

PRIVACY POLICY

We, at Infinity Broadband, INC and Trece Cable TV Corp (the "Company"), are committed to protecting your privacy and ensuring that you experience and enjoy our offered cable, broadband, and other value added services. The Company developed this Privacy Policy ("Policy") with the objective of ensuring compliance with the applicable privacy laws, rules and regulations of the Republic of the Philippines, including but not limited to Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012 (the "Data Privacy Act"), its implementing rules and regulations and rules, regulations and the relevant issuances of the National Privacy Commission of the Philippines ("NPC").

This Policy governs the collection, sharing, recording, updating, modification, retrieval, use, retention, and disposal of Personal Information and Sensitive Personal Information gathered from, Service Application Forms, Website and Campaign-based Registrations, and various communication channels such as phone calls and social media sites, among others.

By applying for subscription or by making inquiries regarding any of our services, accessing the Company's website (<https://sakura.infinitybroadband.ph>), participating in our marketing and promotional activities, availing of customer service by calling and sending a message through our website, and various social media sites, and continued use of the Company's products and services, you indicate your consent and acceptance of the terms of this Policy.

Under the Data Privacy Act, persons whose personal, sensitive or privileged information are collected, stored and processed are called "Data Subjects". Institutions which deal with these information are duty bound to uphold the rights of Data Subjects, as well as to adhere to general data privacy principles and the requirements of lawful processing. Thus, we hereby provide you with our Privacy Policy that will guard the safety and care of your Personal Information and Sensitive Personal Information that we gather from you.

TYPES OF INFORMATION COVERED BY THIS POLICY

This Policy applies to Personal Information and Sensitive Personal Information.

"Personal Information" is defined by law as 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.

"Sensitive Personal Information" is likewise referred to as personal information:

1. About an individual's race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;
2. About an individual's health, education, genetic or sexual life, or to any proceeding for any offense committed or alleged to have been committed by such individual, the disposal of such proceedings, or the sentence of any court in such proceedings
3. Issued by government agencies peculiar to an individual which includes, but is not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and
4. Specifically established by an executive order or an act of Congress to be kept classified.

Information that does not identify or pertain to an individual person, such as anonymous, aggregated, or corporate data, is not covered by this Policy. We may collect, use and disclose such information in order to evaluate and improve and respond to the needs of our service offerings; and, communicate to our affiliates, sponsors, advertiser, service contractor; or for other purposes related to the our offered services.

SCOPE OF THIS PRIVACY POLICY

This Policy covers all Personal Information and Sensitive Personal Information gathered through our Service Application Forms, the website (<https://sakura.infinitybroadband.ph>), social media platforms and any other application or means of procuring information that will be used and maintained by the Company, in relation to the rendering the cable and internet products and services offered including related auxiliary services.

INFORMATION COLLECTION

A. Manner of Collection

Service Application Form

- Registrations through Service Application Form

Phone Call and/or SMS

- Posting of a query or additional requests
- Requests for technical assistance

Website

- Creation of online account and profile
- Posting of queries or additional requests
- Requests for technical assistance
- Registration for promos and raffles

Social Media Sites (including, but not limited to, the Facebook accounts of Infinity Broadband)

- Posting of a query or additional requests
- Requests for technical assistance
- Registration for promotional activities and raffles

Mobile and/or Tablet Applications ("app")

- Creation of online account and profile
- Posting of queries or additional requests
- Requests for technical assistance
- Registration for promos and raffles

B. Information Collected

For purposes of inquiring regarding our products and services, as well as the subscription to the same, the Company collects the following information from subscribers, non-subscribers, and other site visitors:

- personally identifiable information, which may include, but shall not be limited to, your name, e-mail address, home or work address, landline or mobile number, date of birth, your Infinity Broadband, INC account number or the subscription services you use or other information in relation to your Infinity Broadband account;
- anonymous demographic information, which is not unique to you, which may include, but shall not be limited to, your ZIP code, age, gender, preferences, interests and favorites; and

- information about your computer hardware and software that is automatically collected, which may include, but shall not be limited to, your IP address, browser type, domain names, access times, referring website addresses, your surfing and browsing of the website, use of the Infinity Broadband, INC Applications and social media platforms, location and other information collected through cookies and other means.

The Company's objective in collecting information is to ensure that the customers are able to reach the Company for any and all their needs in relation to the subscription.

In reaching out to our customer relations officers for any and all queries relating to the account, subscription, and technical assistance through phone calls and/or SMS, the Company reserves the right to record the communication with any subscriber or non-subscriber.

In the use of our website, the Company maintains the following means in the collection of information:

- **Log Information:**

IP addresses of site visitors are only collected when transactions are made in the Company's Website, for log-in and for dispute handling purposes only.

IP addresses of site visitors are logged in a database securely stored in the cloud web server.

Information can be extracted through the content management system of the Company's Website that is protected by certain security features (i.e. secured log-in system, and restricted access or access is limited only to administrators of the Website).

- **Cookies and Other Tracking Technologies:**

The Website uses "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time by informing the web server that you have returned to a specific page. When you return to the Website, the information you previously provided can be retrieved, so you can easily use the Website features that you customized.

You can accept or decline cookies by modifying your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Website or the linked sites you visit.

DATA PROCESSING PROCEDURE

The Company collects the categories of information above listed. Thereafter, the personal information gathered by the Company about you is used to operate our website and deliver the services you have requested.

The Company shall ensure at all times that only authorized personnel may gain access to information and any violation to its set procedure will be accompanied by corrective measures and remedies within the Company. The Company also reserves its right to use the available legal remedies to correct any reach of protocol and procedure

Such procedures shall also be regularly monitored, modified, and updated to ensure that the rights of the Data Subjects are respected, and that processing thereof is done fully in accordance with the Data Privacy Act, and other applicable laws and regulations.

USE AND SHARING OF PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION

The Company may use your Personal Information and Sensitive Personal Information for the following legitimate business purposes:

- a. management and administrative purposes, which may include, but shall not be limited to, processing your subscription application and providing assistance and responses to queries of non-subscribers, maintenance or termination of accounts, billing, responding to your account and technical needs, and notifying you of any updates to the Company's products and services;
- b. to undertake research and profiling activities, with the aim to better the services offered and to know the needs of the customers in terms of the services being offered and in the maintenance of their subscription; provide training to employees, service contractors and third-party agents in subscription-related queries, technical knowledge and skill, and any other related purposes of maintenance of the Company's products and services;
- c. market research purposes and in order to aid in the continuous development of the Company's products and services, website and/or applications, which may include, but shall not be limited to the following purposes: (a) to conduct market studies or customer satisfaction surveys; (b) to personalize the Company's products and services in connection with your personal preferences and interests, and; (c) to determine which offered features of the Company's products and services are the most popular;
- d. advertising and promotion purposes, which may include, but shall not be limited to, campaign-based registration, the use of collected information by our marketing team for promos, such as raffles, offers, incentives and other rewards if you are eligible for the same, provided that you have consented to be notified or informed of the such offers, incentives and other rewards;
- e. account security purposes, which may include, but shall not be limited to, notifying you of any service and security issues, preventing and detecting identity fraud, privacy breach or other crimes under the laws of the Republic of the Philippines, and conducting internal audits and checking the strength of the security measures in place;
- f. for purposes of compliance with legal and regulatory and requirements, which may include, but shall not be limited to, complying with requirements under applicable laws, rules and regulations in the Republic of the Philippines, or disclosing information to law enforcement agencies or government officials, as may be required by the said applicable laws, rules and regulations; and
- g. for other legitimate business purposes, which business purposes shall be communicated to the subscriber, non-subscriber or visitor of the website.

The Company may share Personal Information and Sensitive Personal Information with the Company's subsidiaries, affiliates, service providers and third-party agents in order to provide and manage all the needs of the customers in the most efficient and responsive means, which will be covered by appropriate Data Sharing Agreements required under the present law.

In the event of a bankruptcy, or a merger, acquisition, joint venture or other business transaction, involving our Site and applications, Personal Information and Sensitive Personal Information may be transferred as part of the assets of the company, but will remain subject to this Policy.

Additionally, Personal Information and Sensitive Personal Information may be disclosed, without prior notice and in good faith, when necessary in order to protect or defend the legal rights or property of the Company, other related Companies or their employees, agents and contractors (including enforcement of our agreements); to

protect the safety and security of other Infinity FiberBlaze users or members of the public; to protect the integrity of products and services; to protect against fraud or for risk management purposes; or, to comply with the law or legal process.

The Company will not sell, rent, or share Personal Information with third parties for any reason other than those described above without first obtaining your consent

HOW WE SAFEGUARD PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION

Safety of all Personal Information and Sensitive Personal Information collected is a top priority for the Company. The Company has implemented policies and procedures in accordance with the Data Privacy Act, related laws and issuances to provide an appropriate level of security for the Personal Information and Sensitive Personal Information that we collect, record, update, modify, retrieve, use, store and dispose. The Company requires third parties, to whom we disclose Personal Information and Sensitive Personal Information governed by this Policy, to implement similar safeguards to protect Personal Information and Sensitive Personal Information.

In case of data breach involving Personal Information and Sensitive Personal Information collected, stored, retained and used by the Company, individual notification to the persons affected will be sent electronically or in written form, in accordance with the Company's breach management protocol as required under the Data Privacy Act, related laws, and issuances.

If you have concerns about data breach involving information you have provided us, please send us an email at legal@infinitybroadband.ph / trececable@yahoo.com.ph or contact us at 09696092590.

ACCESS AND DELETION

The Company gives you the option of editing, updating, modifying or removing your Personal Information and/or Sensitive Personal Information from the Company's systems, which may include any and all information shared to the Company's subsidiaries, affiliates, service providers and third-party agents.

The Company retains Personal Information and Sensitive Personal information for a period of five (5) years or as long as necessary to fulfill a legitimate business purpose, whichever is later. After this retention period, Personal Information and Sensitive Personal Information in the Company's systems will be disposed of in accordance with provisions and procedures of applicable laws.

If you need to access, correct, update, modify or delete any Personal Information or Sensitive Personal Information you have provided to the Company, please send us an email at legal@infinitybroadband.ph / trececable@yahoo.com.ph or contact us at 09696092590.

MODIFICATIONS TO THE POLICY

From time to time, the Company may update the Policy, as necessary and without prior notice, and will post the revised policy at its website. If we make material changes to the Policy that expands our rights to collect and/or use your Personal Information and Sensitive Personal Information, we will notify you through the said website.

This Privacy Policy is updated as of September 5, 2022.

HOW TO CONTACT US

If you wish to inquire on the processing of your information in relation to the Company's products and services, or if you wish to modify or revoke your consent to the processing of permissions granted in relation to the Company's offered products and services, please contact us through our Data Privacy Officer at:

Business Address:	#2475 Sitio Elang, Brgy. San Francisco, General Trias
Contact No.:	09696092590
E-mail Address:	gentri@infinitybroadband.ph / trececable@yahoo.com.ph