

PRIVACY STATEMENT

Updated: As of 20 September 2017

Top Frontier Investment Holdings, Inc. and its subsidiaries (“**Top Frontier**”, “**We**”, “**us**” or “**our**”) respect your privacy and will keep secure and confidential all personal and sensitive information that you may provide to Top Frontier, and/or those that Top Frontier may collect from you (“**Personal Data**”).

This privacy statement (“**Statement**”) provides for the Personal Data we obtain, or which you may provide through this website, www.topfrontier.com.ph (“**Website**”), and the standards we observe in using, processing, keeping, securing and disclosing said Personal Data.

Please read this Statement carefully to understand how We treat Personal Data. We may update this Statement from time to time to reflect change(s) in the law and/or our internal standards. When We do so, We will notify you by posting the updated Statement in this Website for your information and reference. By accessing the Website and submitting your Concerns (defined below), or Personal Data through it, you expressly acknowledge that you have read, understood and hereby agree to all of the terms of this Statement and that you provide consent for us to:

- Process your Personal Data, as provided under applicable laws, regulations, and our policies, for our subsidiaries and affiliates, contractors, service providers, and other authorized third parties’ legitimate purpose/s;
- Make your Personal Data available for our subsidiaries and affiliates, contractors, service providers, and other third parties.

Personal Data We Collect and Process

Our Website allows you to directly reach us and provide comments, suggestions and complaints (collectively, “**Concerns**”) on our products and services to help us improve them. When you access our Website and submit your Concerns, We ask you to provide the following Personal Data to identify you, and enable Top Frontier to act on your Concerns:

- Full Name
- E-mail address
- Contact number

If you do not provide any or all of the foregoing Personal Data accurately, We may not be in the position to effectively address your Concerns.

Any additional Personal Data that you may provide through your correspondence(s) with Top Frontier in connection with your Concerns shall also be considered and treated as Personal Data.

When you navigate through and interact with the Website, depending on your settings, We may use automatic data collection technologies (e.g., cookies, web beacons, small data text files or similar technologies) to obtain certain information about your equipment, browsing actions, and patterns, such as:

- Details of your visits to the Website (e.g., traffic data, location data, logs, and other communication data and the resources that you access and use on the Website).
- Information about your computer/device and internet connection, as well as IP address, operating system, and browser type (collectively, **"Collected Data"**).

The Collected Data are mostly statistical data but may include other Personal Data, and We may maintain or associate them with the Personal Data that We ask you to provide to Top Frontier in connection with your Concerns.

What We Do with Personal Data and Collected Data

Upon receiving your Concerns and the accompanying Personal Data identifying you, Top Frontier or its duly authorized third party forwards the same to the concerned Top Frontier department. Top Frontier may use your Personal Data to get in touch with you, in order to attend to, further inquire about, and address your Concerns. Top Frontier may separately contact you to confirm that the concerned Top Frontier department has acted on your Concerns, ask you for further feedback, request your participation in surveys and/or provide information on its products and services.

For the Collected Data, We use them to help us improve our Website and to deliver a better and more personalized service by enabling us to:

- Estimate our audience size and usage patterns;
- Store information about your preferences, allowing us to customize our Website according to your individual interests;
- Speed up your searches; and
- Recognize you when you return to our Website.

Retention of Personal Data and Collected Data

Top Frontier and/or its duly authorized third party shall retain the Personal Data and Collected Data for a maximum period of five (5) years counted from the date you provide it to Top Frontier or when they were collected, respectively.

Disclosure and Sharing of Personal Data and Collected Data

We may disclose aggregated information about our users, and information that does not identify, or when combined with other information, does not directly and certainly identify any individual, without restriction.

We may disclose and share the Personal Data and Collected Data, subject to compliance with applicable laws and regulations, on a need to know basis, and in all cases only for legitimate business purposes, as follows:

- To our subsidiaries and affiliates;
- To contractors, service providers, and other third parties. We engage to support our business, and who are bound by contractual obligations to keep Customer Information

and Collected Data confidential, and use it only for the purposes for which We disclose it to them;

- To government and law enforcement agencies and regulatory bodies;
- To comply with orders of courts, government agencies, regulatory bodies, stock exchanges and with applicable laws and regulations;
- If We believe disclosure is necessary or appropriate to protect the rights, property, or safety of Top Frontier, our subsidiaries and affiliates, officers, employees customers, or other third parties;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Top Frontier's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Top Frontier about our Website users is among the assets transferred; and
- To conduct investigations of breaches of Top Frontier's internal policies, laws and regulations, enforce appropriate sanctions and pursue legal actions if necessary.

Website Visitor Under the Age of 18

No one under age eighteen (18) ("**Minors**") may provide any Personal Data on the Website. Top Frontier does not knowingly collect Personal Data from Minors. If you are a Minor, please do not use or provide any information on this Website about yourself.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies (alone or in conjunction with web beacons or other tracking technologies) to collect information about you when you use our Website. The information they collect may be associated with your Personal Data or they may collect information, including Personal Data, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Accessing and Correcting Your Personal Data

You are entitled to certain rights in relation to the Personal Data collected from you, including the right to access and correct your Personal Data being processed, object to the processing, and to lodge a complaint before the National Privacy Commission in case of violation of your rights as data subject.

You may send us an e-mail at dpo@topfrontier.com.ph to request access to, correct and/or delete any Personal Data that you have provided to us. Please be advised, however, that We cannot delete your Personal Data without restricting or removing our ability to effectively

address your Concerns. We may not accommodate a request to correct and/or delete Personal Data if We believe the same would violate any law or legal requirement or cause the Personal Data to be incorrect.

Security of your Personal Data and the Collected Data

We have implemented technical, organizational, and physical measures designed to protect the confidentiality, integrity, and availability of your Personal Data and Collected Data and secure such Data from destruction, unauthorized access, alteration, disclosure, fraudulent misuse and/or any other unlawful processing, as well as other natural and human dangers.

Contact Information

Should you have any questions and/or concerns regarding this Statement, Top Frontier's use of your Personal Data and the Collected Data, or your rights in relation thereto under the Data Privacy Act of 2012, please do not hesitate to contact the Top Frontier Data Protection Officer at dpo@topfrontier.com.ph and (+632) 632-3431.