

## Data Privacy Policy

This Privacy Policy governs the way Blue Fin Lending Asia Inc collects, uses, maintains, and discloses information collected from users (each, a “User”) of [www.ipera.ph](http://www.ipera.ph), and [www.ipera.com.ph](http://www.ipera.com.ph) (“Websites”). The policy has been developed to be compliant with the principles defined within “**Republic Act 10173 – Data Privacy Act of 2012**”. This privacy policy applies to the website and all products and services offered by Blue Fin Lending Asia Inc.

The Lender is Blue Fin Lending Asia Inc and loans will be issued by this company only.

This privacy policy together with our Terms of Use, Terms and Conditions, and Loan Agreement applies to your use of:

1. Blue Fin Lending Asia Inc website,
2. Any of the services accessible through other sites of ours or other third-party Sites (Service Sites).

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By applying for a loan, you confirm that you have read, understood, and accept the terms of this policy set out hereunder. You also consent to the collection, use, storage, processing, and disclosure of your personal information in the manner set out in this policy.

- **A. Information we collect from you. We may collect and process the following data about you.**

1. **Information you give us about you (Submitted information)**

This may include information:

- provided by filling in forms when visiting our sites or speaking to our representatives
- provided by corresponding with us (for example, by e-mail or messages);
- provided by subscribing to any of our Services (such as applying for a loan), sharing data via social media or email account for application logins, reporting a problem with the website.

2. **Information we collect about you.**

Each time you visit one of our sites we may automatically collect the following information:

- technical information, including the type of device you use, unique device identifiers (for example, your Device’s IMEI or serial number), your Device’s operating system, the type of browser you use, or your Device’s location and time zone setting (Device Information);

Each time we see you face to face we may collect the following information:

- clothes, Company ID, time of day, schedule, location, proximity to work or to home, people in the meeting, contact information used to make contact.

3. **We need access to some information to be able to offer you a loan. How We Use Collected Information?**

Blue Fin Lending Asia Inc may collect and use Users personal information for the following purposes:

- **To Process Account Verification**

We may use the information Users provide about themselves for verification

purposes for the Users account. We do not share this information with outside parties except to the extent necessary to provide the service.

- **To Assess Credit Worthiness**

We may use the information provided during their loan application process, which includes additional current documentation related to financial activities, to access financial health and credit worthiness. This information is not shared with any outside parties except to the extent necessary to provide the services and facilitate payment and collection.

- **To Send Periodic Emails**

We may use the email address to respond to their inquiries, questions, and/or other requests.

**The data we collect from your application will help us offer you the right loan amount. The data collected would be safe and transported securely. We will also not share your data or sell it to anyone:**

- Geolocation: To get info if the borrower is within the Philippines;
- SMS Messages: We are sending notifications for your reference for every login and transaction done;
- Accounts: To reach out to you via email and phone numbers if we need to;
- Camera and Storage: To upload ids and document required during the application process.
- **Also, we are collecting data for the purpose:**
- To comply with applicable laws, regulations, legal processes, or government request including but not limited to Know Your Customer Principles, Customer Due Diligence, Anti-Money Laundering and Anti-Terrorism Financing
- To provide and maintain the Service
- To notify you about changes to the Service
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues

4. **Information we receive from other sources (Third Party Information).**

Due to the nature of the Services which we provide, we are required to work with a third party (including credit reference agencies) and we may receive information about you from them. This is to create an accurate credit scoring review that we use in our approval process.

5. **Unique application numbers.**

When you install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system and type of device, may be sent.

- **B. Tracking and cookies**

We may use mobile tracking technologies and/or website cookies to distinguish you from other users of the Service Sites. This helps us to provide you with a good experience when you browse any of the Service Sites and allows us to improve our Service Sites.

- **C. Uses made of the information**

We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this Policy for as long as it is combined. Information collected by us shall be used for the purpose of determining whether or not to provide a loan, the amount of such loan and the terms and conditions applicable to such loan. Save in compliance with Philippines Republic Act 10173 – Data Privacy Act of 2012, we do not disclose information about identifiable individuals to other parties, but we may provide them with anonymous aggregate information about our users (for example, we may inform them that 100 women over the age of 35 have applied for a loan on any given day).

- **D. Disclosure of your information**

We may disclose some or all the data we collect from you when you visit our website or meet our representatives face to face to credit reference bureaus or data analytics services.

We may disclose your personal information to any member of our group, which means our subsidiaries, affiliates, our holding company, and its subsidiaries.

We may disclose your personal information to third parties:

- if we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- if Blue Fin Lending Asia Inc or substantially all its assets are acquired by a third party, in which case personal data held by it about customers will be one of the transferred assets.
- if we are under a duty to disclose or share your personal data to comply with any legal or regulatory obligation or request; and/or
- to enforce our Terms and Conditions and other agreements or to investigate potential breaches; report defaulters to any credit bureau; or for the purpose of publishing statistics relating to customers.

**E. Where We store your personal data**

- The data that we collect from you may be transferred to and stored in a highly secured database which locations are not disclosed to anyone outside our higher management team. By submitting your personal data, you agree to the collection, transfer, storing or processing of your personal data in the manner set out above. We will take all steps reasonably necessary to ensure that your data is treated, stored, and processed securely and in accordance with this privacy policy.
- Where we have given you (or where you have chosen) a password that enables you to access certain parts of our service sites, you are responsible for keeping this password confidential. Do not share your password with anyone.
- It is important to note that your password (OTP) is the key to your account. If you do share your password with others, you will be responsible for all actions taken in the name of your account and the consequences. If you lose control of your password, you may lose substantial control over your personal information and other information submitted to us. You could also be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason or if you have grounds to believe that your password has been compromised, you should immediately contact us. We have

enabled an auto-session expiration process in case you forgot to log out your account as an added security measure.

#### **F. How We Protect Your Information**

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site. We employ security protocols, such as firewall and data encryption, and other internal controls which are meant to safeguard all our servers and information systems, including the data stored in these systems.

- The data we collect from you may be transferred to and stored in a highly secured database which locations are not disclosed to anyone outside the higher management team. By submitting your personal data, you agree to the collection, transfer, storing or processing of your personal data in the manner set out above. We will take all steps reasonably necessary to ensure that your data is treated, stored, and processed securely and in accordance with this privacy policy.
- It is important to note that your OTP is the key to your account. If you do share your OTP with others, you will be responsible for all actions taken in the name of your account and the consequences. We have enabled an auto-session expiration process in case you forgot to log out your account as an added security measure.

#### **G. Links to Other Sites**

Our Service does not address anyone under the age of 18 ("Children"). We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child or children have provided us with personal data, please contact us at [customersupport@ipera.ph](mailto:customersupport@ipera.ph). If we become aware that we have collected personal data from children without verification of parental consent, we shall take steps to remove that information from our servers.

#### **H. Your rights**

We will use your data for the purposes of compiling statistics relating to our user base or loan portfolio and may disclose such information to any third party for such purposes, provided that such information will always be anonymous.

- Right to Rectification: OTP's are auto-generated
- Right of Access, Erasure, and Restrict Processing: Users can request access or erasure of their personal information, as well as request restriction on further processing of their personal information by contacting us at [customersupport@ipera.ph](mailto:customersupport@ipera.ph). Please allow up to 30 days for requests to be processed. We reserve the right to charge a reasonable fee to process excessive or repeated requests.
- Right to lodge a complaint with a supervisory authority. Should you feel your data privacy rights are not being adequately protected by us, you have the right to lodge a formal complaint with the appropriate supervisory authority.

Should we wish to use your information for marketing purposes, we will inform you prior to such use. You shall be entitled to prevent such usage by informing us, within 10 days of being informed of the proposed use, that you do not wish to disclose such information.

#### **I. Changes to privacy policy**

Any changes we may make to this Policy in the future will be posted on this page and, where appropriate, notified to you. The new terms may be displayed on-screen, and you may be required to read and accept them to continue your use of the Services. By continuing to use any Services after the posting of any changes, you confirm your continuing acceptance of this Policy together with such changes, and your consent to the terms set out therein.

**Your Acceptance of these Terms**

By using this Site, or by agreeing to this policy face to face with our representatives, you signify your acceptance of this policy and terms of service. If you do not agree to this policy, please do not use our site, or speak to our agents and representatives. Your continued use of the site and continued communication following the posting of changes to this policy will be deemed your acceptance of those changes.

**Contacting Us**

If you have any questions about this Privacy Policy, please contact us at Unit 2206, Atlanta Centre, 31 Annapolis Street, Greenhills, San Juan, 1503 Email: [customersupport@ipera.ph](mailto:customersupport@ipera.ph)

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