



## MERALCO EMPLOYEES SAVINGS AND LOAN ASSOCIATION, INC.

Operations Bldg., Meralco Center, Ortigas Ave., Brgy. Ugong, Pasig City  
(02) 1622-6800 | meralco\_sla@mesala.com.ph | www.mesala.com.ph

**READY WHEN YOU NEED US**

### OUR PRIVACY STATEMENT

**We, at MESALA, value the privacy and confidentiality of your personal data and account information.**

We are committed to ensure that your personal data and account information (“collectively “data”) are treated with utmost confidentiality, and lawfully processed in accordance with the general principles of transparency, proportionality, and legitimate purpose, that the collection, processing, sharing, and retention of your data abide by the specific principles and requirements under Republic Act No. 10173, also known as the Data Privacy Act of 2012 (DPA), and its Implementing Rules and Regulations (IRR) and other regulatory issuances and applicable covenants, data protection policies and best practices, and that reasonable and appropriate measures are established and implemented to secure their confidentiality, integrity, availability, authenticity, and non-repudiation.

Through this Privacy Statement, we hereby inform you of the nature, scope, purpose, duration, and extent of processing by MESALA of your data as well as the data protection measures and procedures we observe in our business operations and in our interactions with you, and the data privacy rights granted to you under the law.

### Our Covenant to you

**We protect the privacy and ensure security of your data through the following policies and practices:**

**A. We collect data only pursuant to, in the course of, or incidental to the conduct of, our business and operations.**

Specifically, we collect data you voluntarily provide to us when you apply for or avail of our products, services or facilities, when you interact with our employees, authorized representatives, agents or service providers, or when we do our due diligence or cross-validation of your data using those gathered from publicly-available sources or with third parties such as government agencies, regulators, tax authorities, judicial and quasi-judicial bodies and business partners or merchants whenever necessary. Data we collect from you include but are not limited to the following:

1. Data provided when filing out and/or submitting MESALA forms such as Membership Application Form, Loan Application Form, Deposit or Withdrawal Form and other forms and supporting documents relating to MESALA products, services, or investments, including, but not limited to, name, birthdate, employment information, contact information, government-issued identification cards, family or customer’s representative information, specimen signature and disclosure on politically exposed persons;
2. Information provided when interacting or doing business with MESALA trustees, officers, employees, consultants and other personal information processors in relation to MESALA products, services, or investments, including voice recordings of telephone conversations, closed circuit television (CCTV) images and audio-visual recordings taken in MESALA premises, and transaction details with third party merchants;
3. Data collected when using MESALA products and services through online or technology platforms like MESALA website or when relaying queries or concerns regarding MESALA, its business or operations;
4. Information generated in the ordinary course of business such as customer-profiling, market research and cross-referencing and data validation with third parties;
5. Information received by and/or disclosed to MESALA pursuant to the requirements of Anti-Money Laundering Act (AMLA), Credit Information System Act, applicable rules and regulations of the Bangko Sentral ng Pilipinas and other pertinent regulations;



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6. Data gathered in connection with any investigation, litigation or inquiry relating to you;
7. Information on your account activities such as account history, account movements, other products and services availed of, relationship and interactions with, or obligations to, third parties such as merchants, utilities and credit card companies.

Moreover, in the course of using our website and electronic platforms, we may collect non-personal information such as cookies and other data provided by your device including IP address, operating system, browser type and version and other non-personal data identifiers. Cookies are small text files placed or stored in the data subject's computing or other electronic devices which allow us to remember you or other data about you including the amount of time spent, number of views made, IP address of your device, and the browser and operating system used. Cookies placed by MESALA server shall only be readable by us, and cookies cannot access, read or modify any other data on an electronic device.

Our website may contain links leading to other websites not covered by this Privacy Statement. We are not be responsible for the protection and privacy of your data that other personal information controllers may collect, store, or process through their website.

### **B. We process your data lawfully and only in accordance with declared, specific and legitimate purposes such as but not limited to the following:**

1. To establish and manage business relationship with you and administer your account with MESALA. MESALA may process your data to evaluate your membership application, facilitate the delivery of products, performance of services or management of investments and/or enable activities related to MESALA's business and operations including those performed by our personal information processors. This covers processing of loan applications and deposit transactions, management of capital contributions, availment of other MESALA products, services, investments and programs, verification of customer identity when accessing or using the account through the various customer touch points, and performance of protective measures to safeguard against fraud and other improper use or abuse of MESALA products, services and investments.
2. To improve the quality of your experience and journey as a customer. MESALA processes your data:
  - a. to respond to your request, concern or complaint;
  - b. to understand your needs or preferences as indicated in the use of MESALA products, services and investments, participation in customer surveys and research activities, and customer browsing behavior in MESALA websites;
  - c. to provide you pertinent information on MESALA products, services, investments or any other programs or promotions that may be useful or of interest to you; and
  - d. to perform profiling, profile analysis, modeling and analytics to better understand needs, preferences and market trends for the development of more suitable products and services;
3. To comply with our operational, audit, administrative, credit and risk management processes, policies and procedures, the terms and conditions governing our products, services, facilities and channels, the Bangko Sentral ng Pilipinas rules and regulations, legal and regulatory requirements of government regulators, judicial, supervisory bodies, tax authorities or courts of competent jurisdiction, as to the same may be amended or supplemental from time to time;
4. To comply with applicable laws of the Philippines and those of other jurisdictions, the laws on the prevention of money laundering including the provisions of Republic Act No. 9160 (Anti-Money Laundering Act of 2001), as amended; and



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5. To comply with legal and regulatory requirements such as submission of data to credit bureaus, credit information companies, the Credit Information Corporation (CIC) (pursuant to RA No. 9510 and its implementing rules and regulations) responding to court orders and other instructions and requests from any local or foreign authorities including regulatory, governmental, tax and law enforcement authorities or other similar authorities.

### **C. We protect your data by implementing appropriate organizational, physical, and technical security measures.**

We take due diligence to ensure the integrity, confidentiality, availability, and security of your data through reasonable organizational, physical, and technical security measures including the use of secure servers, firewalls and security controls and regular conduct of audit and testing of our privacy and security protocols. Through these measures, we maintain the availability, integrity, and confidentiality of your data and protect these data from natural dangers such as accidental loss or destruction and any other unlawful processing and from human dangers such as unlawful access, fraudulent misuse, unlawful destruction, alteration and contamination.

### **D. We share your data to pursue the above purposes only to the following but only to the extent necessary and through secure means:**

#### **1. Employees, Authorized Representatives, Trainees, and Consultants**

Our employees, trainees and consultants commit to observe the applicable privacy policies and corresponding data security measures. Authorized Representatives and Consultants are required to sign a Non-Disclosure Agreement (NDA) and/or Data Privacy agreement/commitment to ensure that they process the data confidentially in a manner consistent with the purpose of their employment or engagement.

#### **2. Vendors, Contractors, and other Business Partners, including Auditors**

Our contractors, subsidiaries, and business partners, through a Data Processing Outsourcing and/or Non-Disclosure Agreement (NDA), are obliged to secure and keep personal data and account information confidential. Business partners include, but are not limited to, the following:

- a. Our counterparties and their respective banks relative to account transactions including fund transfers, payments, issuance of standby letters of credit, banker's guarantees or letters of undertaking and drawing of checks;
- b. Third party service contractors providing administrative or operational services to us, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, customer support investigation services or other services to MESALA;
- c. Agents, contractors, vendors or other third-party service providers in connection with products and services offered by us;
- d. Professional advisers such as external auditors and lawyers;
- e. Surveyors or valuers or other third parties in relation to assets to be charged or mortgaged to MESALA;
- f. Collection and repossession agencies in relation to the enforcement of repayment obligations for loans;
- g. Financial institutions, brokerage houses, clearing houses, depository, depository agents, managers, administrators, fund houses, registrars, custodians, external banks, the Bangko Sentral ng Pilipinas, nominee banks and investment vehicles in relation to asset management and investment product settlement processing.

#### **3. Other Third Parties**

Disclosure shall be subject to strict compliance with this Policy, and if applicable, with a Data Processing Outsourcing and/or Non-Disclosure Agreement (NDA) when made to



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person to whom MESALA is under an obligation or otherwise required to make disclosure under the requirements of any law binding on or applying to MESALA, or any disclosure under and for the purposes of any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers with which we are expected to comply, or any disclosure pursuant to any contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or industry bodies or associations of financial services providers, all of which may be within or outside the Philippines and may be existing currently and in the future.

- E. We do not share your data with our business partners and other third parties for their own commercial purpose or benefit except in cases where consent is provided by the data subject or when allowed under the Data Privacy Act.** We do not also share your data to enable third-party targeted advertisements which are not related to our business.

In case data sharing, including cross-border transfer, is consented or allowed, appropriate Data Sharing Agreements shall be required to ensure protection of the data and notice to the data subject shall be given prior to any such transfer and processing of the data.

- F. We keep your data only for as long as necessary:**

1. for the fulfillment of the declared, specified, and legitimate purposes provided above, or when the processing relevant to the purpose has been completed or terminated;
2. for the establishment, exercise, or defense of legal claims; or
3. for other business purposes, that are consistent with standards established or approved by regulatory agencies governing MESALA.

Thereafter, said personal data shall be disposed or discarded in a secure manner that would prevent further processing, unauthorized access, or disclosure to any other party or the public.

### **Your Rights**

We recognize your rights as data subject. Except when we have legal or contractual obligations or duty to respond to a lawful order or for legitimate reasons that prevent us from acting on your request, we shall comply with your exercise of the following rights:

- A.** To be informed if your data is being processed or has been processed, what data is being processed, and for what purposes;
- B.** The right to reasonably demand access to your data;
- C.** The right to object or withhold your consent to the processing of your data;
- D.** The right to correct or rectify any inaccuracy or error in your data;
- E.** The right to block or erase your data if it is proven to be incomplete, outdated, unlawfully obtained, or used for unauthorized transactions.
- F.** The right to file a complaint with the National Privacy Commission if your personal information has been misused, maliciously disclosed, or improperly disposed, or that any of your data privacy rights have been violated;
- G.** The right to damages sustained from inaccurate, incomplete, outdated, false, unlawfully-obtained data as well as damages from unauthorized uses of your data; and
- H.** The right to data portability or obtain and electronically move, copy or transfer your data in a secure manner, for further use.

We may impose a charge or fee for processing of any request/s for access and/or update depending on the nature and complexity thereof. In such case, prior notice on the processing fee shall be made available to you prior to making the request.



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### **Your Roles:**

**Data privacy and protection are our shared responsibility.** As such:

- A.** You are responsible for the privacy and security of your data which are exclusively under your control or possession. You are expected to adopt or observe appropriate measures to ensure that any medium or device used to transact with MESALA is secure and not accessible to anyone without permission.
- B.** You are obliged to report any data breach, security incident or concern affecting the integrity, availability or confidentiality of your data to enable MESALA to respond appropriately and expeditiously and prevent further damage or breach.

### **Our Contact Details**

You may send your request, query, report or any other data privacy-related concern to our Data Protection Officer:

#### **Data Protection Officer**

#### **Meralco Employees Savings and Loan Association, Inc.**

Operations Bldg., Meralco Center, Ortigas Ave., Brgy. Ugong, Pasig City  
(02) 8425 – 6732 | compliance@mesala.com.ph | Website: www.mesala.com.ph

### **Changes to our Policy and Statement**

We may update our Privacy Policy and Statement from time to time to comply with applicable laws, rules, and regulations, and to any changes to the foregoing, to align with industry practices, or for other legitimate purposes. Changes in any of the relevant provisions shall be relayed to you in a timely manner.