

PROTECTORIA GLOBAL INC. PRIVACY POLICY

1. ABOUT THIS DOCUMENT

This privacy policy sets out the commitment of Protectoria Global Inc. (“Protectoria”, “we”, “us”, “our”) to collect, use, share and store personal data related to the provision of the Protectoria services in accordance with the applicable Data Protection Legislation.

“Data Protection Legislation” means any applicable law relating to the processing, privacy, and use of personal data, including without limitation: (i) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, otherwise known as the General Data Protection Legislation (“GDPR”); (ii) Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012 of the Philippines; and (iii) any other EU or Philippine legislation relating to personal data and all other legislation and regulatory requirements in force from time to time which apply to a party relating to the use of personal data (including, without limitation, the privacy of electronic communications).

2. PRINCIPLES

Your privacy is important to us. Protecting your privacy is a core part of our mission. You trust us to take care of your data, and we strive to be worthy of that trust. This Privacy Policy explains the personal data Protectoria processes, how Protectoria processes it, and for what purposes.

In processing your personal data, we pledge to:

- Be transparent about how we collect, use and store your personal data;
- Ask your permission before we share your personal data with third parties, and to only share such data when it benefits you as a customer; and
- Use the best available security practices and tools to protect your personal data.

By using the web pages, you agree to allow us to collect and process data as described below.

3. PLATFORMS COVERED

The privacy policy applies to the following:

- The websites at www.pgi.international.
- E-mail correspondence between you and us.

4. CONSENT

By using the platforms as set forth in Clause 3 above, you consent to the use of your Personal Data as described in this Privacy Policy. You may withdraw your consent to our processing of your Personal Data at any time. However, withdrawing consent may result in your inability to continue using some or all of the Services within the website. It is to be

noted that you have a choice when it comes to the Personal Data you share to us. When we ask you to provide your Personal Data, you can decline. However, many of our Services require that you provide Personal Data. If you choose to not provide such data required, you may not be able to access certain Services.

5. HOW WE COLLECT YOUR DATA

Protectoria may be able to obtain Personal Data from you in various ways. We collect Personal Data from you through our interactions with you, including answering any query you may send to our designated contact channels, your access of our website and other resources that may be found therein, and through our Services. We collect the Personal Data you provide when you visit our websites, subscribe to our news feeds or letters, complete forms, contact us directly, or in any manner you access, browse, visit, or use any of our websites, platforms, and other digital channels. Data is automatically collected when you use our online platforms, such as our web pages.

6. WHAT DATA WE PROCESS

We may process Personal Data of the following categories:

- Basic information, such as name, title and contact information that you have submitted to us.
- Information generated by using our web pages, such as page visits and downloaded files. You can read more about this under the cookies section below.
- If you consent to receive our newsletters, we process your consent data – to ensure your consent is valid.
- Any other information processed based on your consent. In such cases, you will receive specific descriptions of what information is processed and what it is used for.

Our web pages and digital channels are not meant for nor targeting children under 13 years of age. We do not deliberately process information about minors. If we, to your knowledge, are processing information about children under 13 years of age, you may contact us, and we will delete the information from our systems.

7. PURPOSE AND BASIS OF PROCESSING YOUR DATA

We process Personal Data through our web pages. The processing is conducted for the following purposes:

- **Providing services:** We process Personal Data to provide and deliver services to you. For example, we process your information in relation to identification of customers, invoicing and payments, customer service, technical support and customer complaint handling. Such processing is necessary to fulfill our agreements with you, and/or to provide services at your request.
- **Development and analysis:** We process your Personal Data to improve our services and digital channels. Such processing is based on legitimate interests.
- **Sales and marketing:** We use both anonymized and personal data for marketing purposes. These activities include direct marketing if we send you newsletters and

other forms of direct marketing. We only send these if you consent or we have other legal basis.

- Information security: We may process Personal Data to ensure the security of our systems, and to detect and prevent certain types of misuse of our services. Such processing is based on legitimate interests.
- Legal compliance: We process Personal Data to meet legislative requirements, for example in relation to accounting and providing information to authorities when required by law. Such processing is based on the need of compliance with our legal obligations.
- Collection and disputes: You have the right to request for the erasure or blocking of your Personal Data. You may request us to erase, block or destroy your personal data in our system. This, however, is subject to any legal ground or overriding legitimate interest for the lawful processing of your personal data, such as for purposes of resolving a dispute between us, as the parties, or for purposes of investigating potential liabilities. (Please see Section 19 of the Data Privacy Act)
- Other purposes to which you have given consent: We may process your personal data for any other purpose to which you have given us your consent.

8. COOKIES AND SIMILAR TECHNOLOGIES

Cookies are small text files placed on your device to store data that can be recalled by a web server in the domain that placed the cookie. We use "cookies" and similar technologies on our digital webpages for storing and honoring your preferences and settings, providing interest-based advertising, and analyzing how our Services perform, among other legitimate purposes. Further, these cookies and similar technologies may process data about:

- (1) the browser types and versions used,
- (2) the operating system used by the accessing system,
- (3) the website from which an accessing system reaches our website (so-called referrers),
- (4) the sub-websites,
- (5) the date and time of access to the Internet site,
- (6) an Internet protocol address (IP address),
- (7) the Internet service provider of the accessing system, and
- (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

This information is necessary to (1) deliver the content of our website correctly, (2) optimize the content of our website, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

Google Analytics: We have also integrated Google Analytics on this website. Google Analytics is a web analytics service. A web analysis service collects, for example, data about the website from which a person has arrived (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. We use analytics to optimize the website.

Google Analytics uses cookies which usually transfer information about the use of the website by the user to a Google server in the USA and stored there. As Google is certified

under the Privacy Shield Agreement, it guarantees that [European data protection law](#) to be observed. As we only use Google Analytics with IP anonymisation, the IP address of users is shortened by Google within member states of the European Union.

Only in exceptional cases is the full IP address transferred to a Google server in the USA and shortened there. Google does not merge the IP address transmitted by the user's browser with other data from Google. Users can prevent the storage of cookies by adjusting their browser software settings accordingly; users can also prevent the collection of data generated by the cookie and related to their use of the online offer to Google and the processing of this data by Google by installing cookie management software.

Please check for further information on data used by Google, setting and opposition possibilities on the web pages of Google '[Data usage by Google when you use websites or apps of our partners](#)', 'Use of data for advertising purposes', 'Manage information that Google uses to serve ads to you'.

Google will use this information on our behalf to evaluate the use of our online offer by users, to compile reports on the activities within this online offer and to provide us with further services associated with the use of this online offer and the use of the Internet. Pseudonymous user profiles of the users can be created from the processed data. This is based on our legitimate interests (i.e. interest in the analysis, optimization and economic operation of our online offer within the meaning of the applicable Data Protection Legislation).

9. PROTECTING YOUR INFORMATION

We highly prioritize the protection of your Personal Data, and continuously work to safeguard it and other confidential information. Our security measures include physical, technical, and organizational measures, use of protective software, IT infrastructure, internal and external networks and technical facilities, as well as internal policies and access control.

Our security work is based on regular risk assessments and internal controls to ensure that sufficient security measures are imposed to prevent the unauthorized access of personal data.

10. SHARING OF DATA TO OTHERS

We may disclose personal data to:

RECIPIENT DATA	COUNTRY	LEGAL BASIS
Google Inc. (Google Analytics) 1600 Amphitheatre Pkwy Mountain View CA 94043-1351 United States https://marketingplatform.google.com/about/analytics/terms/us/	USA	EU US Privacy Shield and the Applicable Data Protection Legislation

<p>Protectoria Venture AS Klingenberggata 7b N-0161 OSLO, Norway Phone +47 21 42 01 01 Email: privacy@protectoria.com</p>	Norway	Applicable Data Protection Legislation
<p>eTonec GmbH Kopernikusstr. 35 DE - 10243 Berlin Phone: +49 30 12089321 Email: privacy@etonec.com</p>	Germany	Applicable Data Protection Legislation
<p>Raidboxes GmbH Friedrich-Ebert-Straße DE – 48153 Münster Phone: +49 251 1498 2000 Email: support@raidboxes.io</p>	Germany	Applicable Data Protection Legislation
Other parties	Based on your consent	

We may also transfer Personal Data in the following situations:

- In statutory cases, for instance by orders of courts of law or public authorities, according to predefined procedures.
- In case of transfer of business, for example as part of a merger, acquisition, sale of our assets or transfer of our services to another company. In this case, you will be notified by email or through our web pages about changes in ownership, use of your personal data, and the choices you may have regarding your personal data.

The privacy policies of these third parties are not under our control and may differ from ours. The use of any information that you may provide to any third parties will be governed by the privacy policy of such third party or by your independent agreement with such third party, as the case may be. If you have any doubts about the privacy of the information you are providing to a third party, we recommend that you contact that third party directly for more information or to review its privacy policy.

11. LAW AND ORDER

We may disclose your information to third parties if we determine that such disclosure is reasonably necessary to (a) comply with the law; (b) protect any person from death or serious bodily injury; (c) prevent fraud or abuse of us or our users; or (d) protect our property rights.

12. STORAGE PERIOD

We only store your personal data for as long as necessary and for the purpose the data was collected, unless a legal requirement demands a longer storage period, or if you have given us your consent to extended storage.

Your personal data will be processed for as long as you have an active relationship with

us or our digital channels, or until you request us to delete the Personal Data in our systems. We consider a relationship with us as:

- (1) being a customer or customer contact of Protectoria;
- (2) having given consent to receive marketing material or other notifications from us;
- (3) having actively requested to be contacted by us via social media, electronic messages, electronic forms or on exhibitions, seminars, etc.;
- (4) having requested to follow us on social media, or
- (5) been active in our digital channels after giving your consent.

Your relationship to us is defined as ‘active’ as long as:

- activity has been recorded in our digital channels within the last twelve (12) months;
- your contact information or user profile is needed to maintain the relationship to you or your company; or
- you have not explicitly withdrawn your consent.

We may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law.

Storage of anonymized information is not subject to such limitations or demands, as anonymized information is not considered Personal Data. We work to ensure that Personal Data and other customer data is always updated and correct, and that we do not store Personal Data that is unrelated to the stated purposes for processing of Personal Data. All retained Personal Information will remain subject to the terms of this Privacy Policy. Please note that if you request that your Personal Data be removed from our databases, it may not be possible to completely delete all of your Personal Data due to technological and legal constraints.

13. YOUR RIGHTS

You have the right to access, correct and in some cases delete your personal data processed by us. You may also have the right to restrict or object to the processing, as well as the right to data portability. You can read more about the extent of your rights on the website of the National Privacy Commission (<https://www.privacy.gov.ph>), which summarizes the Data Subject’s Rights as stated in the Data Privacy Act of 2012.

If our processing is based on your consent, you can always withdraw your consent to our processing of your Personal Data.

To assert your rights, please send us a request to privacy@pgi.international. We will answer your request as soon as possible, and in all cases no later than thirty (30) days.

14. COMPLAINTS

If you are of the opinion that our processing of your personal data breaches the terms of this policy, or in other ways breaches the Data Protection Legislation, or any other relevant laws, you can contact us through our Data Protection Officer, whose details are as follows:

PROTECTORIA GLOBAL INC.
7K Monet Le Grand Tower III
8888 E-Commerce Ave
Eastwood Libis, Brgy. Bagumbayan
Quezon City 1110 Manila, Philippines

E-mail: info@pgi.international
Phone: +632 8547 2763

If you wish to contact the National Privacy Commission directly, you can find information on their website: <https://www.privacy.gov.ph>.

15. CHANGES

As our business and tools evolve, we may need to update this policy.

In case of major changes, we may try to contact you directly through available channels, such as e-mail or other digital notifications and, if necessary, ask for your consent.