PRIVACY POLICY

[Revision 01]

APPROVAL SIGNATURE SHEET

This document called "PRIVACY POLICY" is prepared, endorsed and approved for implementation **effective 22 May 2017**. This supersedes the earlier version of this document, dated September 25, 2012.

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1. INTRODUCTION

Republic Act No. 10173, also known as the Data Privacy Act of 2012 (DPA) and its Implementing Rules and Regulations (IRR), aims to protect personal data in information and communications systems both in the government and the private sector.

It requires the entities processing personal data to establish policies and implement reasonable and appropriate measures that will ensure the protection of personal data under their custody.

In compliance with the DPA IRR Section 26b, this Privacy Policy is hereby adopted to ensure that the data we collect from our data subjects -- customers, employees, vendors, stakeholders, and visitors are processed in adherence to the general principles of transparency, proportionality and legitimate purpose; and protected to secure its confidentiality, integrity and availability.

2. OBJECTIVES

This Privacy Policy will serve as a privacy notice to our data subjects. It aims to inform them:

a) of what information we collect, its uses, disclosure, sharing, retention and disposal;
b) how we protect their information; and
c) how they can exercise their rights under the DPA.

This will be published in appropriate format and manner in venues where we collect personal data or information such as in our business centers, customer portal, website lobby or other events.

3. SCOPE

This Policy applies to all our data subjects – Customers, Employees, Vendors, Shareholders and Visitors who provide personal information (in hard copy or electronic form) while conducting business with MERALCO.

4. DEFINITION OF TERMS

a. "Data Subject" – refers to an individual whose personal, sensitive personal or privileged information is processed by the organization.
b. "Personal Information" – refers to any information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual.

c. “Processing” refers to any operation or any set of operations performed upon personal information including, but not limited to, the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of data. Processing may be performed through automated means, or manual processing, if the personal data are contained or are intended to be contained in a filing system.

5. PRIVACY POLICY

(Start)

This Privacy Policy covers your personal information when transacting or doing business with Manila Electric Company (individually and collectively known as "MERALCO", "we", "us" or "our").

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

This Privacy Policy is effective 22 May 2017.

WHAT WE COLLECT

A. From prospective and existing customers, including customers with terminated services:

1. Information you provide to us when you apply for service, such as your name, address, phone number, email address, Tax Identification Number (TIN), 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;

2. Billing and payment information used to pay your electric consumption, 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;

3. Information to determine eligibility 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.;

4. Information you fill out in any form on our website, such as, when you wish to contact us to lodge your concerns, to register at our customer portal, to avail of our on-line application, outage notifications, and billing and/or payment services;

5. Information you give us when you communicate with MERALCO and/or any of our representatives (e.g., Call Center Representatives, Relationship Managers, etc.), such as with respect to inquiries and complaint details on the quality and reliability of electric service;

6. Responses you or your representative provide when you participate in our customer surveys;

7. Information you provide for verification purposes (e.g., to facilitate refunds or to avail of zero-rated VAT transactions), such as photocopy of a valid / government-issued identification card or foreign passport;

8. Any other information you voluntarily provide for any legitimate purpose declared at point of collection of such information.

B. From prospective, active and separated employees:

1. Information you submit when you apply at MERALCO for work, 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 about you during your employment, such as your payroll information, including but not limited to government mandated and third party remittances like SSS, Philhealth, and Pag-ibig contributions, taxes, bank account information; wages; entitlements and benefits ; health and welfare benefits; medical and dental care records; beneficiary and emergency contact information; training and certifications, performance evaluation; sanctions; employment changes / work history;

4. Information we retain about you even after your separation from service, such as beneficiaries, and contact information;

5. Any other information you voluntarily provide for any legitimate purpose declared at point of collection of such information.

C. From Vendors, Suppliers or Contractors

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, address, contact details, educational attainment, work experience and banking information;

2. Any other information you voluntarily provide for any legitimate purpose declared at point of collection of such information.

D. From Shareholders

1. The information you submit to us when you become a shareholder of or in the course of being a shareholder of MERALCO like your name, address, contact details, marital status, government issued identification, and if applicable, details of your authorized representative and heir/s;

2. Any other information you voluntarily provide for any legitimate purpose declared at point of collection of such information.

E. From Guests / Visitors

1. The information you provide when you enter our premises such as your name, address, vehicle type and plate number or conduction sticker number;

2. Any other information you voluntarily provide for any legitimate purpose declared at point of collection of such information.

WHAT WE DO WITH THE INFORMATION WE GATHER

MERALCO stores, processes, and analyzes the information that you provide to us for purposes, including, but not limited to:

A. For our customers

1. providing and continuously improving our electric services, as well as managing your account

2. responding to your inquiry, concern or complaint

3. sending information about our programs (POP, ILP) and service offerings (DSM, etc) that may be of interest to you

4. sending messages related to your services such as outage notifications, updates, alerts, and other information that you request

5. enabling us to accept bill payments according to your enrolled payment mode (i.e., automatic debit from your bank account)

6. verifying 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)

7. verifying your identity and eligibility to claim refunds

B. For our prospective, active and separated employees

1. evaluating your eligibility for initial employment, including the verification of your qualifications and character references (background checking)
2. administering your pay, statutory deductions, entitlements, and benefits
3. complying with applicable statutory and regulatory requirements and submissions
4. conducting performance reviews and rewards
5. establishing appropriate training and/or developmental interventions
6. administering disciplinary action and sanction
7. collecting and maintaining contact information
8. maintaining your employment records
9. processing employee work-related claims (e.g. worker compensation, insurance claims, etc.)
10. developing health and wellness programs

C. For our Vendors, Suppliers or Contractors

1. verifying and confirming your identity as a vendor as part of your accreditation
2. conducting business with you
3. establishing and managing business relationships with you
4. facilitating the payment of your invoices for any goods or services you have delivered/rendered
5. complying with statutory, legal and regulatory requirements
6. updating or maintaining your vendor account information

7. establishing details of your authorized contact persons for the goods and/or services you supply

8. responding to your questions, comments, and feedback or informing you about our requirements, programs, or advisories by letter, e-mail, telephone or other media for internal administrative purposes, such as auditing, data analysis, database records management

D. For our Shareholders

1. maintaining our shareholder register

2. managing your account and our relationship with you

3. handling dividend or any other payments

4. facilitating 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

5. for legal and investor relations purposes

E. For our visitors / guests

1. establishing your identity

2. recording the purpose of your visit

3. monitoring visitor's activities inside the company premises, including ingress and egress of equipment, vehicle, etc.

DATA DISCLOSURE AND SHARING

Access to your personal information is restricted to MERALCO employees and contractors on a need to know basis to carry out their responsibilities with regard to the conduct of our business such as meter reading, bill delivery, field inspection, energization, and restoration of your electric service. We require our contractors, through a Non-Disclosure Agreement (NDA), to secure and keep your information confidential and we do not allow them to disclose your information to others, or to use it for their own purposes.

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

INFORMATION SECURITY

We are committed to ensure that your information is secure. MERALCO shall undertake and implement reasonable organizational, physical, and technical security measures in collecting, receiving, transmitting, storing, and disposing your personal information.

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.

AUTOMATIC COLLECTION OF INFORMATION AND HOW WE USE COOKIES

By using our website and /or using services through it, you agree to the use of cookies, either via the MERALCO website, email or SMS communications. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. However, this may prevent you from taking full advantage of our website.

A cookie is a small file, which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website to enhance your browsing experience. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

We receive and store certain types of information (such as the amount of time you spend on the site and the number of views you made on each page, the IP address of your device, and the browser

and operating system that you are using) when you interact with our website, mobile website, emails and online advertising to monitor proper functionality, determine areas for continuous improvement and to support website requirements. This information is gathered automatically, temporarily stored in log files and removed from the system at a certain point.

LINKS TO OTHER WEBSITES

Our website contains links, which may lead you to other websites beyond our control and not covered by this Privacy Policy. If you access other sites using the links provided, the operators of those sites may collect information from you, which may be used by them in accordance with their own privacy policy. We are not responsible for the protection and privacy of any personal information that third parties may collect, store and use through their website. Therefore, you should exercise caution and carefully study the privacy policy of each website you visit.

LOGS COLLECTION

Your personal information may be collected by our logging processes in case of logical and physical access to our systems and/or premises. When necessary, personal information may be retrieved for security purposes.

PERSONAL DATA RETENTION AND DISPOSAL

We keep your personal data only for as long as necessary:

a) 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;

b) for the establishment, exercise or defense of legal claims; or

c) for other business purposes, that are consistent with standards established or approved by regulatory agencies governing MERALCO

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

CONTROLLING YOUR PERSONAL INFORMATION

You may request for a copy of your personal information in our possession, or have it corrected if you believe that it is inaccurate or incomplete.

If you wish to request for a copy of your personal data, or have it corrected or deleted, please reach out to us through our contact information found below. We will promptly respond to your request.

Chief Data Privacy Officer
Tel. No.: 631-2222
e-mail: cdpo@meralco.com.ph
Office: Lopez Building, Meralco Center, Ortigas Avenue, Brgy. Ugong, Pasig City, 1600

FEEDBACK ON OUR PRIVACY POLICY

For questions or feedback about our Privacy Policy, please contact us through this email: cdpo@meralco.com.ph

CHANGES TO POLICY

MERALCO reserves the right to revise or modify this Privacy Policy, as necessary.

YOUR CONSENT

By using our Website or clicking "I Agree" or any other button indicating your acceptance of this Privacy Policy, you expressly consent to the collection, use, disclosure and processing of your personal data in the manner described in this Privacy Policy, including our procedures relating to cookies, IP addresses and log files.

(End)

6. CHANGE CONTROL PROCESS

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

a) changes to the DPA and its IRR
b) new issuances from the NPC
c) changes to the Company's data processing activities
d) others that may impact this Policy

The change shall be processed in accordance with Meralco's Document Control Procedure (PM-GEQ-001).