



## **BANGKO KABAYAN INC. A PRIVATE DEVELOPMENT BANK**

### **DATA PRIVACY STATEMENT**

Bangko Kabayan Inc. (“BK”, “we”, “us”, or “Bank”) supports, respects, and values your privacy and the secrecy of your account information with us. This Data Privacy Statement (“DPS”) informs you, the Data Subject, the personal data we collect about you, how we collect, use, store, process, share, protect, and delete your personal data with us, and who we will share it with. BK adheres to the data privacy principles of (1) legitimate purpose; (2) transparency; and (3) proportionality.

This DPS applies to our Data Subjects whether as: (1) current, past, and prospective customers as individuals or corporations; or (2) non-clients – payees or payors or bank products and services we provide; visitors or inquirers at our branches and online channels; ultimate beneficial owners, directors or representatives of corporate clients; and such other persons involved in the application of financial services whether approved or rejected – and transactions with us or with our consumers.

This DPS shall be read in conjunction with your products and services terms and conditions. Your continued use of the Bank’s products and services shall be considered a positive action on your part demonstrating your consent to this DPS and any revisions hereto.

### **COLLECTION OF YOUR PERSONAL AND SENSITIVE PERSONAL DATA**

Personal Information refers to any information that identifies or is linkable to a natural person. On the other hand, Sensitive Personal Information is any attribute that can distinguish, qualify, or classify a natural person from the others such as data relating to your ethnicity, age, gender, health, religious or political beliefs, genetic, or biometric data. (Collectively, “Personal Data”)

We collect your Personal Data when you register, sign up, or use our bank products and services, or communicate with us about them. We also collect through your authorized organization, whether private corporation or government instrumentality. We may also obtain your Personal Data from other sources (i.e. publicly available platforms, financial institutions, credit agencies, payment gateway processors, public authorities, and other registers) when allowed by laws and regulations, for purposes of identity verification and regulatory requirements by the Bangko Sentral ng Pilipinas (BSP).

The Personal Data we collect and the manner we process them may differ depending on the type of transaction or engagement you have with us. We collect your Personal Data to confirm your identity and provide you with financial and other relevant products and services. We use the Personal Data we collect to personalize our products and services to fit your needs, to aid us in research to provide better products and services, to manage risk and prevent fraudulent transactions, and to communicate with you to provide updates.

### **KINDS OF DATA WE COLLECT AND PROCESS**

The foregoing data shall be collectively referred to as "Customer Data."

1. **Know-Your-Customer (KYC) / Identification Data:** refers to Personal Information and Sensitive Personal Information we collect when you sign up or register to our products and services such as full legal name, date & place of birth, gender, civil status, nationality, permanent address, present address, home ownership, mobile phone no., home telephone no., and email address; specimen signatures and images; tax identification number, and other government-issued identification numbers; mobile number, home number, office contact details; Employment details - company name, job position or rank, office address, source of funds, gross annual income, and such other information necessary to conduct due diligence and comply with BSP rules and regulations; Business interest, ownership and assets details; Information regarding transactions & dealings, account activities, movement and interactions with third parties like merchants and utility companies
2. **Biometric Data:** subject to limitations imposed by law, this refers to data processed for customer verification using: (1) facial recognition technology; (2) liveness detection mechanism; (3) fingerprint recognition applications; and (4) specimen signatures.
3. **Transactional Data:** linkable to your Personal Data such as (1) bank account number, deposits, withdrawals, such other transfers made to or from your account and details about them such as reference number and place, manner and time these were made; (2) information and records of correspondence when you contact us through our official channel such as branches, contact centers, and web and mobile platforms; (3) and other forms of customer account number, payments, and transactions you have with us.
4. **Financial Data:** information about the value of your property and assets, your credit history and capacity, and other financial products and services you have with us.
5. **Behavioral Data:** this refers to your online behavior, customer segment, usage of our products and services, the internet protocol addresses of your devices used to access our applications, interests and needs you share with us, and customer behavior we collect as part of due diligence, to prevent fraudulent conduct, and comply with banking rules on anti-money laundering, terrorism financing, and tax fraud.
6. **Audio Visual Data:** for security and improvement of our services, we process audio and video recordings of your interactions with us, such as but not limited to voice recordings when you communicate with representatives of the Bank through official Bank communication channels and surveillance videos at branches and automated teller machines, subject to limitations imposed by law.
7. **Sensitive Personal Data:** we may require the following Sensitive Personal Information: (1) your religion when you apply for insurance products with us; (2) for customer verification, your government-issued identification numbers or cards such as passport or driver's license ID; or (3) any information that is necessary, incidental to contractual agreement or in connection with a requested product or service.
8. **Minor's, Incompetent's, and Person under Guardianship's Data** we may collect information about minors (those below 18 years of age) incompetent, and persons under guardianship if they have opened an account with us with parental consent or pursuant to legally-instituted guardianship proceedings or if you provide use with the same in relation to a product or service

you signed up with us (i.e. when you register minor's, incompetents, and those under guardianship as beneficiaries to an insurance product or trust service with us).

9. **Relevant Individuals:** upon your authorization, we may collect information about your family members, beneficiaries, attorneys, attorneys-in-fact, shareholders, beneficial owners whenever applicable, persons under any trust, trustees, partners, committee members, directors, officers or authorized signatories, guarantors, other security and other individuals.

## **DATA PROCESSING**

Processing means any activity pertaining to the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of Customer Data.

We process Customer Data only for legitimate purposes and with lawful basis such as your consent to be bound by this DPS upon application and submission of the signed terms and conditions and application forms, the terms and conditions of the product or service you signed up with us, and as required by our legal obligations, laws, and regulations. We ensure that only authorized employees and third-party service providers, who satisfy our stringent risk management, governance, information security, and data privacy requirements, can process your data.

- **Data Storage**
  - We store Customer Data in secure and encrypted Bank-managed environments, devices, and media. For third-party managed environments such as cloud service providers, we employ BSP-sanctioned security protocols and procure BSP approval prior deployment.
  - We store physical copies of documents containing Customer Data in physical secure vaults and filing cabinets, accessible only to authorized Bank personnel.
- **Data Access**
  - Customer Data can only be accessed by authorized personnel on a role-based manner following the proportionality, need to know, and least privilege principles that authorized personnel can only access and use Customer Data they need for their role and purpose in the Bank.
- **Data Use**
  - **Data Profiling**
    - We perform automated processing of Customer Data to evaluate certain personal aspects relating to natural persons, in particular to analyze or predict aspects containing that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.
  - **Customer Engagement**
    - We use your contact information to communicate with you regarding your relationship with us. These include but are not limited to facilitating activities

concerning your bank accounts and services, such as transaction authorization, distributing statements, providing customer service, conducting surveys, and administering rewards and loyalty programs. We may send notifications about product enhancements and security reminders via the Bangko Kabayan Online app, email, calls, SMS, newsletters, or other official BK communication channels. We may also contact you to verify identities or authorities of relevant individuals or your representatives. This ensures the security and integrity of our interactions and transactions. Additionally, we may communicate to facilitate transactions or seek consent for product-related services and support, such as but not limited to processing or administrative support, acting as an intermediary or nominee and participating in investments, trusts, insurance, credit and debit services, loans, mortgages and wealth management products.

○ **Cross-Sell and Marketing**

- We use Customer Data to better understand your needs and provide you with products and services that are most relevant and helpful to you - including those from our subsidiaries, affiliates, or trusted partners.
- We also analyze your interaction with our products or services to tailor recommendations that are aligned with your preferences, thereby enhancing your overall experience with us.
- We may use your contact information to send out commercial campaigns featuring products and services we believe you will find interesting, relevant, and useful. Our aim is to create a personalized relationship with you by providing tailored offers to suit your lifestyle, interests, and needs. We analyze campaign results to assess their effectiveness and relevance.
- You may opt-out from these processing activities through the channels listed under Rights of the Customer in Clause 5.a.

○ **Due Diligence and Regulatory Compliance**

- We may use Customer Data to evaluate your eligibility to BK products and services.
- In assessing your ability to repay your loans, we conduct credit risk and investigation and reporting on your credit history and account updates.
- We use your account details when you instruct us to make payment or fulfill an investment order.
- We use automated processes and data science solutions for faster decision-making in granting loan products.
- We process Customer Data in compliance with legal obligations and statutory requirements by BSP, and other regulatory agencies, or to support initiatives, projects and programs by or between financial industry self-regulatory organizations, financial

industry bodies, associations of financial services providers, or other financial institutions, including assisting other financial institutions to conduct background or credit checks or collect debts.

- We use your Customer Data to establish, maintain or terminate accounts and establish, provide or continue banking/credit facilities or financial services including investment, trust, insurance, credit, debit, charge, prepaid or any type of card, loan, mortgage, auto loan, financial and wealth management products and services and otherwise maintaining accurate “KYC” information and conducting anti-money laundering and sanctions, and credit and background checks (whether such facilities or services are offered or issued by the Bank’s affiliates, third parties or through other intermediaries, providers or distributors).
- **Business Insights**
  - We perform data analysis and reporting based on your Customer Data, and how we operationalize to aid our management make better decisions. We may make use of automated decision-making computer systems or platforms to help us understand your insights, preferences, or needs.
  - We analyze your Financial, Transactional, and Behavioral Data, your interactions with our products and services, and our communications with you, and we carry out business risk, control or compliance review or testing, internal audits, or enable the conduct of external audits to aid us understand the areas for improvement and development.
  - We analyze Transactional Data performed through our third-party service providers and partners in order to determine how we can jointly improve our products and services for you.
- **Data Quality**
  - We shall process your Customer Data in compliance with the data quality standards imposed by BSP. We shall obtain additional information about you from government institutions or credit bureaus to improve the quality of your Customer Data with us. We may contact you through official BK communication channels to ensure accuracy and integrity of your information in our data processing systems.
- **Protection and Security**
  - We process Customer Data for your account protection against cybercrime, identity theft, estafa, fraud, financial crimes such as money laundering, terrorism financing, and tax fraud.
  - We use your Identification and Transactional to conduct profiling for detection of suspicious activity on your account.
  - We may employ artificial intelligence and machine learning in real-time detection of suspected fraudulent activities on your account.

- We may reset your password or temporarily hold your online banking account to protect you from detected suspected fraudulent activities.
- We may monitor and record your Audio and Visual Data, such as calls and electronic communications with Relevant Individuals and consumers for record keeping, quality assurance, customer service, training, investigation, litigation, and fraud prevention purposes.
- **Bank Remedies and Verification**
  - We may use Customer Data to enforce (including without limitation collecting amounts outstanding) or defend the rights of Bangko Kabayan and/or any of its affiliates and subsidiaries, its employees, officers, and directors, contractual or otherwise.
  - We need to verify the identity or authority of your Relevant Individuals to carry out or respond to requests, questions, or instructions from verified representatives or other parties pursuant to BK's then-current security procedures.
- **Data Retention**
  - For financial data and documents, which indicate taxable transactions, data shall be preserved for ten (10) years per BIR regulation.
  - We keep your data as long as it is necessary: a) for the fulfillment of the declared, specified, and legitimate purposes, or when the processing relevant to the purposes has been terminated; b) for the establishment, exercise or defense of legal claims; or c) for legitimate business purposes, which shall be in accordance with the standards of the banking industry.
  - The processing, profiling, and sharing apply during the prospecting and application stages, as well as for the duration of and even after the rejection, termination, closure, or cancellation of the Services (collectively "Termination") for a period of at least ten (10) years from the Termination of the last existing account or relationship of the Data Subject or Relevant Individual as determined by the Bank.
  - All other transactions and accounts that are not defined above shall be retained following BSP Regulations where retention period for transaction records shall be five (5) years from the date of transaction except where specific laws and/or regulations require a different retention period, in which case, the longer retention period is observed.
- **Data Disposal**
  - After the expiration of the imposed retention period, we dispose of personal data in a secure manner in order to prevent further processing, unauthorized access, or disclosure to any other
  - Customer Data is subject to data retention requirements and to certain limitations under regulatory requirements.

## **DATA SHARING AND PURPOSE**

When you consent to the processing of your Customer Data with us, you also agree to help us comply with our statutory and contractual obligations with other financial institutions. We may also share Customer Data externally with our partners, upon your written and/or electronic consent, for value

added services you may find useful and relevant on top of your account with us. For contractual and value-added service data sharing agreements, we employ standardized model clauses as recommended by the National Privacy Commission to ensure the data protection of Customer Data. Below are the disclosures required by the government entities, other regulatory authorities, and financial institutions:

- **BSP, Anti-Money Laundering Council (AMLC)**

- We are subjected to mandatory disclosures to the AMLC under Republic Act 9160 or the Anti-Money Laundering Act of 2001, as amended, when there is probable cause that the deposits or investments involved are in any way related to unlawful activities or money laundering offenses.
- BSP mandates disclosures and reporting in compliance with its issuances for the protection of the integrity of the banking sector.

- **Bureau of Internal Revenue (BIR)**

- We may conduct random verification with the BIR in order to establish the authenticity of tax returns submitted to us.
- The BIR may inquire into bank accounts of the following: a) a decedent in order to determine his gross estate; b) a taxpayer who has filed an application to compromise his tax liability on the ground of financial incapacity; and c) a taxpayer, information on whose account is requested by a foreign tax authority.

- **Credit Information Corporation (CIC)**

- The Credit Information Systems Act (RA 9510) mandates us to submit your credit data to the CIC and share the same with other accessing entities and special accessing entities authorized by the CIC.

- **Judicial and Investigative Authorities**

- We may be mandated to disclose certain Customer Data upon service of legal court orders (i.e. unexplained wealth under Section 8 of RA 3019) or express legal request from police, public prosecutors, courts, or dispute resolution providers allowed by law.
- In these cases, we will notify you of the disclosure to the requesting government authority, subject to limitations imposed by law.
- Any person or entity to whom the Bank is under an obligation or otherwise required to make disclosure pursuant to legal process or under the requirements of any Philippine Law, regulation, court order or agreement entered into, binding on or applying to the Bank, or agreement entered into by the Bank, whether such legal process, obligation, request, requirement, agreement or guidance may be existing currently or created in the future.

- **Other Regulatory Authorities**

- Regulatory authorities when such other persons or entities we may deem as having authority or right to such disclosure of information as in the case of regulatory agencies, government or otherwise, which have required such disclosure from us and when the

circumstance so warrant.

- **Financial Institutions**

- To fulfill payments and services, we may have to share your Identification, Transactional, and Financial Data with correspondent banks, network payment processors (i.e. Visa, Mastercard, i2i, GCash, Maya), stockholders, fund managers, portfolio service providers, or to any financial institution, processing agent, intermediary, clearing house, issuer, borrower, underwriter, dealer, seller, registrar, registry, paying and collecting agent, custodian, depository, underwriter, fund manager, fund provider, insurer, credit card company, acquiring company, securities and investment services provider, trustee, or any other person who will be involved in the transactions, Services, or any banking/credit or financial activities or with whom the Data Subject has or proposed to or is required to have dealings.
- We disclose your Identification, Transactional, and Financial Data with insurers, insurance brokers, or providers of deposit or credit protection for protection against all kinds of risks.
- For purposes of credit investigation, consumer reporting, or for reports of credit history, account updates and fraud prevention, we may share your Identification, Transactional, and Financial Data with reference agencies such as the Credit Card Association of the Philippines (CCAP), and the Bankers Association of the Philippines (BAP).

- **Cross-sell and Other Value-Added Services**

- We may disclose your Customer Data to our partners who collaborate with us to provide services to you and provide joint communications that we hope you find of interest.
- Through our digital channels, you may instruct other mobile financial technology applications to retrieve your account information, initial payments, or cash-in from your account with us via our Application Programming Interface (API) facility.
- In the course of the Bank's business, we may also disclose your Customer Data to the following authorized personnel, including, but not limited to, an agent, broker, adviser, contractor or third party service provider who provides administrative, mailing, telemarketing, direct sales, telecommunications, call center, business process, travel, visa, knowledge management, human resource, data processing, information technology, computer, information security, anti-fraud, payment, debt collection, credit or business information, reference or other background checks, leads and referrals, nominee or securities clearing, consulting service, or other services to the Bank.
- We may also share from time to time, the data provided by you to us, with, and including, the subsidiaries and affiliates of: a) Aboitiz & Company, Inc. (ACO); b) Aboitiz Equity Ventures (AEV); and c) UnionBank; for the purposes as set out in the Bank's DPS in force, provided by you to us from time to time for cross-selling and compliance to any law, regulations, government requirement, treaty, agreement, policy or as required by or for the purpose of any court legal process, examination, inquiry, audit, or investigation of any authority. This applies notwithstanding any non-disclosure agreement.

- **Assignees/Relevant Individuals**

- We may also share your Customer Data to enable an actual or proposed assignee of the

Bank, or participant or sub-participant or transferee of the Bank's rights in respect of the Customer or any other Relevant Individual, of all or any part of the assets or business of the Bank, to evaluate or consummate a transaction intended to be the subject of the assignment, transfer, participation, or sub-participation.

- Your data may be shared to any party giving or proposing to give a guarantee or third party security to guarantee or secure the Customer's obligations or those of any Relevant Individual.

## RIGHTS OF THE DATA SUBJECTS

Under the Data Privacy Act of 2012 and subject to prescribed procedures of BK, as data subjects you have the following rights:

- **Right to be Informed:** you may demand the details as to how your Customer Data is being processed or has been processed by the Bank, including the existence of automated decision-making and profiling systems. This also includes our notification efforts prior to processing of your Customer Data and mandatory notification in case of data privacy breach.
- **Right to Access:** upon written request, you have reasonable access to demand for your Customer Data, which may include the contents of your processed personal information, the manner of processing, sources where they were obtained, recipients and reason of disclosure.
- **Right to Dispute:** you may dispute inaccuracy or error in your Identification Data in the Bank systems through our contact representatives.
- **Right to Correct:** you may require BK to correct any Identification Data relating to you, which is inaccurate.
- **Right to Object:** you may suspend, withdraw, and remove your Identification Data from certain further processing, upon demand, which includes your right to opt-out to any commercial communication or advertising purposes of the Bank.
  - a. You may exercise your right to Opt-Out by providing your request through the following Bangko Kabayan official channels.
    - i. Contact us at our official telephone numbers;
    - ii. Email us at [dataprivacy@bangkokabayan.com](mailto:dataprivacy@bangkokabayan.com); or
    - iii. Visit any Bangko Kabayan branch near you.
  - b. We will exclude you from receiving cross-sell or marketing advertisement and other similar notifications through the Bank's official communication channels. The Bank may still contact you regarding your transactions, product or service-related requests, or such other purposes that may be required by applicable laws and regulations.
  - c. You will be informed of the limits and bounds of such request. The Opt-out Request shall be processed within (7) banking days after submission. You likewise understand that prior to such opt-out Request, your Customer Data has already been and will still be processed and shared in accordance with this DPS for opportunity, sizing, risk analysis, profiling, and such other necessary processing for BK to provide you with products and services and to comply with our legal and regulatory obligations.
- **Right to Data Erasure:** based on reasonable grounds and subject to data retention requirements based on applicable laws and regulations, you have the right to suspend, withdraw or order blocking, removal or destruction of your personal data from the filing

system, without prejudice to the bank's continuous processing for commercial, operational, legal and regulatory purposes.

- **Right to Secure Data Portability:** you have the right to obtain from the Bank your Identification Data in an electronic or in structure format that is commonly used and allows for your further use.
- **Right to be indemnified for Damages:** as data subject, you have every right to be indemnified for any damages sustained due to such violation of your right to privacy through inaccurate, false, unlawfully obtained or unauthorized use of your Personal Data.
- **Right to File a Complaint:** you may file your complaint or any concerns with our Data Protection Officer and/or with the National Privacy Commission through [www.privacy.gov.ph](http://www.privacy.gov.ph).

#### **CHANGES IN DATA PRIVACY STATEMENT**

The Bank may modify, update, or amend its Data Privacy Statement by placing the updated Data Privacy Statement on our website. The effective date of such modifications, updates, or amendments will be noted at the end of the Data Privacy Statement. The Bank will inform you of any changes to this policy either by email, posting the changes on the branches, or on the Bank's official website, or other communication channels.

#### **CONTACT OUR DATA PRIVACY OFFICER**

To exercise your data privacy rights and for other inquiries and concerns, you may address them to Bangko Kabayan's Data Protection Officer at Bangko Kabayan Inc. (A Private Development Bank) Santiago St., Poblacion, Ibaan, Batangas or through email at [dataprivacy@bangkokabayan.com](mailto:dataprivacy@bangkokabayan.com)

This Data Privacy Statement has been updated as of October 20, 2025.