

I. Policy Statement

The Asia-Pacific Medical Center Bacolod, Inc. (or "APMCBI") Investor Relations Office respects the privacy of the Stockholders and safeguards the integrity and confidentiality of investor-related information. Pursuant to the Data Privacy Act of 2012, Asia-Pacific Medical Center Bacolod, Inc. acts as a personal information controller in respect of the Personal Data of its investors.

We encourage investors to read this Policy carefully. This Policy may change from time to time and we encourage investors to check this regularly to review any changes that the Board of Directors and the Company's Data Privacy Committee might make to this Policy.

This Policy was last updated on July 29, 2023.

II. Definitions

The following definitions shall apply to this Policy:

- A. **"Investor"** means an investor in APMCBI, who may be an individual investor or an institutional (corporate) investor (direct or indirect).
- B. **"Personal Data"** 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. **"Privileged information"** refers to any and all forms of data which under the Rules of Court and other pertinent laws constitute privileged communication.
- D. **"Sensitive personal information"** refers to personal information:
 - i. About an individual race, ethnic, origin, marital status, age, color, and religious, philosophical or political affiliations;
 - ii. About an individual's health, education, generic or sexual life of a person, or to any proceeding for any offense committed or alleged to have been committed by such person, the disposal of such proceedings, or the sentence of any court in such proceedings;
 - iii. Issued by government agencies peculiar to an individual which includes, but not limited to, social security numbers, previous or current

- health records, licenses or its denials, suspension or revocation, and tax returns; and
- iv. Specifically established by an executive order or an act of Congress to be kept classified.

- E. **"You", "Your"** means a living individual, who may be:
- i. an Investor or prospective Investor;
 - ii. an employee, director, officer, trustee, beneficiary, or representation or intermediary of an Investor or Prospective Investor.

III. The Types of Personal Data We Collect

- A. The exercise of the rights, privileges and benefits offered by APMCBI to its investors require the Company to obtain Personal Data about you in order to perform the services required to be rendered by the Hospital. In connection with the provision of those services, APMCBI will collect Personal Data about you:
- i. directly from you;
 - ii. from a third party acting on your behalf, for example an intermediary, lawyer or agent.
- B. Such Personal Data may include:
- i. details of your name, age, date of birth, address, gender, nationality, citizenship and contact information;
 - ii. financial information or other information obtained as a result of your investment (such as banking details);
 - iii. for any tax implications related to your financial activities, your social insurance or Medicare or social security number or other tax identification number and details of tax residency;
 - iv. data provided by you in the context of us carrying out background checks, anti-money laundering, regulatory, tax and know your client checks (such as data included in identification documents, details of criminal records and sanctions);
 - v. a file with your current contact details;
 - vi. information relating to the services, benefits and privileges we provide to our Investors or prospective Investors and their beneficiaries and dependents; and
 - vii. Information required as a result of legal, tax and regulatory requirements or internal policies.

Please note that if you do not provide certain Personal Data to APMCBI when requested (and where relevant, provide your consent), we may not be able to provide you with some or all of our services (including those set out in this Policy or in other agreements we enter into with you).

IV. How We Use Your Personal Data

A. Your Personal Data may be collected, stored, disclosed and processed by APMCBI for the following purposes:

- i. to provide you with marketing communications and inform you about news and information relating to our business and services, including new product launches, product updates and general business news;
- ii. to understand your needs and interests and to respond to your inquiries;
- iii. to analyze and improve our services;
- iv. for the management and administration of our business;
- v. to provide you with notices required by the Revised Corporation Code and the Securities and Exchange Commission and facilitate the benefits and privileges granted to investors;
- vi. to comply with and in order to assess compliance with applicable laws, rules and regulations (including tax reporting purposes pursuant to tax laws), industry codes, voluntary codes we decide to adopt, or good practice, anywhere in the world and internal policies and procedures; to detect, investigate and prevent fraud and other crimes or malpractice;
- vii. for the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings);
- viii. to obtain legal advice or to establish, exercise or defend legal rights;
- ix. the administration and maintenance of databases storing Personal Data;
- x. to comply with our contractual obligations; and
- xi. for purposes otherwise set out in this Policy or as notified to you at the specific time of collection.

B. APMCBI is entitled to use your Personal Data for the purposes listed above because of the following legal bases:

- i. APMCBI needs to do so in order to perform its contractual obligations to you (for example, in order to manage your investments and verify the information you provide);

- ii. APMCBI has obtained your specific and informed consent (which may include written consent) unless an exemption provided under applicable law permits the use and disclosure of your Personal Data without your consent;
- iii. APMCBI has legal or regulatory obligations that must be discharged;
- iv. APMCBI may need to do so in order to establish, exercise or defend its legal rights or for the purpose of legal proceedings;
- v. there may be certain exemptions provided under applicable laws which permit the use and disclosure of your Personal Data without your consent; or
- vi. the use of your Personal Data as described is necessary for our legitimate business interests or the legitimate interests of a third party, including:
 - a. allowing APMCBI to effectively and efficiently administer and manage the operation of its business;
 - b. maintaining compliance with internal policies and procedures;
 - c. monitoring the use of our copyrighted materials; or
 - d. for internal research purposes.

By accepting the terms of this Policy, you expressly provide your consent to APMCBI collecting, using, storing, processing and disclosing your Personal Data as set out in this Policy.

To the extent permitted by applicable law, we may record and/or monitor electronic communications (including email and telephone) to ensure compliance with our legal and regulatory obligations and internal policies and for the purposes outlined in this Policy.

V. Sensitive Personal Information

APMCBI will not process your Sensitive Personal Information unless such processing is compliant with applicable data protection and privacy laws.

VI. Disclosure of Your Personal Data to Third Parties

- A. APMCBI may share or provide access to your Personal Data among its affiliates and business units and third-party agents, service providers and contractors outside of APMCBI subject to Data Sharing Agreement:
 - i. for the purpose of the management and administration of APMCBI's business;



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- ii. in order to facilitate the provision and enhancement of services to you (including the processing of your Portability Benefits);
- iii. for the purpose of the administration and maintenance of the databases storing Personal Data;
- iv. for the purposes of APMCBI receiving services (for example, APMCBI's accountants, administrators, auditors, service providers, custodians, depositories, third party managers, paying agents, professional advisors, IT and communications providers or any entity we reasonably consider necessary for the purposes outlined above). These third parties are expected to be subject to confidentiality requirements (either by contract, professional obligation, duty or otherwise) that require them to only use your Personal Data as described above;
- v. to the extent required by law (for example, if APMCBI is compelled by an obligation or a duty to disclose your Personal Data where we believe it is necessary or appropriate to comply with any legal obligation, rule, regulations or internal APMCBI policies and procedures, including (without limitation) in order to comply with tax reporting requirements and other statutory reporting and disclosures to regulatory authorities), or to establish, exercise or defend its legal rights. This may include disclosure to regulatory bodies or government agencies);
 - a. as part of a transaction, financing, or for other business needs (for example, if APMCBI sells any of its businesses or assets, applies for a loan, or opens bank accounts, in which case APMCBI may need to disclose your Personal Data to the prospective buyer, lender or bank, as the case may be, as part of certain due diligence processes); or
 - b. if APMCBI or any of its affiliates, divisions or business units is required by a third party, including in the unlikely event of a bankruptcy, in which case the Personal Data held by APMCBI about you will be accessible to, and may be acquired by, the third-party buyer.

APMCBI may share anonymous or aggregated data with third parties such as service providers in order to facilitate our business operations.

VII. How We Safeguard Your Personal Data

- A. APMCBI has implemented commercially reasonable controls and appropriate technical and organizational measures to protect Personal Data, as well as to maintain the security of our information and information systems in respect

of Personal Data. Investor files are protected with safeguards according to the sensitivity of the information contained therein.

- B. Appropriate controls (such as restricted access) are placed on our computer systems and used where appropriate. Reasonable measures are taken to ensure physical access to Personal Data is limited to authorized employees.
- C. As a condition of employment, APMCBI employees are required to follow applicable laws and regulations, including in relation to data protection and privacy laws. Unauthorized use or disclosure of confidential Investor information by an APMCBI employee is prohibited and may result in disciplinary measures.
- D. When you contact an APMCBI employee about your file, you may be asked to confirm some details relating to the Personal Data APMCBI holds about you. This type of safeguard is designed to ensure that only you, or someone authorized by you, has access to your file.

VIII. Retention and Destruction of Personal Data

- A. The period for which APMCBI will hold your Personal Data will vary and will be determined by the following criteria:
 - i. **The purpose for which APMCBI using it.** APMCBI is required to retain the Personal Data for as long as is necessary to satisfy or meet the purposes for which it was obtained including applicable legal or regulatory requirements; and
 - ii. **Legal Obligations.** Laws or regulations may set a minimum period for which APMCBI must retain your Personal Data.
- B. APMCBI will take reasonable steps in the circumstances to destroy your Personal Data when we no longer have a legal basis to retain it or to ensure that the information is anonymized.

IX. Your Rights

- A. You have legal rights in relation to the Personal Data about you that APMCBI holds. These rights may include:
 - i. The right to refuse to provide any Personal Data and the right to object at any time to the processing of your Personal Data. Please note that



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- such refusal or objection may prevent us from providing services to you;
- ii. The right to obtain information regarding the processing of your Persona Data and access to the Personal Data about you that APMCBI holds (including any available information as to the source of the Personal Data);
 - iii. Where consent was provided for certain processing activities, the right to withdraw your consent to the collection, processing, use and/or disclosure of your Personal Data at any time. Please note, however, that this will not affect the lawfulness of any collection, processing, use or disclosure undertaken before your withdrawal and that APMCBI may be still entitled to process your Personal Data if it has another legitimate reason (other than consent) or a consent exception for doing so. In some cases, withdrawing your consent to the collection, use process or disclosure of some or all of your Personal Data may prevent us from providing services to you;
 - iv. In some circumstances, the rights to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that APMCBI transmit that data to a third party where this is technically feasible. Please note that this right only applies to Personal Data that you have provided to APMCBI;
 - v. the right to request that APMCBI rectify your Personal Data if it is inaccurate or incomplete;
 - vi. in some circumstances, the right to request that APMCBI erase your Personal Data.
- B. Please note that such a request may prevent us from providing services to you and that there may be circumstances where APMCBI is legally entitled to retain Personal Data regardless of any such request;
- i. in some circumstances, the right to request that APMCBI restrict or block its processing of your Personal Data. Please note that such a request may prevent us from providing services to you and that there may be circumstances where APMCBI is legally entitled to retain Personal Data regardless of any such request; and
 - ii. where applicable, the right to lodge a complaint with the National Privacy Commission if you think that any of your rights have been infringed by APMCBI.
- C. If you wish to exercise any of the rights, which are applicable to you, you may reach out to our Data Privacy Officer on the details provided below.



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X. Processing of Personal Data for Marketing Purposes

- A. To the extent permitted by applicable law, we may contact you by mail, SMS/text, telephone and other electronic means to provide information on the products and services that we believe will be of interest, unless you object to receiving such information. If you do not want to receive such communications from us, please contact the Data Privacy Officer on the details provided above or by using the opt-out facilities provided within the relevant marketing material.
- B. Your option not to receive promotional and marketing material: (a) shall not preclude us from corresponding with you, by email or otherwise, regarding your relationship with us (e.g., your account status and activity or our responses to questions or inquiries you pose to us); (b) shall not preclude us, including our employees, contractors agents and other representatives , from accessing and viewing your Personal Data for our internal business purposes; and (c) shall not preclude us from disclosing your Personal Data as described in this Policy for purposes other than sending you promotional and marketing materials.

XI. Questions and Concerns

If you have any questions or concerns about APMCBI's handling of your Personal Data or about this Policy, please contact our Data Privacy Officer using the contact information set out below.

Department: Investor Relations Office
Data Privacy Officer: Mr. Ariel S. Malata
E-mail: dpo.apmcbacolod@gmail.com
Contact Number: 0917-709-5659

Approved on: July 29, 2023