

Personal Data Privacy Policy



**SAN MIGUEL YAMAMURA
PACKAGING CORPORATION**



CAN ASIA, INC.



**SMC YAMAMURA FUSO
MOLDS CORPORATION**



**MINDANAO CORRUGATED
FIBREBOARD, INC.**

San Miguel Yamamura Packaging Corporation and its subsidiaries and affiliates (collectively, "**SMYPC**", "**We**", "**us**" or "**our**") respect your privacy and will keep secure and confidential all personal and sensitive information that you may provide to us, and/or those that We may collect from you ("**Personal Data**").

This privacy statement ("**Statement**") provides for the Personal Data We obtain, or which you may provide through this website ("**Website**"), and the standards We observe in using, processing, keeping, securing, and disclosing said Personal Data.

Please read this Statement carefully to understand how We treat Personal Data. We may update this Statement from time to time to reflect change(s) in the law and/or our internal standards.

When We do so, We will notify you by posting the updated statement on this Website for your information and reference. By accessing the Website and submitting your Concerns (defined below) or Personal Data through it, you expressly acknowledge that you have read, understood and hereby agree to all of the terms of this Statement and that you provide consent for us to:

- Process your Personal Data, as provided under applicable laws, regulations, and our policies, for, our subsidiaries and affiliates, contractors, service providers, and other authorized third parties' legitimate purpose/s;
- Make your Personal Data available for our subsidiaries and affiliates, contractors, service providers, and other third parties, subject to compliance with applicable laws and regulations.

Personal Data We Collect and Process

Our Website allows you to directly reach us and provide comments, suggestions and requests (collectively, "**Concerns**") on our products and services to help us improve them. When you access our Website and submit your Concerns, We ask you to provide the following Personal Data to identify you, and enable us to act on your Concerns:

- Name
- Contact Details (i.e., telephone number, mobile number, e-mail address)

If you do not provide any or all of the foregoing Personal Data accurately, We may not be in a position to effectively address your Concerns.

Any additional Personal Data you may provide through your correspondence(s) with us in connection with your Concerns shall also be considered and treated as Personal Data.

When you navigate through and interact with the Website, depending on your settings, We may use automatic data collection technologies (e.g., cookies, web beacons, small data text files or similar technologies) to obtain certain information about your equipment, browsing actions, and patterns, such as:

- Details of your visits to the Website (e.g., traffic data, location data, logs, and other communication data and the resources that you access and use on the Website).
- Information about your computer/device and internet connection, as well as IP address, operating system, and browser type (collectively, "Collected Data").

The Collected Data are mostly statistical data but may include other Personal Data, and We may maintain or associate them with the Personal Data that We ask you to provide to us in connection with your Concerns, or which you may provide in your submitted resumes.

What We Do with Personal Data and Collected Data

Upon receiving your Concerns and the accompanying Personal Data identifying you, and your submitted resumes, SMYPC or its duly authorized third party forwards the same to our concerned subsidiary or department. We may use your Personal Data to get in touch with you, in order to attend to, further inquire about, and address your Concerns. We may separately contact you to confirm that our concerned subsidiary or department has acted on your Concerns, ask you for further feedback, request your participation in surveys and/or provide information on its products and services.

For the Collected Data, We use them to help us improve our Website and to deliver a better and more personalized service by enabling us to:

- Estimate our audience size and usage patterns;
- Store information about your preferences, allowing us to customize our Website according to your individual interests;
- Speed up your searches; and
- Recognize you when you return to our Website.

Retention of Personal Data and Collected Data

Subject to applicable requirements of the DPA and other relevant laws and regulations, Personal Data shall not be retained by the Company for a period longer than necessary and/or proportionate to the purposes for which such data was collected. The DPO, with the assistance of any other departments of the Company responsible for the Processing of Personal Data, shall be responsible for developing measures to determine the applicable data retention schedules, and procedures to allow for the withdrawal of previously given consent of the Data Subject, as well as to safeguard the destruction and disposal of such Personal Data in accordance with the DPA and other applicable laws and regulations.

Disclosure and Sharing of Personal Data and Collected Data

We may disclose aggregated information about our users, and information that does not identify, or when combined with other information, does not directly and certainly identify any individual, without restriction.

We may disclose and share the Personal Data and Collected Data, subject to compliance with applicable laws and regulations, on a need-to-know basis, and in all cases only for legitimate business purposes, as follows:

- To our subsidiaries and affiliates;
- To contractors, service providers, and other third parties who We engage to support our business, and who are bound by contractual obligations to keep Customer Information and Collected Data confidential, and use it only for the purposes for which We disclose it to them;
- To government and law enforcement agencies and regulatory bodies;
- To comply with orders of courts, government agencies, regulatory bodies, stock exchanges and with applicable laws and regulations;
- If We believe disclosure is necessary or appropriate to protect our rights, property, or safety, and that of SMYPC, our subsidiaries and affiliates, officers, employees customers, or other third parties;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by SMYPC about our Website users is among the assets transferred; and
- To conduct investigations of breaches of SMYPC's internal policies, laws and regulations, enforce appropriate sanctions and pursue legal actions, if necessary.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies (alone or in conjunction with web beacons or other tracking technologies) to collect information about you when you use our Website. The information they collect may be associated with your Personal Data or they may collect information, including Personal Data, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Accessing and Correcting Your Personal Data

You are entitled to certain rights in relation to the Personal Data collected from you, including the right to access and correct your Personal Data being processed, object to the processing, and to lodge a complaint before the National Privacy Commission in case of violation of your rights as data subject.

You may send us an e-mail at smypc_dpo@smypc.sanmiguel.com.ph to request access to, correct and/or delete any Personal Data that you have provided to us. Please be advised, however, that We cannot delete your Personal Data without restricting or removing our ability to effectively address your Concerns or process submitted resumes for employment purposes. We may not accommodate a request to correct and/or delete Personal Data if We believe the same would violate any law or legal requirement or cause the Personal Data to be incorrect.

Security of Personal Data and Collected Data

We have implemented technical, organizational, and physical measures designed to protect the confidentiality, integrity, and availability of your Personal Data and Collected Data and secure such Data from destruction, unauthorized access, alteration, disclosure, fraudulent misuse and/or any other unlawful processing, as well as other natural and human dangers.

This policy has been reviewed and updated last February 21, 2024.

Contact Information

Should you have any questions and/or concerns regarding this Statement, our use of your Personal Data and the Collected Data, or your rights in relation thereto under the Data Privacy Act of 2012, please do not hesitate to contact our Data Protection Officer (DPO) at the following: +632 5308-8880 or smypc_dpo@smypc.sanmiguel.com.ph. The office of the DPO is located at San Miguel Properties Centre #7 St. Francis St., Mandaluyong City 1550, Metro Manila, Philippines.