

# MPI Privacy Policy

Version 2





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# Introduction

Your privacy is of utmost importance to MicroSourcing and we respect your rights as a data subject pursuant to Republic Act 10173 otherwise known as the Data Privacy Act of 2012 and your rights to privacy under the Australian Privacy Act 1988 (Cth) and the New Zealand Privacy Act 1993, as applicable (collectively “the Acts”) and we comply with all of the Acts’ requirements in respect of the collection, use, management, disclosure, quality, security, access to and correction of your personal information.

In this regard, we would like to inform you as to how your personal data will be used. Hence, we recommend that you read this Privacy Policy for you to better understand our data collection, use, processing, sharing, and storage policy.

Your submission of data to us shall be treated as your consent and express permission for all necessary and applicable disclosures referred to in this Privacy Policy.

## Revision History

Version	Date	Author	Approved By	Description
1	11 May 2017	John Joenelle Nudo	Sjoerd Krosse	Initial Release
2	9 August 2019	John Joenelle Nudo	Sjoerd Krosse	Revised DPO details/ Additional References

## Coverage

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This Privacy Policy seeks to provide you with the knowledge relative to the collection, use, process, transfer, sharing and storage of personal information.

## What is your Personal Information?

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When used in this Privacy Policy, the term “personal information” has the meaning as defined under the relevant Act. This refers to 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.

## Responsibility as to the Personal Information Collected

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Your personal data is controlled by MicroSourcing Philippines Inc., a domestic corporation organized and existing under Philippine laws with principal office address at 6th Floor, 1880 Building, Eastwood CyberPark, Bagumbayan, Quezon City.

Your personal information may be shared, in compliance with the provisions of the Act, with the following affiliates of MicroSourcing:

- a.** MicroSourcing International Limited, a foreign entity registered and existing under laws of Hong Kong with principal address at Room 52, Level 9, Central Building, 1-3 Pedder Street, Central, Hong Kong.
- b.** MicroSourcing Worldwide Services Limited, a foreign entity registered and existing under the laws of Hong Kong with principal address at Room 52, Level 9, Central Building, 1-3 Pedder Street, Central, Hong Kong.
- c.** MicroSourcing Worldwide Services Limited – Philippine ROHQ, the Philippine regional operating headquarters of MicroSourcing Worldwide Services Limited with office address at 6th Floor, 1880 Building, Eastwood CyberPark, Bagumbayan, Quezon City
- d.** Salmat International Pty Ltd, a foreign entity registered and existing under laws of Australia with principal address at 116 Miller Street, North Sydney, New South Wales 2060 Australia
- e.** Salmat Services, Inc., a domestic corporation registered and existing under Philippine laws with principal address at 18/20 Upper McKinley Road, McKinley Hill, Fort Bonifacio, Global City.

## What Personal Information do we collect?

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We may collect the following types of personal information:

- a.** Name
- b.** Age
- c.** Sex
- d.** Data of Birth
- e.** Place of Birth
- f.** Religious affiliation
- g.** Family Background (name of parents, siblings etc.)
- h.** Email address
- i.** Mailing or street address
- j.** Contact Numbers – landline and/or mobile phone
- k.** Educational Background (school, course, date of graduation etc.)
- l.** Work History (present/previous employer, position/job title, period of employment, pay etc.)
- m.** System access usernames and passwords as well as access and browsing activities
- n.** Identification Numbers – Tax Identification Number, Social Security, PhilHealth, Pag-IBIG etc.
- o.** Medical History
- p.** Credit card details
- q.** Details of your credit worthiness and credit history;
- r.** Where you are our customer, details of the products and services you have purchased from us or our customers (on whose behalf we may provide products or services) or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- s.** Where you are our employee, your personnel records including your employment agreement, pay records, leave records, tax status, criminal record checks, superannuation records, training records, and performance and disciplinary records;
- t.** In the case of websites (for example, our Lasoo website), your account password, how you use the website, and information regarding your browsing activity when you visit the website;
- u.** Any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- v.** Any additional information relating to you that you provide us directly or indirectly, through our websites, online presence, surveys and/or representatives

## How do we collect your Personal Information?

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Personal information is only collected by lawful and fair means in accordance with the applicable Act. We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- a.** Your use and access of MicroSourcing website/s;
- b.** Your use of telephone or mobile communication devices
- c.** Your use of electronic devices including personal computers, laptops and tablets issued by the company
- d.** Your conversations and conversations with our officers, employees, relatives, contractors, assigns and representatives
- e.** When you complete an application, contract or purchase order
- f.** Through information collected and shared by our affiliates, subsidiaries, contractors and sub-contractors

As a business process outsourcing and offshore leasing company, MicroSourcing is provided with personal information by our clients collected from individuals or entities from foreign jurisdictions. In compliance with the Acts, we seek client assurance and undertaking that all personal information has been collected lawfully and in full compliance with relevant Acts in the subject countries of origin.

It is important to appreciate that much of the personal information we collect and hold is done so by us when we are acting as the “agent” or service provider of our customer. For example, we operate call centres on behalf of many Australian companies, from retailers to banks and other institutions. When you contact one of our operators at a call centre, you may not necessarily be aware that the call centre is operated by a Salmat entity on behalf of our customer. We have set out in the Annexure to this policy some more detail around the information we may collect and hold in respect of each of our key businesses. Please read this carefully.

MicroSourcing, in the course of its operations, may also collect personal information from third parties who are not our clients, affiliate or subsidiary. This includes recruitment firms, background investigation firms and third-party providers.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous data or aggregated information about how users use our websites. We do not re-identify this information to turn it into personal information.

## Cookies

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We provide information and services ourselves and on behalf of our clients through a range of digital and online services including websites, apps, email, online advertisements, and social media profiles (“Digital Services”). These services may be operated by us to provide a consistent experience, personalize your use of each of those services and to provide targeted marketing.

In some cases we may also collect your personal information through the use of cookies. A cookie is a piece of information that allows the server to identify and interact more effectively with your device. The cookie assists us in maintaining the continuity of your browsing session (e.g. to maintain a shopping cart) and remembering your details and preferences when you return. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users’ habits so that we can improve our online products and services. Other technologies that may be used with Digital Services include web beacons (which may operate in conjunction with cookies), Flash local stored objects and JavaScript. Some of these cookies and other technologies are consistent across our digital services, allowing us and the other providers of these services to understand you better and provide a more consistent experience across these services. You can configure your web browser to reject and delete cookies and block JavaScript but you may limit functionality of our services. You can control your preferences regarding Flash local stored objects at [http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html).

Our systems record a variety of information in relation to interactions with our Digital Services. This can include information about software versions used, device identifiers (like IP address), location data (where available and not disabled by the user), dates, times, file metadata, referring website, data entered and user activity such as links clicked.

In some instances, we may use third-party advertising companies to serve ads when you visit our websites. These companies may use information (not including your name, address, email address, or telephone number) about your visits to our websites and other websites in order to provide advertisements about goods and services of interest to you.

# Purpose of Collecting Personal Information

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MicroSourcing mainly collects personal information from the following:

- a.** Our valued clients; and
- b.** Applicants and employees.

MicroSourcing only collects personal information which is reasonably necessary and/or directly related to the one or more of MicroSourcing's functions, business and activities.

If you do not provide us with the personal information described above, some or all of the following may happen:

- We may not be able to provide the requested products or services to you, either to the same standard or at all, or we may not be able to supply services to our clients which will enable our clients to do the same; or
- We may not be able to provide you with information about products and services that you may want, including information about discounts, sales or special promotions, or we may not be able to supply services to our clients which will enable our clients to do the same; or
- We may be unable to tailor the content of our websites to your preferences, or we may not be able to supply services to our clients which will enable our clients to do the same; or
- If you are a client of ours, we may not be able to provide you with the products and services you require; or
- If you are a prospective employee, we may not be able to hire you; or
- If you are our employee, it may be a breach of your employment conditions to not provide us with the information; or
- If you are a contractor to us, you may not be able to provide your services to us.

MicroSourcing collects personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service to you and to enable us to provide products and services to our clients.

We collect, hold, use and disclose your personal information for the following purposes, in each case, either on our own behalf or when acting on behalf of a client:

- To provide products and services to you and our clients and to send communications requested by you and/ or our clients;
- To answer enquiries and provide information or advice about existing and new products or services;
- To provide you with access to protected areas of our websites;
- To assess the performance of our websites and to improve the operation of our websites;
- To conduct business processing functions including providing personal information to our related bodies corporate, clients, contractors, service providers or other third parties;
- To assess the provision of, and provide credit, to you;
- For the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of Salmat, its related bodies corporate, clients, contractors or service providers;
- To provide your updated personal information to our related bodies corporate, clients, contractors or service providers;
- To update our records and keep your contact details up to date; to process and respond to any complaint made by you; and
- To comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).



Where you are our employee, we may collect, hold, use and disclose your personal information for all purposes connected with our employment relationship. This includes hiring you, training you, administering your personnel records (including pay and leave records), and managing your performance.

We may also use your personal information for other purposes related to those described above, and/or for a purpose for which you would reasonably expect it to be used, as permitted by the applicable Act.

Except as provided below, your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy. We do not disclose personal information we obtain when acting on behalf of one client, to any other client, unless directed by the client.

## Exemptions

MicroSourcing abides by the Data Privacy Act of 2012 and excludes the following information from the scope of this Privacy Policy.

- a.** Information about any individual who is or was an officer or employee of a government institution that relates to the position or functions of the individual, including:
  - 1) The fact that the individual is or was an officer or employee of the government institution;
  - 2) The title, business address and office telephone number of the individual;
  - 3) The classification, salary range and responsibilities of the position held by the individual; and
  - 4) The name of the individual on a document prepared by the individual in the course of employment with the government;
- b.** Information about an individual who is or was performing service under contract for a government institution that relates to the services performed, including the terms of the contract, and the name of the individual given in the course of the performance of those services;
- c.** Information relating to any discretionary benefit of a financial nature such as the granting of a license or permit given by the government to an individual, including the name of the individual and the exact nature of the benefit;
- d.** Personal information processed for journalistic, artistic, literary or research purposes;
- e.** Information necessary in order to carry out the functions of public authority which includes the processing of personal data for the performance by the independent, central monetary authority and law enforcement and regulatory agencies of their constitutionally and statutorily mandated functions. Nothing in this Act shall be construed as to have amended or repealed Republic Act No. 1405, otherwise known as the Secrecy of Bank Deposits Act; Republic Act No. 6426, otherwise known as the Foreign Currency Deposit Act; and Republic Act No. 9510, otherwise known as the Credit Information System Act (CISA);
- f.** Information necessary for banks and other financial institutions under the jurisdiction of the independent, central monetary authority or Bangko Sentral ng Pilipinas to comply with Republic Act No. 9510, and Republic Act No. 9160, as amended, otherwise known as the Anti-Money Laundering Act and other applicable laws; and
- g.** Personal information originally collected from residents of foreign jurisdictions in accordance with the laws of those foreign jurisdictions, including any applicable data privacy laws, which is being processed in the Philippines.

For personal information, as described in item (g) above, MicroSourcing relies on the warranty of its clients relative to their compliance with applicable data privacy laws of foreign jurisdictions.

## Disclosure of Personal Information

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MicroSourcing may disclose your personal information to the following:

- a.** our employees, clients, contractors or service providers for the purposes of operation of our websites or our businesses, fulfilling requests by you, and to otherwise providing products and services to you and our clients including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- b.** our subsidiaries, affiliates and related companies, and their directors, officers, and employees;
- c.** suppliers, clients and other third parties with whom we have commercial relationships, for business, marketing, credit reporting and related purposes;
- d.** Government agencies in relation to MicroSourcing's compliance with its statutory and legal mandates
- e.** Any other individuals, or entities for any authorized purposes with your express consent

Personal information may be combined or shared with other information, personal or otherwise, collected by MicroSourcing or other individuals/entities. Our clients may do likewise.

Personal information may also be shared to individuals/entities overseas, subject to the requirements and limitations under the Acts.

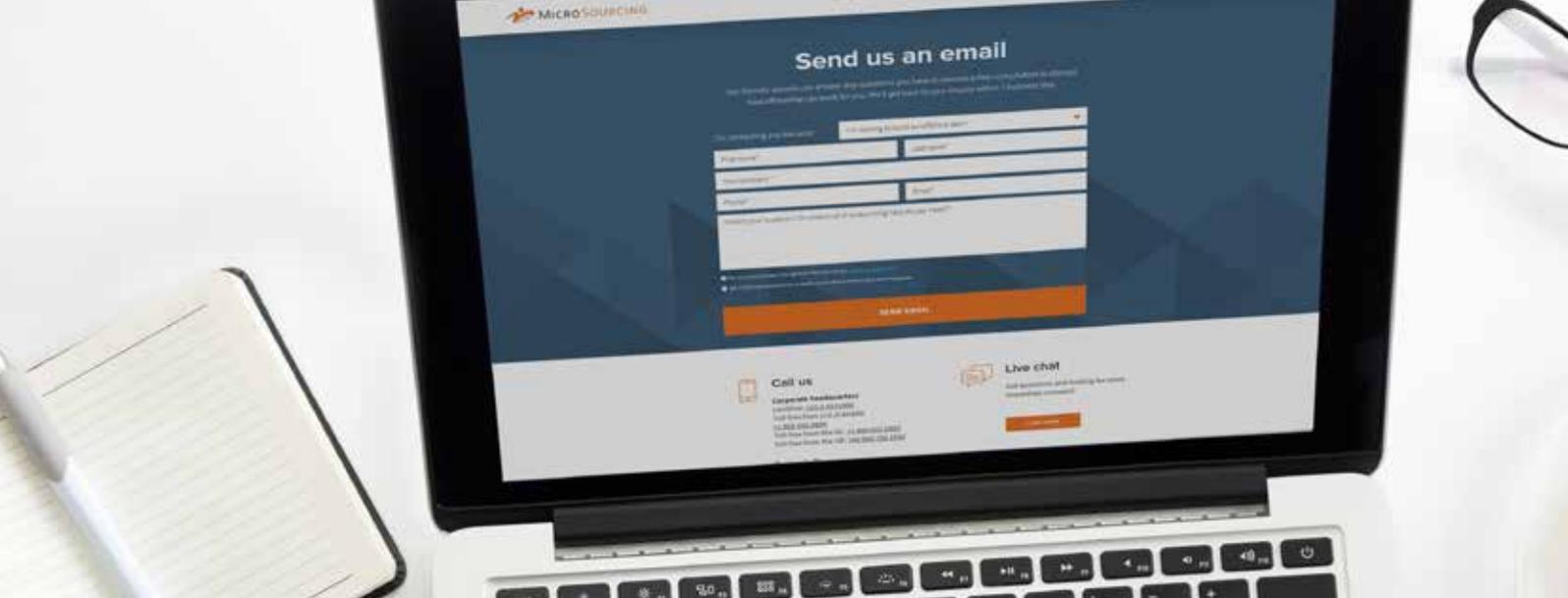
## Direct Marketing Materials

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We may send you direct marketing communications and information about our products and services that we, or our clients, consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Australian Spam Act 2003 (Cth) and the Unsolicited Electronic Messages Act 2007 (NZ). At any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list (or where are using a mailing list provided by our client, we will pass your request on to our client).

We do not provide your personal information to other organizations' for the purposes of direct marketing (see also our use of cookies). However, where we are engaged by our clients to act on their behalf in collecting personal information then we will pass that personal information on to our client.

You may also reach out to our Data Privacy Officer in the address as stated at the bottom of this policy.



## Access and Request for Correction of Personal Information

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MicroSourcing undertakes all necessary measures to ensure that all the personal information that we collect, use, process, store and share are accurate, complete and up-to-date.

As the accuracy is dependent on the quality of the information that you provide us, you may request access to your data and/or request for correction of your personal information through:

**Atty. John Joenelle V Nudo**

Data Protection Officer

MicroSourcing Philippines Inc.

2nd Floor, 1880 Building, Eastwood CyberPark

Bagumbayan, Quezon City 1110

Email address: [dpo@microsourcing.com](mailto:dpo@microsourcing.com)

Landline: +63(2) 437 1000 x 4779

Mobile: +63(2) 947 893 5257

Under the Acts, you have the right to obtain any information relating to you that we collect and store including contents of the personal data processed, sources from which they were obtained, names and addressed of the recipients of your data, manner by which information were processed, reasons for disclosure to recipients, information or automated systems where your data is stored and made available, date when your data was last accessed and modified and the identity and address of the personal information controller.

MicroSourcing, however, reserves the right to refuse access to the personal information if it would unreasonably interfere with the privacy of others or would result to breach of confidentiality. If that happens, we will give you written reasons for any refusal.

## Erasure or Blocking of Personal Data

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Under the Acts, you have the right to suspend, withdraw or order the blocking, removal or destruction of your personal data. You can exercise this right upon discovery and substantial proof of the following:

1. Your personal data is incomplete, outdated, false or unlawfully obtained
2. It is being used for purposes you did not authorize
3. The data is no longer necessary for the purposes for which they were collected
4. You decided to withdraw consent, or you object to its processing and there is no overriding legal ground for its processing
5. The data concerns information prejudicial to your – unless justified by freedom of speech, of expression, or of the press; or otherwise authorized (by court of law)
6. The processing is unlawful
7. The personal information controller, or the personal information processor, violated your rights as data subject

You may submit your request for suspension, withdrawal, blocking and/or removal by submitting a written request to:

**Atty. John Joenelle V Nudo**

Data Protection Officer

MicroSourcing Philippines Inc.

2nd Floor, 1880 Building, Eastwood CyberPark

Bagumbayan, Quezon City 1110

Email address: [dpo@microsourcing.com](mailto:dpo@microsourcing.com)

Landline: +63(2) 437 1000 x 4779

Mobile: +63(2) 947 893 5257

## Overseas Disclosure

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We may disclose personal information to our related bodies corporate and third party suppliers and service providers located overseas for some of the purposes listed above. Some of our employees are located overseas.

Except where specific individual consent has been obtained, we take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located overseas, including the following:

- Our related bodies corporate located in Australia, New Zealand, Philippines, Hong Kong, and Sri Lanka;
- Our data hosting and other IT service providers, located in United States of America, Australia, New Zealand, Philippines, Hong Kong, Singapore, Japan, Sri Lanka, India and the European Economic Union;
- Our clients and their related entities located in foreign countries, to the extent that we are acting on their behalf or at their direction in using, storing, or collecting your personal information. Applicable foreign countries include United States of America, Australia, Canada, New Zealand, Philippines, Hong Kong, Great Britain, Singapore, Japan, Sri Lanka and India.

## Security

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We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorized access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer required for any of the purposes for which it may be lawfully used or disclosed. As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

## Right to file a Complaint

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Complaints relative to data privacy violation or personal data breach under the DActs may lodge their handwritten complaint, attaching all substantial document providing such data privacy violation and personal data breach to:

**Atty. John Joenelle V Nudo**

Data Protection Officer

MicroSourcing Philippines Inc.

2nd Floor, 1880 Building, Eastwood CyberPark

Bagumbayan, Quezon City 1110

Email address: [dpo@microsourcing.com](mailto:dpo@microsourcing.com)

Landline: +63(2) 437 1000 x 4779

Mobile: +63(2) 947 893 5257

We will contact you within ten (10) business days to confirm receipt of your complaint and shall provide you with a response within a reasonable time.

Following the rule on exhaustion of remedies, a complaint may be lodged under the Data Privacy Act of 2012 before the National Privacy Commission through:

**National Privacy Commission**

3rd Floor, Core G, GSIS Headquarters Bldg.

Financial Center, Pasay City, Metro Manila 1308

Landline: +63(2) 517 7808

Email Address: [complaints@privacy.gov.ph](mailto:complaints@privacy.gov.ph)

## Changes to our Privacy Policy

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MicroSourcing reserves the right to modify this Privacy Policy at any time by posting changes to this website. You are encouraged to visit this Privacy Policy from time to time as the acceptance of this Privacy Policy will constitute acceptance of subsequent changes.

## Contacting Us

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If you have further questions regarding this Privacy Policy, you may contact us through:

**Atty. John Joenelle V Nudo**

Data Protection Officer

MicroSourcing Philippines Inc.

2nd Floor, 1880 Building, Eastwood CyberPark

Bagumbayan, Quezon City 1110

Email address: [dpo@microsourcing.com](mailto:dpo@microsourcing.com)

Landline: +63(2) 437 1000 x 4779

Mobile: +63(2) 947 893 5257

## References

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- ISO 27001:2013
  - ISO 9001:2015
  - Data Privacy Act of 2012
  - Australian Privacy Act 1988 (Cth)
  - New Zealand Privacy Act 1993
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