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## DATA PRIVACY STATEMENT

This document explains the approach adopted by modCounsel PH Inc. (“modCounsel”) and any third parties that support processes involving the collection and handling of your personal information on behalf of modCounsel. At modCounsel, we abide by Philippines’ RA 10173 Data Privacy Act of 2012 (“Data Privacy Act”), which forms the basis of how we treat your personal information and, specifically, how we collect and use any personal information that an applicant provides.

modCounsel collects and retains the following types of information about you when you interact with us, particularly when you are applying for or making inquiry into any job opening that has been advertised by modCounsel:

- Information to identify you such, as your full name, date of birth and nationality;
- Your contact information including your telephone/mobile numbers, postal and email address;
- Details from your curriculum vitae, including work history and references from your previous employer(s); your education, qualifications and your references from your institutions of study, and your professional activities and interests;
- Information you have publicly shared on social media (i.e., LinkedIn);
- Information about your cultural or ethnic origin to monitor our compliance with equal opportunities legislation;
- Information about your health and medical conditions (where required to make reasonable adjustments to your working conditions and environment);
- Information about criminal convictions or derogatory record where this is necessary for due diligence purposes and/or compliance with our regulatory obligations or employment law; and
- Other information needed to evaluate your suitability for a position including information which you provide personally during interviews or through our career portal.

### How we collect your personal information

We collect and retain your personal information in several ways. For example:

- When you provide your personal data via application forms, resumes and covering letters, update your profile through our career portal;
- From third parties, for example your previous or current employers, to verify details about you

and/or your application to work for us; and

- In various other ways you interact with us during the recruitment process.

We also proactively look for great talent to become part of our team through referrals and by using career profiles and contact information on publicly available websites such as LinkedIn.

### **Disclosure of your personal information**

modCounsel may need to disclose your information, including information we receive through the recruitment process, to our authorized third-party service providers to perform and/or support functions on our behalf. We only disclose your information to these groups when it is necessary for the services they provide. Services include but are not limited to the following and will depend on the circumstances, but will still relate to the purpose of assessing your application:

- Managing the application and applicant's interaction with the modCounsel;
- Verifying an applicant's background and and/or qualification based on information supplied; and
- Assessing an applicant's competency and/or interviewing an applicant;

### **Taking care of your personal information**

modCounsel store information in different ways, including in paper and electronic form. The security of your personal information is important to us, and we take reasonable steps to protect the information from misuse, interference and loss and from unauthorized access, modification and disclosure.

### **How long we store your personal information**

Your personal data will be deleted when it is no longer reasonably required for the purposes described above, or you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data as per retention requirements of this country.

Applicants who choose not to have their information retained for future consideration or otherwise may express their wishes by sending an email to [privacy@modcounsel.com](mailto:privacy@modcounsel.com) at any time.

If you have any questions or would like to exercise any rights under RA 10173 Data Privacy Act of 2012, please contact us using this email address at [privacy@modcounsel.com](mailto:privacy@modcounsel.com).