 Monde Nissin	Document Type: Policy	Document No.: 01DP-2021	Revision No: 2	Effectivity Date: March 1, 2021	Page: Page 3 of 15
	Department: Legal	Title: <h2 style="text-align: center;">GENERAL DATA PRIVACY POLICY</h2>			
	Business Unit: Corporate				

counterparty or potential buyers or investors only to the extent the same is critical to said activity; or

- in compliance with regulatory or legal requirements;
 - in response to subpoena or other regular and valid processes of a court of administrative agency with jurisdiction;
 - to enforce, guarantee or maintain the safety, health and security of MNC's personnel and/or assets.
- f) Other purposes ancillary to the above –
- Assessment or review of MNC's compliance with applicable laws and regulations (including accounting regulations), or with internal processes and procedures, or in relation to MNC's engagement with professional advisors such as legal counsel, audit firms/external auditors, or insurance agents.

VI. BASES FOR PROCESSING OF PERSONAL INFORMATION


MNC processes your personal information for any of the purposes declared in this Privacy Policy, based on any of the following:

- a) your consent as Data Subject;
- b) fulfillment of contractual obligations;
- c) fulfillment of statutory or regulatory obligations; and
- d) MNC's legitimate interests.

VII. TRANSFER AND DISCLOSURE OF PERSONAL INFORMATION

MNC may share, transfer, and disclose your Personal Information to the following:

- a) MNC's third party suppliers and service providers, such as the following:
 - Data entry services;
 - Database management services;
 - Payment processing services;
 - Logistics providers;
 - Data disposal services;
 - Legal services;
 - Audit services;
- b) MNC's professional advisers (*e.g.*, legal counsels, external auditors/auditing firms), law enforcement agencies, insurers, and regulators, both from the government and private entities, such as stock exchanges or market operators;
- c) MNC's subsidiaries and affiliates; and/or
- d) Potential joint venture partners, creditors, or investors.

 Monde Nissin	Document Type: Policy	Document No.: 01DP-2021	Revision No: 2	Effectivity Date: March 1, 2021	Page: Page 4 of 15
	Department: Legal	GENERAL DATA PRIVACY POLICY			
	Business Unit: Corporate				

VIII. WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

MNC recognizes your rights as a Data Subject, as provided under the Data Privacy Laws:

a) *Right to be informed*

Through this Privacy Policy, MNC notifies you what Personal Information is collected, the instances when Personal Information is collected, the means of and the purposes for the processing of your Personal Information, your rights as a Data Subject, and how MNC protects your Personal Information.

b) *Right to object*


You have the right to object to the processing of your Personal Information, such as when processing is based on your consent or on MNC's legitimate interest. You shall be notified, and be given an opportunity to object and/or withhold consent to the processing of your Personal Information in case of any significant changes or any necessary amendment to the information you supplied or declared to MNC, such as in the following instances: (i) change in the identity of the personal information controller; (ii) the purpose/s of processing; (iii) scope and method of processing; and (iv) other analogous instances. You also have the right to object if the processing of your Personal Information is for direct marketing, automated processing or profiling purposes.

c) *Right to Access*

You have a right to be given reasonable access to specific kinds of information identified in the Data Privacy Laws upon your written demand. However, your right to access is only with respect to your own Personal Information (and other information you provided in accordance with the Data Privacy Laws) and not to information relating to any other individual. Your request to access certain kinds of information may also be denied by MNC if: (i) what you seek to access relates to publicly-available information; (ii) in case of unreasonable requests especially of a repetitive and vexatious nature and which does not appear to be made in good faith; (iii) the request will entail MNC having to exert effort and expend resources to retrieve or gather such information, in a manner and extent which are manifestly disproportionate to the kind of information requested and/or the purposes for which the information is being sought; and (iv) MNC considers, after due consideration, that granting access to the information requested will endanger or compromise the safety or well-being of the Data Subject or any other person.

MNC may, in certain instances, charge you a reasonable fee for the costs incurred by MNC in connection with your request to access your personal information in MNC's system, such as when servicing your request would involve MNC incurring unusual costs or harnessing resources.

You may use the *Access Request Form* attached to this Privacy Policy as **Annex A** to submit requests to MNC pursuant to your right to access as described above.

 Monde Nissin	Document Type: Policy	Document No.: 01DP-2021	Revision No.: 2	Effectivity Date: March 1, 2021	Page: Page 5 of 15
	Department: Legal	Title: GENERAL DATA PRIVACY POLICY			
	Business Unit: Corporate				

d) *Right to Rectification*

You have the right to dispute any inaccuracy or error in your Personal Information that MNC may be holding. In such cases, MNC will accordingly correct any error(s) promptly, unless your request is found to be malicious or unreasonable. MNC may also, in certain instances prescribed by law, require proper notice of the valid order of or process from a competent court or a government agency before making any changes or modifications to the Personal Information it holds.

You may use the *Rectification Request Form* attached to this this Privacy Policy as **Annex B** to submit requests to MNC pursuant to your right to rectification as described in the above.

e) *Right to Erasure or Blocking*

You have the right to suspend, withdraw, or order the blocking, removal or destruction of your Personal Information from MNC’s data filing system, upon presentation of substantial proof that:

- i) The personal data or private information is:
 - incomplete, outdated, false, or unlawfully obtained;
 - used for an unauthorized purpose;
 - no longer necessary for the purpose/s for which they were collected; or
 - prejudicial to the Data Subject, unless justified by freedoms guaranteed under the Constitution or applicable laws, or otherwise authorized by a court order;
- ii) The Data Subject objects to the processing, and there are no other applicable lawful criteria for processing;
- iii) The processing is unlawful; or
- iv) In case of violation of the rights of the data subject.


You may use the *Erasure Request Form* attached to this Privacy Policy as its **Annex C** to submit requests to MNC in the exercise your right to erasure or blocking.

f) *Right to data portability*

You have the right to receive Personal Information that you have provided MNC in a structured, commonly used, and machine readable format, for further use. You also have the right to request from MNC that it transfers or transmits your data to another controller. Data portability allows you to manage your Personal Information on your private device.

g) *Right to Damages*

MNC recognizes your right to receive damages which you may have actually incurred as a result of inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of Personal Information, following adjudication of such damages in your favor as stated in a final and executory decision of a court or quasi-judicial authority (as the case may be) with jurisdiction and rendered and enforced in accordance with prescribed procedure.

 Monde Nissin	Document Type: Policy	Document No.: 01DP-2021	Revision No.: 2	Effectivity Date: March 1, 2021	Page: Page 6 of 15
	Department: Legal	Title: <h2 style="text-align: center;">GENERAL DATA PRIVACY POLICY</h2>			
	Business Unit: Corporate				

IX. HOW LONG DOES MNC KEEP YOUR PERSONAL INFORMATION?

In accordance with the Data Privacy Laws and other applicable laws, MNC will keep your Personal Information for as long as reasonably necessary to:

- fulfill declared, specified, and legitimate purposes, or when the processing of such information relevant to said purposes has not yet been terminated;
- establish, exercise, or assert MNC’s legal rights, or to defend claims and actions against MNC;
- pursue legitimate business purposes consistent with applicable industry standards, or as approved by regulator(s) or the relevant government agency;
- comply with MNC’s statutory, regulatory and other good governance compliance obligations (*e.g.*, fraud identification and protection, anti-money laundering regulations, tax compliance, and regulatory disclosures).

This Privacy Policy’s **Annex D** sets out the various data retention periods in connection with MNC’s data processing activities.

MNC will, after the applicable data retention period, dispose of or discard your Personal Information in a manner that is secure and which would prevent further processing, unauthorized access, or disclosure to any other party, or would otherwise cause prejudice to other persons.

X. HOW DOES MNC PROTECT YOUR PERSONAL INFORMATION?

MNC has put in place physical, electronic, and administrative procedures and safeguards designed to prevent unauthorized access, maintain data security, and for the correct usage of the Personal Information that MNC collects through the Personal Information Collection Methods. These safeguards vary, depending on the sensitivity of the Information that MNC collects and stores.


It must be emphasized that no data transmission or storage system is guaranteed to be 100% secure. If you suspect that a data breach concerning your Personal Information has occurred, please contact MNC’s Data Protection Officer immediately. Please see Part XII of this Privacy Policy for the details on how to get in touch with MNC’s Data Protection Officer.

XI. UPDATES TO CHANGES TO THIS PRIVACY.

MNC may update or make changes to this Privacy Policy in its efforts to ensure continuing, proper, and timely compliance with all statutory and regulatory requirements. Please visit MNC’s official website at www.mondenissin.com/privacy-policy for any updates to this Privacy Policy. We will provide notification mechanisms for any updates or modifications to this Privacy Policy that will reasonably have the effect of significantly affecting your rights as a Data Subject.

XII. HOW CAN YOU REACH US?

If you have any questions or would like to provide feedback or suggestions concerning this Privacy Policy, or would like to exercise in good faith any of your rights as Data Subject, or if you have any

 Monde Nissin	Document Type: Policy	Document No.: 01DP-2021	Revision No: 2	Effectivity Date: March 1, 2021	Page: Page 7 of 15
	Department: Legal	Title: GENERAL DATA PRIVACY POLICY			
	Business Unit: Corporate				


complaints in connection with this Privacy Policy or regarding MNC’s privacy practices, please write, call, or email MNC’s Data Protection Officer using the following details:

The Data Protection Officer
Monde Nissin Corporation
Mailing Address: Felix Reyes St., Balibago, City
of Santa Rosa, Laguna, Philippines, 4026
Tel. No.: +63 9178396320
email: your.privacy.matters@mondenissin.com

XIII . EFFECTIVITY

This Privacy Policy takes effect on March 1, 2021 and supersedes and amends company policies or issuances relating to data privacy insofar as those contain provisions which may be inconsistent with this Privacy Policy. MNC reserves the right to modify, amend, replace or revoke this Privacy Policy at any time.

Adopted by the unanimous vote of the Board of Directors on March 1, 2021.

 Monde Nissin	Document Type: Policy	Document No.: 01DP-2021	Revision No.: 2	Effectivity Date: March 1, 2021	Page: Page 8 of 15
	Department: Legal	Title: <h2 style="text-align: center;">GENERAL DATA PRIVACY POLICY</h2>			
	Business Unit: Corporate				

ANNEX A

MONDE NISSIN CORPORATION
ACCESS REQUEST FORM

I. DATA SUBJECT INFORMATION


FULL NAME			
ADDRESS			
EMAIL ADDRESS		MOBILE NUMBER	

II. INFORMATION REQUESTED

- Contents of the Data Subject’s personal information and categories of data that were processed
- Sources from which Personal Information were obtained, if data was not collected from the Data Subject
- Purposes of processing
- Manner by which the data were processed
- Information on automated processes where the processed data will or is likely to be made as the sole basis for any decision that significantly affects or will affect the Data Subject
- Names and addresses of recipients of the Personal Information
- Reasons for the disclosure of Personal Information to recipients
- Date when the Data Subject’s Personal Information were last accessed and modified
- Period for which particular categories of information will be stored
- Designation, name or identity, and address of MNC’s Data Protection Officer
- Others, please specify details:

III. RELEASE OF THE REQUESTED INFORMATION

- Electronic mail
- Hardcopy
- Others (please specify)

 Monde Nissin	Document Type: Policy	Document No.: 01DP-2021	Revision No.: 2	Effectivity Date: March 1, 2021	Page: Page 9 of 15
	Department: Legal	Title: <h2 style="text-align: center;">GENERAL DATA PRIVACY POLICY</h2>			
	Business Unit: Corporate				

IV. DECLARATION

I, the undersigned, declare that I personally accomplished this form and that the responses and/or input I provided or indicated are a true, correct, and complete statement of the information contained herein. I also authorize Monde Nissin Corporation to verify the information I have provided.

SIGNATURE OVER PRINTED NAME


V. IF FILLED ON BEHALF OF DATA SUBJECT BY AN AUTHORIZED REPRESENTATIVE

FULL NAME			
ADDRESS			
EMAIL ADDRESS	MOBILE NUMBER		

I, the undersigned, declare that I accomplished this form as the authorized representative of the Data Subject, and that the responses and/or input I provided or indicated are a true, correct, and complete statement of the information contained herein. I enclose here written proof of my authority to act on behalf of the Data Subject. I authorize Monde Nissin Corporation to perform any lawful procedures for the purpose of verifying the information I have provided.

SIGNATURE OVER PRINTED NAME

FOR INTERNAL USE ONLY	
RECEIVED BY:	REMARKS:
DATE RECEIVED:	

 Monde Nissin	Document Type: Policy	Document No.: 01DP-2021	Revision No.: 2	Effectivity Date: March 1, 2021	Page: Page 10 of 15
	Department: Legal	Title: GENERAL DATA PRIVACY POLICY			
	Business Unit: Corporate				

ANNEX B
MONDE NISSIN CORPORATION
RECTIFICATION REQUEST FORM

I. DATA SUBJECT INFORMATION

FULL NAME			
ADDRESS			
EMAIL ADDRESS			MOBILE NUMBER


II. DETAILS OF REQUEST

INACCURATE/ERRONEOUS INFORMATION <i>(Please provide sufficient details. Use a separate sheet if necessary.)</i>	CORRECT INFORMATION <i>(Please provide documentation, where necessary and appropriate.)</i>

III. DECLARATION

I, the undersigned, declare that I personally accomplished this form and that the responses and/or input I provided or indicated are a true, correct, and complete statement of the information contained herein. I also authorize Monde Nissin Corporation to verify/ the information I have provided.

SIGNATURE OVER PRINTED NAME

 Monde Nissin	Document Type: Policy	Document No.: 01DP-2021	Revision No.: 2	Effectivity Date: March 1, 2021	Page: Page 11 of 15
	Department: Legal	Title: GENERAL DATA PRIVACY POLICY			
	Business Unit: Corporate				


IV. IF FILLED ON BEHALF OF DATA SUBJECT BY AN AUTHORIZED REPRESENTATIVE

FULL NAME			
ADDRESS			
EMAIL ADDRESS			MOBILE NUMBER

I, the undersigned, declare that I accomplished this form as the authorized representative of the Data Subject, and that the responses and/or input I provided or indicated are a true, correct, and complete statement of the information contained herein. I enclose here written proof of my authority to act on behalf of the Data Subject. I authorize Monde Nissin Corporation to perform any lawful procedures for the purpose of verifying the information I have provided.

SIGNATURE OVER PRINTED NAME

FOR INTERNAL USE ONLY	
RECEIVED BY:	REMARKS:
DATE RECEIVED:	

 Monde Nissin	Document Type: Policy	Document No.: 01DP-2021	Revision No.: 2	Effectivity Date: March 1, 2021	Page: Page 12 of 15
	Department: Legal	GENERAL DATA PRIVACY POLICY			
	Business Unit: Corporate				

ANNEX C
 MONDE NISSIN CORPORATION
 ERASURE REQUEST FORM


I. DATA SUBJECT INFORMATION

FULL NAME	
ADDRESS	
EMAIL ADDRESS	MOBILE NUMBER

II. DESCRIPTION OF INFORMATION SOUGHT TO BE ERASED *(Please provide sufficient details about the personal data you are requesting to be erased. Use a separate sheet if necessary.)*

III. GROUND/S FOR ERASURE *(Mark appropriate boxes as applicable and provide/attach substantial proof.)*

- The personal data is: incomplete outdated false or unlawfully obtained.
 Details: _____
- The personal data is used for an unauthorized purpose/s.
 Details: _____
- The personal data is no longer necessary for the purpose/s for which they were collected.
 Details: _____
- Withdrawal of consent or objection to the processing *(there being no other applicable lawful criteria for processing)*.
 Details: _____
- Personal data concerns private information that is prejudicial to data subject.
 Details: _____
- Processing is unlawful.
 Details: _____

 Monde Nissin	Document Type: Policy	Document No.: 01DP-2021	Revision No.: 2	Effectivity Date: March 1, 2021	Page: Page 13 of 15
	Department: Legal	Title: <h2 style="text-align: center;">GENERAL DATA PRIVACY POLICY</h2>			
	Business Unit: Corporate				

- The personal information controller (PIC) or personal information processor (PIP) violated my rights as a data subject.
 Details:
-

IV. DECLARATION

I, the undersigned, declare that I personally accomplished this form and that the responses and/or input I provided or indicated are a true, correct, and complete statement of the information contained herein. I also authorize Monde Nissin Corporation to verify the information I have provided.

 SIGNATURE OVER PRINTED NAME


V. IF FILLED ON BEHALF OF DATA SUBJECT BY AN AUTHORIZED REPRESENTATIVE

FULL NAME			
ADDRESS			
EMAIL ADDRESS			MOBILE NUMBER

I, the undersigned, declare that I accomplished this form as the authorized representative of the Data Subject, and that the responses and/or input I provided or indicated are a true, correct, and complete statement of the information contained herein. I enclose here written proof of my authority to act on behalf of the Data Subject. I authorize Monde Nissin Corporation to perform any lawful procedures for the purpose of verifying the information I have provided.


 SIGNATURE OVER PRINTED NAME

FOR INTERNAL USE ONLY	
RECEIVED BY:	REMARKS:
DATE RECEIVED:	

 Monde Nissin	Document Type: Policy	Document No.: 01DP-2021	Revision No: 2	Effectivity Date: March 1, 2021	Page: Page 14 of 15
	Department: Legal	GENERAL DATA PRIVACY POLICY			
	Business Unit: Corporate				

ANNEX D
MONDE NISSIN CORPORATION
DATA RETENTION PERIOD

Department	File Type	Records/Data	Retention Period
Accounting and Finance	Accounting and Finance	Accounting Records, including journals, ledgers, trial balances etc.	Permanent (in case of fraud, prescription of action for tax assessment is 10 years from discovery of fraud)
Legal	Contracts	All agreements, memoranda of understanding, job orders, purchase orders, and similar documents	10 years after expiration or termination of the contract
		Amendments and change orders	10 years after expiration or termination of the contract
		Deliverables, reports, correspondence, and other documents pertinent to the contract	10 years after expiration or termination of the contract
		Certificates of completion, warranties, and similar documents	10 years after expiration or termination of the contract
	Corporate Files	Articles of incorporation and by-laws, general information sheets, and other corporate housekeeping files	Permanent
		Permits, licenses, and similar documents	Permanent
		Litigation Files	Case records, submissions, processes, and issuances
		Evidence	Permanent
Human Resources and Personnel	Employment Records	Application Forms, CVs (of unsuccessful job applicants)	1 year after submission of the application form, CVs
		201 Files	10 years after separation from employment
		Disciplinary cases	10 years after separation from employment
		COVID-19 contact tracing forms/health declaration forms	30 days after submission of the personal information
		Employee health records	10 years after separation from employment

 Monde Nissin	Document Type: Policy	Document No.: 01DP-2021	Revision No: 2	Effectivity Date: March 1, 2021	Page: Page 15 of 15
	Department: Legal	Title: <h2 style="margin: 0;">GENERAL DATA PRIVACY POLICY</h2>			
	Business Unit: Corporate				

Department	File Type	Records/Data	Retention Period
Sales and Marketing	Distributor/ Sub-Distributor Files	Distributor/Sub-Distributor/Independent Sellers database	10 years after termination of the contract
	Product complaints database	Customer product complaints	1 year after resolution or closure of the complaint
	Consumer Insights	Participants to consumer insights survey/study	1 month after conclusion of the survey/study
General	Correspondence	Contract-related letters and emails	10 years after expiration or termination of the contract
		Routine communications	2 years