

## Manulife Philippines - Statement of Privacy Principles and Practices ("the Policy")

### At Manulife, we respect your privacy

Protecting your personal information and respecting your privacy is important to us. As a provider of financial products and services, the collection and use of personal information is fundamental to our business. Equally important is your trust in handling of your personal information.

To earn this trust, we abide by **Ten Privacy Principles**.

### Ten Privacy Principles

- 1. Accountability** We are responsible for personal information under our control. We have designated individuals who are responsible for monitoring our ongoing compliance with the Privacy Principles.
- 2. Identifying purposes** The purposes for which personal information is collected, will be identified by us, or through our or your authorized representatives.
- 3. Consent** Your consent is required for the collection, use and disclosure of personal information, subject to certain exceptions. Such exceptions include circumstances where legal, medical or security reasons make it impossible or impractical to seek consent. Your consent may be expressed in writing, it may also be given verbally, electronically or through our or your authorized representatives. In certain circumstances, it may also be implied.
- 4. Limiting collection** The collection of your personal information must be by fair and lawful means, and be limited to that which is necessary for the purposes identified.
- 5. Limiting use, disclosure and retention** Your personal information may only be used or disclosed for the purposes for which it was collected, other purposes you consent to, or as required or permitted by law. It may only be kept for as long as is necessary to satisfy the purposes for which it was collected, or as required or permitted by law.
- 6. Accuracy** Any personal information that is collected, used or disclosed should be as accurate, complete and as up-to-date as is necessary for the purpose for which it is to be used.
- 7. Safeguards** Personal information shall be protected by security safeguards that are appropriate to the sensitivity of the information, in order to protect your personal information from unwarranted intrusion, release or misuse.
- 8. Openness** Information about our privacy policies and practices for managing your personal information shall be made available to you.
- 9. Individual access** Upon written request, you will be informed of the existence, use and disclosure of your personal information, and you will be given access to it, subject to certain exceptions, as permitted by law. You may also verify the accuracy and completeness of your information, and request that it be amended, as appropriate.
- 10. Inquiries and concerns** you may contact us if you have any inquiries or concerns about our privacy policies and practices.

## What our customers should know about Manulife's privacy practices

### The information we collect

Personal information is information that refers to you personally.

For any Manulife product or service you obtain, we will tell you the purposes for which we need the personal information we collect.

We will use fair and lawful means to collect your personal information. We will only collect information that is pertinent and consistent with the purposes of the collection. Whenever practical, we will collect the required information directly from you, or from your authorized representative(s), in completed applications and forms, through other means or correspondence, such as the telephone, mail or the internet, and through your business dealings with us.

In some cases, and with your consent, we may need to ask an independent source to verify or provide supplemental information. These sources could include service providers we retain, other insurance companies or financial institutions, your employer or credit reporting agencies in the case of your medical or health-related information, additional sources could include your doctor(s), other healthcare providers or facilities.

If your information is being collected by telephone, the call may be recorded or monitored for the following reasons:

- to establish a record of the information you provide.
- To take or verify information from you.
- To maintain quality service level.
- To assist in staff training.

If you are not comfortable with having your telephone calls recorded, you have the option of communicating with us in writing instead. Where you have chosen to only communicate with us in writing, your written communication should request that any response to you be in writing as well.

### What we need to know and why

We collect information from you and about you, only with your consent, or as required or permitted by law. In general, we will collect personal information such as your name, address, telephone number(s) or other identifying information, such as your Tax Identification Number (TIN) or date of birth.

The type of additional information we gather will depend on the type of product or service involved. For example, it would depend on whether the product or service is insurance or investment related. The information gathered may be financial, which would include such information as place of employment, annual income, assets and liabilities. It may be investments or advice related, requiring information on such things as your financial goals and retirement plans. If you are applying for insurance or group insurance benefits, it may also include health information or lifestyle related information, such as your occupation, travel history and plans, driving record or criminal record.

Generally, we collect, use and disclose your personal information to:

- Confirm your identity, and to protect both you and us against errors, fraud or other misrepresentations.
- Evaluate your financial needs and determine the suitability of our products and services for you.
- Determine your eligibility for products and services.
- Properly administer the products and services we provide, including the assessment of claims.
- Comply with a variety of legal requirements such as the Anti Money Laundering Act of 2001 ("AMLA"), including any tax reporting obligations under National Internal Revenue Code.
- Assist us to understand the current and future needs of our customers, for example, to conduct customer surveys and other forms of market research and analysis.

We will only keep your personal information in our records for as long as it is needed to fulfill the identified purposes, or as required or permitted by law e.g. 5 years after termination of your policy as provided by the AMLA.

Personal information that is no longer required will be destroyed or erased.

When we destroy personal information, we will use safeguards to prevent unauthorized access to the information during the destruction process.

#### **YOUR TAX IDENTIFICATION NUMBER**

There are a number of reasons why we may ask for your Tax Identification Number.

Where there may be income to be reported, your TIN is required by law in order to meet tax-reporting requirement.

With your consent, we may also use your TIN as a unique identifier, to keep your personal information separate from that of other customers, or individuals with similar names, and to help maintain the integrity and accuracy of your personal information.

You may elect not to have your TIN used for purposes other than as required by law, however, as explained earlier, this may affect our ability to fully ensure the accuracy and integrity of your personal information.

#### **YOUR CONSENT**

We collect, use and share your personal information only for disclosed purposes related to the products and services we offer, and only with your consent, or as permitted or required by law. Your consent may be expressed in writing, or it may be given verbally, electronically, or through our, or your authorized representative(s), such as your financial services advisor.

You may withhold or withdraw your consent for us to collect, use and disclose your personal information, as long as there are no legal or contractual reasons preventing you from doing so. Depending on the circumstances, however, withdrawal of your consent may impact our

ability to continue to provide you with the products and services you have requested, or in the case of insurance and group insurance benefits, it may prevent us from keeping your coverage in force, or properly evaluating and processing any claims.

Generally, the disclosure of your personal information will be restricted to those who have a need for, and the right to, the information.

Your personal information will only be provided to, or be accessible by:

- Our employees, agents and representatives, who need the information in the performance of their duties for us.
- Our affiliates to
  - resolve your concern about any related products and services with us.
  - Assist in other required investigations
- Service providers, which need the information in the performance of their duties for us, and to satisfy their obligations to us.
- Any person or organization to whom you gave consent, and;
- Anyone who is otherwise authorized by law such as the Anti-Money Laundering Council and Bangko Sentral ng Pilipinas.

In some cases, your personal information may be provided to these people, organizations and service providers in other provinces or jurisdictions outside the Philippines, and would therefore be subject to the laws of those provinces or jurisdictions.

#### **Service Providers**

We may use service providers to provide us with various services such as printing, mail distribution, information technology, data storage, administration, marketing, (which would include market research and promotional services), paramedical, investigation and reinsurance. Where personal information is provided to our service providers, we will require them to

protect the information in a manner that is consistent with our privacy policies and practices.

### **Accessing and amending your information**

We will make all reasonable efforts to ensure that any personal information we collect and keep is as accurate, complete and as up-to-date as required for the identified purposes. To do so, we will rely to a large extent on you to provide us with accurate information and to inform us of changes, such as changes in your contact information. You have the right to access and verify your personal information maintained in our files, and to request that any factually inaccurate personal information be corrected, if appropriate. Depending on the circumstances, we may not always be able to give you access to all information, or there may be a charge for personal information that you request. Should this happen, we will let you know.

### **We are committed to protecting Your information**

We are committed to protecting your personal information from unauthorized access or use, by ensuring that the necessary physical, organizational and technological safeguards are in place, that are appropriate to the sensitivity of the information. Essentially this means that personal information is protected:

- Physically, by building security measures and physical barriers;
- Organizationally, by our policies, procedures and access levels, and
- Technologically by, for example, where appropriate, the use of passwords, encryption, firewalls and anti-virus.

All of our employees, representatives, agents and service providers, who act on our behalf, are required to abide by our privacy policies and practices.

If we receive a request to release your personal information, we will only do so upon satisfactory identification and proof of entitlement of the requestor, or as required or permitted by law.

### **Special Offers and marketing promotions... its your choice**

Some of our business areas may, from time to time, offer or promote their other financial products and services, or those of our affiliates and select third parties, that we believe may be of interest to you.

We will share personal information with our affiliates for these purposes, only if the law permits it.

Please note that we do not give your personal information, without your consent, to any organization outside of our member companies, for the purpose of that organization marketing their own products or services directly to you.

If you do not wish to receive our marketing offers or special promotions, you may choose to “opt out” by simply contacting us, and we will remove your name from our mailing lists. This means you will not be eligible to receive addressed, direct mail offerings. This opt-out will not extend to:

- Information included in or with monthly statements, which relate to any Manulife’s product or service that you currently have with or receive from us, or
- General product and service information and updates included in or with client statements.

To remove your name from any special mailing list that we maintain, please contact us by telephone or mail.

**Please note** When you contact us to remove your name and address from our marketing mailing lists, we will use all reasonable efforts to do so in a timely fashion. If you are applying for a new product or service, we will process your request immediately. Otherwise, if you have an existing product or service with us, we will generally require a reasonable period of time, which may vary, depending upon the product or service, to process your request.

### **Who we are**

In this Statement of Privacy Principles and Practices, “we”, “us and “our” mean The Manufacturers Life Insurance Co. (Phils.), Inc, Manulife Financial Plans and Manulife Chinabank Life Assurance Corporation. “You” and “your” mean individuals whose personal information we are collecting, using and disclosing.

**Contact Us**

If you have any questions or concerns about our privacy policies and practices, or you want to know more about the process for accessing and/or correcting your personal information, or opting out of marketing offers, please contact us:

Mail: Privacy Officer  
Legal & Compliance Department  
The Manufacturers Life Insurance Co. (Phils.), Inc.  
24/F LKG Tower  
Ayala Avenue  
Makati City 1226