your Personal Information to:

- Determine potential clients' qualifications to avail of our products and/or services.
- Monitor and provide information to you relating to your contractual obligations with Euro Towers and the status of your accounts.
- Provide you with the products and services that you have requested, including customer assistance.
- Communicate relevant information about our condominium projects and services.
- Respond to your queries, requests and/or complaints.
- Send promotional advertisements and other marketing emails or messages.
- Ensure that the property is properly and correctly transferred and titled in the name of the Buyer after the same has been fully paid.
- Ensure that all Data/Information will be used to facilitate the processing and approval of any financing scheme applied for/requested by the Client; and
- Generate data for statistical, analytical, and research purposes.

IV. STORAGE AND RETENTION OF PERSONAL INFORMATION

Euro Towers takes the needed precautions and employs the necessary technical and physical measures to protect the safety and confidentiality of your Personal Information.

Your Personal Information are stored in a secure environment and are only accessible to designated and authorized employees, and our agents and contractors who may be required to process your information.

Our website/servers are protected by a firewall and other security tools. Such website/servers are scanned regularly for any security loopholes, in order to detect, correct and avoid any vulnerabilities and to ensure that your Personal Information are always protected.

All Personal Information provided and collected by us are stored in our database and shall be stored so long as:

- You remain as one of our unit owners, buyers, sellers, lessors or lessees.
- Any disputes involving any transaction or dealings with Euro Towers have not been judicially resolved with finality.
- Required by applicable law; and

- May be needed to enable us to fully and efficiently achieve the Purposes set out in Part III above.

V. THIRD PARTY TRANSFER

It is our policy not to share nor disclose your Personal Information to any individuals or entities other than our own employees, officers, lawyers, accountants and other authorized agents.

However, your Personal Information may also be disclosed to any of our affiliates, subsidiaries, professional consultants, contractors, real estate agents and third-party service providers when necessary to do so in the ordinary course of our business, or upon properly and duly authorized in writing by the Owner of the Personal Information.

Euro Towers may also disclose your Personal Information when it is necessary to comply with any law, rule, regulation or court order.

VI. DATA PROTECTION OFFICER

The Data Protection Officer (“DPO”) is responsible for supervising, checking and enforcing compliance of this Policy. The relevant contact details of the DPO are as follows:

Title/Designation : Data Protection Officer
Postal Address : 3rd Floor, Vivaldi Residences Cubao, 628 EDSA cor. Aurora Blvd.,
Cubao, Quezon City, Philippines, 1109
Telephone Number : +63 (2) 8376 1111
Email Address : dpo@eurotowersintl.com

If you have any inquiries or concerns related to this Privacy Policy or your Personal Information, please contact our DPO through the contact details indicated above.

VII. RIGHT TO ACCESS, CHANGE OR DELETE PERSONAL INFORMATION

You have the right to access your Personal Information stored with us by requesting a copy thereof from our DPO. For any request for corrections, changes or deletion of your Personal Information, please inform our DPO as soon as possible so that the necessary changes may be reflected in our data base.

VIII. CHANGES AND UPDATES TO THE PRIVACY POLICY

Euro Towers reserves the right to revise or change this Privacy Policy at any time. We shall inform you of such changes by posting the revised or amended Privacy Policy in our website with a date indicated therein.