

# DATA PRIVACY CONSENT FORM

*(Republic Act No. 10173 – Data Privacy Act of 2012)*

## TURBEL ENTERPRISES, INC.

**Company Name:** Turbel Enterprises, Inc.

**Business Address:** Block 29 Lot 16 Alabaster St., Villa Esmeralda, Santa Rosa City, Laguna

**Contact Email:** info@turbel-enterprises.com *(or official company email)*

**Contact Number:** (049) 502-1161

## 1. Declaration of Consent

I hereby voluntarily give my **full, informed, and explicit consent** to **Turbel Enterprises, Inc.** ("the Company") to collect, use, process, store, update, and retain my personal information in accordance with the **Data Privacy Act of 2012 (RA 10173)** and its Implementing Rules and Regulations.

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## 2. Personal Data to be Collected

The personal data that may be collected includes, but is not limited to:

- Full name, address, date of birth, gender, nationality
  - Contact details (mobile number, telephone number, email address)
  - Government-issued identification numbers (TIN, SSS, PhilHealth, Pag-IBIG, etc.)
  - Employment, business, or contractual information
  - Financial and billing information (when applicable)
  - Any other information necessary for legitimate business purposes
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## 3. Purpose of Collection and Processing

My personal data shall be collected and processed for legitimate purposes, including but not limited to:

- Employment, recruitment, and human resource administration
  - Business transactions, supplier accreditation, and client servicing
  - Compliance with legal, regulatory, and contractual obligations
  - Accounting, auditing, billing, and tax reporting
  - Security, record-keeping, and internal management purposes
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## 4. Data Sharing and Disclosure

I understand and agree that my personal data may be shared with:

- Authorized personnel of Turbel Enterprises, Inc.
- Government agencies, regulators, or law enforcement authorities when required by law
- Accredited service providers, auditors, banks, insurers, or business partners strictly for legitimate business purposes

All data sharing shall be subject to **confidentiality and data protection safeguards**.

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## 5. Data Retention and Protection

Turbel Enterprises, Inc. shall retain my personal data **only for as long as necessary** to fulfil the stated purposes or as required by applicable laws and regulations. The Company commits to implementing **reasonable and appropriate organizational, physical, and technical security measures** to protect my personal data against unauthorized access, loss, misuse, or disclosure.

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## 6. Data Subject Rights

I acknowledge that I have the right to:

- Be informed of the processing of my personal data
- Access, correct, update, or request deletion of my personal data
- Object to the processing of my personal data
- Withdraw my consent, subject to legal and contractual limitations
- File a complaint with the National Privacy Commission (NPC), if necessary

Requests related to these rights may be submitted in writing to the Company.

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## 7. Consent and Acknowledgment

By signing below, I confirm that:

- I have read and understood this Data Privacy Consent Form
- I was given the opportunity to ask questions and seek clarification
- I freely and voluntarily give my consent to the processing of my personal data

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## DATA SUBJECT INFORMATION

Full Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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## FOR TURBEL ENTERPRISES, INC.

Authorized Representative: \_\_\_\_\_

Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## WEBSITE DATA PRIVACY DECLARATION

### What Services are Covered by this Privacy Notice?

The information that we collect are only those necessary and relevant to our dealings with you. Said information will be kept for as long as they are pertinent for the purpose for which they were collected and/or as we are required under the law.

This Privacy Notice describes how we handle your personal information when you use this website and or when you avail of our services (“Services”) in any of our stores.

Among others, these Services may include the following:

- Customer service and marketing activities;
- In-store transactions;
- E-commerce transactions;
- Order delivery or similar services;
- Recruitment and applicant sourcing activities

This also outlines the purposes for which we use your personal information and the measures we implement to protect the privacy and security of your information.

References in this Privacy Notice to “we”, “us” or “our” are references to Turbel Enterprises.

### What are not covered by this Privacy Notice?

This Privacy Notice DOES NOT cover the processing for:

- Sourcing and accreditation of vendors. Such is covered by the relevant data privacy provisions in their respective contracts with us and by a separate Privacy Notice made accessible to them.

### What Personal Information Do We Collect and How Do We Collect Them?

1. When you avail of our Services, we may collect or receive all or some of the following categories of personal information:
  - **Identifiers.** Personal identifiers and profile data, such as full name, email address, home or delivery address, signature and loyalty account number (where available).
  - **Contact Data.** Contact data may include mobile number or telephone number.
2. When you enter our premises, we may collect the following categories of personal information:

- **CCTV Footage.** Videos and snapshots of your likeness may be captured inside our premises.
3. When you use our website or mobile application, we may collect the following categories of personal information:
    - **Technical Data.** Technical data such as cookies, web beacons and other similar technologies for storing information may be used to collect your Internet Protocol (IP) address, computer / mobile device operating system information, type of web browser used, Unique Device Identifier (UDID) or mobile equipment identifier (MEID) and browsing behaviour.
  4. When you create an account with our website or mobile application, we may collect additional categories of personal information such as:
    - **User Profile Data.** User profile data may include username and nominated password.
  5. When you pay via credit card, debit card, or e-wallet, you will be redirected to a separate website controlled by a Payment Gateway Provider. Such provider will collect your personal and financial data to process your payment according to its own terms and conditions and privacy policy. Once payment is processed, the Payment Gateway Provider will share to us:
    - **Payment Data.** Payment data such as the name of issuing bank, name of cardholder, first six digits and last four digits of the credit or debit card used or masked card information, e-wallet account number and the amount involved. These details are used for payment verification and payment-related concerns such as requests for refunds or similar complaints.
  6. When you submit your application for a job opportunity with Turbel Enterprises, we may collect additional categories of personal and sensitive personal information such as:
    - **Recruitment data.** Recruitment data may include LinkedIn URL, social media account and copy of résumé which may contain your photograph, gender, citizenship, marital status, birthdate, age, religion, ethnic origin, health information, educational background, employment history, references, skills, qualifications, seminars and trainings attended, salary information with current and former employers, salary expectation, copy of NBI clearance and copy of government-issued identification.

### **How Do We Use Your Personal Information?**

We will use your information only for the following legitimate purposes (“Purposes”):

Customer Interaction and Service:

- Providing you with products, services, promos, or activities that you have availed;
- Processing your reservations, orders, payments and completing your transactions with us;
- Contacting you in relation to your inquiries, requests or complaints;
- Maintaining your accounts when you register in or use our digital platforms, including our mobile applications;
- Verifying your identity when you access your account;

#### Analytics, Marketing and Promotion:

- Performing data enrichment, data analytics and profiling for statistical, marketing, analytical, and research purposes;
- Conducting business analyses to improve our goods and/or services;
- Sending out market surveys, campaigns, promotions, and other marketing activities;
- Communicating relevant products and services and advisories to you;

#### Legal and Regulatory Purposes:

- Complying with the requirements of the law and legal proceedings;
- Preventing, detecting, and investigating a crime;
- Pursuing or defending our legal claim;

#### Security, Recruitment and General Business Operations:

- Ensuring the security of our premises and the safety of our personnel and visitors;
- Processing your job application and conducting pre-employment screening; and
- Carrying out other legitimate business purposes.

### **Do We Share Your Personal Information to Other Entities?**

TurBel Enterprises ensures that your personal information shall be shared only in a manner that respects your privacy and in compliance with the requirements of the DPA. In certain circumstances, we may share your personal information to the following:

#### **Service Group**

Our service group may access and/or use your personal information. These may include our marketing partners, consultants, technology partners, service providers, hosting providers, third-party logistics providers, courier service providers, administrators of our loyalty or point earning/redemption programs, and those that help us with our business

activities. Through the execution of data privacy agreements or similar contracts, we require our service providers to keep your personal information secure and we prohibit them from using or sharing your personal information for any purpose other than the Purposes declared in this Privacy Notice.

### **Government Agencies**

We may also share your personal data in compliance with applicable laws or when required by a competent court, relevant government office or agency pursuant to DPA legislation and other applicable rules and regulations pertaining to data privacy.

### **What are our Legal Bases for the Processing of Your Personal Information?**

We may process your personal information based on one or more of the following legal grounds:

- **Consent:** We may process your personal information and/or sensitive personal information based on your explicit consent. This means that you have provided clear and voluntary permission for us to use your data for specific purposes, which you can withdraw at any time. Please note, however, that should you opt to withdraw, modify or limit the scope of consent provided, we may not be able to provide you with the services which you require. By continuously availing of our services or, by your continued use of our website and mobile application, you reaffirm the consent you have provided and authorize us to process your personal data pursuant to this Privacy Notice.
- **Contractual Obligation:** If you have entered into an agreement with us, we may process your personal information to fulfil our obligations under that contract. This includes providing the services or products you've requested and managing the associated transactions.
- **Legal or Regulatory Obligation:** In certain situations, we may need to process your personal information and/or sensitive personal information to comply with legal or regulatory requirements, such as tax regulations, or to respond to lawful requests from government authorities.
- **Legitimate Interests:** We may process your personal information when it's necessary for our legitimate interests, provided those interests are not overridden by your rights and interests. This could include improving our services, conducting marketing activities, or ensuring the security of our systems.

### **How Long Do We Retain Your Personal Information?**

We will keep the personal information we collect about you for as long as necessary to carry out the Purposes set forth in this Privacy Notice or in accordance with prescribed retention periods under relevant regulations (e.g. BIR, DOLE). We may also retain your

personal data in order to enforce our legal rights or whenever it is required under the DPA or upon lawful order of a competent court or relevant government agency.

### **How Do We Dispose Your Personal Information?**

Electronic files shall be erased, while physical records shall be shredded for disposal. When appropriate, anonymization techniques may be performed to permanently remove identifiable information from our records. In all cases, we will make sure that the personal information is destroyed in a way that prevents unauthorized people from accessing, processing, or retrieving it.

### **What are the Risks Involved?**

Risk is the chance that a harmful incident may happen. In the context of personal data, risk refers to the chance that someone might collect, use, disclose, or access your personal data in an unauthorized manner or in a way that may cause you harm. In order to ensure that the risks to your personal information are minimized, we employ various measures to safeguard your personal information. However, this does not guarantee protection against all threats such as when systems are exposed to targeted cyberattacks, malware, ransomware, and computer viruses or when manual records are accessed without authority. In case a security incident occurs, we're prepared to respond and manage such incidents in line with our policies and in accordance with regulations.

### **Where Do We Store Your Personal Information?**

Your personal data are stored in a secure facility in the Philippines or in other countries where we or our Business Partners have facilities. When we transfer your personal information to other countries, we comply with the requirements of DPA Legislation or relevant regulation for such transfer and take steps to ensure that your personal information is protected and processed in accordance with this Privacy Notice.

### **How Do We Protect Your Personal Information?**

We implement industry-standard security measures to protect the confidentiality, integrity, and availability of the personal data that we process. These security measures include the following:

#### **Organizational Security Measures**

- Appointing a Data Protection Officer;
- Conducting data privacy training and periodic refresher sessions across the organization;
- Instituting policies and procedures to safeguard personal data against any unauthorized or malicious access, alteration and disclosure;

## Physical Security Measures

- Storing physical records of personal data in a locked and secure place accessible only to authorized personnel;
- Securely destroying records or files of personal data when such is no longer needed for any legal or business purpose;

## Technical Security Measures

- Implementing role-based access on our systems to ensure that only authorized personnel are granted access on a need-to-know basis;
- Performing periodic reviews of access rights;
- Deploying firewall equipment and similar network devices to protect our systems and network;
- Storing your electronic data in a secure IT infrastructure and utilizing up-to-date technology products to prevent unauthorized computer access
- Regularly running vulnerability scans on our systems and websites and performing other maintenance activities to ensure that your personal information is secure; and
- Ensuring sensitive personal information are transmitted through secure channels and implementing encryption methods, whenever suitable.

## Do We Use Cookies?

Our website collects device cookies to enable you to browse our website and to enable us to address your concerns and inquiry better. Cookies are small text files that are stored on your device when you visit our websites or use our apps. We utilize various cookies as described below.

- **Necessary cookies:** These cookies are essential for the website to function properly. They allow you to browse our website and use its features, such as logging in and adding items to your shopping cart. Without these cookies, our site will not work the way it should.
- **Analytics cookies:** These cookies collect information about how you use our website, such as the pages you visit and the links you click. This information is used to improve our website and to make it more user-friendly.
- **Functional cookies:** These cookies remember your preferences, such as your language and font size. This allows us to provide you with a more personalized experience.
- **Performance cookies:** These cookies collect information about how our website is performing, such as how many visitors we have and which pages are the most popular. This information is used to improve the performance of our website.

- **Advertisement cookies:** These cookies are used to deliver advertising content that is relevant to you. The purpose is to provide you with customized ads based on your interest, search and browsing behaviour.
- **Third-Party Cookies:** Third-party cookies, such as those from Google Analytics and Facebook Pixel, are also utilized for measurement, analytics, and ad personalization purposes. These cookies help us gain insights into user behaviour and enhance our services. For more details, please refer to the respective third-party websites.

### **Consent on Cookies**

You may withdraw your consent by choosing the opt-out function in our cookie setting. However, by opting out of these third-party cookies, your browsing experience may be affected. You may also later opt-out from said third-party cookies after giving your consent by clearing your cookies and other site data in your browser settings.

### **What if You are a Minor?**

Turbel Enterprises shall not knowingly collect the personal data of a person below 18 years old without any legal basis or consent of the minor's parent/s or legal guardian. Should it come to our attention that the personal data of minors was provided without a legal basis or consent of the minor's parent/s or legal guardian, such personal data shall be destroyed or deleted in a secure manner.

Minors are advised not to provide any personal data, such as their name, age, gender, email address, contact information, among others, and should consult their parent(s) or guardian(s).

### **What are Your Rights and Obligations?**

You are responsible for ensuring that the personal data you provide is accurate and up-to-date and that you are of legal age when you submit any data to us.

We encourage you to use the latest version of web browsers for your own safety and security. Updated web browsers are normally equipped with security features that provide anti-phishing protection, improved parental controls, and tools to prevent malware and other privacy threats. We will not be liable for any damage, loss, injury, or claim that may result when you fail to comply with these obligations.

Please set and maintain your communication preferences so that we send communications to you in accordance with your preferences. You are not licensed or otherwise allowed to add other users to our mailing list (email or physical mail) without their express consent. You should not send any messages which contain spam, spyware or virus via the Website. If you would like to report any suspicious messages, please contact us at our email address below.

As provided under the DPA, you have the following data privacy rights:

- **Right to be informed.** You have the right to be informed of the collection and processing of your personal data, the purpose for which they will be processed, among others. Thus, you are required to read this privacy notice before giving your consent to the collection and processing of your personal data.
- **Right to object.** You have the right to object to the processing of your personal data. You will be given an option or opportunity to withhold your consent to the processing of your personal data whenever TurBel Enterprises communicates with you.
- **Right to access your information.** It is your right to obtain confirmation on whether or not data relating to you are being processed as well as other relevant information about the processing involved.
- **Right to updating or rectification.** You have the right to rectify or correct any inaccuracy or error in your personal data by submitting your request for rectification or correction.
- **Right to erasure or blocking.** You have the right to the erasure or blocking of your personal data in accordance with the requirements of the DPA, subject to restrictions imposed by other regulations.
- **Right to damages.** You have the right to be indemnified if you incur damages due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of your personal data.
- **Right to data portability.** You have the right to obtain a copy of your data in a structured and commonly used format by submitting a proper request.
- **Right to file a complaint.** If you have reason to believe that your personal information has been misused, maliciously disclosed, or improperly disposed of or that your data privacy rights have been violated, you have the right to file a complaint.

If you intend to exercise any of your abovementioned data privacy rights, you may contact our Data Protection Officer (DPO) through the contact details provided in the succeeding section.

### **How Can You Contact the DPO?**

For inquiries regarding the processing of personal data, as well as any concerns or complaints regarding data privacy, or should you want to exercise your rights as a Data Subject, you may contact the DPO using the information below:

#### **The Data Protection Officer**

#### **TurBel Enterprises Inc.**

Tel: +63 (49) 5021161

Email: [dpo@turbel-enterprises.com](mailto:dpo@turbel-enterprises.com)

We encourage you to submit your inquiry and/or concerns in writing for proper documentation and tracking. Our response will be within 15 days upon receipt.

**How Will You Know if this Privacy Notice Changes?**

TurBel Enterprises may change this Privacy Notice from time to time without prior notice. Revised versions of this Privacy Notice will be posted on this page, together with an updated effective date.

*Last updated on Jan 31, 2026*