

## **Background**

The Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012 (DPA), aims to protect personal data in information and communications systems both in the government and the private sector. It ensures that entities or organizations processing personal data establish policies and implement measures and procedures that guarantee the safety and security of personal data under their control or custody, thereby upholding an individual's data privacy rights. A personal information controller or personal information processor is instructed to implement reasonable and appropriate measures to protect personal data against natural dangers such as accidental loss or destruction, and human dangers such as unlawful access, fraudulent misuse, unlawful destruction, alteration and contamination.

To inform its personnel of such measures, each personal information controller or personal information processor is expected to produce a Privacy Manual. The Manual serves as a guide or handbook for ensuring the compliance of an organization or entity with the DPA, its Implementing Rules and Regulations (IRR), and other relevant issuances of the National Privacy Commission (NPC). It also encapsulates the privacy and data protection protocols that need to be observed and carried out within the organization for specific circumstances (e.g., from collection to destruction), directed toward the fulfillment and realization of the rights of data subjects.

## **Introduction**

This Privacy Manual is hereby adopted in compliance with Republic Act No. 10173 or the Data Privacy Act of 2012 (DPA), its Implementing Rules and Regulations, and other relevant policies, including issuances of the National Privacy Commission. This organization respects and values your data privacy rights and makes sure that all personal data collected from you, our clients and customers, are processed in adherence to the general principles of transparency, legitimate purpose, and proportionality.

This Manual shall inform you of our data protection and security measures and may serve as your guide in exercising your rights under the DPA.



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## Definition of Terms

1. “**Act**” or “**DPA**” refers to Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012;
2. “**Commission**” or “**NPC**” refers to the National Privacy Commission;
3. “**Data Sharing Agreement**” refers to a contract, joint issuance, or any similar document that contains the terms and conditions of a data sharing arrangement between two or more parties: Provided, that only personal information controllers shall be made parties to a data sharing agreement;
4. “**Data Subject**” – refers to an individual whose personal, sensitive personal or privileged information is processed by the organization. It may refer to officers, employees, consultants, and clients of this organization.
5. “**EEA**” – European Economic Area
6. “**Personal data**” refers to all types of personal information, including privileged information;
7. “**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.
8. “**Personal information controller**” or “**PIC**” refers to a person or organization who controls the collection, holding, processing or use of personal information, including a person or organization who instructs another person or organization to collect, hold, process, use, transfer or disclose personal information on his or her behalf. The term excludes:
  - a. a person or organization who performs such functions as instructed by another person or organization; or
  - b. an individual who collects, holds, processes or uses personal information in connection with the individual’s personal, family or household affairs.

There is control if the natural or juridical person or any other body decides on what information is collected, or the purpose or extent of its processing;

9. “**Processing**” refers to any operation or any set of operations performed upon personal information including, but not limited to, the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of data.
10. “**Services we provide**” refers to any service that Paperless Trail provide, including but not limited to document imaging, webhosting, email hosting and technical support services



## Our Commitment to Data Privacy

Archive One, arch Factory, and Go Paperless are products of Paperless Trail Inc. (PTI)

PTI commits to the protection of your personal privacy and intends to give you as much control as possible over your personal information.

We provide this privacy policy to explain the type of information we collect and process when you use our products and services. This policy also explains the choices you can make about the way your information is collected and used. Your personal data and privacy are important to us, which is why we would like everyone to know how we handle and protect the personal information you have provided to us.

## Information We Collect When You Use Our Services

We will be asking you to provide us all the information which we deem to be necessary when you utilize any of our products, services and websites. The amount and type of information that we gather depends on the nature of interaction which is further discussed in the sections below.

### Information you provide

This include all the information which we will require from you so that we can provide accurate information regarding your inquiries and requests.

#### When you avail our products and services

- Names of administrative, technical and billing contact
- Company name
- Address
- Email address
- Telephone number
- Purchases
- Expiry and renewal information
- Information requests
- Customer service requests
- Notes or details explaining what you asked for and how we responded

Customers who wish to avail of our Activity Factory or any data hosting service are required to fill-out our Vendor Consent Form – see *Appendix A*.

#### When you communicate with us directly

- Name
- Company name
- Address
- Email address
- Telephone number

#### When you join any of our seminars and events

- Name



**PAPERLESS TRAIL INC.**  
People . Technology . Innovation

- Company name
- Address
- Email address
- Telephone number
- Event photos

We may require additional personal information apart from the ones listed when we deem it to be necessary. In such cases, the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide such.

## Information we collect when you use our websites

### Cookies and Other Trackers

Like many companies, we use browser cookies in all our websites. We use cookies and plug-ins to enhance your online experience, analyze our marketing efforts, and provide offers through advertising, marketing, and analytics partners.

The cookies that we use are as follows:

- Required cookies - are necessary for our website to work properly
- Performance cookies - allow us to analyze how visitors use our website so we can measure and improve the performance of our website
- Functional cookies allow us to remember choices you may have made on our website
- Advertising cookies are used to present ads that are relevant to your interests. We may utilize cookies to track referrals from internal and external affiliates, as well as advertising campaigns

You can control the use of cookies at the individual browser level when you access our website for the first time.

### Customer Surveys

We may periodically conduct customer surveys. Participation in our customer surveys is voluntary. However, we encourage our users to participate in these surveys because they provide us with important information that helps us improve the products and services we offer and provide to you. Your personal information, if provided, will remain confidential, even if the survey is conducted by a third-party service provider on our behalf.

### Social Media

Our website includes social media features (such as the Facebook "Like" and "Share" button). These features may collect your IP address and which page you are visiting on our website and may set a cookie to enable the feature to function properly. Social media features and widgets may be hosted by a third party or directly on our website. Your interactions with these features are governed by the privacy policy of the company providing the feature.



## Information We Receive from Third Parties

### Third-Party Partners

We may also receive publicly available information about you from our third-party partners and combine it with data that we have about you. We do this to enhance our ability to serve you, to tailor our products and services to you, and to offer you opportunities to purchase products or services that we believe may be of interest to you.

## How We Use Information

We use Personal Data to conduct business, provide information and support for products and services, better understand your needs and interests, refine and develop our business, improve services, personalize communications and ensure a quality experience for users of the Website and Services. For example, we may use your information to:

- Provide, operate, and maintain our Services;
- Measure, analyze and improve our products and services, the effectiveness of our websites, and our advertising and marketing;
- Understand and analyze how you use our Services and what products and services are most relevant to you;
- Develop new products, services, features, and functionality;
- Communicate, interact and build our relationship with you with you, either directly or through one of our partners, including for customer service;
- Communicate with you from time to time relevant promotions, important updates and other information about the services we provide;
- Help identify and communicate offers of products, programs and services that may be of interest to you;
- Process your transactions;
- Detect and prevent fraud and abuse of our Services and systems; and
- For compliance purposes, including enforcing our Terms of Service, or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.

## Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only **(i)** where we need the personal information to perform a contract with you; **(ii)** where the processing is in our legitimate interests and not overridden by your rights; or **(iii)** where we have your consent to do so. We have a legitimate interest in operating our services and communicating with you as necessary to provide these services, for example when responding to your queries,



improving our platform, undertaking marketing, or for the purposes performing the service that you requested.

In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

## Security

We employ a variety of security technologies and measures designed to protect information from unauthorized disclosure, misuse, alteration or loss. The measures we use, including and not limited to: physical, electronic and managerial procedures to safeguard and secure the information we collect, are designed to provide a level of security appropriate to the risk of processing your personal information. However, please bear in mind that the we cannot guarantee your transmission of data to us to be 100% secure.

## Data Retention

We retain personal information we collect from you when we have an ongoing legitimate legal or business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax, or accounting requirements).

These might include retention periods:

- mandated by law, contract or similar obligations applicable to our business operations;
- for preserving, resolving, defending or enforcing our legal/contractual rights; or
- needed to maintain adequate and accurate business and financial records.

Clients have the right to execute their Right to be Forgotten. Upon receiving such request, personal data will be removed within 30 days unless you have an existing legal, tax, or accounting issues with us.

## Access

If you make a request to delete your personal data and that data is necessary for the products or services you have purchased, the request will be honored only to the extent it is no longer necessary for any Services purchased or required for our legitimate business purposes or legal or contractual record keeping requirements.

To protect your privacy and security, we may also take reasonable steps to verify your identity before updating or removing your information. The information you provide us may be archived or stored periodically by us according to backup processes conducted in the ordinary course of business for disaster recovery purposes.





# Your data protection rights under the General Data Protection Regulation (GDPR)

If you are a resident of the EEA, you have the following data protection rights:

A **right of access** to a copy of the information comprised in their personal data. PTI clients can request a copy of our information by sending an email to [privacy@paperlesstrail.net](mailto:privacy@paperlesstrail.net)

A **right to prevent processing for direct marketing**; You can withdraw your consent from having your personal data used for marketing purposes by clicking on the "Unsubscribe" or "opt-out" link in the marketing emails we send you.

Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

You have the right to **withdraw your consent for these Privacy and Security policies** in any time by sending us an email. In case you withdraw your consent from these points we will not be able to continue providing any type of service and you have the right to discontinue your service or/and proceed with your Right To Be Forgotten.

Upon executing your **Right to be Forgotten** you understand and agree that:

- your client area and personal details will be permanently removed
- your hosting accounts and services will be cancelled and terminated
- all your files, databases, email accounts and any other type of data hosted on your hosting account will be permanently removed
- your invoices and billing data will be no longer accessible
- your payment and credit card information will be permanently deleted
- your support tickets and any information included in them will be permanently removed

## Your choices

You can use our website to watch the infomercials instead of inquiring directly, thereby limiting the type of information that we collect.



You may unsubscribe from receiving certain promotional emails from us. If you wish to do so, simply follow the instructions found at the end of the email. Even if you unsubscribe, we may still contact you for informational, transactional, account-related, or similar purposes.

Many browsers have an option for disabling cookies, which may prevent your browser from accepting new cookies or enable selective use of cookies. Please note that, if you choose not to accept cookies, some features and the personalization of our websites may no longer work for you. You will continue to receive advertising material, but it will not be tailored to your interests.

## Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and any other places we deem appropriate, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If we make material changes to this Privacy Policy, we will notify you here, by email, or by means of a notice on our terms of service page. We encourage you to periodically review this page for the latest information on our privacy practices.

## Unsubscribe Policy

By registering on our product website, visitors allow Paperless Trail Inc. to use their personal identifiable information in accordance with the terms of Paperless Trail's privacy policy.

Paperless Trail Inc. provides site visitors with the opportunity to opt-out of receiving updates on the company's products and services, newsletters and other promotional materials. You may choose not to be contacted in the future if you do not wish to receive any information with respect to Paperless Trail Inc. and our products and services. Visitors may unsubscribe at any time, by sending an e-mail to [marketing@paperlesstrail.net](mailto:marketing@paperlesstrail.net) or by calling 02-8935951 and stating the request.

## Contact Us

If you have any questions, concerns or clarifications about this Privacy Policy, you may get in touch with the Data Privacy Officer through the following means:

[privacy@paperlesstrail.net](mailto:privacy@paperlesstrail.net)

Tel. nos. 893-5951, 893-5983



## Appendix A. – Data Processing Consent Form

R.A. 10173, also known as The Data Privacy Act of 2012 (the “DPA”) sets out the principles that should be followed when processing any private personal data. One of the steps that Paperless Trail Inc. (PTI) does to comply with these principles is to request for the client’s consent in the acquiring and processing data, relevant to the service that needs to be provided.

By signing this document, you agree that PTI will acquire and process the following information for the **2018-61555-MOOG-Imaging Project**:

### HBU

Document Type	Indices	Description	Document Title
<b>A&amp;T Production Record</b>	BU/Department	Dropdown	<p style="text-align: center;">BU-P/N-M/N-W/O-S/N Sample: <b>HBU-1111-2222-3333-4444</b></p>
	P/N		
	M/N		
	W/O		
	S/N		

### CBU

Document Type	Indices	Description	Document Title
<b>A&amp;T Production Record</b>	BU/Department	Dropdown	<p style="text-align: center;">BU-P/N-M/N-W/O-S/N Sample: <b>CBU-1111-2222-3333-4444</b></p>
	P/N		
	M/N		
	W/O		
	S/N		

### GBU

Document Type	Indices	Description	Document Title
<b>A&amp;T Production Record</b>	BU/Department	Dropdown	<p style="text-align: center;">BU-P/N-M/N-W/O-S/N Sample: <b>GBU-1111-2222-3333-4444</b></p>
	P/N		
	M/N		
	W/O		
	S/N		



## GS

Document Type	Indices	Description	Document Title
<b>A&amp;T Production Record</b>	BU/Department	Dropdown	BU-P/N-M/N-W/O-S/N Sample: <b>GS-1111-2222-3333-4444</b>
	P/N		
	M/N		
	W/O		
	S/N		

## BIG

Document Type	Indices	Description	Document Title
<b>A&amp;T Production Record</b>	BU/Department	Dropdown	BU-P/N-M/N-W/O-S/N Sample: <b>BIG-1111-2222-3333-4444</b>
	P/N		
	M/N		
	W/O		
	S/N		


**FINANCE**

Document Type	Indices	Description	Document Title
<b>Payables</b>	Code		CODE_FY_BANK_CHECK NO._TRANSACTION DATE Sample: <b>00001_2017_BDO_123456789_MARCH 1-7 2017</b>
	FY		
	Bank	Dropdown	
	Check No.		
	Transaction Date		
<b>Vouchers</b>	Code		CODE_FY_JV_PERIOD_TRANSACTIONS DATE Sample: <b>00001_2017_JV_MARCH_MARCH 1-7 2017</b>
	FY		
	Journal Vouchers	Document Type	
	Period		
	Transaction Date		
<b>Balance Files</b>	Code		CODE_FY_GL_PERIOD_TRANSACTIONS DATE Sample: <b>00001_2017_GL_MARCH_MARCH 1-7 2017</b>
	FY		
	Bal Files	Document Type	
	Period		
	Transaction Date		
<b>PPE Docs</b>			
<b>Inventory</b>			
<b>Payroll</b>			
<b>Government</b>			



## SC

Document Type	Indices	Description	Document Title
<b>PO SS</b>	Document Type:	Dropdown	PO SS_PO # Sample: <b>PO SS_123456789</b>
	PO No.		
<b>Late Start PO/Buyer/Supplier</b>	Document Type:	Dropdown	DOC. TYPE_PO #_MONTH_VENDOR CODE_SUPPLIER Sample: <b>LATE START PO_123456_MAY_1111_CROWN</b>
	PO No.		
	Month		
	Vendor Code		
	Supplier		

## HR

Document Type	Indices	Description	Document Title
<b>Employment Record/201 File</b>	Document Type:		DOC TYPE_EE NAME_EE # Sample: <b>201 FILE_APOLINARIO MABINI_000023</b>
	Employee No.		
	Employee Name		
<b>Training &amp; Certification</b>	Document Type:		DOC TYPE_EE NAME_EE # Sample: <b>TRAINING &amp; CERT_APOLINARIO MABINI_000023</b>
	Employee No.		
	Employee Name		
<b>Medical Records</b>	Document Type:		DOC TYPE_EE NAME_EE # Sample: <b>MEDICAL RECORD_APOLINARIO MABINI_000023</b>
	Employee No.		
	Employee Name		

## CALIB

Document Type	Indices	Description	Document Title
<b>Calibration Records</b>	Category	Dropdown	CATEGORY_S/N_CALIB DATE Sample: <b>ECAL_123456789_3-18-2018</b>
	S/N		
	Calibration Date		


**E & S**

Document Type	Indices	Description	Document Title
<b>Compliance Records</b>	Document Type		DOCUMENT TYPE_SUPPLIER Sample: <b>COMPLIANCE RECORDS_CROWN WORLD WIDE</b>
	Supplier		
<b>Permits</b>	Document Type		DOCUMENT TYPE_PERMIT # Sample: <b>PERMIT_1234567</b>
	Permit #		
<b>Certificate of Treatment</b>	Document Type		DOCUMENT TYPE_MANIFEST # Sample: <b>CERTIFICATE OF TREATMENT_1234567</b>
	Manifest #		

**WAREHOUSE**

Document Type	Indices	Description	Document Title
<b>OP-Sheet (AFS)</b>	Document Type		DOCUMENT TYPE_P/N_W/O Sample: <b>AFS_1234567_9876541</b>
	P/N		
	W/O		
<b>Receiving Document Package</b>	Document Type		CN_AR NO_Customer Name Sample: <b>RDP_CROWN_1234567</b>
	Supplier Name		
	Lot #		
<b>D.R #</b>	Document Type		CN_OR NO_Customer Name Sample: <b>DR_1234567</b>
	D.R #		

**SPEC PROC**

Document Type	Indices	Description	Document Title
<b>Wet Cell Records</b>			
<b>NDT Records</b>			
<b>MetLab Records</b>			



## BCS

Document Type	Indices	Description	Document Title
<b>Baguio Capacity Reports</b>	Document Type		DOCUMENT TYPE_PRESENTATION NAME_NAME Sample: <b>BCS_MANCOM REPORT_JOSE RIZAL</b>
	Presentation Name		
	Name		

## EXTERNAL LOGISTICS

Document Type	Indices	Description	Document Title
<b>Import Documents</b>	Document Type		DOCUMENT TYPE_AIRWAY BILL #_SUPPLIER NAME Sample: <b>IMPORT DOCS_1234567_CROWN WORLD WIDE</b>
	Airway Bill #		
	Supplier Name		
<b>Local Logistics Documents</b>	Document Type		
	8105/8106 #		
	Supplier Name		

If you have any questions, please contact our Data Privacy Officer through the following channels:

Email: [privacy@paperlesstrail.net](mailto:privacy@paperlesstrail.net)

Phone: 893-5951, 893-5983