

MPT DriveHub Privacy Notice

Your privacy is important to us. This Privacy Notice provides information on how MPT DriveHub handles your personal data whenever you use the mobile application. It describes the purpose and manner of processing your personal data. It also covers your data privacy rights and how you can exercise them.

We respect your right to be informed, ensuring that this Privacy Notice is presented to you before or promptly after the collection of your personal data. In the course of processing your data for the purposes discussed herein and those closely related to such, we strive to create privacy notices that serve as reminders of how we collect, use, disclose, and process your personal data in accordance with the details outlined in this notice.

For any purposes not explicitly stated in this Privacy Notice, those not readily inferred, or for purposes for processing personal data that requires your consent, we will make every reasonable effort to seek your permission. This may involve presenting a separate consent form that may require your signature, a tick box for you to select, or feature a button for you to click as an indication of your consent.

This privacy notice details the processing of your personal data when you sign up and use the MPT DriveHub application.

What types of personal data do we collect and how do we collect it?

Personal Data Collected and Manner of Collection

We collect personal data only when it is needed and depending on the services that you wish to avail.

When you sign up using your email, we collect the following personal data:

- Name
- Email Address
- Mobile Number
- Birthday

When you sign up using your Google or Apple ID accounts, we collect the following personal data:

- Name
- Email Address

Before you can add your Easytrip Radio Frequency Identification ("RFID") account and/or your Cebu Cordova Link Expressway ("CCLEX") RFID account, we collect the following personal data to verify your profile:

- Mobile Number (Google and Apple ID)
- Birthday (Google and Apple ID)
- Gender (with option not to disclose)
- Province
- Town/City

When you add your Easytrip RFID account, the following personal data will be collected:

- Easytrip RFID Account Number
- Easytrip RFID Card Number
- Vehicle License Plate Number

If you want to add an Easytrip RFID account that is not under your name (e.g., family, friends, others), you guarantee that you have obtained consent from the actual owner of the Easytrip RFID account prior to submitting.

When you sign up using your CCLEX QR Code, the following personal data will be collected from your CCLEX account:

- Name
- Email Address
- Mobile Number
- Birthday
- CCLEX RFID Account Number
- CCLEX RFID Card Number
- Vehicle License Plate Number
- Vehicle Make

To purchase vehicle insurance products from our insurance provider partners in the platform, we collect the following additional personal data:

- Tax Identification Number (optional)
- Complete address
- Vehicle License Plate Number
- Vehicle Conduction Sticker
- Vehicle Engine Number
- Vehicle Chassis/Serial Number
- Vehicle M/V File Number
- Vehicle Color
- Vehicle Body Type
- Vehicle Registration Type

When filing a claim with our insurance provider partners, we will need you to upload a photo of your government ID. The uploaded government ID will be sent to the insurance provider partner but will not be stored by us.

The following personal data are also collected when you use MPT DriveHub:

- Internet Protocol (IP) Address
- Login Data, Browser Type and Version
- International Mobile Equipment Identity (IMEI)
- Device Identifier, Operating System and Platform
- Time Zone
- Location (optional depending on device permission)

- Payment and transaction data. When you make a transaction in the MPT DriveHub application using your credit or debit card, we only store the first four (4) digits and last four (4) digits of your credit or debit card. Your transaction, purchase, order, or payment logs and history will be collected as well.
- Information, including accurate and up-to-date personal data, you voluntarily provide when you contact us or use MPT DriveHub.

Why do we collect and process your personal data?

Purposes for Collecting and Processing Personal Data

We collect and process your personal data for the following purposes:

- For identification, due diligence, or know your customer purposes (we may request for documentation to verify the personal data provided by you as part of our user verification processes).
- For you to be able to manage your Easytrip RFID accounts such as balance inquiries, trip history, transaction history, and reloads.
- For you to be able to purchase insurance products from our insurance provider partners through the platform.
- For you to be able to file a claim with your availed insurance provider.
- To locate rest stops along the Metro Pacific Tollways Corporation (MPTC) Group toll road.
- To call roadside assistance along MPTC Group toll roads.
- To be able to contact customer support for your inquiries and concerns.
- To be able to provide advisories.
- For marketing promotions and advertising purposes.
- To send RFID balance push notifications of your favorite RFID account.
- For collecting feedback and to contact you regarding your feedback.
- To conduct research, analysis and development activities (including, but not limited to, data analytics, surveys, product and service development), to analyze how MPT DriveHub users use our services and to improve our services and/or to enhance your customer experience.
- To setup and maintain backups and other mechanisms necessary for business continuity plans
- To enforce or defend any legal claims.
- To comply with the requirements of the law.

How do we store your personal data and who do we share it with?

Security Measures, Storage and Transmission of Personal Data

We store and transmit personal data securely using organizational, physical, and technical security measures based on widely accepted data privacy and information security standards to protect the confidentiality, integrity, and availability of your personal data.

If you believe that your privacy has been breached, please contact us immediately. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

Your password is the key to your account. Please update it regularly and use unique numbers, letters, and special characters, and do not share your password to anyone.

In addition, we have advertisements with links to third-party sites posted in the application. Please be advised that when you click these ads, you may be redirected to their website. We do not have control over these websites' security, and we are not responsible nor liable for their content, privacy policies, or practices. We recommend that you review the privacy policy and terms of service of any third-party site you visit to ensure the protection of your personal information.

Third Party Transfer

We have partners that help provide you with better services. We may share or disclose your personal data with them for essential purposes. Our partners execute agreements with us to ensure that they protect your personal data as well. Here are who we share your information with:

1. **Metro Pacific Tollways Corporation (MPTC), its subsidiaries and affiliates, or other companies controlled by or is under common control with MPTC.** For example, your personal data may be shared to (1) Easytrip Services Corporation (ESC) and/or Cebu Cordova Link Expressway Corporation (CCLEC) to verify your Easytrip and/or CCLEC RFID information, confirm your identity, prevent crime, process payments, and send you information about your RFID, such as transaction history, including marketing and promotion services if you participate in such; (2) Metro Pacific Tollways Digital, Inc. (MPTDI) to provide technical support (application maintenance, development, storage, disposal), manage, organize, and analyze information (e.g., how MPT DriveHub users interact with the mobile app) that may be used to improve how MPT DriveHub may smoothly deliver its services to you; and (3) SAVVICE Corporation (SAVVICE) for roadside assistance.

In case of reorganization, sale of all or any portion of assets, merger, or acquisition by another entity, your personal data may be transferred to the successor entity. In the event that MPT DriveHub's business operations cease or enter bankruptcy, your personal data shall become an asset to be transferred or acquired by a third party. You acknowledge that such transfers may occur, and that the transferee may decline to honor the commitments made in this Privacy Notice.

2. **Service Providers.** For example, we may share information to our trusted services providers, which may include limited access to essential personal data, for the purpose of enhancing/testing the security of MPT DriveHub, further analyzing information, conceptualizing and/or showing you advertising campaigns that may be relevant or suited to your preferences and promotion activities you participate in and may unsubscribe to at any time (e.g., MPT DriveHub *Holideals* raffle promo).
3. **Third Party Partners.** For example, your personal data may be shared to our payment partners in order to process your transactions. Your personal data may be shared to our insurance provider partners to verify vehicle details you have entered and when you purchase insurance products through the MPT DriveHub application.
4. **Government authorities.** In exceptional circumstances, we may be required to disclose personal data, such as when there are grounds to believe that the disclosure is necessary to prevent a threat to life or health, to investigate or remedy potential or actual violations, to protect the rights, property, and safety

of others, or for law enforcement purposes, or for fulfillment of legal and regulatory requirements and requests.

Why do we retain and when do we dispose your personal data?

Retention and Disposal

Whatever personal data provided by you or pertaining to you shall only be retained for as long as necessary:

1. For the fulfillment of the declared, specified, and legitimate purpose, or when the processing relevant to the purpose has been terminated;
2. For the establishment, exercise, or defense of legal claims; or
3. For legitimate business purposes, which must be consistent with standards followed by the applicable industry or approved by the appropriate government agency.

We shall cease to retain your personal data or remove the means by which the data can be associated with you as soon as it is reasonable to assume that such retention no longer serves the purposes for which it was collected and is no longer necessary for any legal or business purpose.

We have a variety of obligations to retain the personal data that you provide to us, such as, but not limited to, ensuring that transactions can be appropriately processed, settled, or charged-back, where applicable, to help identify fraud and to comply with other laws and rules that apply to us and to our service providers.

Generally, your personal data is retained not longer than two (2) years unless otherwise necessary for the specified purposes or legal obligation. When no longer necessary, it shall be disposed of or discarded in a secure manner that would prevent further processing, unauthorized access, or disclosure to any other party.

When you choose to delete your MPT DriveHub account, your Easytrip/CCLEX RFID account subscriptions will still remain. Only your MPT DriveHub account will be deleted.

Should you wish to end your Easytrip/CCLEX RFID subscriptions, you may email customercare@mptc.com.ph.

What are your rights as a data subject?

Under Section 16 of the Data Privacy Act of 2012, your rights as a data subject are as follows:

1. Right to be Informed

You have the right to be informed whether your personal data shall be, are being, or have been processed, including the existence of automated decision-making and profiling.

2. Right to Access

You have a right to be given access to specific kinds of information identified in the Data Privacy Act upon reasonable demand.

You may request information about your personal data which we have collected or inquire about the ways in which your personal data may have been used, disclosed, stored, or processed by us within the past year. To facilitate processing of your request, it may be necessary for us to request further information relating to your request.

We reserve the right to charge a reasonable administrative fee for the retrieval of your personal data records. In any case, you shall be informed of the fee before any such request is processed.

We will respond to your request as soon as reasonably possible. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the applicable data protection laws).

3. Right to Object

You shall have the right to object to the processing of your personal data where such processing is based on consent or legitimate interest, including processing for direct marketing, automated processing or profiling. You shall also be notified and be given an opportunity to withhold consent to the processing in case of changes or any amendment to the information supplied or declared to the data subject.

4. Right to Rectification

You have the right to dispute the inaccuracy or error in your personal data and have us correct the same within a reasonable period of time, unless the request is vexatious or otherwise unreasonable.

You may change certain personal data directly through MPT DriveHub. For other personal data that cannot be changed through the MPT DriveHub application, you may email our customer support team at [<customercare@mptc.com.ph>](mailto:customercare@mptc.com.ph). We may ask for additional identification for verification purposes when you request to correct your personal data for security purposes.

5. Right to File a Complaint

If you feel that your personal data has been misused, maliciously disclosed, or improperly disposed, or that any of your data privacy rights have been violated, you have a right to file a complaint.

6. Right to Erasure or Blocking

You shall have the right to suspend, withdraw or order the blocking, removal, or destruction of your personal data from the MPT DriveHub system.

You may terminate your MPT DriveHub account at any time in your MPT DriveHub application, by clicking Account > Login & Security > Account Deletion or calling our customer support team. If you choose to process your account terminating through MPT DriveHub, your request to terminate will be sent to our customer support team for assistance and verification. We may need to ask for additional personal data to prove your identity for verification and security purposes. The account and the information will be deactivated or deleted from the active databases upon successful verification.

However, information may be retained in order to prevent fraud, troubleshoot problems, assist with any investigations, enforce Terms and Condition of use, and/or comply with legal requirements.

7. Right to Damages

Upon presentation of a valid decision, we recognize your right to be indemnified for actual and verifiable damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of Personal Information, taking into account any violation of your rights and freedoms as data subject.

8. Right to Data Portability

As a data subject, you have the right to obtain from us a copy of your personal data and/or have the same transmitted from to another personal information controller (PIC), in an electronic or structured format that is commonly used.

Is this Privacy Notice updated?

Updates or Changes to the Privacy Notice

We reserve the right to update or revise this privacy notice at any time and as required by latest amendments to the Data Privacy Act of 2012, its Implementing Rules and Regulations, issuances of the National Privacy Commission, or when there are improvements and changes to the collection, processing, sharing or disclosure, retention, and disposal of your personal data. Previous versions of the privacy notice will be retained and provided to data subjects upon request.

Last updated: June 4, 2024

How can you reach us?

For general inquiries, you may reach us through our customer support team at <customer@mpc.com.ph> or through the MPT DriveHub hotline 1-35000.

For any questions, concerns, feedback on this privacy notice, or to exercise your data privacy rights, you may reach us through:

DATA PROTECTION OFFICER

MPT Mobility Corporation
7th Floor SM North Tower 1, EDSA corner
North Avenue, Bagong Pag-asa,
Quezon City, Metro Manila
<dataprivacyoffice@mptmobility.com>