MERALCO PRIVACY STATEMENT

As of November 14, 2025

We, in MERALCO, care for your personal data and take your privacy seriously. We are committed to ensuring that your personal data are protected from collection to disposal. Our privacy practices are aligned with the Republic Act No. 10173 or the Data Privacy Act of 2012 (DPA) and its Implementing Rules and Regulations (IRR).

This Privacy Statement serves as our notice to all our data subjects on how we keep our privacy practices consistent with the data privacy principles of transparency, legitimate purpose and proportionality. This Statement also outlines the nature, scope, purpose and extent of our collection and processing of the personal data we collect, including, where applicable, the automated processing of these data for profiling, direct marketing, and sharing with government authorities.

Privacy Statement for prospective and existing customers, including customers with terminated services

We value your data

We value the privacy of our individual customers and their authorized representatives, as well as the officers, employees, attorneys-in-fact, and authorized representatives of our corporate customers.

Collecting your personal data

From where we collect your data. We collect personal data through various channels, including:

- **Business centers** - during service application, request for service modifications (e.g., transfer, disconnection, reconnection), bill payments or billing inquiries, submission of concerns or feedback, account information updates, and availing of customer assistance programs.
- **Official social media accounts of MERALCO** – for sending inquiries or service requests, participating in customer engagement campaigns or surveys, and reporting service interruptions or concerns.
- **Digital platforms** – such as, but not limited to, *My Meralco*, for digital services like those processed in business centers, including service applications, account management, bills payment, outage reporting, concern management, and other customer interactions conducted through web-based services, chatbot platforms, and email support.

This data includes any other information you voluntarily provide for a legitimate purpose declared at the point of collection, as well as information about you that we received from third parties and other sources where the disclosure was subject to a consent that you gave separately, as the result of a legal requirement, or any legitimate purpose made known to you.

Transparency in processing. Whenever we collect personal data, we provide just-in-time privacy notices and consent forms, when applicable, at the point of collection.

Data minimization. The data we collect is only as much as is relevant and necessary to meet our processing purpose. We collect this personal data in the course of or incidental to our business with you.

The data we collect. Generally, we collect the following information:

1. Information you provide to us when you apply for service, such as your name, address (i.e. postal address, geographical coordinates, and open location codes), phone number, email address, Tax Identification Number (TIN), government-issued identification information, evidence of authority to occupy (e.g., contract of lease, Transfer Certificate of Title, Special Power of Attorney (SPA), Undertaking / Authorization from owner of the premises) and, if applicable, details of your authorized representative and other documentary requirements.

2. Information you provide in relation to the conduct of our business, such as regarding retail electricity supply or embedded generation.

3. Billing and payment information used to process payment for your electric consumption and other liabilities, such as your banking (for auto debit arrangement) and credit card (for auto charge arrangement) information. However, details of the payment instrument (like prepaid card, debit card, credit card) used to pay your bills via the MERALCO Customer Portal are captured and processed by the payment gateway service provider.

   You may view the privacy notice of Bayad Center, MERALCO's payment processor, by clicking this link: Bayad Privacy Policy

4. Information to determine your eligibility and creditworthiness to participate in certain energy programs or services, such as peak-off-peak rates (POP), net metering, Interruptible Load Program (ILP), demand side management (DSM), etc.

5. Information you provide us when you visit or use our company website, mobile and online applications, as well as our official social media accounts, such as when you contact us to lodge your concerns, register at our customer portal, or avail of our online application, outage notifications, and billing and/or payment services, including information generated through such activities or, more specifically, your device details: location, internet protocol address, transaction time stamp, device identification, device type, network identification, browser type, and operating software type.

6. Information you give us when you communicate with MERALCO and/or any of our representatives, whether in our business centers (e.g. Relationship Managers), through our hotline (e.g. Call Center Representatives) or through our official social media accounts (e.g. Digital Agents), such as with respect to inquiries and concern details on the quality and reliability of electric service.

7. Meralco-related information that you post in your social media accounts, such as your posts in X (previously Twitter), Facebook, YouTube, etc., that talk about your experience in transacting with Meralco and/or any of our representatives.

8. Responses you or your representative provide when you participate in our customer surveys, promos, and loyalty programs, and when you interact with posts published in Meralco's official social media accounts.

9. Information you provide for verification purposes (e.g., to facilitate refunds), such as photocopy of a valid / government-issued identification card,

10. Information you provide when you visit or use the Certified by Meralco (CBM) Platform to reach out to and tap energy service providers, contractors, developers, and designers to assist you in complying with various technical requirements before Meralco energizes your premises.

Purpose of Processing

We store, process, and analyze the collected personal data for legitimate purposes related to, or incidental to, our business operations, including maintaining safety and security within the company premises.

Specifically, we may store, process, and analyze your personal data for the following and any other legitimate purposes related to the fulfillment thereof:

1. ***To perform our contractual and legal obligations to you.*** We process your personal data to evaluate your eligibility and creditworthiness for electric and other related services; to provide you quality, reliable and regular supply of electricity; and to continuously improve our business and operations as well as our products and services.

2. ***To enhance your customer experience.*** We process your personal data to respond to your inquiry, concern, or complaint; to provide you information about our programs, service offerings, and other programs or promos that may interest you; to provide you assistance in complying with various technical requirements for energization; to send you messages related to your services including outage notifications, updates, alerts, and other information that you request; to understand your needs and preferences by analyzing your use of our products and services, your participation in our surveys and research activities, and your browsing behavior in our mobile and digital applications, company website, including its webpages, and official social media accounts; to address root causes of common concerns by analyzing Meralco-related information that you post in your social media accounts, so we can serve you better.

   Information collected from social media will not be used against you or to hold you in a negative light, except if the social media activity promotes fraud or any illegal act that can hurt others.

3. ***To manage your account with us.*** We process your data to administer and update your customer data; to compute your electric consumption and facilitate your payment or claims, including acceptance of bill payments according to your enrolled payment mode (e.g., automatic debit from your bank account); to verify your identity when you access your account through the various customer engagement channels (e.g., e-mail, website, mobile application, via phone call, walk-in) and/or your eligibility to our programs, or entitlement to refunds and other claims; and to conduct meter-reading and meter installation.

   For our non-portal enrolled customers, we process your data to facilitate non-portal service notifications, including bill notifications, payment confirmation, payment reminders (Due Date, Overdue, Disconnection Notice), and outage notifications through your preferred engagement channel/s.

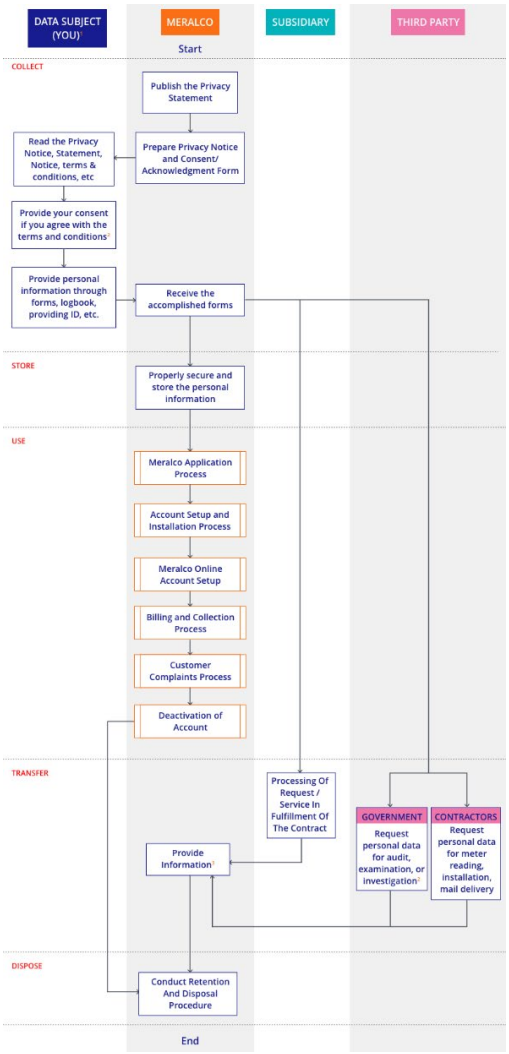
4. ***To comply with applicable laws & regulations*.** We collect and process your personal data to comply with the existing laws, rules and regulations, as well as ordinances, issued or mandated by the government, all or any of its agencies and instrumentalities, national or local, e.g., submit reportorial requirements to regulatory bodies; initiate and/or facilitate various electricity programs; cooperate with law enforcement; and commit to the legal obligation of the Company

in the protection of its customers: industrial, commercial, and residential, including those still applying for electric service. We shall, if summoned, disclose necessary information, subject to careful review by Company authorities and as mandated by law.

5. ***To manage risks and prevent fraud.*** We collect and process personal data, including billing and payment history, to uphold the integrity of our operations and protect against fraudulent activities. This includes validating payment instruments, monitoring billing and payment behavior, and temporarily restricting check payments in cases of returned checks. These measures help prevent non-compliant transactions, ensure adherence to payment terms, and safeguard Meralco and its customers from financial and operational risks.

   Where necessary, we may share relevant data with authorized parties to support these efforts. All processing activities are conducted to fulfill contractual obligations and protect our legitimate business interests, in accordance with applicable data privacy laws. These are subject to internal review and oversight to ensure fairness, proportionality, and accountability.

How do we process your personal data



[1] ***Data Subject*** *- Prospective, Existing, and Terminated Customers*
[2] *As needed / as applicable*
[3] *When applicable, data sharing or outsourced processes are covered by DSA, NDA, and/or OAs*

Note: Privacy Notice is process specific while the Privacy Statement is a public commitment to data privacy

Sharing your personal data

Unless you provide specific consent or in instances allowed under law, we do not share your personal data with our business partners or other third parties for their own commercial purposes or benefit.

Additionally, we do not use your personal data to enable third-party targeted advertisements that are unrelated to our business.

When data is shared, especially across borders and jurisdictions, we ensure your data is protected through appropriate Data Sharing Agreements.

In the processing of your personal information, we may have to disclose your data to parties acting as personal information processors, which may fall across these broad categories:

- **Authorized Representatives and Consultants.** We ensure that our authorized representatives and consultants adhere to the same standards as our employees and trainees, and require them to commit to observing the company's privacy policies. We require our Authorized Representatives and Consultants to sign a Non-Disclosure Agreement (NDA) to ensure that they process your data confidentially in a manner consistent with the purpose of their employment or engagement.
- **Contractors and Business Partners, including Auditors.** We require our contractors, subsidiaries, and business partners to secure and keep your data confidential through appropriate contractual and operational controls. We do not allow our contractors, subsidiaries, or business partners acting as personal information processors to disclose or share your data with others or use it for their own purposes. We take punitive or legal action in cases of proven misconduct.

In the processing of your personal information, such personal information may nonetheless be disclosed when legally required or when necessary to complete our commitment to provide services to you.

These entities to whom your personal data may be disclosed include:

- **Government entities.** Your information may also be disclosed to government entities pursuant to and in compliance with applicable laws and regulations, subpoena or court order.
- **Homeowners' Association (HOAs) and Building Administrators.** We may share redacted field or work orders with HOAs and Building Administrators, strictly upon formal request and only when necessary. Prior to disclosure, documents are reviewed to ensure they do not contain any personal data such as names, contact details, or account numbers. Only information relevant to facilitate access, coordination, or compliance with property and security protocols of the subdivisions, condominiums, establishments, or other premises is shared in accordance with applicable data privacy laws.

Keeping your data secure

We are committed to ensuring the integrity, confidentiality, availability, and security of your information. We implement reasonable organizational, physical, and technical security measures in collecting, processing, transmitting, storing, and disposing your personal data such as using secure servers, firewalls and security controls and ensuring regular conduct of audit and testing of our security protocols. We only store your personal data in Meralco-owned and/or controlled data storage solutions.

For an enhanced online experience, our services are available through compatible devices, such as laptops, PCs, tablets, and mobile phones. For your added security, we recommend that you install anti-virus software on any such device before accessing the internet.

You are responsible for the security of your information once it reaches you or your representative in any medium, including but not limited to written correspondences, bills, emails, system applications, and on-line accounts.

You should take appropriate measures to ensure that any medium or device you use to monitor or manage your account is secure and not accessible to anyone without permission.

Retaining your personal data

We keep your personal data only for as long as necessary to fulfill the declared, specified, and legitimate purposes outlined above, or until the processing relevant to those purposes has been completed or terminated. We may also retain your data for the establishment, exercise, or defense of legal claims, or for other business purposes that align with standards established or approved by regulatory agencies governing Meralco.

For further information on our retention rules for documents with personal data, you may refer to our Retention and Disposal Rules for Service Application and Billing-Related Documents with Personal Data and Retention and Disposal rules for Payments-Related Documents with Personal Data.

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

Your data subject rights

If you wish to request a copy of your personal data, or have it corrected or deleted, or to exercise your rights as data subject, you may reach out to us through our Data Privacy Office (DPO). Meralco DPO will promptly respond to your request or questions and also review any feedback that you may have about our Privacy Statement.

The Data Privacy Office
E-mail: cdpo@meralco.com.ph
Office: Technical Services Building
Meralco Center Ortigas Avenue
Brgy. Ugong, Pasig City, 1600

We uphold your right to be informed whenever we provide a link to or a copy of this Statement prior to collecting your personal data or as soon as reasonably practicable after collection. In processing your data for the specific purposes we discussed in this Statement and those that may be related to such purposes, we shall endeavor to prepare privacy notices that remind you how we collect, use, disclose, and process your personal data in the manner described in this Statement, including our procedures relating to cookies, IP addresses and log files. As to any other purpose that you may not find or cannot infer from this Statement, we shall take all reasonable efforts to obtain your permission through a separate consent form that may either require your signature or contain a button that you could click as proof of your consent.

About this Statement

From time to time, we may update this Statement to comply with applicable laws, rules, and regulations; to reflect any changes to the foregoing; to align with industry practices; or for other legitimate purposes.

You may view past versions of the Statement here: https://company.meralco.com.ph/privacy-policy/version-history/privacy

Privacy Statement for prospective, active, and separated employees, as well as on-the-job trainees

We value your data

We value the privacy of our employees and their dependents as well as our job applicants, on-the-job trainees and retirees. We collect and maintain their personal data in connection with our prospective, active, and previous contracts with them, whether for employment or training agreements. We ensure that their information are up-to-date and kept confidential even until their separation from Meralco.

Collecting your personal data

We collect your personal data in the course of, or incidental to the conduct of, our business with you. This data include any other information that you voluntarily provide to us for a legitimate purpose declared at the point of collection, as well as information about you that we received from third parties and other sources where the disclosure was subject to a consent that you gave separately, as the result of a legal requirement, or any legitimate purpose made known to you.

Transparency in processing. Whenever we collect personal data, we provide just-in-time privacy notices and consent forms, when applicable, at the point of collection.

Data minimization. The data we collect is only as much as is relevant and necessary to meet our processing purpose. We collect this personal data in the course of or incidental to our business with you.

The data we collect. Generally, we collect the following information:

1. Information you submit when you apply at MERALCO for work or training, including what is contained in your resume or curriculum vitae and application form (e.g., work references).
2. Information we collect during the processing of your application, such as testing results, employment offer, results of character investigation, and pre-employment medical assessment.
3. Information we collect and maintain during your employment, such as your personal information, addresses, education records, professional licenses and permits, and government-issued identification information; payroll information, including but not limited to government mandated and third party remittances like SSS, Philhealth, and Pag-ibig membership and contributions, taxes, bank account information; wages; entitlements and benefits; medical and dental care records; emergency contact information; training and certifications; performance evaluation; sanctions; and employment changes / work history.
4. Information we collect and maintain to facilitate your use of tools, equipment, and software that are related to the performance of your duties and responsibilities; to assist you in any work-related issues that you may encounter as you perform your duties and responsibilities, including troubleshooting of technical problems; to develop ways to improve your work conditions, such as automation of transactions and processes.

5. Information you provide about your dependents/beneficiaries for purposes of but not limited to administration of health maintenance plan, insurance claims, or profiling.

6. Information you provide when you participate in our surveys related to internal business processes, such as but not limited to employee engagement events, sustainability efforts, post-training assessments, climate surveys.

7. Information we retain after your separation from service, such as but not limited to pension information, retiree eligibilities and other benefits, bank account information, addresses, beneficiaries, and emergency contact information.

8. Information we may record as you perform your duties and responsibilities, which may include photos and videos of you in the workplace or in other Meralco-sponsored programs that capture your image or voice. When necessary for documentation, communication, or official business purposes, these recordings may also include your name and/or position.

9. Information required to comply with occupational safety and health standards under Republic Act No. 11058, an *Act Strengthening Compliance with Occupational Safety and Health Standards*, including but not limited to medical assessments and health surveillance for high-risk roles, training records on safety procedures, PPE issuance and compliance logs, incident and accident reports, and participation in safety programs and committees.

Purpose of Processing

We store, process, and analyze the collected personal data for legitimate purposes related to, or incidental to, our business operations, including maintaining safety and security within the company premises.

Specifically, we may store, process, and analyze your personal data for the following and any other legitimate purposes related to the fulfillment thereof:

1. ***To handle your application for employment or training.*** We process your personal data to evaluate your eligibility for employment or training, including the verification of your qualifications, employment history, and character references (background checking).

2. ***To manage our employer-employee or training relationship.*** We process your data to maintain your employment, on-the-job training and/or personal records, including your contact information, for operational or administrative efficiency. Specifically for employees, we collect, store, and process your data to administer your pay, statutory and salary deductions, entitlements, and benefits, and those of your dependents or beneficiaries, to conduct your performance reviews and grant rewards, to establish appropriate training and/or developmental interventions including your membership with professional or industry organizations, to monitor your work performance and use of company resources, and to conduct internal investigation and/or administer disciplinary action and sanction as necessary.

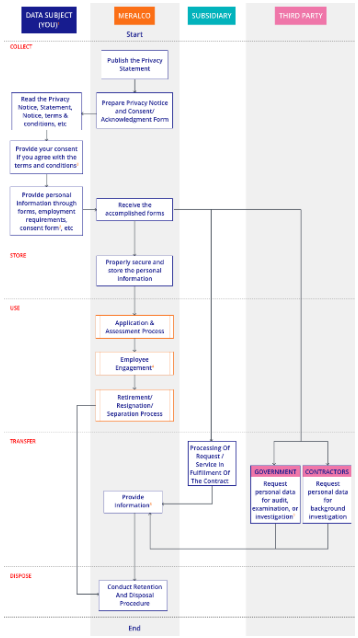
3. ***To address or enforce legal claims or obligations arising from employment contract or training relationship.*** We process your data to comply with applicable statutory and regulatory requirements and submissions, including the processing of your work or labor-related claims (e.g. worker compensation, insurance claims, etc.). Your personal data may also be processed to enforce our claims or defend our rights in any proceeding arising from our relationship.

4. ***To improve your welfare, productivity, safety, and security at work.*** We process your data to develop your health and wellness programs, including provision of your medical benefits; to conduct employee engagement activities; to create and maintain user accounts that serve as your personalized work credentials and access rights; and to facilitate and maintain overall productivity, safety, and security in the workplace and in all business operations. We also facilitate corporate social responsibility and other Company programs and events, including the payment of your donation to foundations or charitable institutions through deduction from your payroll account. In compliance with RA 11058, we also process your data to ensure a safe and healthful working environment, including monitoring of workplace hazards, implementation of safety protocols, issuance and tracking of personal protective equipment (PPE), and documentation of safety-related incidents and trainings.

5. ***To maintain our post-employment relationship.*** We process your data to administer your pension, retiree eligibilities and other benefits.

6. ***To prepare publications that feature Meralco.*** We process your images or voice that we may have recorded in the workplace or during your participation in Meralco-sponsored activities to give the general public previews on the work culture and workplace environment in Meralco.

How do we process your personal data



[1] ***Data Subject*** *- Prospective, active, and separated employees, as well as on-the-job trainees*
[2] *As needed / as applicable*
[3] *When applicable, data sharing or outsourced processes are covered by DSA, NDA, and/or OAs*
[4] ***Engagement*** *– Engagement - Onboarding, company activities, duties and responsibilities as a Meralco employee, payroll, filing of government mandatories (BIR, DOLE, etc.), benefits processing, etc.*

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Sharing your personal data

Unless you provide specific consent or in instances allowed under law, we do not share your personal data with our business partners or other third parties for their own commercial purposes or benefit.

Additionally, we do not use your personal data to enable third-party targeted advertisements that are unrelated to our business.

When data is shared, especially across borders and jurisdictions, we ensure your data is protected through appropriate Data Sharing Agreements.

In the processing of your personal information, we may have to disclose your data to parties acting as personal information processors, which may fall across these broad categories:

- **Authorized Representatives and Consultants.** We ensure that our authorized representatives and consultants adhere to the same standards as our employees and trainees, and require them to commit to observing the company's privacy policies. We require our Authorized Representatives and Consultants to sign a Non-Disclosure Agreement (NDA), to ensure that they process your data confidentially in a manner consistent with the purpose of their employment or engagement.
- **Contractors and Business Partners, including Auditors.** We require our contractors, subsidiaries, and business partners to secure and keep your data confidential through appropriate contractual and operational controls. We do not allow our contractors, subsidiaries, and business partners acting as personal information processors to disclose or share your data with others or use it for their own purposes. We take punitive or legal action in cases of proven misconduct.

In the processing of your personal information, such personal information may nonetheless be disclosed when legally required or when necessary to complete our commitment to provide services to you.

These entities to whom your personal data may be disclosed include:

- **Government entities.** Your information may also be disclosed to government entities pursuant to and in compliance with applicable laws and regulations, subpoena or court order.
- **Authorized Third Parties for Occupational Safety and Health Compliance**. In accordance with Republic Act No. 11058, we may disclose your personal data to accredited health and safety service providers, personal protective equipment (PPE) suppliers, and training institutions engaged by the Company to support the implementation of workplace safety and health programs. These disclosures shall be limited to what is necessary for the fulfillment of such programs and shall be governed by appropriate data sharing or processing agreements.

- **Foundations and Charitable Institutions.** We may disclose your information to the One Meralco Foundation, the social development arm of Meralco, for the purpose of facilitating your donations made through payroll deductions, in support of corporate social responsibility programs and other Company-led initiatives.

Keeping your data secure

We are committed to ensure the integrity, confidentiality, availability, and security of your information. We implement reasonable organizational, physical, and technical security measures in collecting, processing, transmitting, storing, and disposing your personal data such as using secure servers, firewalls and security controls and ensuring regular conduct of audit and testing of our security protocols. We only store your personal data in Meralco-owned and/or controlled data storage solutions.

For an enhanced online experience, our services are available through compatible devices, such as laptops, PCs, tablets, and mobile phones. For your added security, we recommend that you install anti-virus software on any such device before accessing the internet.

You are responsible for the security of your information once it reaches you or your representative in any medium, including but not limited to written correspondences, bills, emails, system applications, and on-line accounts.

You should take appropriate measures to ensure that any medium or device you use to monitor or manage your account is secure and not accessible to anyone without permission.

Retaining your personal data

We keep your personal data only for as long as necessary to fulfill the declared, specified, and legitimate purposes outlined above, or until the processing relevant to those purposes has been completed or terminated. We may also retain your data for the establishment, exercise, or defense of legal claims, or for other business purposes that align with standards established or approved by regulatory agencies governing Meralco.

For further information on our retention rules for documents with personal data, you may refer to our DP FAQ 2021-01 Retention of Documents Containing Personal Data.

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

Your data subject rights

If you wish to request a copy of your personal data, or have it corrected or deleted, or to exercise your rights as data subject, you may reach out to us through our Data Privacy Office (DPO). Meralco DPO will promptly respond to your request or questions, and also review any feedback that you may have about our Privacy Statement.

The Data Privacy Office
E-mail: cdpo@meralco.com.ph
Office: Technical Services Building
Meralco Center, Ortigas Avenue
Brgy. Ugong, Pasig City, 1600

We uphold your right to be informed whenever we provide a link to or a copy of this Statement prior to collecting your personal data or as soon as reasonably practicable after collection. In processing your data for the specific purposes we discussed in this Statement and those that may be related to such purposes, we shall endeavor to prepare privacy notices that remind you how we collect, use, disclose, and process your personal data in the manner described in this Statement, including our procedures relating to cookies, IP addresses and log files. As to any other purpose that you may not find or cannot infer from this Statement, we shall take all reasonable efforts to obtain your permission through a separate consent form that may either require your signature or contain a button that you could click as proof of your consent.

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You may view past versions of the Statement here: https://company.meralco.com.ph/privacy-policy/version-history/privacy

Privacy Statement for vendors, suppliers or contractors, and consultants

We value your data

We value the privacy of all our individual vendors, suppliers, contractors and consultants as well as the officers, employees, attorneys-in-fact, and authorized representatives of our corporate service providers. We request for the personal data of sole proprietors and other individual persons representing our corporate contractors mostly for purposes of accreditation and official correspondences. At the point of data collection, we give them an opportunity to review our Privacy Statement and sign acknowledgment forms to signify that they have understood how we uphold their rights as data subjects and how we secure copies of their personal data that are in our possession.

Collecting your personal data

We collect your personal data in the course of, or incidental to the conduct of, our business with you. This data includes any other information that you voluntarily provide for a legitimate purpose declared at the point of collection, as well as information about you that we received from third parties and other sources where the disclosure was subject to a consent that you gave separately, as the result of a legal requirement, or any legitimate purpose made known to you.

Transparency in processing. Whenever we collect personal data, we provide just-in-time privacy notices and consent forms, when applicable, at the point of collection.

Data minimization. The data we collect is only as much as is relevant and necessary to meet our processing purpose. We collect this personal data in the course of or incidental to our business with you.

The data we collect. Generally, we will collect the following information:

1. Information you submit to MERALCO in your application for accreditation, use of supply chain application system, and/or processing of payments, such as your name, tax identification number, government-issued identification information, address, contact details, educational attainment, work experience and banking information.

2. Information we collect and maintain about you and your employees in relation to the preparation, execution, or fulfilment of your contract with us, and to the development of a single contact directory that may guide MERALCO, its subsidiaries and affiliates in coordinating with your representatives for upcoming business partnerships or engagements.

3. Information we collect and maintain about you in relation to your Certified by Meralco (CBM) membership, such as when you apply for accreditation and participate in the CBM selection process on its website.

4. Information that your employees submit to have access to or perform your services or deliver your products within the premises of the Company.

Purpose of Processing

We store, process, and/or analyze the personal data collected for legitimate purposes related to, or incidental to, our business operations, including maintaining safety and security within the company premises.

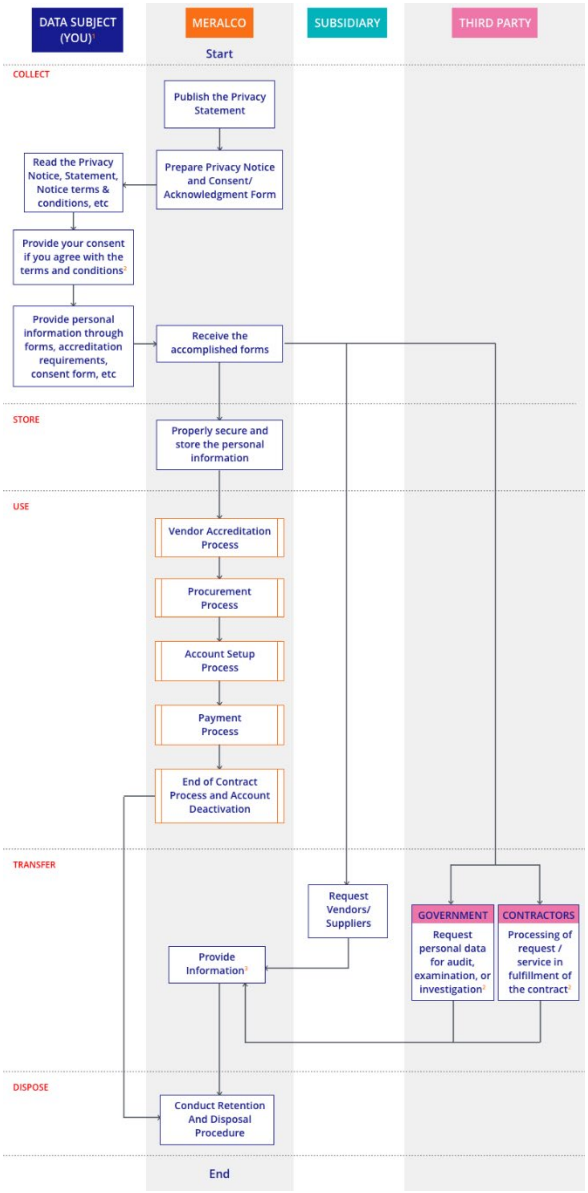
Specifically, we may store, process, and analyze your personal data for the following and any other legitimate purposes related to the fulfillment thereof:

1. ***To establish our business relationship or consultancy engagement.*** We process your personal data to evaluate your application for accreditation or as basis for our engagement.

2. ***To conduct business with you.*** We process your data to enforce our legal and contractual obligations including evaluating or auditing the provision of goods and/or services you provide, and facilitating the payment of your invoices in various payment methods (i.e., Fund Transfer, Corporate Check, Outsourced Check); informing you of our requirements, programs, or advisories; referring you as a potential service provider to our customers; and responding to your questions, comments, and feedback by letter, e-mail, telephone, or other media for internal administrative purposes, such as auditing, data analysis, and database records management. Your data may also be processed to comply with statutory, legal, and regulatory requirements related to our business.

3. ***To maintain your account with us and establish potential business relationship with our Subsidiaries and Affiliates.*** We maintain and update your vendor account information and establish details of your authorized contact persons for the goods and/or services you provide. We may also process your data for procurement synergy initiatives, including referring you as a potential vendor to our subsidiaries and affiliates and maintaining a directory as a single point of reference in the pursuit of these initiatives.

How do we process your personal data



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- **Authorized Representatives and Consultants**. We ensure that our authorized representatives and consultants adhere to the same standards as our employees and trainees, and require them to commit to observing the company's privacy policies. We require our Authorized Representatives and Consultants to sign a Non-Disclosure Agreement (NDA) to ensure that they process your data confidentially in a manner consistent with the purpose of their employment or engagement.
- **Contractors and Business Partners, including Auditors.** We require our contractors, subsidiaries, and business partners to secure and keep your data confidential through appropriate contractual and operational controls. We do not allow our contractors, subsidiaries, or business partners acting as personal information processors to disclose or share your data with others or use it for their own purposes. We take punitive or legal action in cases of proven misconduct.

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These entities to whom your personal data may be disclosed include:

- **Government entities.** Your information may also be disclosed to government entities pursuant to and in compliance with applicable laws and regulations, subpoena or court order.

Keeping your data secure

We are committed to ensure the integrity, confidentiality, availability, and security of your information. We implement reasonable organizational, physical, and technical security measures in collecting, processing, transmitting, storing, and disposing your personal data such as using secure servers, firewalls and security controls and ensuring regular conduct of audit and testing of our security protocols. We only store your personal data in Meralco-owned and/or controlled data storage solutions.

For an enhanced online experience, our services are available through compatible devices, such as laptops, PCs, tablets, and mobile phones. For your added security, we recommend that you install anti-virus software on any such device before accessing the internet.

You are responsible for the security of your information once it reaches you or your representative in any medium, including but not limited to written correspondences, bills, emails, system applications, and on-line accounts.

You should take appropriate measures to ensure that any medium or device you use to monitor or manage your account is secure and not accessible to anyone without permission.

Retaining your personal data

We keep your personal data only for as long as necessary to fulfill the declared, specified, and legitimate purposes provided above, or until the processing relevant to those purposes has been completed or terminated. We may also retain your data for the establishment, exercise, or defense of legal claims, or for other business purposes that align with standards established or approved by regulatory agencies governing Meralco.

For further information on our retention rules for documents with personal data, you may refer to our DP FAQ 2021-01 Retention of Documents Containing Personal Data.

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

Your data subject rights

If you wish to request a copy of your personal data, or have it corrected or deleted, or to exercise your rights as data subject, you may reach out to us through our Data Privacy Office (DPO). Meralco DPO will promptly respond to your request or questions and also review any feedback that you may have about our Privacy Statement.

The Data Privacy Office

E-mail: cdpo@meralco.com.ph

Office: Technical Services Building
Meralco Center Ortigas Avenue
Brgy. Ugong, Pasig City, 1600

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Privacy Statement for shareholders

We value your data

We value the privacy of every individual shareholder of Meralco and their authorized representatives as well as the officers, employees, attorneys-in-fact, trustees, and authorized representatives of juridical entities that own Meralco shares. We make sure that copies of personal data that we either receive directly from our shareholders through subscription agreements or sourced from regulatory disclosures are maintained in secure storage spaces, whether physical or electronic. Whenever we are required by law to disclose information about our shareholders in reportorial requirements, in view of Meralco's capacity as a publicly listed company, we only share information to government agencies and the general public that are specifically stated in the applicable rules and regulations.

Collecting your personal data

We collect your personal data in the course of, or incidental to the conduct of, our business with you. This data includes any other information that you voluntarily provide for a legitimate purpose declared at the point of collection, as well as information about you that we received from third parties and other sources where the disclosure was subject to a consent that you gave separately, as the result of a legal requirement, or any legitimate purpose made known to you.

Transparency in processing. Whenever we collect personal data, we provide just-in-time privacy notices and consent forms, when applicable, at the point of collection.

Data minimization. The data we collect is only as much as is relevant and necessary to meet our processing purpose. We collect this personal data in the course of or incidental to our business with you.

The data we collect. Generally, we collect the following information:

1. Information you submit to us when you become a shareholder of or while being a shareholder of MERALCO like your name, address, contact details, marital status, government-issued identification information, bank account information, and if applicable, details of your authorized representative and heir/s.
2. Information provided to us by your broker or by the Company's stock transfer agent.

Purpose of Processing

We store, process, and analyze the collected personal data for legitimate purposes related to, or incidental to, our business operations, including maintaining safety and security within the company premises.

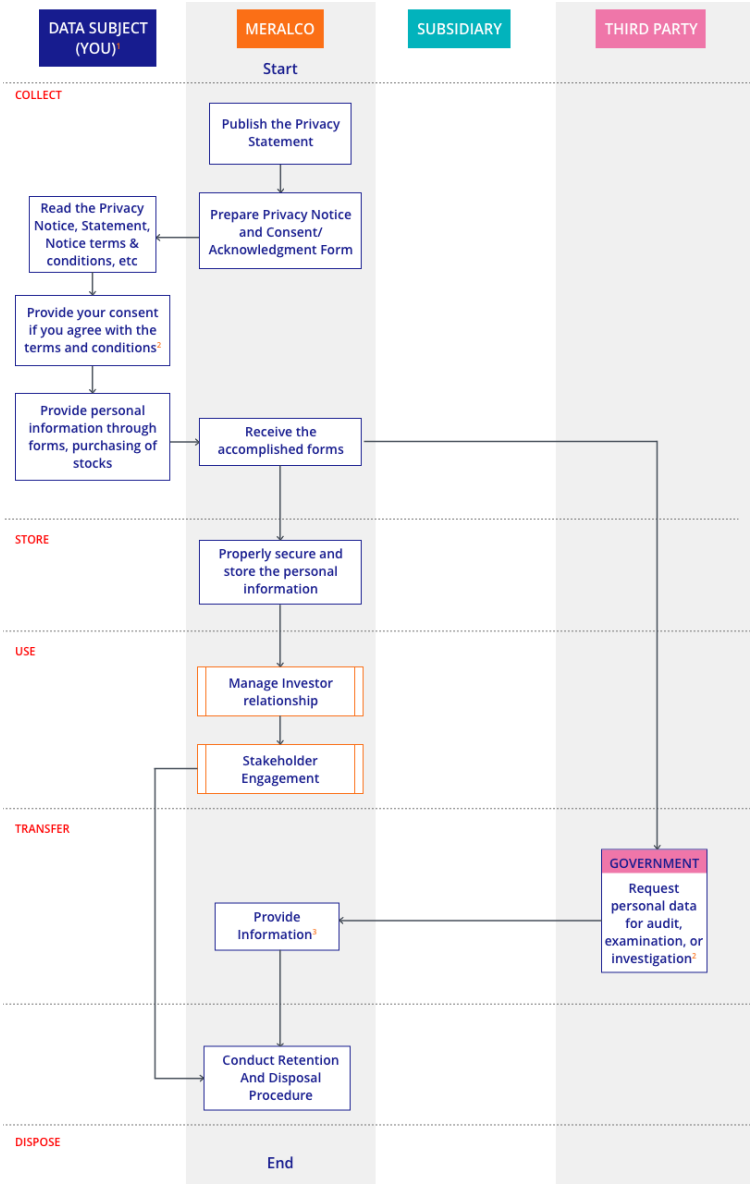
Specifically, we may store, process, and analyze your personal data for the following and any other legitimate purposes related to the fulfillment thereof:

1. ***To manage investor relations.*** We process your personal data to maintain your account and our relationship, to administer the shareholder register, to facilitate payment of your dividend or

any other amounts related to your shareholdings, to coordinate with your broker or our stock transfer agent for your concerns, and to comply with legal or disclosure requirements.

2. ***To improve our stakeholder engagement.*** We process your data to facilitate communications with you, including responding to your queries and requests, sending notices of general meetings, annual reports, and shareholder circulars to you, registering shareholders at general meetings and shareholders' events including without limitation to verification of your identity and/or your proxy.

How do we process your personal data



[1] ***Data Subject*** *- vendors, suppliers or contractors, and consultants*
[2] *As needed / as applicable*
[3] *When applicable, data sharing or outsourced processes are covered by DSA, NDA, and/or OAs*

Note: Privacy Notice is process specific while the Privacy Statement is a public commitment to data privacy

Sharing your personal data

Unless you provide specific consent or in instances allowed under law, we do not share your personal data with our business partners or other third parties for their own commercial purposes or benefit.

Additionally, we do not use your personal data to enable third-party targeted advertisements that are unrelated to our business.

When data is shared, especially across borders and jurisdictions, we ensure your data is protected through appropriate Data Sharing Agreements.

In the processing of your personal information, we may have to disclose your data to parties acting as personal information processors, which may fall across these broad categories:

- **Authorized Representatives and Consultants.** We ensure that our authorized representatives and consultants adhere to the same standards as our employees and trainees, and require them to commit to observing the company's privacy policies. We require our Authorized Representatives and Consultants to sign a Non-Disclosure Agreement (NDA) to ensure that they process your data confidentially in a manner consistent with the purpose of their employment or engagement.
- **Contractors and Business Partners, including Auditors.** We require our contractors, subsidiaries, and business partners to secure and keep your data confidential through appropriate contractual and operational controls. We do not allow our contractors, subsidiaries, or business partners acting as personal information processors to disclose or share your data with others or to use it for their own purposes. We take punitive or legal action in cases of proven misconduct.

In the processing of your personal information, such personal information may nonetheless be disclosed when legally required or when necessary to complete our commitment to provide services to you.

These entities to whom your personal data may be disclosed include:

- **Government entities.** Your information may also be disclosed to government entities pursuant to and in compliance with applicable laws and regulations, subpoena or court order.

Keeping your data secure

We are committed to ensuring the integrity, confidentiality, availability, and security of your information. We implement reasonable organizational, physical, and technical security measures in collecting, processing, transmitting, storing, and disposing your personal data such as using secure servers, firewalls and security controls and ensuring regular conduct of audit and testing of our security protocols. We only store your personal data in Meralco-owned and/or controlled data storage solutions.

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You should take appropriate measures to ensure that any medium or device you use to monitor or manage your account is secure and not accessible to anyone without permission.

Retaining your personal data

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For further information on our retention rules for documents with personal data, you may refer to our DP FAQ 2021-01 Retention of Documents Containing Personal Data.

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Your data subject rights

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Privacy Statement for guests / visitors

We value your data

We respect the privacy of any person who visits Meralco's physical offices and other areas where Meralco's properties are located whether by invitation, upon authorization, or on their own accord. We primarily collect their personal data to establish their identities and monitor their whereabouts while they are inside Meralco-owned premises. Unless required by reasons of public safety and orderliness, we neither access nor share any information that might have been stored in our devices such as closed-circuit television cameras after the guest or visitor has left the Meralco-owned premises.

Collecting your personal data

We collect your personal data in the course of, or incidental to the conduct of, our business with you. This data includes any other information that you voluntarily provide for a legitimate purpose declared at the point of collection, as well as information about you that we received from third parties and other sources where the disclosure was subject to a consent that you gave separately, as the result of a legal requirement, or any legitimate purpose made known to you.

Transparency in processing. Whenever we collect personal data, we provide just-in-time privacy notices and consent forms, when applicable, at the point of collection.

Data minimization. The data we collect is only as much as is relevant and necessary to meet our processing purpose. We collect this personal data in the course of or incidental to our business with you.

The data we collect. Generally, we collect the following information:

1. Information we collect when you enter our premises, such as your name, address, vehicle type, and plate number or conduction sticker number, and identification card details, including government-issued identification information.
2. Information captured by our close circuit television (CCTV) installed in our premises including entrance and exit points.

Purpose of Processing

We store, process, and analyze the collected personal data for legitimate purposes related to, or incidental to, our business operations, including maintaining safety and security within the company premises.

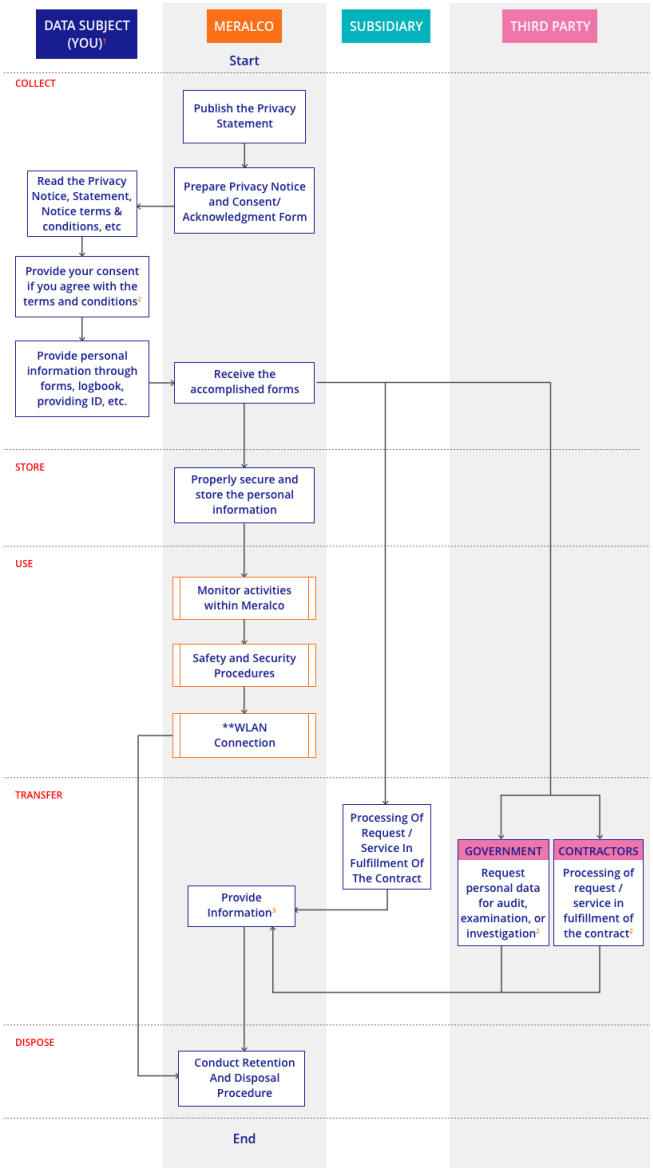
Specifically, we may store, process, and analyze your personal data for the following and any other legitimate purposes related to the fulfillment thereof:

1. ***To monitor and/or control your entrance to, or exit from, and activities within, our premises.*** We process your personal data to facilitate your ingress to and egress from our premises, offices, and facilities, including your vehicles or materials, such as verification of your identity and recording

the purpose of your visit. We also monitor your location and activities inside the company premises, including ingress and egress of equipment, vehicle, and materials.

2. ***To enforce safety and security measures and procedures.*** This includes conducting investigations and imposing sanctions in case of violations of Company policies and security and safety procedures or commission of crimes.

How do we process your personal data



[1] ***Data Subject*** *- Visitors / Guests and other data subjects entering our Company premises or using our facilities or resources*
[2] *As needed / as applicable*
[3] *When applicable, data sharing or outsourced processes are covered by DSA, NDA, and/or OAs*

Note: Privacy Notice is process specific while the Privacy Statement is a public commitment to data privacy

Sharing your personal data

Unless you provide specific consent or in instances allowed under law, we do not share your personal data with our business partners or other third parties for their own commercial purposes or benefit.

Additionally, we do not use your personal data to enable third-party targeted advertisements that are unrelated to our business.

When data is shared, especially across borders and jurisdictions, we ensure your data is protected through appropriate Data Sharing Agreements.

In the processing of your personal information, we may have to disclose your data to parties acting as personal information processors, which may fall across these broad categories:

- **Authorized Representatives and Consultants.** We ensure that our authorized representatives and consultants adhere to the same standards as our employees and trainees, and require them to commit to observing the company's privacy policies. We require our Authorized Representatives and Consultants to sign a Non-Disclosure Agreement (NDA) to ensure that they process your data confidentially in a manner consistent with the purpose of their employment or engagement.
- **Contractors and Business Partners, including Auditors.** We require our contractors, subsidiaries, and business partners to secure and keep your data confidential through appropriate contractual and operational controls. We do not allow our contractors, subsidiaries, and business partners acting as personal information processors to disclose or share your data with others or use it for their own purposes. We take punitive or legal action in cases of proven misconduct.

In the processing of your personal information, such personal information may nonetheless be disclosed when legally required or when necessary to complete our commitment to provide services to you.

These entities to whom your personal data may be disclosed include:

- **Government entities.** Your information may also be disclosed to government entities pursuant to and in compliance with applicable laws and regulations, subpoena or court order.

Keeping your data secure

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Retaining your personal data

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Privacy Statement for other pertinent third parties

We value your data

We respect the privacy of third-party individuals who have official businesses and charitable pursuits involving Meralco, its subsidiaries, and its affiliates. We shall only request for information that are relevant and necessary to respond to the requirements of the authorities that they are representing or pursue the causes and interests that they are advocating for. Unless authorized by the individuals themselves or required by law, we do not share information about these third-party individuals to other data subjects or business partners of the Company.

Collecting your personal data

We collect your personal data in the course of, or incidental to the conduct of, our business with you. This data includes any other information that you voluntarily provide to us for a legitimate purpose declared at the point of collection, as well as information about you that we received from third parties and other sources where the disclosure was subject to a consent that you gave separately, as the result of a legal requirement, or any legitimate purpose made known to you.

Transparency in processing. Whenever we collect personal data, we provide just-in-time privacy notices and consent forms, when applicable, at the point of collection.

Data minimization. The data we collect is only as much as is relevant and necessary to meet our processing purpose. We collect this personal data in the course of or incidental to our business with you.

The data we collect. Generally, we collect the following information:

1. Information we collect from third parties by virtue of a legal claim or demand, such as claims filed by or against third parties, claims in relation to damage to company property, or in connection with our services, programs and events such as Corporate Social Responsibility Programs, Luminaries, Makabansa Basketball League, and other company events.
2. Information we collect from our business partners pursuant to a potential or existing transaction.
3. Information provided to us by government agencies, regulators or public officers and employees in the performance of their lawfully mandated duties.
4. In general, information collected or provided relating to our business, including those intended for market research and data analytics.
5. Information we may record as you participate in activities, campaigns, programs, and projects involving Meralco, such as, but not limited to, photos and videos of you for the duration of any of the foregoing.

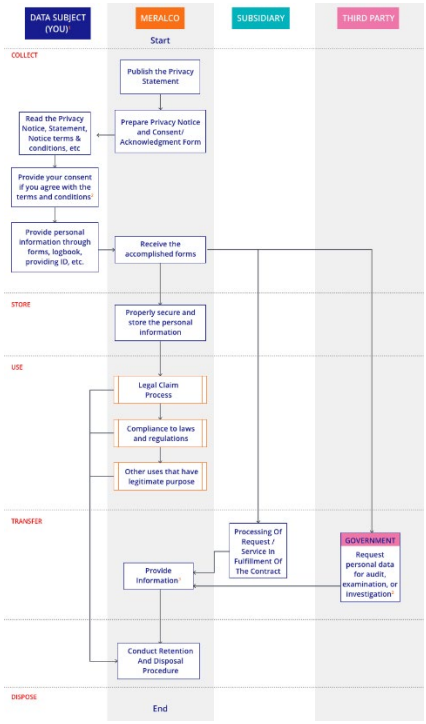
Purpose of Processing

We store, process, and analyze the collected personal data for legitimate purposes related to, or incidental to, our business operations, including maintaining safety and security within the company premises.

Specifically, we may store, process, and analyze your personal data for the following and any other legitimate purposes related to the fulfillment thereof:

1. To file and/or prosecute a legal claim or defend the Company, its officers, employees, and representatives against a demand.
2. To pursue a potential or existing transaction.
3. To comply with our legal, regulatory, or contractual obligations.
4. To assist public authorities in their government programs and initiatives.
5. To prepare publications that feature the activities, campaigns, programs, and projects organized or led by Meralco, which you took part of.
6. In general, to facilitate the performance of our services, provide you with information about our products, services, programs, or promos that may be of interest to you, implement our programs or events like Corporate Social Responsibility Programs, Luminaries, Makabansa Basketball League, and other company events, or conduct our business operations.

How do we process your personal data



[1] ***Data Subject*** *- Other Pertinent Third Party*
[2] *As needed / as applicable*
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