

# **PRIVACY POLICY**

**UpFinance FINANCE CORP.**

**Users (hereinafter referred to as “User”, individually, and “Users”, collectively) of the website <https://upfinance.com/> (hereinafter referred to as “Website”) are provided with the appropriate technical resources so that, prior to the voluntary completion of User Data, Users can access this Privacy Policy and any other relevant information on the Protection of User Data.**

**This Privacy Policy is applicable to any User of the afore-mentioned Website and any applicant for a loan of UpFinance FINANCE CORP. (hereinafter referred to as “UpFinance”), so Users are advised to review it periodically for updates that are implemented on a regular basis.**

**The User is advised to read this Privacy Policy intently because use of the Website implies that the User consents to the Website’s treatment of the User’s Data.**

## **1. General terms**

**1.1. This Privacy Policy is valid in relation to all User Data received by UpFinance from the natural person holding such User data at the time of using or attempting to use the services of 247pera, including contracting loans.**

**1.2. User accepts this Privacy Policy through the use of the website**

and gives consent for the collection, processing, storage and transmission of the User's Data in the formats prescribed by the applicable Philippine laws and regulations as well as this Privacy Policy.

1.3. The purpose of this Privacy Policy is to respect the Users' rights to the User Data owners in relation to the collection and processing of such Data by 247pera.

## **2. User Data**

2.1. Collection of User Data is done through several sources:

2.1.1 by virtue of the registration on the Website;

2.1.2 upon completing the online loan application form;

2.1.3 by virtue of communication with ServicioDePrestamoemployees;

2.1.4 by virtue of credit reports and data; and,

2.1.5 by virtue of navigation through the Website.

2.2. User Data are both Personal and Non-Personal Information:

2.2.1. Personal Information is any information from which the identity of a User can be reasonably and directly ascertained, or when put together with other information would directly and certainly identify an individual, such as name, gender, date of birth, address, telephone/mobile number, email address, proof of identification, etc. It also includes information about:

2.2.1.1. the data that would help UpFinance valuate the User's credit standing such as spouse details financial details, business details, and other data points whenever applicable;

2.2.1.2. the location of the User's device, whether desktop, laptop, or

mobile devices, as used to access the Website; and

2.2.1.3. the User's navigation experience when accessing the Website to see activities done in the Website, the pages visited, and the sequence thereof.

2.2.2. Non-Personal Information is any information that does not identify the User individually, and includes statistical and analytical data, and anonymous and aggregate reports.

2.2.3. The User may also be requested to update Personal Information from time to time. Should the User be unable to supply the required Personal Information, ServicioDePrestamomay be unable to provide the User with requested products and services and updates on the latest offerings. The User may also be unable to participate in ServicioDePrestamoevents, promotions or other activities.

2.2.3. Depending on the Users' device or Internet browser settings, when Users access the Website and electronically communicate with 247pera, ServicioDePrestamomay use cookies, web beacons, small data text files or similar technologies to identify the Users' devices and record the Users' preferences, with the Users' consent.

2.3.4. The User has the duty to inform ServicioDePrestamooof any change in the information provided, in order to keep it updated and avoid errors.

### **3. Anti-Money Laundering Compliance**

3.1. The Anti-Money Laundering Act (hereinafter referred to as "AMLA"), as amended, requires all Covered Institutions to obtain, verify, and record information that identifies each person who applies for a loan.

3.2. Being a Covered Institution under AMLA, ServicioDePrestamowill

ask for the User's name, address, date of birth, business, tax identification number, Social Security System or Government Service Insurance System numbers, and other information that will allow ServicioDePrestamoto identify the User.

3.3. ServicioDePrestamomay also ask to see the User's driver's license, passport, or other competent evidence of identity bearing the User photograph and signature in order to comply with AMLA and other applicable laws and regulations.

## **4. User Data Processing**

4.1. Without limitation, User data may be treated by ServicioDePrestamoamong others for the following purposes:

4.1.1. Verify the User's identity;

4.1.2. Manage the provision of services being offered by the Website, such as processing the loan application or rendering the loan credit decision, among others;

4.1.3. Evaluate the User's credit standing through external credit report providers and bureaus;

4.1.4. Contact the User;

4.1.5. Transfer the loan proceeds;

4.1.6. Manage and recover outstanding debt;

4.1.7. Update the information regarding the loan granted;

4.1.8 Enhance the User's customer experience and improve, develop and determine customized products to meet customer preferences and needs;

4.1.9. Send commercial communications on the products and

**services;**

**4.1.10. Improve the service and contents of the service through statistical analysis and market research;**

**4.1.11. Abide by any safety, security, public service or legal requirements and processes;**

**4.1.12. Process information for statistical, analytical, and research purposes; and**

**4.1.13. Any other purpose expressly provided in the Loan Application Form and/or in the General Conditions s well as in the Promissory Note / Disclosure Statement.**

**4.2. ServicioDePrestamoalso uses the User's Personal Information to the extent necessary to comply with the requirements of the law and legal process, such as a court order; to comply with legal obligations; or to prevent all damages to public security, safety or order.**

**4.3. ServicioDePrestamoalso uses the User's Non-Personal Information for statistical, analytical, and research purposes to create anonymous and aggregate reports.**

**4.4. User consents that UpFinance maintains the data provided even when the loan application has not been accepted, in order to ensure compliance with legal obligations and avoid duplication in the new applications treatment.**

**4.5. ServicioDePrestamoutsources or contracts the processing of User Data to third parties, such as but not limited to the following parties: vendors, service providers, partners or other telecommunications operators, to fulfill any of the above purposes. These parties are only authorized to use User Data for such contracted purposes. These parties may have access to User Data for a limited time under reasonable contractual and technical safeguards**

to limit their use of such information. ServicioDePrestamorequires these parties to protect User Data in compliance with this Privacy Policy.

## **5. Third-Party Links and Other Companies / Organizations**

**5.1. Links to other websites (i.e. third-party links) may appear on which have its own privacy policy and are understood as accepted by clicking on them. This Privacy Policy does not apply to such third-party links that may appear on the Website. The responsibility of UpFinance with regards to the User's Data extends only to the Website proper.**

**5.2. This Privacy Policy also does not regulate the data processing activities of other companies and organizations that advertise UpFinance services.**

**We can send you information SMS and email messages.**