

Your privacy is our priority. At HDI Securities, Inc. (“HDI Securities”), the identities and privacy of our existing and prospective customers are valuable to us. We are dedicated to protecting the information disclosed to us. As such we have enacted this Privacy Policy, which shall be updated from time to time to keep in pace with our commitment to maintain the privacy and confidentiality of the information entrusted to us. While information plays a large role in our ability to provide good quality service we know that our most important asset is the good quality service, we know that our most important asset is the customers’ trust and confidence in us. Thus, keeping customer information secured, and using it in a manner most ideal for our clients and consistent only with the legitimate purpose for which it was collected are sacred principles HDI Securities. With this in mind, here is our pledge to you as HDI Securities customer.

We will:

1. Value the trust you place in us and respect the confidential nature of the information you disclose in the course of our broker-customer relationship;
2. Limit the collection and use of customer information to what we believe are indispensable and necessary to service your accounts and administer our business;
3. Restrict employee access to customer information to those who need to know in order to provide services to you;
4. Continuously educate our employees to reinforce the importance of confidentiality and customer privacy;
5. Maintain appropriate security standards and procedures to protect information about you;
6. Respond quickly to your request to correct or rectify inaccurate information; and
7. Strictly adhere to the provisions of Republic Act No. 10173, or otherwise known as “The Data Privacy Act of 2012” and its Implementing Rules and Regulations.

You can count on us to protect the privacy of the information you have entrusted to us and to provide you with the responsive professional service you deserve.

How we obtain personal information

HDI Securities takes great care to protect your personal information. When we use it, we do so with utmost respect for your privacy. HDI Securities may happen to collect public and non-public personal information about you from any of the following sources:

1. Client Account Information Form (CAIF) that you accomplish as such name, address, Tax Identification Number, Social Security number, birth date, assets and income, among others;
2. Transactional activity in your account which may include trading history and balances, and other similar activities;
3. Other interactions with HDI Securities, including but not limited to personal or phone discussions with our staff, information you enter into our website, emails, correspondences, and survey questionnaires and/or materials which we may provide to help us improve the services,

performance and products of HDI Securities; and Other sources with your consent or with the consent of your representative – (i.e. from other Brokers if you transfer positions into HDI Securities)

Why we obtain personal information

We use your personal information to service and maintain your account; process transactions in your account; respond to your inquiries or your representative; carry out regulatory checks and comply with our obligations to any relevant regulatory authority; and to develop and improve our services to you and other customers, protect our interests and for future references in the event that there would be valid order by a court or other governmental body or as would be required by law

How we share information about you with third parties

HDI Securities does not share personal information about our customers with unaffiliated third parties for use in marketing their products and services.

We may share personal information with the following entities:

- Unaffiliated service providers (securities clearinghouses and other entities who may provide services at HDISI's direction);
- Government agencies, other regulatory bodies and law enforcement officials (only with a valid written order by a court or other governmental body or as otherwise required by law -);
- Other organizations, with your consent or as directed by your representative (for example, if you request HDI Securities to issue a certificate on the existence of your account with us), or as permitted or required by law (for example, for fraud prevention); and
- Our service providers are obligated to keep the personal information we share with them confidential and use it only to provide services specified by HDI Securities.

How We Protect Your Information

We comply with applicable laws and regulations regarding the protection of personal information. We will store and process your information on the HDI Securities computers wherever located and in any other medium. We maintain physical, electronic and procedural safeguards that restrict access to your personal information. We use industry leading security technologies, including layered security and access controls over personal information. These safeguards are reviewed as necessary and may be adjusted in response to advances in technology and the latest security threats or trends. We also train our employees about privacy and our commitment to protect your personal information.

Privacy online

Privacy, security, and service in HDI Securities' online operations are just as critical as the rest of our business. We use firewall barriers, encryption techniques and authentication procedures, among others,

to maintain the security of your online session and to protect HDISI's accounts and systems from unauthorized access. When you visit HDI Securities' website, we may collect technical and navigational information, such as device type, browser type, Internet protocol address, pages visited, and average time spent on HDI Securities' websites. We use this information for a variety of purposes, such as maintaining the security of your online session, facilitating site navigation, improving HDI Securities website design and functionality, and personalizing your experience on HDI Securities website. Additionally, the following policies and practices apply when you are online.

Cookies and similar technologies

We use cookies and similar technologies to support the operation of HDI Securities websites. Cookies are small amounts of data that a website sends to a web browser on a visitor's computer. Our cookies help us to collect information about visitors to HDI Securities websites, including date and time of visits, pages viewed, amount of time spent on our sites, or general information about the device used to access the site. HDI Securities cookies are also used for security purposes. You can refuse or delete cookies. Most browsers and mobile devices offer their own settings to manage cookies. If you refuse a cookie when on a HDI Securities website, or if you delete cookies, you may experience some inconvenience in your use of HDI Securities website. For example, you may not be able to sign in and access your account, or we may not be able to recognize you, your device, or your online preferences. We do not share personally identifiable information about our customers with third-party service providers, and these service providers do not collect such information on our behalf

We have security standards and procedures in place designed to prevent unauthorized access to your accounts and personal information. A key part of this process ensures that all information we have about you is accurate and up-to-date. If you ever discover inaccuracies in our data or if your personal information changes, we urge you to notify us immediately

Protect Your Password

One way to guard against unauthorized access or intrusion to your account is to keep your HDI Securities Online password private.

Note: HDI Securities does not have access to your password. You are solely responsible for the confidentiality, protection and use of the password and/or access number that provides electronic access to your account. Any orders or instructions that are received under your account number and password are authorized and binding on you. Here are some suggestions on how to choose and safeguard your password:

Do not share your password with anyone. Do not write your password down. Type your password each time it is required of you.

Do not save your password on the site entry screen or develop a shortcut to reproducing your password.

Avoid using easily guessed words such as your name, user id, or any variation thereof (backwards, changing case, etc.).

Avoid words referring to anything noticeable about you: the name of your spouse, child, and pet, your favorite basketball team, or literary character.

Avoid any combination of your office number, address, birthday, or anniversary

Avoid any combination of your license-plate number, your social-security number. If you feel that your password is no longer secure, please change it immediately.

Calls

You authorized HDISI to log, record and monitor calls made or received by us to maintain high quality service standards, to check instructions, for your protection and ours How long will we keep your personal information on file We will retain information about you after the closure of your account for as long as it is permitted or required for legal, regulatory, fraud prevention and audit purposes.

Additional information

If you are a former customer, this privacy policy shall also retroactively apply to you. We treat your information with the same care as we do information about current customers. HDI Securities offers several options for accessing and, if necessary, correcting your account information. You can review your information using your statements or through our telephone or email services. You may also write or call us with your request for information; specific Internet addresses, mailing addresses and telephone numbers which are listed on your statements and other correspondence. Customer Service Support If you have any queries regarding privacy issues then please email us at info@hdisecurities.com or call us (632) 877955 to 56.

Terms of Use

The following terms and conditions govern the use of HDI Securities' website/s and/or HDI Securities' mobile application/s. The HDI Securities' Website and HDI Securities' mobile application shall collectively be referred to as the "HDI Resources."

By using the HDI Resources, you (the "User") agree to be bound by these terms and conditions. If the User does not agree to any of the terms and conditions, access to the HDI Resources is disallowed.

INTELLECTUAL PROPERTY RIGHTS. Everything in the HDI Resources, including all real time or other information and content as well as any software programs available on or through the HDI Resources ("Content"), are protected by intellectual property rights laws. With the exception of information obtained from HDI SECURITIES's third party providers, all right, title and interest in and to the HDI Resources and its Content are owned, licensed or controlled by HDI SECURITIES. HDI SECURITIES reserves the right to amend or withdraw any of the HDI Resources.

OWNERSHIP AND USE OF HDI SECURITIES MEDIA. HDI SECURITIES grants access to the HDI Resources to the User exclusively for his personal, non- commercial, and lawful use. User agrees not to transmit, transfer, perform, broadcast, publish, reproduce, create a derivative work from, display or distribute,

sell, license, rent, lease or otherwise transfer any Content to any third person (including, without limitation, others in User's company or organization) whether for direct commercial or monetary gain or otherwise without the prior written permission of HDI SECURITIES. Requests for such permission must be in writing and should be sent to: Unit 2305A, 23rd Floor The Orient Square Bldg., F.Ortigas Jr. Road (formerly Emerald Ave.), Ortigas Center, Pasig City, 1605 Metro Manila

LIMITATION OF LIABILITY. While the Content has been obtained from sources believed to be reliable, they are provided on an "AS IS" and "AS AVAILABLE" basis. HDI SECURITIES, its affiliates, officers, directors, employees, and agents do not make any representations and disclaim all express, implied and statutory warranties of any kind, including, but not limited to, those regarding accuracy, timeliness, completeness, correctness, timeliness, non- infringement, merchantability, or fitness for any particular purpose, or any representations or warranties arising from usage or custom or trade or by operation of law. Further, User acknowledges that due to the number of sources from where the Contents are obtained from, and the inherent hazards of electronic distribution, there may be omissions or inaccuracies in the Content. Lastly, User agrees not to hold HDI SECURITIES liable for any damages, including without limitation direct or indirect, special, incidental, or consequential damages, losses or expenses arising in connection with the HDI Resources or Third Party Media (as hereinafter defined) or use thereof or inability to use by any party, or in connection with any failure of performance, error, omission, interruption, defect, delay in operation or transmission, computer virus or line or system failure, even if HDI SECURITIES, or representatives thereof, are advised of the possibility of such damages, losses or expenses. Any claims arising in connection with the use of HDI Resources must be brought within one (1) year from the date the event giving rise to such action occurred, exclusively with the appropriate courts of Pasig City, Philippines.

The HDI Resources may contain links to other websites or applications controlled or offered by third party providers ("Third Party Media"). HDI SECURITIES disclaims liability for any information, material, product, or service posted or offered at said Third Party Media. The link to said Third Party Media does not mean an endorsement or recommendation from HDI SECURITIES for any products or services offered or information contained in said Third Party Media. Neither shall HDI SECURITIES be liable for any failure of the products or services offered or advertised at the Third Party Media. User is aware that the use of Third Party Media may be governed by differed terms and conditions and that said Third Party Media may provide less security than the HDI Resources.