



DPO/DPS

DATA PROTECTION OFFICER

DATA PROCESSING SYSTEM

REGISTERED

**"DATOS NG PILIPINO,
PROTEKTADO KO!"**



VALIDITY PERIOD:

05 August 2025

A handwritten signature in black ink, appearing to read "J. Naga", written over a horizontal line.

Atty. John Henry D. Naga
PRIVACY COMMISSIONER

DATA PRIVACY NOTICE AND CONSENT

For purposes of instant messaging with prospective clients and merchants, Tangent collects, stores, uses and/or discloses personal and sensitive personal information of a natural/legal person in view of his/her intent to communicate with the company.

By providing your personal and sensitive personal information in Tangent's client/merchant messaging platform, you acknowledge and consent to the collection and processing of your personal and sensitive personal information as appropriate to evaluate your inquiries about the potential business with us. Regarding personal information about someone other than yourself, you confirm and acknowledge that you have obtained their consent for the disclosure of their personal information to Tangent.

Further, you understand and agree that all the information you supplied will be managed by Tangent in accordance with the Data Privacy Act of 2012, Tangent Privacy Policy, Tangent Information Security Policy and other related rules and regulations. Refer to this platform's Terms of Use.

Finally, you attest to the truthfulness and correctness of all the information supplied to us in this platform and authorize Tangent to conduct reference checks. Should falsehoods be discovered during your employment in any position in this Company, you fully agree that the same is a just cause for your termination.

TANGENT PRIVACY POLICY

Section 1. Introduction

With a view respecting privacy and information, Tangent Solutions, Inc., processes its data subjects' personal data and protect them physically, organizationally, and technologically.

This Privacy Policy sets out the commitment of the Company to collect and process personal data in accordance with the applicable laws and regulations on data privacy, primarily including the Philippine Data Privacy Act (DPA) of 2012 and its implementing rules and regulations (DPA IRR). This Privacy Policy explains how Tangent collects, use, disclose and protect personal data. In processing the personal data, Tangent seeks to adhere to the general privacy principles of transparency, legitimate purpose and proportionality, and such other relevant principles in the collection, processing and retention of personal data as required by applicable law. It is presumed that all concerned to Tangent's Privacy Policy have read, understood, and agreed to the terms and conditions of this Privacy Policy.

This Privacy Policy, and any updates, amendments, or supplements thereto, is available at the Corporate Communications, Internal Audit, Risk Management, and Compliance Office (CCIARCO) and/or anytime upon request via Tangent DPO:

Email : dpo@tangentsolutionsinc.com
: cciarco@tangentsolutionsinc.com

Call : 8636-8844 local 112 SMS : 09171130801

Section 4. Confidentiality under Philippine Law

All information that Tangent receives from its customers, suppliers, employees and other stakeholders, by electronic or any other means, whether or not constituting personal data, are generally protected as privileged communication which are automatically kept confidential. This notwithstanding, Tangent subjects itself to applicable laws and regulations and authorities when disclosure of these information may be required and permitted under certain conditions such as when the information has already become public.

Section 5. DPA Exemption

This Privacy Policy does not apply to the following information:

1. 5.1 Information processed for the purpose of allowing public access to information that fall within matters of public concern, pertaining to:
 1. (a) Information about any individual who is or was an officer or employee of government that relates to his or her position or functions.
 2. (b) Information about any individual who is or was performing a service under contract for a government institution, but only in so far as it relates to such service, including his name and the terms of his contract; and
 3. (c) Information relating to a benefit of a financial nature conferred on an individual upon the discretion of the government, such as the granting of a license to or permit, including the name of the individual and the exact nature of the benefit: Provided that they do not include benefits given in the course of an ordinary transaction or as a matter of right.
2. 5.2 Personal information that will be processed for research purpose, intended for a public benefit, subject to the requirements of applicable laws, regulations, or ethical standards; and
3. 5.3 Information necessary in order to carry out the functions of public authority, in accordance with a constitutionality or statutorily mandated function, including the performance of the functions of the independent, central monetary authority, subject to restrictions provided by law.

Section 6. How Tangent Collects and Process Personal Data

Tangent may obtain personal data in various ways. These include where a natural or juridical person (a "Person"):

1. 6.1 Enters into an agreement with Tangent Solutions, Inc. whether or not written, including an employment contract, agreements and contracts with suppliers and customers;
2. 6.2 Submits to Tangent any application, form, request, notice, or other business documents;
3. 6.3 Makes inquiries;
4. 6.4 Becomes an employee, officer, consultant, agent, supplier or service provider, customer, applicant, guests or visitor;
5. 6.5 Accesses, browses, visits, or uses any of Tangent websites, platforms, social media presence, and other online presence; or
6. 6.6 Otherwise provides Tangent with personal data, whether directly or through another Person

Where personal data is publicly available, Tangent may be able to collect the data from such public sources, including any online presence it may have. Personal data from the above natural or juridical person may include name, address, email address, telephone number, age, marital status, information issued by government agencies, and other information that may be used to enter into or help perform a contract, provide products and services, communicate, or meet any of the purposes set out in Section 7 of this Policy.

Insofar as anyone discloses personal data when accessing or visiting Tangent's website, platform, social media and other online presence, the company may process such personal data as well. Further, Tangent may collect and process information that is normally collected as a standard part of browsing activity. This may include the visitor's IP address, access times, system activity, cookies, device identifier and hardware information, and other log information that is collected when one browses or visits Tangent online sites and accounts.

Section 7. Purposes of Collection and Processing, Recipients of Personal Data and Consent and Other Lawful Criteria for Collection and Processing

7.1 Purposes of Collection and Processing

Tangent collects and processes personal data for the purposes for which the data subjects have provided the data or made it otherwise available to Tangent or to the public, to enable the company to fully and efficiently achieve these purposes and as allowed by applicable law/s.

In general, Tangent uses personal data to:

1. (a) Comply with and exercise its rights under contracts and agreements, and the law, as may be required by its business operations and in pursuit of the company's legitimate business and commercial objectives;
2. (b) Perform and improve the company's product and service fulfillment, and address any concern or complaint about the same;
3. (c) Implement efficiencies and best practices;
4. (d) Obtain services for the company's operations and business;
5. (e) Conduct surveys, research, and data gathering exercises for purposes of continual process and service improvements;
6. (f) Market, promote and share information about Tangent such as but not limited to the company's products and service offerings and employment opportunities;
7. (g) Communicate to its stakeholders; and
8. (h) Allow audits and due diligence reviews by third parties under a confidentiality agreement.

Specific to employee data, Tangent may collect and process personal data from current or prospective employees in order to initiate, carry out, or terminate an employment agreement, including the results of certain medical examinations that are part of conditions of employment.

For job applicants, the company may process personal data required in order to initiate the employment application process. The collected personal data of any applicant, who may not have been hired, may be retained by Tangent for purposes of future selection process. The company may share an applicant's or employee's personal data when expressly authorized by law or when the applicant or employee concerned has given consent, as when the Company is provided as a reference.

Company files, records (whether electronic), computers, devices and facilities are the property of Tangent Solutions Inc., and Tangent through authorized personnel may examine and review files, records (whether electronic), computers, devices, and facilities at any time, whether an officer, employee or other staff has personal data, property or other information stored therein.

7.2 Recipients of Personal Data

Recipients of personal data that Tangent collects include persons within the company (including related companies) and third parties to whom Tangent may have outsourced or may outsource certain business or operating activities, advisers, suppliers, service providers, and business partners and customers, in order to achieve the data collection purposes as set out in this section. Some of these entities may be outside the Philippines and that transfer of data will be cross-border and is specifically covered by Cross-border Data Flows in Section 8 of this Policy. On top of the persons to whom personal data may be transferred or shared as mentioned above, Tangent may also disclose information, whether intended to be kept confidential or not, upon lawful request by a governmental authority, in response to a court order, or when required by applicable law.

7.3 Consent and Other Lawful Criteria for Collection and Processing

Where personal data are provided to Tangent through any of the interactions mentioned above, in providing or making available the personal data, the data subject agrees and consents to Tangent's collecting, using, disclosing, sharing and otherwise processing the personal data for the Purposes, and in the manner and under the terms and conditions, in this Policy.

This provision supplements but does not supersede nor replace: (1) any other consent which Tangent's data subjects may have previously provided or will provide to the company with respect to his/her/its personal data, or (2) the existence of a lawful basis or bases for the collection and processing of the company's data subjects' personal data.

Where the data may not be covered by the DPA, data processing by Tangent is always premised on the fact that applicable laws allow it and it is done only for the legal and mutually beneficial purposes for which both data and consent are given

Section 8. Cross-Border Data Flows

Tangent Solutions Inc., will allow any form of sharing personal data to natural or juridical person (a "Person") outside the Philippines only if:

1. (a) The data subject has consented to the transfer; or
2. (b) The company reasonably believes that the recipient is subject to laws or a contract enforces information handling principles substantially similar to DPA of 2012; or
3. (c) The transfer is necessary for the performance of a contract between the natural or juridical person and Tangent Solutions, Inc.; or
4. (d) The transfer is necessary as part of a contract in the interest of the data subject between Tangent and a third party; or
5. (e) The transfer is for the benefit of the data subject; or
6. (f) It is impractical to obtain the consent of the data subject; or
7. (g) If it were practicable the data subject would likely consent.

In all the foregoing, Tangent will take reasonable steps so that the information transferred will be held, used, and disclosed consistently with the privacy framework, laws, and rules applicable to its data subjects like DPA 2012 for data subjects so covered by it.

Section 9. Scope and Method of Collection and Processing

Tangent utilizes standard manual and computerized methods and systems to file, store and process personal data. Collection and processing of personal data are undertaken in accordance with the principles set out in this Policy and as required by law. Tangent stores and retains personal data for such period as may be required by applicable law or as may be needed to enable the company to fully and efficiently achieve the Purposes set out in Section 7 of this Policy.

Section 10. Amendments and Supplements

Tangent may amend or update this Policy. Tangent's data subjects agree to be bound by the prevailing terms of this Policy as updated from time to time, upon the amendment or when a supplement is published on its website or otherwise advised directly to the data subjects. Please check Tangent's website regularly for updated information about, or amendments or supplements to this Policy.

Section 11. Rights of Data Subjects

Under the DPA, data subjects have the following rights:

11.1 Right to Object

Data subject has the right to indicate his/her refusal to the collection and processing of his/her personal data, including processing for direct marketing, automated processing, or profiling. He/she has the right to be informed and to withhold his/her consent to further processing in case there are any changes or

amendment to information given to him/her. Once data subject has notified Tangent of the withholding of his/her consent, further processing of the data subject's personal data will no longer be allowed, unless:

1. (a) The processing is required pursuant to a subpoena, lawful order, or as required by law; or
2. (b) The collection and processing is undertaken pursuant to any lawful basis or criteria indicated under Clause 7.3 of this Policy.

11.2 Right to Access

Upon data subject's request, he/she may be given access to his/her personal data that Tangent collects and processes, as described in Section 6 of this Policy. The data subject also has the right to request access to the circumstances relating to the processing and collection of his/her personal data, insofar as allowed by law.

11.3 Right to Rectification

Tangent's data subject has the right to dispute any inaccuracy or error in his/her personal data and may request the company to immediately correct it. Upon data subject's request, and after correction has been made, Tangent will inform any recipient of his/her personal data of its inaccuracy and the subsequent rectification that was made.

11.4 Right to Erasure or Blocking

In the absence of any other legal ground or overriding legitimate interest for the lawful processing of a data subject's personal data, or when there is substantial proof that the data subject's personal data is incomplete, outdated, false, or have been unlawfully obtained, he/she may request Tangent to suspend, withdraw, or order the blocking, removal, or destruction of his/her personal data from Tangent's filing system. Tangent may also notify those who have previously received his/her processed personal data.

11.5 Right to Damages

Data subject has the right to be indemnified for any damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of your personal data, taking into account any violation of his/her rights and freedoms as a data subject, as provided by law.

11.6 Right to Data Portability

In case the data subject's personal data was processed through electronic means and in a structured and commonly used format, he/she has the right to obtain a copy of his/her personal data in such electronic or structured format for his/her further use, subject to the guidelines of the National Privacy Commission with regard to the exercise of such right.

11.7 Transmissibility of Rights of the Data Subject

Tangent wishes to advise its data subjects that upon the passing of a data subject, or in case of a data subject's incapacity or incapability to exercise legal rights, the data subject's lawful heirs and assigns may invoke the data subject's rights in his/her place.

11.8 Limitation on Rights and Manner of Exercising

The rights mentioned under this item are not applicable if personal data are processed only for scientific and statistical research purposes, and without being used as basis for carrying out any activity or taking any decision regarding you as the data subject. Your rights as a data subject are also subject to other limitations provided by law.

The law requires you to exercise your rights as described in this Policy in a reasonable and non-arbitrary manner, and with regard to rights of other parties. All requests, demands or notices which you may make under this Policy or applicable law must be made in writing, and will only be considered made and received if sent in accordance with Clause 14.2.

Section 12. Security Measures

We have taken appropriate security measures to protect your personal data against unauthorized access or unauthorized alteration, disclosure, or destruction. These measures include internal reviews of our data collection, storage, and processing practices, as well as physical security measures to protect your information against unauthorized access. As part of our efforts to ensure your information is protected, we restrict access to personal data to personnel who would need that information to perform their functions.

Section 13. Data Breaches

We will comply with the relevant provisions of rules and circulars on handling personal data security breaches, including notification to you or to the National Privacy Commission, where an unauthorized acquisition of sensitive personal information or information that may be used to enable identity fraud has been acquired by an unauthorized person, and is likely to give rise to a real risk of serious harm to the affected data subject. Please note that under applicable law, not all personal data breaches are notifiable.

Section 14. Data Protection Officer

The Data Protection Officer (DPO) is responsible for the supervision and enforcement of this Policy hand in hand with Tangent's Corporate Communications, Internal Audit, Risk Management and Compliance Office (CCIARCO) to ensure Tangent's compliance with applicable laws and regulations for the protection of data privacy and security.

Section 15. Inquiries and Notices

1. For any inquiry related to this Policy, please contact our Data Protection Officer through the contact details below:

Contact Address

Email
Text or Call Call

: The Tangent Data Protection Officer (DPO)
: 15/F Suite 1507-A, Tektite East Tower, Exchange Road,

Ortigas Center, Pasig City 1605 Philippines

: dpo@tangentsolutionsinc.com : +63 917-1130801
: 8636-8844 local 112

2. All requests, demands or notices which a data subject may send or submit to Tangent under this Policy may be coursed through the Corporate Communications, Internal Audit, Risk Management and Compliance Office (CCIARCO) but addressed to **The Tangent Data Privacy Officer (DPO)** in the contact details above. Such a submission will be deemed duly given (i) on the date of delivery if delivered personally, (ii) on the third business day following the date of sending if delivered by a nationally recognized next-day courier service and the service has confirmed delivery, or (iii) if given by electronic mail, when such electronic mail is transmitted to the email address specified above and the appropriate confirmation has been received by the sender via email.