# Capital One Philippines Support Services Corporation – Online Privacy Standard

Capital One Philippines Support Services Corporation (COPSSC) is committed to your privacy.

Our goal is to maintain your trust and confidence when handling personal information about you.

### What this policy covers

This COPSSC Online Privacy Standard ("Privacy Standard") describes how we process your information when you access or submit information to COPSSC's Careers Website.

Collecting, Using, and Sharing Information

## How Does COPSSC Collect Information Online?

We collect information in a variety of ways. For example, we may collect information:

- Directly from you. We collect information directly from you, such as when you submit personal information while applying for a job with us.
- Automatically when you access or use COPSCC's Careers Website. We and others on our behalf may collect Device Data, Online/Mobile Activity Data, and/or other information automatically when you interact with us online.

This Privacy Standard applies to information we collect when you use our COPSSC's Careers Website. We may combine that information with information we collect from other ways, such as from our phone calls and emails with you, from third-party data sources for fraud prevention, identity verification, and from publicly available data sources. We will treat such combined information in accordance with this Privacy Standard.

#### What information does COPSSC Collect?

Depending on how you interact online with us, we may collect Contact or Identity data, such as your name, email address, and phone number. These are collected from you for the purpose of allowing us to process your application for employment (if applicable), so that we can contact you.

If you inquire about or apply for a job at COPSSC, we may also collect employment application data, such as employment and education history collected through COPSSC's Careers Website, phone calls or through emails. These are collected from you so that we can process your application and evaluate your potential employment with the company. We may also use the information you provide for purposes of conducting confirmation checks to determine their accuracy.

When you browse our website, we or third parties acting on our behalf may also collect:

- Device data, such as but not limited to your device type, web browser type and version, display/screen resolution, language
- Online/mobile activity data while logged into COPSSC's Careers website, such as login data, search history or pages visited, geolocation data, social media channels where users are coming from leading to the site and time of visiting the site.

The above enumerated information is collected in order to allow us or third parties to continuously update our online system and provide you with an optimal and user-focused browsing experience.

If you disclose any information relating to other people to us or to our service providers when you visit or use COPSSC's Career Website, you acknowledge that you have consent to do so and permit us to use the information in accordance with this Privacy Standard.

## How does COPSSC use this Information?

We use information for various purposes depending on your interaction with us.

Your personal information such as your name, contact number, email address and employment application data such as employment and education history, may be used

- for Human Resource Management, Financial Management, and Security Management;
- to process your application and evaluate your potential employment with the company;
- to conduct confirmatory checks to determine accuracy
- to inform you of other roles that may become available from time to time.

Your personal information such as device data and online/mobile activity data while logged into the COPSSC's Careers Website may be used.

• For conducting analytics and research, such as examining which parts of our website you visit, evaluating user interface and experiences, testing features or functionality, performing debugging and error repair, and analyzing the use of COPSSC's Careers Website;

• To help us understand where (through geolocation data) where a majority of those accessing the website are located and the sources of website/online traffic

In general, any of the information provided above may be used:

For carrying out legal and business purposes, such as complying with applicable laws, responding to civil, criminal, or regulatory lawsuits, subpoenas, or investigations, exercising our rights or defending against legal claims, resolving complaints and disputes, performing compliance activities, regulatory reporting, performing institutional risk control, conducting human resources activities, and otherwise operating, managing, and maintaining our business.

In addition, any of the information you provide may be anonymized so that you are non-identifiable. This kind of information may be compiled and converted into various statistics to understand trends or to research the percentage of users accessing a specific website feature. Information that has been aggregated and deidentified is no longer subject to this Online Privacy Standard

# How does COPSSC share this information?

We share information through a variety of ways. For example, we may share your information with:

• Service providers. We use other companies to provide services on our behalf and to help us run our business. We may share information with these service providers, or they may collect information on our behalf, for various business purposes. For example, we use service providers for hosting and securing our information systems, detecting and preventing fraud, assisting with human resources activities, analyzing and improving COPSSC's Careers Website. Information that is shared with these service providers will comply with guidance from the Data Privacy Act of the Philippines by having Outsourcing Agreements in place for the protection of your personal information

• Third parties with whom you authorize or direct us to share your information. We share information with your consent or at your direction. For example, this website which is managed by a third party, collects your name, email address and contact number for the purpose of your application with us. Prior to sharing your information, we will obtain your consent and such sharing of information shall be governed by a Data Sharing Agreement pursuant to the requirements of the Data Privacy Act, its implementing rules and regulations (IRR), and the issuances of the National Privacy Commission (NPC). The identity of the third party shall be disclosed to you upon request.

• Government entities and others with whom we share information for legal or necessary purposes. We share information with government entities and others for legal and necessary purposes, such as:

• To respond to requests from our regulators or to respond to a warrant, subpoena, governmental audit or investigation, law enforcement request, legal order, or other legal process.

• For other legal purposes, such as to enforce our terms and conditions, exercise or defend legal claims, or if we determine that disclosure is necessary or appropriate to protect the life, safety, or property of our customers, ourselves, or others.

• Recipients of aggregated and de-identified information. We may share aggregated and de-identified information with third parties for legal or contractual compliance and/or other business purposes

## What online tracking technology does COPSSC use?

We and third-party providers acting on our behalf use a variety of online tools and technologies to collect information when you visit or use COPSSC's Careers Website, including Device Data and Mobile/Online Activity Data.

These tools include:

- Server logs. Server logs automatically record information and details about your online interactions with us. For example, server logs may record information about your visit to our website on a particular time and day.
- Cookies. Cookies are small text files that a website's server stores in your web browser. Cookies allow companies to recognize your device and store information about your account and preferences. For example, we may use cookies to store information about pages visited on our sites, language preferences, your relationship with us, or other information that we have associated with you or your device. You can manage cookies on your device.
- Pixel tags. A pixel tag (also known as a web beacon, clear GIF, pixel, or tag) is an image or a small string of code that may be placed in a website, advertisement, or email. It allows companies to set or read cookies or transfer information to their servers when you load a webpage or interact with online content. For example, we or our service providers may use pixel tags to determine whether you have interacted with a specific part of our website, or opened a specific email.
- Third-party plugins. COPSSC's Careers Website may include plugins from other companies, including social media companies (e.g., the Facebook "Like" button). These plugins may collect information, such as information about the pages you visit, and share it with the company that created the plugin even if you do not click on the plugin. These third-party plugins are governed by the privacy policies and terms of the companies that created them.

How does COPSSC use online tracking technology to conduct personalization and analytics, and how can you opt out?

• Personalization. We may use online tracking technologies to recognize your computer or device when you're logged in, enable enhanced features or functionality, and improve usability.

• Analytics. We and our third-party providers use online tracking technologies to engage in data analytics, auditing, measurement, research, reporting, and debugging on our Careers Website. For example, we use Google Analytics for such purposes. You can learn more about Google Analytics here and opt out here.

#### Storage, Retention, and Destruction of your Personal Information

We will store your information on secure servers with modern security measures in place to protect against the loss, unauthorized access, alteration, or misuse of such information.

With our commitment to protect the information we collect from you through this website, we will only keep your personal information for as long as necessary and dispose following guidance from our Information Retention Standards and other related standards and procedures and for the fulfillment of the purposes stated in this privacy notice.

You may request for the removal/destruction of your personal information by reaching out to us in the "Contact Us" section of this document. Please note that if you request removal/destruction of your personal information, we may no longer be able to provide you with services that require the use of your personal information. Further, we may retain certain personal information that is necessary if there are valid grounds under the Data Privacy Act (DPA) for us to do so (e.g., for the defense against legal claims).

#### Your Privacy Rights and Choices

You have the right to withdraw your consent to the processing of your personal information in cases where consent is required by law to process your personal data. However, please note that withdrawal of such consent may prevent us from providing services to you. To withdraw your consent, please contact us using the contact details in the "Contact Us" section.

To the extent required by applicable law, you have rights regarding your personal data, including: your rights to be informed of the processing of your personal data, access, correction, suspension, blocking, removal or destruction, cessation of processing, and compensation for damages, whenever applicable. To assert your rights, please contact us using the contact details in the "Contact Us" section.

#### Manage cookies on your device

You can set your web browser to inform you when cookies are set, delete your cookies, or block cookies altogether. Each browser (e.g., Chrome, Safari, Firefox, Internet Explorer) is a little different, so look at your browser's settings or support pages to assist you in managing cookies on your browser or device. Your decision not to accept cookies could limit access to some of our Careers Website features.

Certain web browsers can transmit "Do Not Track" signals, but there is no universally accepted standard for how to interpret such signals. Our Careers Website does not function differently in response to these web browser "Do Not Track" signals.

# Changes to this Statement

This Statement describes COPSSC's current online privacy practices. COPSSC may change its online privacy practices in the future and we may revise this Statement to reflect material changes. This Statement was last revised October 21, 2020, and is effective as of that date.

# Contact Us

If you have any questions about this Privacy Notice, please contact our Data Protection Officer (DPO) by email copsscdataprivacy@capitalone.com . Alternatively, you may reach our DPO through

Data Protection Officer Capital One Philippines Support Service Corporation (COPSSC) North Bridgeway Northgate, Filinvest Alabang, Muntinlupa, 1781 Metro Manila, Philippines Tel: +63 2 8779 9300