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Meralco Privacy Statement

As of June 16, 2021

Commented [MIMC1]: Previously, “Privacy Policy”.

To differentiate a Policy (internal document) from a Notice or Statement (external document), we intend to rename the Privacy Policy webpage to the “Meralco Privacy Statement”.

Splash Page

Introduction (Splash Page)

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.

In this Statement, the term “We” or “Us” refers to MERALCO, which, under the DPA, is your Personal Information Controller (PIC) with respect to the personal data specified in this webpage.

Commented [MIC2]: Previously:

MERALCO cares for your personal data and takes your privacy seriously. We, in MERALCO, are committed to ensuring that your personal data is protected from collection to disposal.

In compliance with Republic Act No. 10173 or the Data Privacy Act of 2012 (DPA) and its Implementing Rules and Regulations, we hereby adopt this Privacy Policy to specify the nature, scope, purpose and extent of our collection and processing of the personal data of our data subjects, including, where applicable, the automated processing of these data for profiling, or processing for direct marketing, and data sharing.

This serves as our notice to all our data subjects of our privacy procedures and practices which we ensure to be consistent with the data privacy principles of transparency, legitimate purpose and proportionality.

In this Policy, the term “We” or “Us” refers to MERALCO, which under the DPA, is your Personal Information Controller (PIC) with respect to the personal data specified below.

Headings and Subheadings per Data Subject

	Headings	Subheadings
1	Collecting your personal data	What do we collect?
		Why do we collect them?
		How do we process them?
2	Sharing your personal data	To whom do we disclose?
		With whom do we share?
3	Keeping your data secure	N/A
4	Retaining your personal data	N/A
5	Your safety and security	What health information do we collect from our customers?
		Why do we collect them?
		On what basis do we collect them?
		With whom do we share them?
		In which automated processes will we use them?
		How long will we keep them?
6	Your data subject rights	What are your data privacy rights?
		How to contact Meralco?
		To what do you consent?

7	About this statement	How do we keep it up to date?
		When do we revise it?

Privacy Statement per Data Subject

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

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. We commonly collect their personal data in business centers during service application and in official social media accounts of MERALCO for inquiries. Recently, we have been collecting their personal data in digital platforms for bills payment.

Whenever we collect their personal data, we provide privacy notices and consent forms, whichever is applicable, at the point of collection, and also ask for information that are relevant and necessary for us to perform our services to them.

Collecting your personal data

What do we collect?

We collect your personal data in the course of, or incidental to the conduct of, our business with you. These data include any other information that you voluntarily provide to us for any 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 of a consent that you gave separately or a legal requirement.

We will be collecting the following information from you:

1. Information you provide to us when you apply for service, such as your name, address, 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 complaint details on the quality and reliability of electric service;
7. 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; and
8. Information you provide for verification purposes (e.g., to facilitate refunds), such as photocopy of a valid / government-issued identification card.

Why do we collect them?

We store, process, and/or analyze the personal data collected for some legitimate purpose, related or incidental to the conduct of our business, including maintaining safety and security within the Company premises.

Commented [MIC3]: Included in relation to credit scoring that CRS conducts; BAU.

Commented [JRRGRJ4]: Can we also please add those device details, etc? The ones mentioned by CRS for the Meralco Online?

Commented [MIMC5R4]: Will add the following here:

1. Location
2. IP
3. Timestamp
4. Device ID
5. Device Type
6. Network ID
7. Browser Types
8. OS types
9. IDs
10. Selfie
11. Authorization letter
12. Relationship to Payor

Commented [MIC6]: Included in relation to social media listening / analytics of Meralco Social Media Team.

Commented [JRRGRJ7]: Was thinking of whether we should add comments / post on our social media accounts

Commented [MIMC8R7]: Agree. Included social media feedback here.

Commented [JRRGRJ9]: Can we mention that part about taking pictures? We have a number of projects, we document these, and then we sometimes include them in our collaterals. They're not necessarily talents. Kiko and I thought that we could use the journalism exception but that might not be the case all the time. So I was thinking that we can include under "why we collect them" for outreach programs, community activities, etc

Commented [MIMC10R9]: Agree, but that might be more appropriate in the "other pertinent third parties" page.

Specifically, we may store, process, and/or 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 any other programs or promos that may be of interest to you; to send you messages related to your services including outage notifications, updates, alerts, and other information that you request; and 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, so we can serve you better.
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.

How do we process them?

[insert flowchart for customers]

Sharing your personal data

To whom do we disclose?

- **Employees, Authorized Representatives, Trainees, and Consultants**

We ensure that our employees and trainees commit to observe the privacy policies of the Company. 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, through a Data Processing, Data Sharing, or Outsourcing Agreements, as applicable, and/or Non-Disclosure Agreement (NDA), to secure and keep your data confidential. We take your privacy seriously so punitive or legal action will be initiated in case of proven misdeed. Moreover, we do not allow our contractors, subsidiaries, and business partners to disclose or share your data to others, or to use it for their own purposes, without your consent.

Commented [MIC11]: Expanded the list.

- **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.

With whom do we share?

Unless you provide specific consent or except in instances allowed under the DPA, we will not:

- Share your personal data with our business partners and other third parties for their own commercial purpose or benefit;
- Use your personal data to enable third-party targeted advertisements which are not related to our business.

In case data sharing, including cross-border transfer, is allowed, we shall ensure the protection of your data through appropriate Data Sharing Agreements and commit to give you prior notice to any such transfer and processing of your data.

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.

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:

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 Meralco.

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 safety and security

Since the outbreak of the coronavirus disease in 2019 (COVID-19), Meralco has actively cooperated and coordinated with government authorities in containing the spread of the virus and ensuring the safety and well-being of the persons it services, employs, and otherwise transacts with. The occupational safety of its employees and the general well-being of its data subjects are now among the primary concerns of Meralco, which prompted the Company to formulate policies and develop solutions for health monitoring of all its data subjects, as necessary. In collecting health information from its data subjects, Meralco shall always inform them about why, how, and where they will be used and shared, as discussed below.

What health information do we collect from our customers?

We will be collecting the following health information from you as well as other relevant information:

1. Information you provide in Health Declaration Forms and Contact Tracing Forms as required by the Department of Trade and Industry (DTI) and Department of Labor and Employment (DOLE) Joint Memorandum Circular (JMC) No. 20-04-A Series of 2020, such as your full name, complete address, contact information, signature, COVID-19 exposure, health conditions, and travel history;
2. Information you provide in interviews to determine close contacts of a probable or confirmed COVID-19 case, including yourself; and
3. Information you give us when you visit the establishment or when you engage with Meralco and/or any of our representatives, through attendance records, CCTV footages, calendar of client meetings, and logbooks in facilities of exposure

Commented [MIC12]: Separate section for COVID-19 and other health-related data processing activities.

Why do we collect them?

We store, process, and/or analyze your personal data for the following purposes:

1. To conduct effective contact tracing and prevention and management of the spread of COVID-19 and other infectious diseases in Meralco offices and establishments;
2. To assist the government in providing effective response during the COVID-19 pandemic and other health crises that may be declared as a cause for state emergency including case investigations, treatment, and control and containment; and
3. To provide accurate and timely health information about notifiable diseases, and health-related events and conditions.

On what basis do we collect them?

DTI-DOLE JMC No. 20-04-A

The DTI-DOLE JMC No. 20-04-A requires all private establishments to implement all necessary workplace safety and health programs, including COVID-related programs, at no cost to the employees. This includes remote management of cases and close contacts, isolation and referral, contact tracing, COVID-19 testing, occupational safety and health committees, notification and reporting, and disinfection and closure of buildings/workplaces.

Republic Act No. 11332

Under RA 11332, all public and private physicians, allied medical personnel, professional societies, hospitals, clinics, health facilities, laboratories, institutions, workplaces, schools, prisons, ports, airports, establishments, communities, other government agencies, and NGOs are required to accurately and immediately report notifiable diseases and health events of public health concern as issued by the DOH.

Republic Act No. 11058

RA 11058 requires all establishments, projects, sites, and all other places where work is being undertaken in all branches of economic activity to ensure a safe and healthful workplace for all working people by affording them full protection against all hazards in their work environment. This includes submitting all safety health reports, and notifications prescribed by the DOLE.

With whom do we share them?

- **Department of Health (DOH) and its partner agencies**

We will share your information with DOH and its partner agencies for purposes of conducting contact tracing or management of probable, suspected, and confirmed COVID-19 patients. Meralco is mandated to report COVID-19 test results in the workplace in accordance with DOH

Administrative Order No. 2020-0013, entitled “Revised Guidelines for the Inclusion of COVID-19 in the List of Notifiable Diseases for Mandatory Reporting to the Department of Health.”

- **Local government units (LGUs) or other authorized persons**

We will also share your information to the local health office having jurisdiction over the workplace and the Barangay Health Emergency Team (BHERT) of your place of residence, in accordance with DOH DM No. 2020-0189.

- **DOLE**

We submit monthly reports of illness, diseases and injuries in the workplace to the Regional Office of the DOLE in accordance with the DTI-DOLE Interim Guidelines on Workplace Prevention and Control of COVID-19 using the Work Accident/Illness Report (WAIR) COVID-19 form.

- **Affiliate Hospitals**

We may share your information to our affiliate hospitals if, during health screening prior to your entry to any of the Company’s establishments or at any point that you voluntarily declare your health condition to us, we determine that you may need immediate medical assistance.

In which automated processes will we use them?

We may collect personal data and other information electronically through digital or online forms with privacy notices that provide a link to this Statement or a copy thereof placed at the point of data collection in a readable font and in an easy-to-understand presentation.

How long will we keep them?

All personal data collected for contact tracing shall be retained only for the period allowed by existing government issuances. The DTI-DOLE JMC provides that personal data collected through the health declaration form or the contact tracing form shall be stored only for thirty (30) days from date of accomplishment.

All other personal data collected for the management of probable, suspected, and confirmed COVID-19 patients shall be stored only for as long as necessary or when the purpose for processing still exists.

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

What are your data privacy rights?

As an individual whose information we collect and store to fulfill our legitimate purposes, you have rights as a data subject under the DPA.

You have the **right to be informed** about how and why we collect your personal data. You also have the **right to access** a copy of your personal information in our possession; **the right to withdraw consent** that you previously gave; the **right to have your information corrected** if you believe that it is inaccurate or incomplete; and the **right to erase or block** your information from our databases.

We also recognize your **right to data portability**, also known as your right to obtain and electronically move, copy, or transfer personal data for further use. Furthermore, we also respect your **right to file a complaint** with the National Privacy Commission and your **right to be indemnified** for any damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of your personal information.

How to contact Meralco?

If you wish to request for 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. Meralco DPO will promptly respond to your request or questions, and also review any feedback that you may have about our Privacy Statement.

Data Privacy Office

E-mail: cdpo@meralco.com.ph

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

To what do you consent?

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.

Commented [MIC13]: Specified the data subject rights under the DPA 2012.

Commented [MIC14]: Revised the contact information portion to indicate DPO as the data privacy and protection POC in Meralco.

Commented [MIC15]: Clarified PN and Consent Form

About this Statement

How do we keep this Statement up to date?

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 purpose.

You may view past versions of the Statement here [\[link\]](#).

When do we revise this Statement?

This Statement shall be reviewed annually or as necessary, in light of the following:

1. changes to the DPA and its IRR
2. new issuances from the NPC
3. changes to the Company's data processing activities
4. others that may impact this Statement

Commented [JRRGRJ16]: We will still provide link to the past notices right?

Commented [VITD17R16]: Yes, there will be a designated section in the proposed layout of the new Privacy Policy webpage that will compile all past versions.

Commented [MIMC18R16]: We will mention the link to the version history here.

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

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

What do we collect?

We collect your personal data in the course of, or incidental to the conduct of, our business with you. These data include any other information that you voluntarily provide to us for any 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 of a consent that you gave separately or a legal requirement.

We will be collecting the following information from you:

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;

Commented [MIC19]: Included this in relation to Data Historian, Payslip Digitization, and Employee Account Creation projects

6. 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; and
7. Information we may record as you perform your duties and responsibilities, strictly limited to photos and videos of you in the workplace or in other Meralco-sponsored programs that contain your image or voice.

Why do we collect them?

We store, process, and/or analyze the personal data collected for some legitimate purpose, related or incidental to the conduct of our business, including maintaining safety and security within the Company premises.

Specifically, we may store, process, and/or 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 the payment of your donation to foundations or charitable institutions through deduction from your payroll account and implement corporate social responsibility and other Company programs or events.

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 it?

[insert flowchart for employees]

Sharing your personal data

To whom do we disclose?

- **Employees, Authorized Representatives, Trainees, and Consultants**

We ensure that our employees and trainees commit to observe the privacy policies of the Company. 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, through a Data Processing, Data Sharing, or Outsourcing Agreements, as applicable, and/or Non-Disclosure Agreement (NDA), to secure and keep your data confidential. We take your privacy seriously so punitive or legal action will be initiated in case of proven misdeed. Moreover, we do not allow our contractors, subsidiaries, and business partners to disclose or share your data to others, or to use it for their own purposes, without your consent.

- **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.

With whom do we share?

Unless you provide specific consent or except in instances allowed under the Data Privacy Act, we will not:

- Share your personal data with our business partners and other third parties for their own commercial purpose or benefit;
- Use your personal data to enable third-party targeted advertisements which are not related to our business.

In case data sharing, including cross-border transfer, is allowed, we shall ensure the protection of your data through appropriate Data Sharing Agreements and commit to give you prior notice to any such transfer and processing of your data.

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.

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:

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 MERALCO

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 safety and security

Since the outbreak of the coronavirus disease in 2019 (COVID-19), Meralco has actively cooperated and coordinated with government authorities in containing the spread of the virus and ensuring the safety and well-being of the persons it services, employs, and otherwise transacts with. The occupational safety of its employees and the general well-being of its data subjects are now among the primary concerns of Meralco, which prompted the Company to formulate policies and develop solutions for health monitoring of all its data subjects, as necessary. In collecting health information from its data subjects, Meralco shall always inform them about why, how, and where they will be used and shared, as discussed below.

What health information do we collect from our employees?

We will be collecting the following health information from you as well as other relevant information:

1. Information you provide in Health Declaration Forms and Contact Tracing Forms as required by the Department of Trade and Industry (DTI) and Department of Labor and Employment (DOLE) Joint Memorandum Circular (JMC) No. 20-04-A Series of 2020, such as your full name, complete address, mobile or phone number, email address, signature, symptoms declaration, COVID-19 exposure, and travel history
2. Information you provide in interviews to determine close contacts of a probable or confirmed COVID-19 case; and
3. Information you provide for the provision of COVID-19 vaccine and health advice, including prescription of medicines, related to the treatment of the effects of COVID-19 or other infectious diseases such as your full name, complete address, age, sex, birthdate, civil status, contact number, employment information, and your health conditions.

Why do we collect them?

We store, process, and/or analyze your personal data for the following purposes:

1. To conduct effective contact tracing and prevention and management of the spread of the disease in the workplace
2. To assist the government in providing effective response during the COVID-19 pandemic including case investigations, treatment, and control and containment
3. To provide accurate and timely health information about notifiable diseases, and health-related events and conditions; and
4. To provide health-related benefits and services such as check-ups and consultations, vaccines, and leaves and other entitlements.

Commented [MIMC20]: Hi Vielle,

Please copy-paste this Section, after filling out the sub-headings below, before "Your data subject rights".

Commented [MIC21R20]: Separate section for COVID-19 and other health-related data processing activities – unique compared to other "safety and security" sections because it includes CodeLight Bot, MyHRExpress SAP, and health benefits that cannot be applied to other data subjects.

On what basis do we collect them?

DTI-DOLE JMC No. 20-04-A

The DTI-DOLE JMC No. 20-04-A requires all private establishments to implement all necessary workplace safety and health programs, including COVID-related programs, at no cost to the employees. This includes remote management of cases and close contacts, isolation and referral, contact tracing, COVID-19 testing, occupational safety and health committees, notification and reporting, and disinfection and closure of buildings/workplaces.

Republic Act No. 11332

Under RA 11332, all public and private physicians, allied medical personnel, professional societies, hospitals, clinics, health facilities, laboratories, institutions, workplaces, schools, prisons, ports, airports, establishments, communities, other government agencies, and NGOs are required to accurately and immediately report notifiable diseases and health events of public health concern as issued by the DOH.

Republic Act No. 11058

RA 11058 requires all establishments, projects, sites, and all other places where work is being undertaken in all branches of economic activity to ensure a safe and healthful workplace for all working people by affording them full protection against all hazards in their work environment. This includes submitting all safety health reports, and notifications prescribed by the DOLE.

With whom do we share them?

- **Department of Health (DOH) and its partner agencies**

We will share your information with DOH and its partner agencies for purposes of conducting contact tracing or management of probable, suspected, and confirmed COVID-19 patients. Meralco is mandated to report COVID-19 test results in the workplace in accordance with DOH Administrative Order No. 2020-0013, entitled “Revised Guidelines for the Inclusion of COVID-19 in the List of Notifiable Diseases for Mandatory Reporting to the Department of Health.”

- **Local government units (LGUs) or other authorized persons**

We will also share your information to the local health office having jurisdiction over the workplace and the Barangay Health Emergency Team (BHERT) of your place of residence, in accordance with DOH DM No. 2020-0189.

- **DOLE**

We submit monthly reports of illness, diseases and injuries in the workplace to the Regional Office of the DOLE in accordance with the DTI-DOLE Interim Guidelines on Workplace Prevention and Control of COVID-19 using the Work Accident/Illness Report (WAIR) COVID-19 form.

- **Meralco Corporate Wellness Center (CWC)**

We may share your information to the Meralco CWC in our mandate to conduct contact tracing via the CodeLight Bot and to direct symptomatic individuals to the nearest healthcare facility.

In which automated processes will we use them?

We may collect personal data and other information electronically through digital or online forms.

- **CodeLight Bot**

CodeLight Bot, as a paperless contact tracing form, generates daily personal status reports on the health of Meralco employees based on their responses.

It also determines, through automated processing, whether or not the employee is allowed to enter company premises.

- **MyHRExpress SAP**

MyHRExpress SAP houses the Meralco COVID-19 Vaccine Pre-Registration Form. It shall classify vaccine eligibility of the employees and their dependents according to their available health data.

- **All other data collection forms**

We may collect personal data and other information electronically through digital or online forms with privacy notices that provide a link to this Statement or a copy thereof placed at the point of data collection in a readable font and in an easy-to-understand presentation.

How long will we keep them?

All personal data collected for contact tracing shall be retained only for the period allowed by existing government issuances. The DTI-DOLE JMC provides that personal data collected through the health declaration form or the contact tracing form shall be stored only for thirty (30) days from date of accomplishment.

All other personal data collected for the management of probable, suspected, and confirmed COVID-19 patients shall be stored only for as long as necessary or when the purpose for processing still exists.

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

What are your data privacy rights?

As an individual whose information we collect and store to fulfill our legitimate purposes, you have rights as a data subject under the DPA.

You have the **right to be informed** about how and why we collect your personal data. You also have the **right to access** a copy of your personal information in our possession; **the right to withdraw consent** that you previously gave; the **right to have your information corrected** if you believe that it is inaccurate or incomplete; and the **right to erase or block** your information from our databases.

We also recognize your **right to data portability**, also known as your right to obtain and electronically move, copy, or transfer personal data for further use. Furthermore, we also respect your **right to file a complaint** with the National Privacy Commission and your **right to be indemnified** for any damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of your personal information.

How to contact Meralco?

If you wish to request for 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. Meralco DPO will promptly respond to your request or questions, and also review any feedback that you may have about our Privacy Statement.

Data Privacy Office

E-mail: cdpo@meralco.com.ph

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

To what do you consent?

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, 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

How do we keep this Statement up to date?

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 purpose.

You may view past versions of the Statement here [\[link\]](#).

When do we revise this Statement?

This Statement shall be reviewed annually or as necessary, in light of the following:

1. changes to the DPA and its IRR
2. new issuances from the NPC
3. changes to the Company's data processing activities
4. others that may impact this Statement

Privacy Statement for vendors, suppliers or contractors, and consultants

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

What do we collect?

We collect your personal data in the course of, or incidental to the conduct of, our business with you. These data include any other information that you voluntarily provide to us for any 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 of a consent that you gave separately or a legal requirement.

We will be collecting the following information from you:

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 through evaluation or audit of the processes for the goods or service you provide;
4. Information that your employees submit to have access to or perform your services or deliver your products within the premises of the Company.

Commented [MIC22]: Related to the OneMeralco Vendor Database / Masterlist initiated by Supply Chain

Why do we collect them?

We store, process, and/or analyze the personal data collected for some legitimate purpose, related or incidental to the conduct of our business, including maintaining safety and security within the Company premises.

Specifically, we may store, process, and/or 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; 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 it?

[insert flowchart for vendors, suppliers, contractors]

Sharing your personal data

To whom do we disclose?

- **Employees, Authorized Representatives, Trainees, and Consultants**

We ensure that our employees and trainees commit to observe the privacy policies of the Company. 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, through a Data Processing, Data Sharing, or Outsourcing Agreements, as applicable, and/or Non-Disclosure Agreement (NDA), to secure and keep your data confidential. We take your privacy seriously so punitive or legal action will be initiated in case of proven misdeed. Moreover, we do not allow our contractors, subsidiaries, and business partners to disclose or share your data to others, or to use it for their own purposes, without your consent.

- **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.

With whom do we share?

Unless you provide specific consent or except in instances allowed under the Data Privacy Act, we will not:

- Share your personal data with our business partners and other third parties for their own commercial purpose or benefit;
- Use your personal data to enable third-party targeted advertisements which are not related to our business.

In case data sharing, including cross-border transfer, is allowed, we shall ensure the protection of your data through appropriate Data Sharing Agreements and commit to give you prior notice to any such transfer and processing of your data.

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.

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:

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 MERALCO

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 safety and security

Since the outbreak of the coronavirus disease in 2019 (COVID-19), Meralco has actively cooperated and coordinated with government authorities in containing the spread of the virus and ensuring the safety and well-being of the persons it services, employs, and otherwise transacts with. The occupational safety of its employees and the general well-being of its data subjects are now among the primary concerns of Meralco, which prompted the Company to formulate policies and develop solutions for health monitoring of all its data subjects, as necessary. In collecting health information from its data subjects, Meralco shall always inform them about why, how, and where they will be used and shared, as discussed below.

What health information do we collect from our vendors, suppliers, and/or contractors?

We will be collecting the following health information from you as well as other relevant information:

1. Information you provide in Health Declaration Forms and Contact Tracing Forms as required by the Department of Trade and Industry (DTI) and Department of Labor and Employment (DOLE) Joint Memorandum Circular (JMC) No. 20-04-A Series of 2020, such as your full name, complete address, contact information, signature, COVID-19 exposure, health conditions, and travel history;
2. Information you provide in interviews to determine close contacts of a probable or confirmed COVID-19 case, including yourself; and
3. Information you give us when you visit the establishment or when you engage with Meralco and/or any of our representatives, through attendance records, CCTV footages, calendar of client meetings, and logbooks in facilities of exposure

Commented [MIMC23]: Hi Vielle,

Please copy-paste this Section, after filling out the sub-headings below, before "Your data subject rights".

Commented [MIC24R23]: Separate section for COVID-19 and other health-related data processing activities.

Commented [JRRGRJ25R23]: Great thanks!

Why do we collect them?

We store, process, and/or analyze your personal data for the following purposes:

1. To conduct effective contact tracing and prevention and management of the spread of COVID-19 and other infectious diseases in Meralco offices and establishments;
2. To assist the government in providing effective response during the COVID-19 pandemic and other health crises that may be declared as a cause for state emergency including case investigations, treatment, and control and containment; and
3. To provide accurate and timely health information about notifiable diseases, and health-related events and conditions.

On what basis do we collect them?

DTI-DOLE JMC No. 20-04-A

The DTI-DOLE JMC No. 20-04-A requires all private establishments to implement all necessary workplace safety and health programs, including COVID-related programs, at no cost to the employees. This includes remote management of cases and close contacts, isolation and referral, contact tracing, COVID-19 testing, occupational safety and health committees, notification and reporting, and disinfection and closure of buildings/workplaces.

Republic Act No. 11332

Under RA 11332, all public and private physicians, allied medical personnel, professional societies, hospitals, clinics, health facilities, laboratories, institutions, workplaces, schools, prisons, ports, airports, establishments, communities, other government agencies, and NGOs are required to accurately and immediately report notifiable diseases and health events of public health concern as issued by the DOH.

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RA 11058 requires all establishments, projects, sites, and all other places where work is being undertaken in all branches of economic activity to ensure a safe and healthful workplace for all working people by affording them full protection against all hazards in their work environment. This includes submitting all safety health reports, and notifications prescribed by the DOLE.

With whom do we share them?

- **Department of Health (DOH) and its partner agencies**

We will share your information with DOH and its partner agencies for purposes of conducting contact tracing or management of probable, suspected, and confirmed COVID-19 patients. Meralco

is mandated to report COVID-19 test results in the workplace in accordance with DOH Administrative Order No. 2020-0013, entitled “Revised Guidelines for the Inclusion of COVID-19 in the List of Notifiable Diseases for Mandatory Reporting to the Department of Health.”

- **Local government units (LGUs) or other authorized persons**

We will also share your information to the local health office having jurisdiction over the workplace and the Barangay Health Emergency Team (BHERT) of your place of residence, in accordance with DOH DM No. 2020-0189.

- **DOLE**

We submit monthly reports of illness, diseases and injuries in the workplace to the Regional Office of the DOLE in accordance with the DTI-DOLE Interim Guidelines on Workplace Prevention and Control of COVID-19 using the Work Accident/Illness Report (WAIR) COVID-19 form.

- **Affiliate Hospitals**

We may share your information to our affiliate hospitals if, during health screening prior to your entry to any of the Company’s establishments or at any point that you voluntarily declare your health condition to us, we determine that you may need immediate medical assistance.

In which automated processes will we use them?

We may collect personal data and other information electronically through digital or online forms with privacy notices that provide a link to this Statement or a copy thereof placed at the point of data collection in a readable font and in an easy-to-understand presentation.

How long will we keep them?

All personal data collected for contact tracing shall be retained only for the period allowed by existing government issuances. The DTI-DOLE JMC provides that personal data collected through the health declaration form or the contact tracing form shall be stored only for thirty (30) days from date of accomplishment.

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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

What are your data privacy rights?

As an individual whose information we collect and store to fulfill our legitimate purposes, you have rights as a data subject under the DPA.

You have the **right to be informed** about how and why we collect your personal data. You also have the **right to access** a copy of your personal information in our possession; **the right to withdraw consent** that you previously gave; the **right to have your information corrected** if you believe that it is inaccurate or incomplete; and the **right to erase or block** your information from our databases.

We also recognize your **right to data portability**, also known as your right to obtain and electronically move, copy, or transfer personal data for further use. Furthermore, we also respect your **right to file a complaint** with the National Privacy Commission and your **right to be indemnified** for any damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of your personal information.

How to contact Meralco?

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Data Privacy Office

E-mail: cdpo@meralco.com.ph

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

To what do you consent?

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, 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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1. changes to the DPA and its IRR
2. new issuances from the NPC
3. changes to the Company's data processing activities
4. others that may impact this Statement

Privacy Statement for shareholders

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

What do we collect?

We collect your personal data in the course of, or incidental to the conduct of, our business with you. These data include any other information that you voluntarily provide to us for any 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 of a consent that you gave separately or a legal requirement.

We will be collecting the following information from you:

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.

Why do we collect them?

We store, process, and/or analyze the personal data collected for some legitimate purpose, related or incidental to the conduct of our business, including maintaining safety and security within the Company premises.

Specifically, we may store, process, and/or 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

Commented [JRRGRJ26]: Can we add something like if they avail themselves of Meralco services (for example, I don't know if can go to CWC), then information that they might obtain like health etc. I feel like all benefits available to employees might be available to owners like ... vaccine? May corporate governance might be able to answer such questions.

Commented [MIMC27R26]: Please double-check with CGCO, Vielle.

Commented [VITD28R26]: Got this po. Will check with CGCO.

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 it?

[insert flowchart for shareholders]

Sharing your personal data

To whom do we disclose?

- **Employees, Authorized Representatives, Trainees, and Consultants**

We ensure that our employees and trainees commit to observe the privacy policies of the Company. 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, through a Data Processing, Data Sharing, or Outsourcing Agreements, as applicable, and/or Non-Disclosure Agreement (NDA), to secure and keep your data confidential. We take your privacy seriously so punitive or legal action will be initiated in case of proven misdeed. Moreover, we do not allow our contractors, subsidiaries, and business partners to disclose or share your data to others, or to use it for their own purposes, without your consent.

- **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.

With whom do we share?

Unless you provide specific consent or except in instances allowed under the Data Privacy Act, we will not:

- Share your personal data with our business partners and other third parties for their own commercial purpose or benefit;
- Use your personal data to enable third-party targeted advertisements which are not related to our business.

In case data sharing, including cross-border transfer, is allowed, we shall ensure the protection of your data through appropriate Data Sharing Agreements and commit to give you prior notice to any such transfer and processing of your data.

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.

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:

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
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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 safety and security

Since the outbreak of the coronavirus disease in 2019 (COVID-19), Meralco has actively cooperated and coordinated with government authorities in containing the spread of the virus and ensuring the safety and well-being of the persons it services, employs, and otherwise transacts with. The occupational safety of its employees and the general well-being of its data subjects are now among the primary concerns of Meralco, which prompted the Company to formulate policies and develop solutions for health monitoring of all its data subjects, as necessary. In collecting health information from its data subjects, Meralco shall always inform them about why, how, and where they will be used and shared, as discussed below.

What health information do we collect from our shareholders?

We will be collecting the following health information from you as well as other relevant information:

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2. Information you provide in interviews to determine close contacts of a probable or confirmed COVID-19 case, including yourself; and
3. Information you give us when you visit the establishment or when you engage with Meralco and/or any of our representatives, through attendance records, CCTV footages, calendar of client meetings, and logbooks in facilities of exposure

Why do we collect them?

We store, process, and/or analyze your personal data for the following purposes:

1. To conduct effective contact tracing and prevention and management of the spread of COVID-19 and other infectious diseases in Meralco offices and establishments;
2. To assist the government in providing effective response during the COVID-19 pandemic and other health crises that may be declared as a cause for state emergency including case investigations, treatment, and control and containment; and
3. To provide accurate and timely health information about notifiable diseases, and health-related events and conditions.

On what basis do we collect them?

DTI-DOLE JMC No. 20-04-A

Commented [MIMC29]: Hi Vielle,

Please copy-paste this Section, after filling out the sub-headings below, before "Your data subject rights".

Commented [MIC30R29]: Separate section for COVID-19 and other health-related data processing activities.

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Republic Act No. 11332

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- **Local government units (LGUs) or other authorized persons**

We will also share your information to the local health office having jurisdiction over the workplace and the Barangay Health Emergency Team (BHET) of your place of residence, in accordance with DOH DM No. 2020-0189.

- **DOLE**

We submit monthly reports of illness, diseases and injuries in the workplace to the Regional Office of the DOLE in accordance with the DTI-DOLE Interim Guidelines on Workplace Prevention and Control of COVID-19 using the Work Accident/Illness Report (WAIR) COVID-19 form.

- **Affiliate Hospitals**

We may share your information to our affiliate hospitals if, during health screening prior to your entry to any of the Company's establishments or at any point that you voluntarily declare your health condition to us, we determine that you may need immediate medical assistance.

In which automated processes will we use them?

We may collect personal data and other information electronically through digital or online forms with privacy notices that provide a link to this Statement or a copy thereof placed at the point of data collection in a readable font and in an easy-to-understand presentation.

How long will we keep them?

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All other personal data collected for the management of probable, suspected, and confirmed COVID-19 patients shall be stored only for as long as necessary or when the purpose for processing still exists.

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

What are your data privacy rights?

As an individual whose information we collect and store to fulfill our legitimate purposes, you have rights as a data subject under the DPA.

You have the **right to be informed** about how and why we collect your personal data. You also have the **right to access** a copy of your personal information in our possession; **the right to withdraw consent** that you previously gave; the **right to have your information corrected** if you believe that it is inaccurate or incomplete; and the **right to erase or block** your information from our databases.

We also recognize your **right to data portability**, also known as your right to obtain and electronically move, copy, or transfer personal data for further use. Furthermore, we also respect your **right to file a complaint** with the National Privacy Commission and your **right to be indemnified** for any damages sustained due to

inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of your personal information.

How to contact Meralco?

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Data Privacy Office

E-mail: cdpo@meralco.com.ph

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

To what do you consent?

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, 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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When do we revise this Statement?

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1. changes to the DPA and its IRR
2. new issuances from the NPC

3. changes to the Company's data processing activities
4. others that may impact this Statement

Privacy Statement for guests / visitors

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

What do we collect?

We collect your personal data in the course of, or incidental to the conduct of, our business with you. These data include any other information that you voluntarily provide to us for any 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 of a consent that you gave separately or a legal requirement.

We will be collecting the following information from you:

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; and
2. Information captured by our close circuit television (CCTV) installed in our premises including entrance and exit points.

Why do we collect them?

We store, process, and/or analyze the personal data collected for some legitimate purpose, related or incidental to the conduct of our business, including maintaining safety and security within the Company premises.

Specifically, we may store, process, and/or 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;

Commented [JRRGRJ31]: The health information when required

Commented [MIMC32R31]: We'll probably create a separate section for general and occupational health and safety for all pages.

Commented [MIC33R31]: Done.

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 it?

[insert flowchart for guests/visitors]

Sharing your personal data

To whom do we disclose?

- **Employees, Authorized Representatives, Trainees, and Consultants**

We ensure that our employees and trainees commit to observe the privacy policies of the Company. 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, through a Data Processing, Data Sharing, or Outsourcing Agreements, as applicable, and/or Non-Disclosure Agreement (NDA), to secure and keep your data confidential. We take your privacy seriously so punitive or legal action will be initiated in case of proven misdeed. Moreover, we do not allow our contractors, subsidiaries, and business partners to disclose or share your data to others, or to use it for their own purposes, without your consent.

- **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.

With whom do we share?

Unless you provide specific consent or except in instances allowed under the Data Privacy Act, we will not:

- Share your personal data with our business partners and other third parties for their own commercial purpose or benefit;

- Use your personal data to enable third-party targeted advertisements which are not related to our business.

In case data sharing, including cross-border transfer, is allowed, we shall ensure the protection of your data through appropriate Data Sharing Agreements and commit to give you prior notice to any such transfer and processing of your data.

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.

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:

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 MERALCO

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 safety and security

Commented [MIMC34]: Hi Vielle,

Please copy-paste this Section, after filling out the sub-headings below, before "Your data subject rights".

Commented [MIC35R34]: Separate section for COVID-19 and other health-related data processing activities.

Since the outbreak of the coronavirus disease in 2019 (COVID-19), Meralco has actively cooperated and coordinated with government authorities in containing the spread of the virus and ensuring the safety and well-being of the persons it services, employs, and otherwise transacts with. The occupational safety of its employees and the general well-being of its data subjects are now among the primary concerns of Meralco, which prompted the Company to formulate policies and develop solutions for health monitoring of all its data subjects, as necessary. In collecting health information from its data subjects, Meralco shall always inform them about why, how, and where they will be used and shared, as discussed below.

What health information do we collect from our guests and/or visitors?

We will be collecting the following health information from you as well as other relevant information:

1. Information you provide in Health Declaration Forms and Contact Tracing Forms as required by the Department of Trade and Industry (DTI) and Department of Labor and Employment (DOLE) Joint Memorandum Circular (JMC) No. 20-04-A Series of 2020, such as your full name, complete address, contact information, signature, COVID-19 exposure, health conditions, and travel history;
2. Information you provide in interviews to determine close contacts of a probable or confirmed COVID-19 case, including yourself; and
3. Information you give us when you visit the establishment or when you engage with Meralco and/or any of our representatives, through attendance records, CCTV footages, calendar of client meetings, and logbooks in facilities of exposure

Why do we collect them?

We store, process, and/or analyze your personal data for the following purposes:

1. To conduct effective contact tracing and prevention and management of the spread of COVID-19 and other infectious diseases in Meralco offices and establishments;
2. To assist the government in providing effective response during the COVID-19 pandemic and other health crises that may be declared as a cause for state emergency including case investigations, treatment, and control and containment; and
3. To provide accurate and timely health information about notifiable diseases, and health-related events and conditions.

On what basis do we collect them?

DTI-DOLE JMC No. 20-04-A

The DTI-DOLE JMC No. 20-04-A requires all private establishments to implement all necessary workplace safety and health programs, including COVID-related programs, at no cost to the employees. This includes remote management of cases and close contacts, isolation and referral, contact tracing, COVID-19 testing,

occupational safety and health committees, notification and reporting, and disinfection and closure of buildings/workplaces.

Republic Act No. 11332

Under RA 11332, all public and private physicians, allied medical personnel, professional societies, hospitals, clinics, health facilities, laboratories, institutions, workplaces, schools, prisons, ports, airports, establishments, communities, other government agencies, and NGOs are required to accurately and immediately report notifiable diseases and health events of public health concern as issued by the DOH.

Republic Act No. 11058

RA 11058 requires all establishments, projects, sites, and all other places where work is being undertaken in all branches of economic activity to ensure a safe and healthful workplace for all working people by affording them full protection against all hazards in their work environment. This includes submitting all safety health reports, and notifications prescribed by the DOLE.

With whom do we share them?

- **Department of Health (DOH) and its partner agencies**

We will share your information with DOH and its partner agencies for purposes of conducting contact tracing or management of probable, suspected, and confirmed COVID-19 patients. Meralco is mandated to report COVID-19 test results in the workplace in accordance with DOH Administrative Order No. 2020-0013, entitled "Revised Guidelines for the Inclusion of COVID-19 in the List of Notifiable Diseases for Mandatory Reporting to the Department of Health."

- **Local government units (LGUs) or other authorized persons**

We will also share your information to the local health office having jurisdiction over the workplace and the Barangay Health Emergency Team (BHET) of your place of residence, in accordance with DOH DM No. 2020-0189.

- **DOLE**

We submit monthly reports of illness, diseases and injuries in the workplace to the Regional Office of the DOLE in accordance with the DTI-DOLE Interim Guidelines on Workplace Prevention and Control of COVID-19 using the Work Accident/Illness Report (WAIR) COVID-19 form.

- **Affiliate Hospitals**

We may share your information to our affiliate hospitals if, during health screening prior to your entry to any of the Company's establishments or at any point that you voluntarily declare your health condition to us, we determine that you may need immediate medical assistance.

In which automated processes will we use them?

We may collect personal data and other information electronically through digital or online forms with privacy notices that provide a link to this Statement or a copy thereof placed at the point of data collection in a readable font and in an easy-to-understand presentation.

How long will we keep them?

All personal data collected for contact tracing shall be retained only for the period allowed by existing government issuances. The DTI-DOLE JMC provides that personal data collected through the health declaration form or the contact tracing form shall be stored only for thirty (30) days from date of accomplishment.

All other personal data collected for the management of probable, suspected, and confirmed COVID-19 patients shall be stored only for as long as necessary or when the purpose for processing still exists.

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

What are your data privacy rights?

As an individual whose information we collect and store to fulfill our legitimate purposes, you have rights as a data subject under the DPA.

You have the **right to be informed** about how and why we collect your personal data. You also have the **right to access** a copy of your personal information in our possession; **the right to withdraw consent** that you previously gave; the **right to have your information corrected** if you believe that it is inaccurate or incomplete; and the **right to erase or block** your information from our databases.

We also recognize your **right to data portability**, also known as your right to obtain and electronically move, copy, or transfer personal data for further use. Furthermore, we also respect your **right to file a complaint** with the National Privacy Commission and your **right to be indemnified** for any damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of your personal information.

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4. others that may impact this Statement

Privacy Statement for other pertinent third parties

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

What do we collect?

We collect your personal data in the course of, or incidental to the conduct of, our business with you. These data include any other information that you voluntarily provide to us for any 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 of a consent that you gave separately or a legal requirement.

We will be collecting the following information from you:

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; and
5. Information we may record as you participate in activities, campaigns, programs, and projects involving Meralco, strictly limited to photos and videos of you for the duration of any of the foregoing.

Why do we collect them?

We store, process, and/or analyze the personal data collected for some legitimate purpose, related or incidental to the conduct of our business, including maintaining safety and security within the Company premises. Specifically, we may store, process, and/or analyze your personal data for the following and any other legitimate purposes:

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; and
6. In general, to facilitate the performance of our services, provide you 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 it?

[insert flowchart for third parties]

Sharing your personal data

To whom do we disclose?

- **Employees, Authorized Representatives, Trainees, and Consultants**

We ensure that our employees and trainees commit to observe the privacy policies of the Company. 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, through a Data Processing, Data Sharing, or Outsourcing Agreements, as applicable, and/or Non-Disclosure Agreement (NDA), to secure and keep your data confidential. We take your privacy seriously so punitive or legal action will be initiated in case of proven misdeed. Moreover, we do not allow our contractors, subsidiaries, and business partners to disclose or share your data to others, or to use it for their own purposes, without your consent.

- **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.

With whom do we share?

Unless you provide specific consent or except in instances allowed under the Data Privacy Act, we will not:

- Share your personal data with our business partners and other third parties for their own commercial purpose or benefit;
- Use your personal data to enable third-party targeted advertisements which are not related to our business.

In case data sharing, including cross-border transfer, is allowed, we shall ensure the protection of your data through appropriate Data Sharing Agreements and commit to give you prior notice to any such transfer and processing of your data.

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.

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:

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 MERALCO

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 safety and security

Since the outbreak of the coronavirus disease in 2019 (COVID-19), Meralco has actively cooperated and coordinated with government authorities in containing the spread of the virus and ensuring the safety and well-being of the persons it services, employs, and otherwise transacts with. The occupational safety of its employees and the general well-being of its data subjects are now among the primary concerns of Meralco, which prompted the Company to formulate policies and develop solutions for health monitoring of all its data subjects, as necessary. In collecting health information from its data subjects, Meralco shall always inform them about why, how, and where they will be used and shared, as discussed below.

What health information do we collect from our vendors, suppliers, and/or contractors?

We will be collecting the following health information from you as well as other relevant information:

1. Information you provide in Health Declaration Forms and Contact Tracing Forms as required by the Department of Trade and Industry (DTI) and Department of Labor and Employment (DOLE) Joint Memorandum Circular (JMC) No. 20-04-A Series of 2020, such as your full name, complete address, contact information, signature, COVID-19 exposure, health conditions, and travel history;
2. Information you provide in interviews to determine close contacts of a probable or confirmed COVID-19 case, including yourself; and
3. Information you give us when you visit the establishment or when you engage with Meralco and/or any of our representatives, through attendance records, CCTV footages, calendar of client meetings, and logbooks in facilities of exposure

Why do we collect them?

We store, process, and/or analyze your personal data for the following purposes:

1. To conduct effective contact tracing and prevention and management of the spread of COVID-19 and other infectious diseases in Meralco offices and establishments;
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3. To provide accurate and timely health information about notifiable diseases, and health-related events and conditions.

On what basis do we collect them?

DTI-DOLE JMC No. 20-04-A

The DTI-DOLE JMC No. 20-04-A requires all private establishments to implement all necessary workplace safety and health programs, including COVID-related programs, at no cost to the employees. This includes remote management of cases and close contacts, isolation and referral, contact tracing, COVID-19 testing, occupational safety and health committees, notification and reporting, and disinfection and closure of buildings/workplaces.

Republic Act No. 11332

Under RA 11332, all public and private physicians, allied medical personnel, professional societies, hospitals, clinics, health facilities, laboratories, institutions, workplaces, schools, prisons, ports, airports, establishments, communities, other government agencies, and NGOs are required to accurately and immediately report notifiable diseases and health events of public health concern as issued by the DOH.

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RA 11058 requires all establishments, projects, sites, and all other places where work is being undertaken in all branches of economic activity to ensure a safe and healthful workplace for all working people by affording them full protection against all hazards in their work environment. This includes submitting all safety health reports, and notifications prescribed by the DOLE.

With whom do we share them?

- **Department of Health (DOH) and its partner agencies**

We will share your information with DOH and its partner agencies for purposes of conducting contact tracing or management of probable, suspected, and confirmed COVID-19 patients. Meralco is mandated to report COVID-19 test results in the workplace in accordance with DOH Administrative Order No. 2020-0013, entitled "Revised Guidelines for the Inclusion of COVID-19 in the List of Notifiable Diseases for Mandatory Reporting to the Department of Health."

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We will also share your information to the local health office having jurisdiction over the workplace and the Barangay Health Emergency Team (BHET) of your place of residence, in accordance with DOH DM No. 2020-0189.

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How long will we keep them?

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