

Privacy Policy

When you use our services, you trust us with your information. We understand this is a big responsibility, and we work hard to protect your information and put you in control.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

CPCPA GROUP DATA PRIVACY STATEMENT

We at CPCPA Accounting and Bookkeeping Services, together with our affiliates and members of CPCPA Group, are committed to protecting your privacy as our client, and even as a visitor to this website, we respect and value your rights as your data.

The CPCPA Group is steadfast to comply with the Data Privacy Act of 2012 or "DPA", its Implementing Rules and Regulations, relevant issuances of the National Privacy Commission ("NPC"), and other applicable privacy laws to uphold your right to privacy and protect the personal data that you entrusted to us.

You are welcome to visit our website while remaining anonymous and without revealing any of your personal data.

How we collect information

Our website does not collect or record personal information online. However, we may manually or automatically collect your personal information should you choose to provide them using your contact and email services every time you:

- a.** Visit the website, we may use web analytic tools, including those of third parties, that use cookies to collect anonymous information and data generated from your activities, such as the number of times the website is visited, the searches you perform, access internal links, etc.
- b.** Visit a third party website and click on advertisements of a member of the CPCPA Group;
- c.** Visit any office, premises, and/or use the facilities of a member of the CPCPA Group;
- d.** Enter into a transaction with a member of the CPCPA Group;

- e. Submit your application forms and documentary requirements to a member of the CPCPA Group; or
- f. File complaints, inquiries, or requests with a member of the CPCPA Group;

What we may collect from you

In cases where email messages contain personal information, CPCPA Group will use the information for purposes provided to us. This may include but not limited to:

1. Contacting you in order to obtain your consent.
2. Responding to your messages, inquiries, comments, or request for information; and
3. Sending you the information that you requested for.

We may collect the following personal information:

- a. Your name and other particulars such as, but not limited to, contact details, residential address, birthdate, gender, marital status, business name, and place of business;
- b. Details and photocopies of your government or other IDs, and other digital photos and biometrics captured or submitted in the course of your transactions with a member of the CPCPA Group;
- c. Financial information such as income, expenses, bank deposits, investments, loans, credit cards statements, liabilities, and other financial records;
- d. Employment details and other information required for tax returns filing, and your employee's personal information and their employment details.
- e. Images and audio recordings captured by our CCTV camera and similar recording devices in accordance with existing laws and internal policies of the members of the CPCPA Group;
- f. Voice recordings of your conversations with our associates and firm's representative or any employee who accommodated you when transaction with a member of the CPCPA Group;
- g. Information about your transactions with third parties, including your customers, supplier merchants, service providers, banks and utility companies;
- h. Non-personal information provided by the electronic device you are using such as the IP address, operating system, browser type and version, and other machine-related identifiers; and
- i. Specimen signatures.

How we may use your information

Your personal data may be used, stored, processed, shared and disclosed by the CPCPA Group to its members and employees, as well as third parties (as may be allowed by law) for the following relevant and necessary purposes:

a. Legal. To comply with relevant and applicable laws in the Philippines and those of other jurisdictions, such as but not limited to Republic Act No. 10173 or the Data Privacy Act of 2012, Republic Act No. 1405 or the Bank Secrecy Law, Republic Act No. 8791 or the General Banking Law of 2000, Republic Act No. 9510 or the Credit Information System Act, Republic Act No. 9160 or Anti-Money Laundering Act of 2001, as amended, and the Foreign Account Tax Compliance Act (FATCA).

b. Transactions. To be able to provide and complete the services, activities, and transactions which you request, or other products and services that you have availed and are maintaining with any of the members of the CPCPA Group.

c. KYC Procedures. To perform know-your-client (KYC) and customer identification procedures to establish your identity via authorized third parties that conduct due diligence and file-matching services that is consistent with applicable regulatory requirements of the Anti-Money Laundering and the National Privacy Commission (NPC), among others; and to process and share your KYC information within the CPCPA Group that will ultimately benefit you in such a way that you will only need to provide or update certain personal data that were not previously provided when availing any new product or service with any member of the CPCPA Group.

d. Policies and obligations. To comply with the CPCPA Group's internal policies and its reporting obligations to governmental authorities under applicable laws.

e. Research and Profiling. To conduct studies, researches, automatic and manual profile analysis, behavioral modeling on your values, scores, metrics from your personal data, your preferences, financial behavior across product interactions, along with market trends for members of the CPCPA Group to be able to develop and improve the efficiency and reliability of their products and services, assess your risk profile, and further elevate customer experience.

f. Cross-Selling. To offer and send you direct communications via call, SMS, email, Electronic Direct Mail (EDM), chat applications, direct mailers, etc., through authorized third parties based on the campaigns designed by members of the CPCPA Group.

g. Marketing. To promote relevant and more personalized communications about products and services that you may have availed or might be interested in.

h. Promotion. To communicate with you regarding services information, including offers, promotions, discounts, rewards; and to personalize your experience with

various touchpoints such as branches, call centers, telemarketing, email, messaging and other channels;

j. Use of Cookies. To analyze non-identifiable web traffic data that includes your IP address, links, pages, sites or platforms that you have accessed, visited or clicked; the date and time of your visit, your geolocation, and your IOS and web browser type/s.

k. As necessitated by third parties or members of the CPCPA Group:

- k.1.** To provide support in delivering our services and products to you;
- k.2.** To comply with existing laws, rules, and legal processes;
- k.3.** To implement policies and terms of use, or such other applicable policies with respect to the products and services that we provide;
- k.4.** To address fraud, illegal activities, security or technical issues;
- k.5.** To protect rights, interests, property or security, of clients and third parties;

Your Data Privacy Rights

Subject to the requirements, conditions and exemptions under the applicable law and Data Privacy Laws, and payment of reasonable fees, you are entitled to the following rights:

- a.** To know and access your personal data, including:
 - a.1.** The sources from which they were obtained;
 - a.2.** The manner by which such data were processed;
 - a.3.** The reasons for the disclosure of your personal data to recipients, including the names and addresses of recipients thereof;
 - a.4.** The information on automated processes where the data will or likely to be made as the sole basis for any decision significantly affecting or will affect you;
 - a.5.** The date when your personal data was last accessed and modified.
- b.** To dispute any inaccuracy or error in your personal data and require the CPCPA Group to correct or update the same.
- c.** To obtain a copy of your personal data in an electronic or structured format for further use.
- d.** To (i) suspend, withdraw from, or opt-out of certain activities such as but not limited to profiling, marketing, promotions, or cross-selling or (ii) order the blocking, removal, or destruction of your personal data from CPCPA Group's system, provided, that in

either case, such action is neither critical nor required by any applicable laws and regulations to maintain the products and services that you availed.

e. To file a complaint with the National Privacy Commission.

For a complete reference of your rights under the Data Privacy Act, you may access the National Privacy Commission website at www.privacy.gov.ph.

How we protect your information

We assure you that your personal data are handled with utmost care and discretion as we take data privacy and information security very seriously. We have put in place appropriate organizational, physical, and technical security measures and controls to safeguard and maintain the confidentiality, integrity, and availability of your personal data. This includes secured storage and encryption.

We will not process your personal data without any lawful or legitimate basis as access to your personal information is restricted to authorized persons only pursuant to existing laws and regulations issued by relevant government authorities.

All our personnel who may have received and processed your personal information are bound by professionalism and confidentiality as stipulated in their employment contracts. They have also signed a non-disclosure agreement before onboarding and upon formal resignation.

Your personal data will be stored in a secured database for no longer than ten (10) years either from your last transaction with any member of the CPCPA Group or until the expiration of the retention limits set by applicable law, whichever comes later. After this duration, both physical records and digital files will be disposed of.

Changes to our Data Privacy Statement

CPCPA Group has the discretion to modify this Data Privacy Statement from time to time to align with relevant laws and regulations and the CPCPA Group's policies and procedures as applicable. All updates will be posted in this webpage.

How to contact us

If you have any questions, inquiries, clarifications, or requests in relation to this Data Privacy Statement, you may address them to CPCPA Group's Data Protection Officer by sending an email at informationdpo.cpcpa@gmail.com.

This Data Privacy Statement has been updated as of April 2025.