



DATA PRIVACY POLICY

SpeedyPay, Inc. (Mango e-Wallet/e-Mango) adhere to the applicable privacy laws of the Republic of the Philippines, Data Privacy Act of 2012 and its implementing rules and regulations to protect and secure your personal information and any information or data that can be used to distinguished, identify or contact you.

This Data Privacy Policy outlines the guidelines that SpeedyPay follows in collecting, processing, storing, transmitting and retaining of your personal information during the use of Mango e-Wallet platforms such as but not limited to the Mango e-Wallet mobile application, e-Mango Card, and web portals. SpeedyPay, Inc committed to provide transparency to support the legitimacy of our purpose of handling your personal information.

We provide contact details of our Data Privacy Officer in our website (www.e-mango.ph) should you have any concern on how SpeedyPay, Inc. protect and secure your information.

We update this Data Privacy Policy in our website and mobile application to comply with government and regulatory requirements, to adopt new technologies and information security protocols, to align with industry practices, or for other legitimate purposes.

We will provide notice and obtain your consent if there will be any material changes in our Data Privacy Policy and if we are required by law.

DEFINITION OF PERSONAL INFORMATION

We collect information from Basic Personal Information to Special Category Information:

Basic Personal Information is any information from which the identity of an individual can be reasonably and directly ascertained, or when put together with other information would directly and certainly identify an individual like name, date and place of birth, nationality, present and permanent address, biometrics (face recognition), source of fund/income, name of employer or self-employment business, contact details such as telephone number, mobile number and email address, user credentials like username and password (login password and/or payment password), information about the device you use to interact with us, and identity supporting documents such as photo and valid identification cards.

Special Category Information: is any information with higher security impact as described in applicable privacy law. This information includes but not limited to: marital status, cardholder data(CVV/CVC, Expiry Date), tax returns, individual government issued numbers, information on IDs issued by private entities duly registered with Department of Trade and Industries (DTI) and the Securities and Exchange Commission (SEC), and student IDs for those who are not yet of voting age (below 18 years old).

PURPOSE OF COLLECTING PERSONAL INFORMATION

It is important that we collect, use, process and analyze your personal information to comply with the requirements of the law and legal process, such as a legal and regulatory obligations to Bangko Sentral ng Pilipinas (BSP) and Anti-Money Laundering Act (AMLA).

We will ask for your consent before we use or process your Personal Information when required by our Data Privacy Policy for any other purpose.

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Please see below the following purpose of collecting your personal information:

1. To create and manage your account and to ensure your fair and lawful use of platform's products and services;
2. To facilitate your transaction based on your preferences and needs from our products and services;
3. To communicate relevant advisories that might enhance your end-user experience and information on offers and promotions for our services and from our business partners;
4. To send relevant advertisements from SpeedyPay, from our business partners and third-party service providers;
5. Generate information to conduct statistical and analytical review for research and marketing purposes, for customer care and aftersales services, and other similar purposes;
6. To provide your information to the Credit Information Corporation in accordance to Republic Act no. 9510, otherwise known as the Credit Information System Act;
7. To share your information with third-party service providers for which you sign-up;
8. To implement measures to prevent money laundering, fraud and identity theft.

SpeedyPay collect information of the device you use to access our Products and Services in order to safeguard and secure your account as part of our risk management and fraud prevention, to customize our services and to enhance and improve your end-user experience.

Please see below the following device information we collect:

- a. Operating system, hardware and software versions, available storage space, browser type and installed applications;
- b. Device IDs and other unique identifiers;
- c. Nearby WiFi access points, hotspots and cell towers;
- d. Mobile network operator or Internet service provider, Time Zone, IP Address, connection speed and information about any devices that are nearby or on your network;

PRODUCTS AND SERVICES

We collect and process your personal information to have an access with the following products and services we are offering through our Mango e-Wallet platform:

- **PRODUCTS**
 - e-Mango Card (*physical*)
 - Mango e-Wallet mobile application (*virtual*)
- **SERVICES**
 - Account Maintenance including change in account information, contact details and user credentials (user name, login password and/or payment password)
 - Cash-In/Cash-Out service (*CICO*)
 - Purchase in store or online
 - Bills Payment to various merchants either in private or public entities.
 - Send Money (*Mango e-Wallet to Mango e-Wallet transfers*)
 - Send Voucher/Redeem Voucher (*Mango e-Wallet to Non Mango e-Wallet transfers*)
 - Bank Transfer

PROCESS OF COLLECTING PERSONAL INFORMATION

Your Personal Information may be obtained in many ways including:

- a) Through Mango e-Wallet platform (Mobile App or Web Portal);

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- b) Through an accredited agents or third-party service providers platform or channel;
- c) Through SpeedyPay's subsidiaries, affiliates, suppliers, or business partners enrolling you as their employees and members for payment disbursements;
- d) Through other sources from commercially or publicly available sources like published directories and public documents from which you have given consent for the disclosure of such information relating to you and where otherwise lawfully permitted;

We collect your Personal Information when you:

1. Submit your registration to our services by via the Mobile App, filling out a Registration Form online, in one of our stores, or disclose your personal information to one of our accredited Agents or third-party service providers through phone calls, emails, SMS or verbal communications;
2. Submit supporting documents to validate your identity;
3. File a complaint, request for service or product inquiry through different channels;
4. Visit our official websites to take part in our research and surveys and/or apply for job with us.

SHARE YOUR INFORMATION WITH THIRD PARTY

SpeedyPay, Inc. value and respect your privacy as an end-user of our platform, Mango e-Wallet. We are committed to protect your privacy and to be transparent with the way we handle your personal information. We may need to disclose or share some of your personal information that you have provided to us with our accredited Third-Party service providers, who we engage with to support our business. SpeedyPay, Inc ensure that the Accredited Third-Party service providers are bound by obligations to keep your Personal Information confidential and to use them only for purposes for which we disclose it to them and this provision is included on the Data Sharing section of their agreed contractual arrangement with us. Accredited Third-Party service providers are always subject to the SpeedyPay, Inc's Information Security Policies and applicable privacy laws of the Republic of the Philippines, Data Privacy Act of 2012 and its implementing rules and regulations.

SpeedyPay, Inc. will never disclose your personal information to Third-Parties which are not part of our organizations, accredited agencies including their sub-contractors or business partners that act as our service providers and/or contractors except in the special circumstances where you have given your consent, and as described in this Data Privacy Policy.

SpeedyPay, Inc. and our Accredited Third-Parties service providers may share your Personal Information to regulatory government agencies where we are bound to comply with reportorial and information submission requirements.

SpeedyPay, Inc. may also disclose your Personal Information to our Third-Party Affiliates and Partners for marketing research and other specified legitimate purposes only after obtaining your consent on such sharing of information.

You are hereby consent that your Personal and Special Category Information may be collected, deposited, kept, transferred, processed, or otherwise dealt with in another jurisdiction which may be outside of the Philippine jurisdiction where Mango e-Wallet, its subsidiaries and affiliates, and third party partners may maintain their facilities and resources, in providing the Mango e-Wallet Services.

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STORAGE, PROTECTION AND RETENTION OF YOUR PERSONAL INFORMATION

SpeedyPay, Inc. strictly enforce our Data Privacy Policy within the organization, accredited agencies including their sub-contractors and business partners that act as our service providers and/or contractors.

SpeedyPay, Inc. ensure that we have implemented appropriate technological, physical and organizational privacy and security measures that are designed to secure and protect your information from unauthorized access, use, alteration and disclosure and to maintain confidentiality and integrity in retaining and processing of your Personal Information.

We also implement Information Security Policy as follows:

1. We keep and protect your information using a secured server behind a firewall encryption and security controls;
2. We strict access to your information only to qualified and authorized personnel who hold your information with strict confidentiality;
3. We undergo regular audit and rigorous testing of our infrastructure's security protocols to ensure your information is always protected;
4. We let you update your information securely to keep our records accurate;
5. We implement processes to secure and protect the privacy of personal information being shared with service providers, both local and overseas;
6. We keep your information only for as long as necessary for the fulfillment of the purpose for which the information was obtained or for the establishment, exercise or defense of legal claims, or for legitimate business purposes, or as provided by law, rules and regulations; and up to 5 years after account closure to comply with the requirements of Bangko Sentral ng Pilipinas (BSP) and to adhere with Anti-Money Laundering Act of 2001 (RA 9160).
7. We will destroy your Personal Information in adherence with our physical and/or technical information security policy when retention is no longer required with respect to existing laws, rules and regulations; and
8. We promptly notify you and the National Privacy Commission, when sensitive personal information that may, under the circumstances, be used to enable identity fraud are reasonably believed to have been acquired by an unauthorized person.

OWNER'S RIGHTS FOR THEIR PERSONAL INFORMATION

You, as the owner of the Personal Information, have certain rights under the Data Privacy Act of 2012, which includes:

1. Right to object to process your Personal Information;
2. Right to access your Personal Information;
3. Right to modify any inaccurate Personal information;
4. Right to suspend, withdraw or order the blocking, removal, or destruction of your Personal Information in our processing systems upon discovery and substantial proof that your Personal Information is no longer necessary for the purpose/s for which it was collected, and for such other cases provided in the Data Privacy Act of 2012, however, we will have to retain your account information in our systems in compliance with the retention period as prescribed in the "STORAGE, PROTECTION AND RETENTION OF YOUR PERSONAL INFORMATION" section of this Data Privacy Policy, as prescribed by another law, i.e. Anti-Money Laundering Act of 2001 (RA 9160);
5. Right to file a complaint with the National Privacy Commission should you feel that your personal information has been misused, maliciously disclosed, or improperly disposed, or that any of your data privacy rights have been violated;

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6. Right to claim damages in case of inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of your personal information;

When you think that the Personal Information we have for you is incomplete, not up-to-date, or inaccurate, we have provided you with a self-service facility within the Mango e-Wallet mobile application for you to update your information.

You may also get in touch with our Data Privacy Officer through the contact details provided in our website (www.e-mango.ph), should you feel that there has been mishandling or misuse of your Personal Information, or that any of your data privacy rights have been violated.

Questions and comments regarding your data privacy concerns should be directed to this email address: dpo@e-mango.ph

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