

Privacy Notice

At Sumitomo Mitsui Banking Corporation, we recognize the importance of the personal data of individuals (collectively, "Data Subject") which may have been provided to us or we may have had access to in relation to our dealings with you or your personal information controllers (such as your companies, employers and/or principals) (each and collectively, "You" or, as applicable, "Your"). Please note that reference to the "Data Subject" may include his/her heirs and assigns, when applicable.

This Privacy Notice aims to explain some of our policies pertaining to the privacy of the Data Subject's personal data, all of which we have adopted as our commitment to respecting, maintaining, protecting and safeguarding the privacy of such personal data entrusted to us. Please note, however, that nothing here should be construed to impose on us a higher degree of responsibility over data privacy than those prescribed by applicable data privacy laws.

We will collect, use, process, share, disclose, transfer and retain such personal data in accordance with applicable data privacy laws, this Privacy Notice and/or our other privacy notices (as they may be amended from time to time) (collectively, the "Privacy Notices") and the data privacy terms in Your agreement(s) with us.

Please also refer to the data privacy terms in Your agreement(s) with us (collectively, the "Privacy Agreements"), including, but not limited to, Your Data Sharing Agreement with us and Your other agreements with us for other information in relation to the collection, use, processing, sharing, disclosure, transfer, and retention (collectively, "Processing" or, as applicable, "Process", "Processed" or "Processes") of the Data Subject's personal data (including, but not limited to, Your banking agreements, service agreements, vendor agreements, employment contracts and/or applications for employment with us).

For applicants for employment with us, please note that, without limiting any agreement between us, consent by You and/or undertaking by You, we will consider your voluntary application with us as consent to the contents of this Privacy Notice.

What Kind of Personal Data We Process and How We Collect Them

We only Process personal data which we believe to be relevant and/or is required with your transactions or dealings with us and to conduct our business.

To generally conduct our business and/or operations or otherwise transact, deal with and/or communicate with or in relation to You, we may need, may be required, find it proper to, and/or automatically Process the personal data of Your Data Subjects. As applicable to You, the personal data we Process depend on our relationship and dealings with You, and may include, but are not limited to:

- a. **Personal and/or work identification and contact information:** names, addresses, contact details (e.g. email addresses or contact numbers), sex, date of birth, age, nationality, citizenship, occupation, designation, signatures, biometrics (e.g. thumbprint), government-issued identification numbers, identifying documents or cards, images, and voice recordings;
- b. **Financial and ownership information:** bank account details, taxation data and documents, credit information and documents, other financial statements and documents, and/or stockholdings or proprietorship;
- c. **Health, movement and access information related to the access of our facilities or online services:** location of person and device, IP address, other location or device identifiers (e.g. device type, Bluetooth or WiFi access, hardware information, operating system) security and account information, and other information on behavior and access to our premises (e.g. time, duration, manner of visit or access);
- d. Other personal data you provide us voluntarily or incorporated in any information or documents you provide or make available to us.
- e. Other personal data required or allowed to be Processed without consent by applicable laws and regulations such as, but not limited to, Republic Act. No. 9510 or the Credit Information System Act or Republic Act No. 9160 (as amended) or the Anti-Money Laundering Act of 2001.

For employees or applicants for employment, in addition to those enumerated above, we will also Process the personal data relevant to your employment or application, including:

- a. **Employment information:** employment and/or work history, educational background, resumés, years of service, work location, employment ID, work records, bank account details, work references, ratings, evaluations, skills and competencies, and/or other work-related qualifications, compensation, fees and benefits, work responsibilities, work schedules, security and account information (e.g. log-in, password, security keys or codes), use, behavior, access, (e.g. time, duration or manner) of our applications, websites, programs, products and services, and other relevant work, educational, and/or training information (e.g. diplomas, certificates, licenses, disciplinary records, background check reports, and employer and government-issued clearances);

- b. **Information regarding Your family members, dependents and/or emergency contacts:** general identifying information and contact details;
- c. **Health records:** information contained or related to annual physical examinations, executive check-ups, pre-employment medical testing and/or drug testing; and
- d. **Interactions with us online through social media:** behavior and access in relation to our social media, and public posts, responses and activities in social media related to us.

These personal data may include, but not be limited to, sensitive personal information or privileged information.

We may obtain such personal data from You or from a variety of sources on our own and/or through Contractors (as defined below), including, but not limited to:

- a. through Your relationships and/or other dealings with us or Your information or documentary submissions to us, including, but not limited to, information provided by you in identification documents, application forms, agreements, corporate and financial documents (e.g. secretary's certificates, powers of attorney, financial statements, general information sheets, articles of incorporation, by-laws);
- b. through communications with us or our representatives in any form or medium (including, but not limited to, those made on Your behalf by other persons) and/or any voluntary disclosures of Your information and/or documents (including, but not limited to, those provided by or through your devices);
- c. from Your transactions with us, availing of and/or subscription to our products and/or service, provision of service and/or goods to us, entry and/or access to our premises (e.g. through security measures and/or surveillance devices or systems, such as, without limitation, CCTV, biometric readers), use and/or access of our applications, websites, programs, devices, WIFI, and/or social media (including, but not limited to, those made on Your behalf by other persons), and/or other interactions with us; from relevant governmental, arbitral, or other regulatory authorities or bodies, credit agencies or credit bureaus, or public sources and/or referrals from other persons.

Why and How We Process Your Data Subject's Personal Data

We may Process the Data Subject's personal data for one or more of the purposes and objectives mentioned in our Privacy Notices and/or Privacy Agreements (collectively, "Purposes"), including, but not limited to:

- a. compliance with any law or regulation, and/or any order, requirement, or request of any governmental, arbitral, or other regulatory authority and/or body in any jurisdiction, and/or the policies or procedures adopted by us in relation to the same (including, but not limited to, the United States Foreign Account Tax Compliance Act, the Credit Information Systems Act, Bangko Sentral ng Pilipinas Manual of Regulations for Banks, anti-money laundering, counter terrorist financing, sanctions, "know your customer", labor and/or social welfare laws, regulations, requirements and/or procedures, governmental requests for information, liens or garnishments and/or tax compliance);
- b. the promotion and/or provision of any service or product to You and/or Your provision of any service and/or products to us, (including, but not limited to, our evaluation on Your eligibility and/or suitability, due diligence, and/or credit and/or other reviews), the carrying out, processing, implementing and/or giving effect to Your transactions and/or Your agreements, applications, instructions, inquiries, requests, and/or communications with us, and/or for such other commercial or operational purposes permitted by law;
- c. the potential or actual transfer or entry into any other contract in relation to our rights and obligations under or in connection with any agreement and/or contract You may have with us (including, but not limited to, mergers and acquisitions, other restructurings, assignment and/or novation) and/or any outsourcing, consultancy, advisory, management, subcontracting, and/or other arrangement we may enter into in relation to our business and/or operations (including, but not limited to, credit and/or financial, information technology, banking operations and/or processing services, payments and/or fund transfers, pick-up and/or

- delivery, legal and/or regulatory, and/or tax and/or audit services;
- d. any dealings You may have or You may propose to have with other financial institutions and/or compliance with the requirements and/or requests of any credit agency or credit bureau (including, but not limited to, to enable them to conduct due diligence, credit and/or other checks on You);
 - e. exercise of remedies available to us or the enforcement and defense of our rights and/or Your obligations (including, but limited, to any actual or potential disputes, consultations, evidence-gathering, litigation and/or pre- and/or post-litigation matters, enforcement of any collateral, credit protection and/or security);
 - f. our internal operational requirements and/or any purposes related to the management, administration, and maintenance of our actual and/or potential relationships with You (including, but not limited to, reviews and/or due diligence, accreditation, internal, regulatory and/or external audits, examinations and/or inspections, record-keeping, retention requirements, background or medical checks, reference or credit checks, internal or external communications or reporting, health and/or safety measures and/or programs, security and/or surveillance measures, systems and/or other repairs and/or maintenance, compliance with internal policies and/or procedures, workplace management, travel and expense programs, insurance, risk management, statistical, analytical and/or research purposes, satisfaction, quality, credit and/or other monitoring and/or operation and/or maintenances of our websites, programs, applications, systems, devices and/or social media);
 - g. purposes permitted by our policies, as may be adopted and/or amended from time to time and made available (in any manner or form) to You (including, but not limited to, data privacy and/or the Processing of personal data); and/or
 - h. purposes incidental or analogous to the Purposes and/or consented, authorized, confirmed, permitted, requested, and/or instructed by You and/or other purposes not contrary to law.

For employees or applicants for employment, in addition to those enumerated above, your personal data will be also be Processed in connection to or with:

- a. the evaluation of Your application for employment, or assessment of your employment contract or other agreement with us;
- b. Your potential or actual position and the work to be rendered;
- c. our hiring, management or supervision of our employees (including, but not limited to, workforce administration, payroll, compensation and benefits programs, performance management, learning and development; discipline and supervision, and other human resource management matters); and
- d. the carrying out, processing or giving effect to or effecting any dealings requested or authorized by You or contemplated by Your application for employment, employment contract or other agreement with us;

For our Processing for any purpose other than the Purposes, we will ask for the Data Subject's consent, authorization, confirmation or permission and/or notify You as may be required by applicable data privacy laws and regulations.

We may Process the personal data in different ways, including, but not limited to:

- a. manual Processing, such as, without limitation, where original or hard copy documents are Processed by our employees and/or Processing in person over our counters;
- b. digital and/or electronic, such as, without limitation, where we Process information secured and/or accessed digitally and/or electronically and/or in soft copies and/or through our programs, systems, websites, electronic mail, facsimile, social media;
- c. automatic Processing, such as, without limitation, automatic Processing by devices, systems, back-up procedures, and/or through the use of our websites, applications, cookies, social media, programs, WiFi, Bluetooth, and/or other digital and/or electronic channels;
- d. Processing singly, such as, without limitation, the Processing of the personal data of a single Data Subject or the individual of personal data;
- e. Processing in aggregate, such as, without limitation, the processing of different personal data and/or the personal data of different Data Subjects, batch Processing, and/or aggregating of personal data from different sources;
- f. Processing in-house, such as, without limitation, Processing by our Manila Branch and/or by any of our offices, subsidiaries and/or affiliates (and/or our or their employees, officers, and/or agents); and/or
- g. Processing through personal information processors and/or other personal information controllers, such as, without limitation, outsourcing to, dealing with, and/or engagement of contractors, subcontractors, service providers, consultants, advisers, third parties, suppliers, and/or vendors where the latter will, as the main service and/or product and/or incidental and/or in relation to the service and/or products, Process Your personal data.

As our company and group operates in many locations, our Processing may be carried out by our Manila Branch in the Philippines and/or by our other offices (head, branch, representative office or otherwise), holding companies, subsidiaries and/or affiliates in other locations (collectively, "Offices" and each, an "Office"). Examples of these include, but are not limited to, the following:

- a. our operational functions and/or processing may be carried out by different Offices (e.g. transaction processing, credit review);
- b. Your applications, availments of our products and/or services, agreements and/or transactions with us may require consultation with, reporting to and/or approval of different Offices (e.g. credit applications, exceptions handling);
- c. our databases, repositories, storage, systems, applications, programs, websites, and/or social may be centralized regionally or globally and/or managed by, and/or accessible to, different Offices; and/or
- d. Your transactions, agreements and/or availments of services and/or products with us may be considered cross-border (e.g. where more than one Office is a party, where internally there is an Office facilitating a transactions booked in another Office, where the product and/or service will be provided and/or performed by different Offices).

Rest assured, each of our office, subsidiary and/or affiliate strives to be compliant with data privacy laws and regulations. Please refer to our company's, subsidiaries', and affiliates' website, privacy notices, and privacy policies and Your agreements with us and our subsidiaries and affiliates to know how Your personal data is Processed by our different offices, subsidiaries and affiliates in their locations.

We may also outsource some of our operations, deal with third parties, and/or engage contractors, subcontractors, service providers, consultants, advisers, third parties, suppliers, agents, and/or vendors (collectively, "Contractors"). These Contractors may, as the main service and/or product and/or incidental and/or in relation to the service and/or products, Process Your personal data.

Examples of these Contractors include, but are not limited to, lawyers, auditors, tax consultants, messengers, guards, receptionists, nurses, IT engineers and/or consultants, agent, correspondent, intermediary and/or beneficiary banks and/or recruitment agencies, headhunters, partner clinics and/or hospitals, drug testing companies, insurance companies and/or agents, health maintenance organization. Examples of the services and/or products include, but not be limited to, fund transfers, payments, banking, operations, digital services, trade, administration, management, information technology, pick-up and/or delivery, storage (manual, cloud, internet, intranet and/or other electronic and/or digital means), recordkeeping, ICT, systems installation, maintenance and/or repair, software, hardware, databases, security, finance, procurement, training, background checks, credit checks, taxation, auditing, health, safety and/or legal.

Where we directly engage these Contractors, they are generally made subject to an accreditation, due diligence, and/or regular evaluation process and we generally require adherence to data privacy laws where transfer of personal data is anticipated and confidentiality obligations where transfer of confidential information is anticipated.

There may be instances where we do not directly engage these Contractors and/or do not have a contract or may be required to enter into a non-negotiable contract with them, including, but not limited to, where there is no other Contractor or limited Contractors for that service and/or product and/or if the Contractor is mandatorily required by and/or accredited with the regulators, laws and/or regulations. In those cases, applicable data privacy laws will apply.

Access and/or Disclosure of Your Personal Data

To carry out our Processing and/or our Purposes, including, but not limited to, to generally conduct our business and/or operations or otherwise transact, deal with and/or communicate with or in relation to You, we may share, transfer, grant access to or disclose information about You and/or Your transactions with us (including, but not limited to, the personal data of Data Subjects) to one or more of the persons mentioned in our Privacy Notices and/or Privacy Agreements (collectively, the "Permitted Recipients"), including, but not limited to:

- a. our Offices who may disclose and/or otherwise Process the personal data in the same manner as us and/or in accordance with the Privacy Notices and/or Privacy Agreements and/or in accordance with their own privacy notices and/or privacy agreements with or made available to You;
- b. any authority in any jurisdiction, including, but not limited to, any central bank, tax, or other fiscal or monetary authority;
- c. any actual or potential assignee or transferee in relation to our rights and/or obligations under and/or in connection with any of Your agreements or contracts with us and/or the relevant transaction and/or any person with whom we may enter into any contractual relations in relation to our rights and/or obligations under and/or in connection with Your agreement(s) with us;
- d. any security provider or person that has provided security or credit support for Your obligations to us, any provider of credit protection in relation to our rights and/or obligations in relation to any of Your agreements with us and/or any insurance broker or insurer (whether ours, Yours, or Your security provider's);
- e. our Contractors (including, but not limited to, any host server or storage provider or service provider) and/or any personal information processors (in the event we outsources our Processing) ;
- f. any person where required by or pursuant to any law, regulation and/or upon the order or request of any court, tribunal, arbitrator, administrative agency or regulatory body (including, but not limited to, the Credit Information Corporation, any self-regulatory organization or stock exchange) and/or in connection with any dispute or action taken or contemplated against You or any security or credit support providers or in connection with any products, services, or facilities made available to You;
- g. any financial institution with which You have or propose to have dealings with, any credit bureau or credit agency, and/or internal or external auditors (whether ours or Yours);
- h. any trade repository or clearing house in connection with any derivative transaction;

- i. any other person where we have secured a consent from You or the relevant Data Subject, or to whom we are under a duty to disclose; and/or
- i. any person for the purpose of giving effect to Your transactions with us (including, but not limited to, such information as may be requested or required by agent, correspondent, intermediary or beneficiary banks, or other persons for the purpose of effecting payment or transfers of funds).

For employees or applicants for employment, in addition to those enumerated above, we may also share, transfer, grant access to or disclose information about You to any person for purposes in relation to the application for employment with us, our hiring, management or supervision of our employees, and/or as may be permitted by the application for employment, employment contract or other agreements with us and/or in accordance with our policies.

Our disclosures will be subject, at all times, to the degree of confidentiality as prescribed by applicable laws and regulations.

The Permitted Recipients may also Process the personal data for purposes similar or analogous to the Purposes, for purposes in their own privacy notices and/or agreements with or made available to You, or other purposes permitted by applicable laws or regulations, in the volume and frequency necessary or proper given such purposes and/or in accordance with their own privacy notices and/or agreements with or made available to You. We or the Permitted Recipients may Process the personal data within or outside of the Philippines and, in cases outside of the Philippines, may Process in the manner required by the laws of the country where the Processing is being carried out.

Your submission of, grant of access to, and/or publication of Your information through the internet (including, but not limited to, our website and/or our social media) may be available through the internet and/or accessible by different persons in different locations. We have no control over and are not responsible for the Processing of Your information if Your submission, grant of access, and/or publication is made through a public platform and/or using unsecure, public, and/or third party channels.

If our websites or social media have hyperlinks or references to third party websites and/or social media, You are advised to check the privacy policies, notices, and/or agreements of those third parties as we likewise do not have control over and are not responsible for the Processing of Your information by such third parties.

Security of your Data Subject's Personal Data

We place great importance on ensuring the security of personal data entrusted to us. We regularly establish, review, implement and update reasonable and/or appropriate technical, physical, and/or organizational security and/or precautionary measures and/or safeguards for the Processing of confidential information (including, but not limited to, Your personal data).

We are also a highly regulated entity subject not only to data privacy laws and/or regulations, but also bank secrecy and/or confidentiality laws and/or regulations and/or banking laws and/or regulations requiring us to have policies, and/or procedures in place in relation to confidentiality, bank secrecy, data privacy, information security, and/or risk management.

Some of our technical, physical, and/or organizational security and/or precautionary measures and/or safeguards include, but are not limited to:

- a. physical locks, posted guards and/or receptionists, multiple custodian access, biometric, key card access, CCTV and/or other surveillance equipment (including, but not limited to, to our premises, rooms for employees and/or systems, cabinets);
- b. password-protected systems/ files, multi-factor authentication on remote access connection, programs, and/or databases, regular systems access review, and/or encrypted information and/or transmissions (e.g. Secure Socket Layer or SSL);

- c. regular security scanning, anti-malware controls, penetration testing, cyber monitoring, security operations and incident response management, and/or testing of our systems and/or websites to check for, among others, vulnerabilities to cyber-attacks.
- d. use of secured servers, threat protection appliances and/or applications, and/or network security devices, periodic system and application log reviews and system hardening
- e. policies and/or procedures which include, but are not limited to, information security risk control measures, data breach management, and/or disclosure, access, storage, disposal, retention, return, fraud, and/or data integrity and/or security of confidential information (including, but not limited to, personal data); and/or
- f. regular training of employees in confidentiality, bank secrecy, data privacy, information security, and/or risk management, including, but not limited to, handling personal data in a secure manner.

Please note, however, that despite taking reasonable and adequate precautions, safeguards and/or security measures, some platforms (including, but not limited to, the internet) will not be fully secured.

Retention and Disposal of the Personal Data

We will retain Your personal data for the period and the extent required and/or permitted by the Privacy Notices and/or Privacy Agreements (collectively, "Retention Periods"), including but not limited to, for as long as reasonably necessary or proper in connection with:

- a. the Processing and/or Purposes mentioned in our Privacy Notices and/or Privacy Agreements, including, but not limited to, retention for of the personal data for the term of our contracts, agreements, transactions, and/or engagements with You;
- b. applicable laws and/or regulations (including, but not limited to, "know your client" requirements, anti-money laundering regulations, tax compliance, and regulatory disclosures), and/or the order or request of any court, tribunal, arbitrator, administrative agency or regulatory body (including, but not limited to, any self-regulatory organization or stock exchange), including, but not limited to, the extent required and/or permitted by any of the foregoing;
- c. the establishment, exercise, and/or assertion of our rights, remedies and/or claims; our defense in relation to any claims and/or actions against us; and/or any dispute or action involving us in any manner;
- d. our internal operational, policy, management, administration, and maintenance requirements (including, but not limited to, technical, systems, security, record-keeping, health and/or safety, risk management, insurance, audit, monitoring, security and/or surveillance measures and/or limitations)

We may retain the personal data in any manner, including, but not limited to, manual, electronic, and/or digital formats. We may also store, Process, and/or transfer any information (including, but not limited to, personal data) in, to, and/or using manual storage services, electronic or digital services, and/or cloud services which may be hosted and/or provided by any of our Offices or by any of our Contractors within or outside of the Philippines.

After the Retention Periods, we may destroy, dispose, discard or return the personal data in any reasonable, practicable or proper manner as we understand to be permitted by law (including, but not limited to shredding of documents, deletion of files, physical, electronic and/or digital return). We take reasonable measures to ensure return, destruction disposal or discarding of personal data is reasonably secure and proper and will reasonably prevent or make impracticable or improbable further Processing, unauthorized access and/or disclosure. We will not be obliged to return or destroy said personal data if not reasonably possible or practicable (e.g. systems limitations, publication where retention is not within our control, such as, but not limited to, the internet or social media).

Rights of the Data Subject

Data Subjects have the following rights under data privacy laws and regulations:

- a. Right to be informed of the Processing of their personal data, such as through the Privacy Notices and/or Privacy Agreements;
- b. Right to object to the Processing of their personal data;
- c. Right to access information on the Processing of their personal data;
- d. Right to have their personal data corrected or rectified in case of any errors or inaccuracies;
- e. Right to request for the erasure, return, or destruction of their personal data;
- f. Right to be indemnified for damages sustained due to such inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal data;
- g. Right to data portability and to obtain a receipt or proof of transmission of their personal data provided by us to another organization, in a machine-readable form; and
- h. Right to complain or raise concerns with our Data Protection Officer and to avail of further remedies before the National Privacy Commission (“NPC”) in case we are unable to adequately address the Data Subject’s concerns.

We recognize and uphold the rights of Data Subjects. Should You have any request or instruction (each, a “Request”, collectively, “Requests”) in relation to Your personal data (including, but not limited to, the exercise of the Data Subject’s rights, information requests, access to or rectification, suspension, withdrawal, blocking, removal or destruction of the personal data), such Request should be addressed to our Data Protection Officer.

Your Requests may, however, be subject to applicable laws and regulations, the Privacy Notices, Privacy Agreements, and/or our policies, procedures, restrictions, and/or requirements, which may include, but not be limited to:

- a. that the Request be in good faith, for a reasonable purpose, and within a reasonable scope;
- b. that the Request be subject to our verification measures and/or requirements, including, but not limited to, identifying You as the Data Subject (if Your personal data was shared to us by another person, this can include, but not be limited to, requiring the endorsement of such person);
- c. that the Request be in writing, indicates the specific purpose and scope of the action requested, and, if required by us, accompanied with satisfactory proof that such action requested is warranted;
- d. that the Request be received by us in advance (in the period required by us or, if no period is required, a reasonable period) prior to the proposed date of the action requested and indicates such proposed date of the action requested;
- e. that the Request and/or proposed date of the action requested is subject to our approval as we may have to carry out preliminary action, including, but not limited to, assessing the feasibility, validity and/or legitimacy of the Request, compliance with our requirements, impact on other information (including other personal data or confidential information), preparing access and/or isolating the data;
- f. that the Request, the action requested (including, but not limited to, proposed dates and/or times), and/or the period for complying with the Request be within our banking hours, during banking days, and/or within reasonable times, days, periods, and/or schedules;
- g. that the manner, format and/or method of performance of the action requested shall be determined by us and/or be subject to our approval as we may have to determine the same in relation to different factors, including, but not limited to, our obligations of confidentiality to You and/or other persons (whether under the law, contract or otherwise), security and/or surveillance measures, health and/or safety requirements, legal and/or regulatory obligations, and/or preserving the integrity and confidentiality of the information;
- h. that You be subject to and observe our security, confidentiality, privacy and/or other policies and procedures;
- i. that the Request be subject to the personal data still being retained by us in a form that can be practicably and/or reasonably acted on;
- j. that the Request be subject to any processing and/or fees (including, but not limited to, any costs for producing copies);
- k. that the Request will not cause or threaten to cause: (1) us to breach our obligations to other persons or another person’s rights under applicable laws or regulations or otherwise; (2) a security breach or otherwise adversely impact our security; (3) information held by us to

- become false, inaccurate, unintelligible or misleading; (4) a failure or error in our systems; or (5) a violation of our intellectual property rights, proprietary rights, and/or privacy or confidentiality rights;
- l. any action that shall be requested by the Data Subject may be denied by the Bank: (1) when the requests are recurring within a short time interval, (2) where granting such request could compromise the privacy of another person or unreasonably expose sensitive, confidential and/or proprietary Bank information, (3) where there are any similar or analogous circumstances or where there are other reasonable circumstances justifying the denial, and/or (4) pursuant to any of our agreements with the Bank and/or the Bank's policies; and/or
 - m. that we may take measures to redact or prevent the disclosure of trade, industrial and/or other business secrets, confidential and/or proprietary information, and/or any other information the disclosure of which could endanger or compromise our information systems, and/or expose to harm the confidentiality, integrity, and/or availability of information (including, but not limited to, personal data) under our control or custody.

Please note that, as we have no control over Your Requests, Your Requests may increase our risks, and/or the same may have impact on our business, operations and/or dealings with You and/or others, You may be required to hold us free and harmless and indemnify us for any claims, losses, expenses or liabilities we may incur in connection with Your Requests.

We take reasonable steps to ensure that personal data is accurate, complete, and current. Please note, however, that you have shared responsibility with regard to the accuracy of Your personal data and should timely update us of any changes to Your personal data. While we recognize and will uphold the Data Subject's rights to access and/or correct any personal data held by us, this may be subject to the requirements set out in our Privacy Notices, Privacy Agreements and/or our policies, procedures, restrictions, and/or requirements. Please also note that we may use our reasonable discretion in allowing the corrections requested and/or may require further evidence of the new information to avoid any fraud or inaccuracy.

Please note that the exercise of Your rights (including, but not limited to, withdrawal of Your consent to any part or aspect of the Processing may put us in a position where we can no longer transact, deal with and/or communication with or in relation to You (including, but not limited to, Your availments of our products and/or services, our engagements of Your services and/or availments of Your products, Your use of our platforms, systems, databases and/or programs).

Revisions to this Privacy Notice

This Privacy Notice may be revised from time to time, including, but not limited to, to update to reflect and/or ensure consistency with our business, operational, and/or legal or regulatory requirements. Notice of any revisions may be made available from time to time by any means of communication we deem suitable, including, but not limited to, through our website at: <https://www.smbc.co.jp/asia/philippines/>.

Data Privacy Concerns

If You have any queries, Requests, complaints and/or feedback as regards the Processing of Your personal data or for NPC investigations, You may contact our Data Protection Officer through the following contact details:

DATA PROTECTION OFFICER
Sumitomo Mitsui Banking Corporation – Manila Branch
Phone Number: 8880-7164
E-mail: SMBC_DPO@ph.smbc.co.jp

Mailing Address: 21st Floor, Tower One & Exchange Plaza, Ayala Triangle, Ayala Avenue, Makati City, Philippines 1226

