



The AC Automotive companies listed below (collectively referred as “AC Automotive”, “we”, “us” or “our”) are committed to the security and protection of your personal information. As such, we operate in compliance with applicable laws and regulations on data protection and data security, such as Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012, its corresponding Implementing Rules and Procedures, and the existing Memorandum Circulars and Advisories issued by the National Privacy Commission. In doing so, we ensure that all personal data collected from our customers, vendors, partners, employees, agents and other stakeholders and processed by AC Automotive are protected at all times.

AC Automotive Privacy Notice

Personal Information

Personal information (which may also be referred to in this Policy as “personal data”) is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. This includes all information relating to an identified or identifiable individual (natural person) including name, contact, details, address, email address, gender, age, date of birth, and any information which is collected, recorded, held or stored by AC Automotive.

We collect both electronic and physical personal data from the following sources:

- Directly from customers when they avail of any of our products and/or services. We also collect such information when customers, among others, contact us through our agents and representatives, and sign up to receive communications from us, respond to our surveys, participate in our events, and/or receive queries, requests and complaints from them; and indirectly through third-party sources such as social media sites, publicly available databases and government repositories and/or from other customers.
- We also obtain such information when customers visit our website and social media profiles as well as when they use our digital platforms and/or mobile applications.
- When individuals representing or affiliated with our vendors, partners, investors and other business contacts voluntarily provide us with their contact information in order to develop business relations and/or complete legitimate transactions with them.
- Directly from our employees and job applicants through their curriculum vitae, personal information sheets, submitted medical records and government documents, and interview and training assessment results conducted by authorized personnel, and pre-employment health screening and indirectly from the verification efforts of third-party employee background/screening service providers, job search sites and/or other social media sites and references from previous employers and other third parties.

Purpose and Use

We are entitled to process or use such data with your consent or on the basis of law. By providing AC Automotive with your personal information in the use of any of our products and services as described in this Privacy Policy, you have explicitly authorized and consented to our collection, use, access, transfer, storage and processing of said personal data.

In general, we use such data only for the purpose for which you divulged the data to us, such as, but not limited to:

- (a) entering into transactions for the delivery of the necessary products and/or services in connection with such transactions which are necessary for AC Automotive business process execution, including delivery of notices, services and/or products, partners, new product launches and events, planning purposes in connection with future products, including promotional events with AC



Automotive business partners which may include third party service providers located outside the Philippines;

- (b) administering and/or managing your relationship and/or account(s) with AC Automotive; and
- (c) sending of marketing, advertising and promotional information about other products/services that AC Automotive, as well as business partners and related companies may be offering, and which AC Automotive believes may be of interest or benefit to you by way of postal mail, electronic transmission or through mobile or telephone line.

In addition to the foregoing, the data collected from you may be used or processed in any of the following instances:

- it is necessary for compliance with legal regulations on the part of AC Automotive and its subsidiaries, or mandated by governmental or judicial authorities;
- it is necessary to protect vitally important interests, including life and health;
- it is necessary to respond to national emergency, to comply with the requirements of public order and safety, or

We may also collect, use, disclose or process information contained in employment applications or other employment-related forms/documents submitted to us for administrative and management purposes, including but not limited to: recruitment, assessment of the candidate's suitability, appraisal, performance, promotion, training, career development, remuneration, health and safety, discipline, and/or review of human resource policies. Personal data or any other information contained in employment applications shall be processed exclusively for legitimate purposes as specified above.

Disclosure of Personal Data

We generally do not disclose the personal data we process to third parties without the consent of data subjects unless we are legally required to do so; if it is necessary to fulfill the purposes for which we process personal data as mentioned above; or if such action is necessary to protect, defend and/or enforce our rights, property or the personal safety of our employees and other individuals. It may be necessary for AC Automotive to disclose and transfer your personal data to third party companies, entities, or service providers engaged by AC Automotive to perform certain services on behalf of AC Automotive, including the following:

- Insurance providers;
- Financial institutions;
- Government agencies (eg. Land Transportation Office);
- External consultants and other professional advisors, such as auditors and legal firms;
- Contractors or sub-contractors; and
- Such other service provider that may be appointed by AC Automotive.

Protection Measures

AC Automotive shall exercise reasonable and appropriate administrative and security measures and procedures to prevent unauthorized or unlawful processing, and loss of or damage to, your personal data.

AC Automotive shall implement reasonable and appropriate organizational, physical, and technical measures intended for the protection of personal information or data against any accidental or unlawful destruction, alteration and disclosure. The employees, contractors, sub-contractors or representatives of AC Automotive who are involved in the processing of personal information or data shall hold personal information confidential, especially if it is not intended for public disclosure.

THE RIGHTS OF DATA SUBJECTS

AC Automotive fully recognizes that under the Data Privacy Act, our customers, employees vendors, partners, investors, shareholder and other business contacts and employees, as data subjects, are accorded the following rights:

- **Right to be informed**

They have the right to demand and be informed of the details about the type of personal data, the purpose of processing, and how they are being processed by AC, including its sources, recipients, methods, disclosures to third parties and their identities, automated processes, manner of storage, period of retention, manner of disposal and any changes to such processing activities before the same is undertaken.

- **Right to access**

They have the right to have reasonable access to their personal data, sensitive or otherwise, upon demand. They have the right to review and amend their personal data processed by AC Automotive in case there are errors.

- **Right to dispute**

They have the right to dispute inaccuracy or error in personal data processed by AC Automotive.

- **Right to object**

They have the right to reject further processing of their personal data, including the right to suspend, withdraw, and remove their personal data in possession of AC Automotive which are falsely collected or unlawfully processed.

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we employ commercially reasonable security measures to protect data and seek to partner with companies which do the same, we cannot guarantee the security of any information transmitted to or from our websites, and are not responsible for the actions of any third parties that may receive any such information.

Website Cookies

AC Automotive websites may store some information on your computer in the form of a “cookie”. Cookies are used by many web sites to give visitors access to certain functions. The information stored in the cookie can also be used to monitor a user’s behavior on the web site. There are two types of cookies: the first saves a file for an extended period on your computer and is used to determine whether there has been any contact between us and your computer in the past. The second type is called a “session cookie”, and is stored temporarily in your computer’s memory while you are visiting the site. Session cookies are not stored in your browser for an extended period, but are deleted when you close your browser. AC Automotive uses cookies to gather visitor statistics and to record information about your preferences as you navigate through the web sites. In this way, we hope to be able to better target relevant information to our visitors. Unless particularly stated elsewhere, cookies are never used by AC Automotive with the aim to gather personal data. If you do not accept the AC Automotive use of cookies on our web site, it is possible for you to configure your browser to reject cookies by modifying your browser settings. However, this means that we cannot guarantee that all functions of our web site will function as intended.

Amendment to the Privacy Policy



AC Automotive reserves the right to modify this Policy at any time to comply with any future developments in local and/or foreign data privacy regulations where applicable and to reflect any changes in the organization's policies and/or personal data processing activities, so please review it frequently. The most updated version of the Policy shall apply and supersede all previous versions of the Policy.

Questions and Comments

AC Automotive will respond to reasonable requests to review your personal data collected by us and to correct, amend or delete any inaccuracies. If you have any questions or comments about the AC Automotive Data Privacy Policy, please send us an email at dpacauto@ayalaauto.com.

Automotive Companies

1. Honda Cars Makati, Inc: (HCMI)
2. Honda Cars Cebu, Inc (HCCI)
3. Isuzu Automotive Dealership, Inc (IADI)
4. Isuzu Cebu, Inc. (ICI)
5. Isuzu Iloilo Corporation (IIC)
6. Automotive Central Enterprise, Inc. (ACEI)
7. Iconic Dealership, Inc (IDI)
8. Adventure Cycle Philippines, Inc. (ACPI)
9. KTM Asia Motorcycle Manufacturing, Inc. (KAMMI).