

## **Privacy Statement**

### **Compliance Disclaimer**

**This Privacy Statement is issued in accordance with the Data Privacy Act of 2012 (Republic Act No. 10173) and its Implementing Rules and Regulations. While Functional Inc., located at 814 J.P. Rizal Street, Makati City, has been granted an Exception by the National Privacy Commission (NPC), we remain committed to upholding the principles of transparency, legitimate purpose, and proportionality as prescribed by law. Our practices are designed to meet or exceed the standards required for entities with full compliance certification.**

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### **Our Commitment**

**Functional Inc. is dedicated to protecting your privacy and ensuring the security of your personal information. Although exempted, we voluntarily adhere to the same rigorous standards and best practices observed by fully compliant organizations.**

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### **Legal Basis for Processing**

**We process personal information based on the following legal grounds:**

- Contractual Necessity – To fulfill obligations related to the services you have requested.**
  - Legal Obligation – To comply with applicable laws, regulations, and government requirements.**
  - Legitimate Interest – To improve our services, maintain security, and ensure operational efficiency.**
  - Consent – When you voluntarily provide information for specific purposes, subject to your right to withdraw consent at any time.**
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### **Data Collection and Use**

**We collect only the personal information necessary to deliver our services effectively. This may include, but is not limited to, your name, contact details, and other relevant information. All data collected is used solely for its intended purpose and in accordance with applicable laws and regulations.**

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## Data Protection

We implement robust technical and organizational measures to safeguard your personal information against unauthorized access, alteration, disclosure, or destruction. Our security practices align with the highest standards of data protection to maintain confidentiality, integrity, and availability.

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## Data Sharing and Disclosure

We do not share your personal information with third parties without your explicit consent, except when required by law or necessary to provide our services. Any third-party service providers we engage are bound by strict confidentiality agreements and must comply with our privacy standards.

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## Retention Policy

We retain personal information only for as long as necessary to fulfill the purposes for which it was collected, comply with legal obligations, or resolve disputes. Once the retention period lapses, data is securely deleted or anonymized to prevent unauthorized use.

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## Your Rights

You have the right to access, correct, or request deletion of your personal information held by us. For any concerns or inquiries regarding how your data is handled, please contact our Data Protection Officer:



**Functional Inc.**

814 J.P. Rizal Street, Makati City

Email: [privacyofficer@functional.com.ph](mailto:privacyofficer@functional.com.ph)

Phone: +632 8899 8741-45

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## **Changes to This Privacy Statement**

**We may update this Privacy Statement from time to time to reflect changes in our practices or legal requirements. Significant updates will be communicated promptly, and the latest version will always be accessible.**