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| Policy No. 2018 – LEGCOM - 02 | Effectivity Date: | 21 March 2018 | Version No.: | 1 |
| | Prepared By: | Administration Department; Legal and Compliance Department | Approved By: | Data Privacy Committee and the Executive Committee |

Policy on Paper Conservation and Disposal

I. Coverage

The officers, employees, and consultants of the **Paramount Life & General Insurance Corporation** (the "Company") are expected to faithfully comply with this policy.

II. Statement of the Policy

In line with the Company's general objectives of preserving the environment and ensuring minimal wastage of Company resources, it is our policy that, whenever possible, we use our paper to its full capacity without sacrificing the confidentiality of the personal data of our employees, clients and business partners, and of Company proprietary information.

III. Definition of Terms

1. Data Privacy Act - refers to Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012;
2. Destruction - any act of destroying or discarding of Paper;
3. Fully Utilized Paper - both sides of the Paper are used or one side was used but cannot be used as scratch paper due to confidentiality of information contained in the document;
4. Paper - includes CF Paper, Colored Paper, Newsprint, White Paper;
5. Personal Data - refers to all types of personal information, including privileged information;
6. Personal Information - refers to any information, whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual;
7. Proprietary Information - also known as a trade secret, is information the Company wishes to keep confidential. Proprietary information can include client list, processes, and methods used in sales. It can also include the Company's business and marketing plans, salary structure, contracts, and details of its computer systems.
8. Scratch Paper - Paper used for taking notes, doodling, brainstorming, or writing informally, often repurposed from earlier uses, such as the reverse side of documents one no longer needs;
9. Scrap Paper - Fully Utilized Paper identified as ready for Destruction or recycling;
10. Sensitive Personal Information - refers to personal information:
 - a. About an individual's race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;
 - b. About an individual's health, education, genetic or sexual life of a person, or to any proceeding for any offense committed or alleged to have been committed by such individual, the disposal of such proceedings, or the sentence of any court in such proceedings;
 - c. Issued by government agencies peculiar to an individual which includes, but is not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation and tax returns; and
 - d. Specifically established by an executive order or an act of Congress to be kept classified;

III. Guidelines

1. Requirements

- a. Repository Box/Paper Conservation Box – to be provided by the Administration Department to be used to store Scrap Paper;
- b. Repository Monitor – a member of the department/floor assigned as repository monitor. He or she shall secure the Repository Box/Paper Conservation Box and monitor the same as to when it will be sent for disposal.

2. Procedure

2.1 General Provisions

- a. **All are encouraged to repurpose or reuse Paper.** However, to preserve the confidentiality of the Personal Data and Company proprietary information, **Paper which contains Personal Data (of employees, clients and business partners) or Company proprietary information, shall not be used as Scratch Paper or reused and circulated to other departments or other employees.**
- b. Paper which contains Personal Data or Company proprietary information **shall not be disposed in trash cans unless properly shredded or destroyed** in a manner wherein the Personal Data and Company proprietary information can no longer be reconstructed.
- c. All are encouraged to place/store Fully Utilized Paper in the Repository Box.
- d. The Repository Box must be placed by the Repository Monitor in a **secure and inconspicuous location.**

2.2. Procedure Specific for Head Office, OFW Division, and WGlobal

- a. Once the Repository Box is full, it must be sent to the Administration Department for proper disposal. Repository Boxes must be sealed, labeled as "*Scrap Paper/___ Floor or ___Department*", and accompanied by a transmittal slip declaring the Scrap Paper ready for disposal.
- b. Administration Department shall send these Repository Boxes to the Company warehouse to be stored until disposed in the proper manner.
- c. Buyers of the Scrap Paper may destroy the Scrap Paper via shredding, burning or any other means. **Scrap Paper which contain Personal Data and company proprietary information must be destroyed in a manner wherein the Personal Data and company proprietary information can no longer be reconstructed.** During such destruction, a representative of PLGIC Records Department shall be present.

2.3. Procedure Specific for Branches

- a. Every six (6) months or when the Repository Box is full, the Scrap Paper must be offered for sale by the Repository Monitor.
- b. Buyers of the Scrap Paper may destroy the Scrap Paper via shredding, burning or any other means. **Scrap Paper which contains Personal Data and company proprietary information must be destroyed in a manner wherein the Personal Data and company proprietary information can no longer be reconstructed.** During such destruction, a representative from the Branch shall be present.
- c. The fees paid for the Scrap Paper shall be remitted to the Company Cashier immediately upon receipt.

IV. Breach of the Policy

Breach of this Policy will not be tolerated and may lead to disciplinary and other actions up to and including termination of employment or services as provided in the Company's Code of Ethics, without prejudice to other liabilities as provided in the Data Privacy Act and other relevant laws.

V. Effectivity

This policy, approved by the Data Privacy Committee on 7 March 2018 and by the Executive Committee on 8 March 2018, shall take effect immediately.

VI. Review of Policy

This Policy may be amended at any time and is subject to further guidance from the Data Privacy Committee and approval of the Executive Committee.



REPOSITORY MONITOR

| BRANCH ASSISTANTS | |
|-------------------|---|
| ANGELES | EMMALOU EDEN |
| BAGUIO | NINFA RODAS |
| CABANATUAN | KRISTINE JOY HAMAD |
| DAGUPAN | JEAN NAVARRO |
| MALOLOS | ARLENE DELA CRUZ |
| TUGUEGARAO | JULIET ANNANG |
| LAS PIÑAS | KATHERINE NAPA ANNA MARIE ENDOZO |
| MAKATI | |
| VILLAMOR | MARY ANN JAMES |
| BATANGAS | ARLENE MANALO |
| CALAMBA | EMELYN PAKINGAN |
| CAVITE | REINALYN DASIG - MANJARES |
| DAET | ANNIEFLOR RAFER VERGANIO |
| LEGASPI | JULIE AGAO |
| LUCENA | CHARIELYN MERGINIO |
| NAGA | AILENE VASQUEZ |
| PALAWAN | PRINCESS REA ABARINTOS (NON-LIFE BRANCH CASHIER) |
| SORSOGON | MA. GRAZIELLA ARIETA |
| BACOLOD | NANETTE S. MILLAN |
| CEBU | MAE LAPINGCAO |
| ILOILO | CONNIE MALICAY |
| KALIBO | SHERYL Q. YEBAN |
| ROXAS | GINA DELFIN |
| TACLOBAN | REGINA CABRAL CUESTA |
| CDO | EMMA TAPIA |
| DAVAO | MARILOU TALLEDO |
| GENERAL SAN 1 | WILLEE MARIE VILLASEÑOR |
| GENERAL SAN 2 | LOURDES TRAZO |
| PAGADIAN | MARY JEAN ECDANG |
| TAGUM | MEAH DIANNE GONZALES |
| ZAMBOANGA | LIZA LAURITO |