



19th floor, Tycoon Centre Building, Pearl Drive, San Antonio, Ortigas Center, Pasig City

Privacy Guidelines of ARMORAK LENDING INC.

(updated and approved on 22 July 2024)

1. STATEMENT OF GUIDELINES

Protecting the Users privacy is important to Armorak Lending Inc. (“Armorak”).

This Privacy Guidelines sets out the commitment of ARMORAK to collect and process personal and sensitive information (collectively, “data and/or information”) in accordance with the applicable laws and regulations on data privacy, including the Data Privacy Act (RA 10173) and its Implementing Rules and Regulations (IRRs), as well as the National Privacy Commission Issuances.

As part of this commitment, these guidelines govern ARMORAK’s actions as they relate to the collection, use, disclosure and retention of personal information.

The Users are advised to read the entire Privacy Guidelines and may opt to agree or disagree provided herein. Note that on disagreeing to the terms and condition of the privacy policy would mean that the application cannot proceed.

Finally, ARMORAK reserves the right to make changes, update, modify, or amend this Privacy Guidelines.

For guidance of all concerned, thank you.

2. WHO WE ARE AND WHAT DO WE DO?

ARMORAK is a private company registered under the laws of the Philippines and authorized by Securities and Exchange Commission to engaged in the business of lending. It has established and created a mobile application for analyzing, processing, disseminating credit information and other relevant information for the purpose of, but not limited to, reviewing credit portfolio, approving and/or granting loan, and other related services to our Users, Clients, and other institutions

including, but not limited to, banks, credit card companies, financial intermediaries, non-bank financial institutions.

3. WHAT DATA DO WE COLLECT?

ARMORAK obtains information to update its users' files that have relevance to a user's application and credit history to accurately assess the credit information and efficiently grant their loan. This information is collected through fair and lawful means through its users, data subjects, or the public domain. The data we collect may include the following:

A. USER INFORMATION	(i) First Name
	(ii) Last Name
	(iii) Gender
	(iv) Age
	(v) Nationality
	(vi) Civil Status
	(vii) Date of Birth
B. ID INFORMATION	
B. ID INFORMATION	(i) ID Number
	(ii) ID Type
C. ADDRESS	
C. ADDRESS	(i) Address
	(ii) House No. and/or Unit Number, if applicable
	(iii) Street Number, if applicable
	(iv) Street Name
	(v) Barangay
	(vi) City
	(vii) ZIP / Postal Code
	(viii) Region / Province
	(ix) State / Country
D. PHONE	
D. PHONE	(i) Phone Number
	(ii) Phone Number Type
E. EMAIL	
E. EMAIL	(i) Email

F. EMPLOYMENT	(i) Company Name
	(ii) Nature of Business
	(iii) Employment Type
	(iv) Occupation
	(v) Length of Employment
	(vi) Income in Php
	(vii) Company ID with ID No.
G. PURPOSE OF YOUR LOAN	
<p>Collecting the "purpose of loan" is a critical compliance measure under the Anti-Money Laundering Act (AMLA) of the Philippines. This requirement helps financial institutions like us to:</p> <p>(1) Identify Suspicious Transactions: Understanding the purpose of a loan allows institutions to detect unusual or potentially illicit activities, such as loans being used to launder money or finance illegal operations; (2) Ensure Transparency: It ensures that the loan aligns with the borrower's declared financial capacity and legitimate business or personal needs, reducing the risk of misuse; (3) Comply with Reporting Obligations: Financial institutions are required to report suspicious transactions to the Anti-Money Laundering Council (AMLC). Knowing the loan's purpose aids in fulfilling this obligation effectively; and (4) Prevent Financial Crimes: By verifying the legitimacy of the loan's purpose, institutions contribute to the broader goal of preventing money laundering and other financial crimes.</p> <p>This practice aligns with the AMLA's objective to preserve the integrity of the financial system and ensure compliance with global anti-money laundering standards</p>	
H. USAGE DATA	
<p>While using our Mobile Application, in order to fully provide the features of our application, we may collect the following information, with your prior permission:</p> <p>a) FILES AND DOC Save Weloan's configuration and user information as well as picture information on your mobile device and upload your photo parameters, such as picture size and quantity, to help judge your loan eligibility.</p> <p>b) CAMERA Use the camera to take documents and / or photos required for the application and evaluation process.</p> <p>c) LOCATION</p>	

We need your device location authorization to collect location-related information, which includes the location method of the user device, location time, longitude, latitude, current location, location area code, etc. Using your location information, we will be able to check your credit rating as well as increase the security of your account. In the event that an abnormality is discovered, you will be notified promptly. We will upload the data to the server <https://tba.weloanpro.ph>.

d) PHOTOS AND VIDEOS

We need to verify your ID picture to determine your loan qualifications.

e) PHONE NUMBER

We will also obtain your local number to assist in identifying your identity to ensure the security of your account and funds. Once any abnormality is found, we will freeze your account in time and send you a notice in time. We will upload the data to the server <https://tba.weloanpro.ph>.

f) MOBILE PHONE/DEVICE

Upload and monitor the information about your device. The device information we need is the unique device identifier such as device name, model, region, status, language, device identification code, device software and hardware information, usage habits, IMEI, and serial number to confirm the uniqueness of the device and ensure the security of your account. The mobile device information will be encrypted and uploaded to our server for anti-fraud services and credit evaluation only. We will not sell, trade or rent your contact information to any third party. We will upload the data to the server <https://tba.weloanpro.ph>.

g) BLUETOOTH

We require Bluetooth access to detect connected Bluetooth devices and prevent data leakage due to data transfer between Bluetooth devices.

h) CALENDAR

We also need you to grant read and write access to the calendar, which will allow us to alert you in advance of the repayment date to avoid late fees; At the same time, we will not delete or modify the information you have written, but only evaluate the loan schedule to confirm your loan eligibility.

i) COOKIES

We use cookies to identify you as a User and make your user experience easier, optimize our services, content and advertising; help you ensure that your account security is not compromised, mitigate risk and prevent fraud; and to promote trust and safety on our website.

Cookies allow our servers to remember IP addresses, date and time of visits, monitor web traffic and prevent fraudulent activities.

Our cookies never store personal or sensitive information; they simply hold a unique random reference to you so that once you visit the site we can recognize who you are and provide certain content to you. If your browser or browser add-on permits, you have the choice to disable cookies on our website, however this may impact your experience using our website.

I. OTHER USAGE DATA

(i) Comments, Questions, Requests and Orders you may make;

(ii) professional associations and registration numbers

	(iii) financial information needed to process loans and payments, such as credit card or account information or other banking information
	(iv) Location
	(v) With your consent, we may also collect additional Personal Information in other ways including emails, surveys, and other forms of communication. Once you begin using our services through your account, we will keep records of your transactions and collect information of your other activities related to our services. We will not share or disclose your Personal Information with a third party without your consent except as may be required for the purpose of providing you with our services or under applicable laws.
	(vi) We may retrieve additional Personal Information about you from third parties and other identification/verification services such as your financial institution and payment processor.
	(vii) With your consent, we may collect your email and mobile number for promotional and advertisement purposes.

4. PURPOSES FOR WHICH YOUR INFORMATION/DATA IS PROCESSED

The purpose for our collection of your information/data are as follows:



19th floor, Tycoon Centre Building, Pearl Drive, San Antonio, Ortigas Center, Pasig City

<p>A. PERSONAL INFORMATION</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> provide you with the required services; pursue the repayment of loans made to you; to maintain up-to-date records; to attend and manage your requests to us; for the performance of a contract between us; to respond to your questions or requests; to contact you by email, telephone calls, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications; improve features, website content and analyse data to develop products and services; address inappropriate use of our website; prevent, detect and manage risk against fraud and illegal activities using internal and third party screening tools; send you marketing content, newsletters and service updates created by us, however, we will provide you with an option to unsubscribe if you do not want to hear from us; verify your identity and the information you provide in line with our statutory obligations using internal and third party tools; resolve disputes that may arise, including investigations by law enforcement or regulatory bodies; any other purpose that we disclose to you in the course of providing our services to you;
<p>B. OTHER PURPOSES</p>	<p>For other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.</p>

<p>C. LIMITATION OF PURPOSE</p>	<p>We collect Personal Information for identified purposes, and provision of loaning service, and for which consent has been obtained. Such Personal Information cannot be reused for another purpose that is incompatible with the original purpose, except consent is obtained for such purpose.</p>

We collect your data and/or information for different purposes. For example, we may use it in the following ways:

- to communicate with you and internal parties, on a strict need to know basis, regarding your loan application, credit score, and/or other details related to the stated purpose;
- to update our consumer credit database;
- to verify your identity;
- to prevent fraud and unauthorized disclosures of your personal information;
- to record and demonstrate how we have conducted the dispute and complaint resolution process and arrived at a resolution;
- to comply with legal requirements;
- for research and development of products; and
- to conduct surveys and analytics.

5. HOW DO WE COLLECT YOUR DATA?

ARMORAK is committed to the principle that the knowledge and consent of the consumer are required for the collection, use or disclosure of information/data, except when authorized by law or as ordered by court. All ARMORAK users must obtain and secure the user’s authorization to release information before they can share any information about a user to ARMORAK.

Additionally, ARMORAK limits the Information/data collection and usage to data that is relevant, adequate, and absolutely necessary for carrying out the purpose for which the data is processed. It evaluates whether and to what extent the processing of Information/data is necessary and where the purpose allows, anonymized data will be used.



19th floor, Tycoon Centre Building, Pearl Drive, San Antonio, Ortigas Center, Pasig City

Finally, ARMORAK only collects and upload the users' information and data when the Mobile Application is running/opened. ARMORAK do not collect and/or upload when the subject users are not running the APP.

6. HOW DO WE USE/PROCESS/STORE YOUR DATA AND TO WHOM DO WE DISCLOSE THE SAME?

As stated in Number 4 of this Guidelines, ARMORAK shall not use or disclose personal information for purposes other than those for which it was collected, unless (i) with the consent of the consumer, (ii) the sharing of information is pursuant to an agreement between the parties or (iii) as required by law or ordered by the court.

We use your data for the purpose of, but not limited to:

- Evaluation and/or review of your loan application;
- Granting of your Loan Request;
- Furnishing Credit Reports and Scores;
- Credit investigation;
- Credit Reference Checks;
- Update Our Consumer Credit Database;
- Fraud and Identity Verification services;
- Delivering consumer information, lists, and other marketing products;
- Providing Credit Decision Support Services;
- Providing related services to ARMORAK Users;
- For research and development of products; and
- To conduct surveys and analytics
- share with service providers to monitor and analyze the use of our services, to contact you;
- share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of assets, financing, or acquisition of all or a portion of our business to another company;
- share Your information with our business partners to offer you certain products, services or promotions;

We disclose the data to all ARMORAK's affiliates and its business partners, including but not limited to, credit information bureau in the Philippines, whether public or private, banks, credit card companies, financial intermediaries, non-bank financial institutions, insurance companies, telecommunications companies, other utility companies.

As a multi-national corporation, information and data shared to ARMORAK may be processed, transferred to, used and stored on servers that may be located outside of the Philippines.

In providing you with the services, we may rely on third-party servers located in foreign jurisdictions from time to time, which as a result, may require the transfer or maintenance of your personally identifiable information on computers or servers in foreign jurisdictions. We will endeavor to ensure that such foreign jurisdictions have data protection legislation that is no less than the existing data protection regulations in force in the Philippines and your personally identifiable information is treated in a safe and secure manner.

Transfer of Personal Information out of the Philippines would be in accordance with the provisions of the Philippines Data Protection Regulation. We will therefore only transfer Personal Information out of the Philippines on one of the following conditions:

- Your consent has been obtained;
- The transfer is necessary for the performance of a contract between us and you;
- The transfer is necessary to conclude a contract between us and a third party in the interest of you;
- The transfer is necessary for reason of public interest;
- The transfer is for the establishment, exercise or defense of legal claims;
- The transfer is necessary in order to protect the vital interests of you or other persons, where you are physically or legally incapable of giving consent;

7. HOW LONG DO WE RETAIN YOUR DATA

ARMORAK adheres to the local privacy regulation and retains personal information for as long as necessary for the fulfillment of the stated purposes herein. After which physical records shall be disposed of through shredding, while digital files shall undergo purge protocols.

It should be noted that ARMORAK will retain your information for as long as your account is active or as needed to provide our services to you.

8. WHAT ARE YOUR RIGHTS UNDER THE DATA PRIVACY ACT OF 2012?

The Data Subject has the following rights under Republic Act 10173 otherwise known as the Data Privacy Act of 2012:

- **Right to be informed** – the data subject has the right to be informed whether personal data pertaining to him or her will be, are being, or were processed. The data subject should be notified by ARMORAK and shall give his or her informed consent prior to the collection, processing, sharing and storing of his or personal data.
- **Right to object** – the data subject has the right to object to the processing of his or her personal data, including processing for direct marketing, automated processing, or profiling. He or she should be given an opportunity to withhold consent in case of any amendment to the information supplied to the data subject under the right to be informed. The personal information controller (PIC) should not process the personal data without consent unless:
 - The personal data is needed pursuant to subpoena;
 - The collection and processing are for obvious purposes, including, when it is necessary for the performance of or in relation to a contract or service to which the data subject is a party, or when necessary or desirable in the context of an employer-employee relationship between the collector and the data subject; or
 - The information is being collected and processed because of a legal obligation.

- **Right to Access** – the data subject has the right to reasonable access to, upon demand of the following:
 - Contents of his or her personal data that were processed;
 - Sources from which personal data were obtained;
 - Names and addresses of recipients of the personal data;
 - Manner by which such data were processed;
 - Reasons for the disclosure of the personal data to recipients, if any;
 - Information on automated processes where the data will, or is likely to, be made as the sole basis for any decision that significantly affects or will affect the data subject;
 - Date when his or her personal data concerning the data subject were last accessed and modified; and
 - The designation, name or identity, and address of the personal information controller.
- **Right to erasure or blocking** – the data subject has the right to suspend, withdraw or order the blocking, removal, or destruction of his or her personal data from the personal information controller’s filing system. This right may be exercised upon discovery and substantial proof of any of the following:
 - The personal data is incomplete, outdated, false, or unlawfully obtained;
 - The personal data is being used for a purpose not authorized by the data subject;
 - The personal data is no longer necessary for the purposes for which they were collected;
 - The data subject withdraws consent or objects to the processing of his or her information, and there is no other legal ground or overriding legitimate interest for the processing;
 - The personal data concerns private information that is prejudicial to data subject, unless justified by freedom of speech, of expression, or of the press or otherwise authorized;
 - The processing is unlawful; or
 - The personal information controller or personal information processor violated the rights of the data subject;



19th floor, Tycoon Centre Building, Pearl Drive, San Antonio, Ortigas Center, Pasig City

9. HOW DO WE SECURE AND PROTECT YOUR DATA?

ARMORAK implements strict security measures that ensure the availability, integrity, and confidentiality of Personal Data, including but not limited to the implementation of reasonable and appropriate organizational, physical, technical, administrative, procedural and security measures to protect Personal Data against any loss, unauthorized use, access or disclosure and Security Breach as prescribed in the Data Privacy Act, its IRR, and circulars issued by the NPC.

Data collected are encrypted and uploaded to our server, the server address is <https://tba.weloanpro.ph>. we do not trade with third parties, but we may share your information with trusted third parties to provide services such as payments, loan identity verification, etc. to serve you.

10. CONTACT US.

If you have any comments with regards to our Privacy Guidelines, you may reach ARMORAK LENDING INC. through:

Via mail:	ARMORAK LENDING INC. 19 th floor, Tycoon Centre Building, Pearl Drive, San Antonio, Ortigas Center, Pasig City, 1605, Metro Manila, Philippines.
-----------	---



19th floor, Tycoon Centre Building, Pearl Drive, San Antonio, Ortigas Center, Pasig City

Via Electronic Mail:	<p><i>For deletion of account or other concerns:</i></p> <p>service@weloanpro.ph CUSTOMER SERVICE REPRESENTATIVE 19th floor, Tycoon Centre Building, Pearl Drive, San Antonio, Ortigas Center, Pasig City, 1605, Metro Manila, Philippines.</p> <p><i>For Data Privacy Concern:</i></p> <p>Dataprotection@armorak.com DATA PROTECTION OFFICER (DPO) 19th floor, Tycoon Centre Building, Pearl Drive, San Antonio, Ortigas Center, Pasig City, 1605, Metro Manila, Philippines</p>
----------------------	---

*****nothing follows*****