# EMPLOYEE PERSONAL DATA PRIVACY POLICY

Sandman Software Systems, Inc.

Sandman Software Systems Inc. is committed to fully protecting your personal data privacy in compliance with Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012 (DPA).

This document details how we process your data and your rights therein. Rest assured that we follow the provisions of the DPA especially those on Transparency, Legitimate Purpose, and Proportionality.

## Personal Data and Manner of Collection

As an employee, the following personal data is collected from you, manually or electronically

- Full Name and Date of Birth
- School records and identification cards, for recruitment
- Personal email address, for recruitment correspondence
- Physical address, for courier and mail purposes
- Phone numbers, for correspondence post-recruitment
- Banking, TIN, HDMF, and SSS, for payroll needs
- Name and contact number of emergency reference
- Secondary identification, for activities involving travel

## Basis, Use, and Purpose of Processing Personal Data

Your consent will always be solicited to process your personal data, unless in the following circumstances:

- 1. When we need to log your activity at work, for attendance and work evaluation
- 2. When we have to reply to you after a query or correspondence
- 3. When complying with legal obligations, especially BIR and NPC requirements
- 4. When complying with requirements of public order and public authority
- 5. When we have to provide appropriate action regarding your rights

#### Methods utilized when doing automated access

Our workforce is largely remote, but employees are required to use an HR Integrated System (HRIS) that programmatically collects your IP address and geolocation. This data is only for attendance purposes and is only visible to HR and your respective supervisory personnel.

## **Disclosure of Personal Data**

Personal data is not shared outside of SSSI unless such disclosure is allowed under Section 12 or 13 of the Data Privacy Act.

### Storage, Retention, and Disposal

We store files safely in our computers and cloud servers in FIPS-140 compliant hardware and MD5 encrypted databases. Rest assured we do our best to keep your data safe.

Your data is retained for up to 6 months within our servers and computers. Other categories of data may be kept longer as determined by other relevant legislation.

#### **Rights of the Employee**

Under the DPA, you have the right to be informed regarding the processing of your data.

You are also entitled to request:

- 1. Access to the personal data we process about you
- 2. Rectification, correction, or updating, of your data, given it is inaccurate
- 3. Erasure or blocking of your data, whenever warranted
- 4. Object to the processing of your data, given it is a legitimate interest
- 5. The right to data portability, for secure transfer of what data you have

#### **Changes to Privacy Notice**

Times change, and with them, legislation. Over time, this privacy notice will be updated as the need, laws, and ultimately, the goal of Sandman Software Systems Inc. changes.

#### Feedback on the Privacy Notice

If you have feedback regarding the privacy notice, you may reach out to the Data Privacy Officer of Sandman Software Systems Inc. at 2/F Joroma Place Congressional Ave. Brgy. Bahay Toro, Quezon City with landline number (02)7756-0063, or email us at <u>dpo@sandmansystems.com</u>.