

PRIVACY POLICY of NEED MONEY FINANCING INC.

Users (hereinafter referred to as "User", individually, and "Users", collectively) of the website <https://needmny.com> (hereinafter referred to as "Website") are provided with the suitable technical resources so that, prior to the voluntary completion of User Data, Users can access this Privacy Policy and any other relevant information on the Protection of User Data.

This Privacy Policy is applicable to any User of the Website through any of its features processes, functions and its related services including, but not limited to, loan applications ("Services") to NEED MONEY FINANCING INC. (hereinafter referred to as "PRS"), hence Users are instructed to review it from time to time for updates that are effected on a regular basis.

The User is advised to read this Privacy Policy carefully because use of the Website indicates that the User consents to the Website's usage of the User's Data.

1. General terms

1. This Privacy Policy is binding in relation to all User Data received by PRS from the natural person holding such User data at the time of using or attempting to use the services of PRS, including contracting loans.
2. User accepts this Privacy Policy through the use of the website and gives consent for the collection, processing, storage and transmission of the User's Data in the formats prescribed by the applicable Philippine laws and regulations as well as this Privacy Policy.
3. The purpose of this Privacy Policy is to inform the Users of their right to privacy to the User Data in relation to the collection, use, storage, processing, disclosure, security and eventual destruction of such Data by PRS.

2. User Data

1. Collection of User Data is done through several sources:
 1. by virtue of the registration on the Website;
 2. upon completing the online loan application form;
 3. by virtue of communication with PRS employees;
 4. by virtue of credit reports and data; and,
 5. by virtue of navigation through the Website.
2. User Data are both Personal and Non-Personal Information:
 1. Personal Information is any information from which the identity of a User can be reasonably and directly ascertained, or when put together with other information would directly and certainly identify an individual, such as name, gender, date of birth, address, telephone/mobile number, email address, proof of identification, etc. It also includes information about:

1. the data that would help PRS evaluate the User's credit standing such as spouse details financial details, business details, and other data points whenever applicable;
 2. the location of the User's device, whether desktop, laptop, or mobile devices, as used to access the Website; and
 3. the User's navigation experience when accessing the Website to see activities done in the Website, the pages visited, and the sequence thereof.
 2. Non-Personal Information is any information that does not identify the User individually, and includes statistical and analytical data, and anonymous and aggregate reports.
 3. The User may also be requested to update Personal Information from time to time. Should the User be unable to supply the required Personal Information, PRS may be unable to provide the User with requested products and services and updates on the latest offerings. The User may also be unable to participate in PRS events, promotions or other activities.
 4. Depending on the Users' device or Internet browser settings, when Users access the Website and electronically communicate with PRS, PRS may use cookies, web beacons, small data text files or similar technologies to identify the Users' devices and record the Users' preferences, with the Users' consent.
 5. The User has the duty to inform PRS of any change in the information provided, in order to keep it updated and avoid errors.
 6. If the User uses our Website or Services in place of other people, such as family, friends or employees, User must ensure that he is authorized to provide PRS with their Personal Information. Use of the Website in this manner automatically presumes that User has obtained proper authorization from the owner/s of the Personal Information and have informed said person/s of this Privacy Policy. User hereby represents and warrants that all family, friends or employees whose personal information User has provided to PRS have agreed to the use, processing, storage and/or disclosure of their data in accordance with this policy and all applicable laws.
3. User Consent
1. User consent is a pre-requisite for the availment of the Services. If the User chooses not to provide PRS with any Personal Information required from User, PRS reserves the right to refuse User request for, or the continuation of, any of the Services.
 2. The User may not withdraw consent, at any time during use of PRS's Services, to the collection, processing, and/or storage of any Personal Information, as defined in this Privacy Policy unless User settles all obligations.
4. Anti-Money Laundering Compliance

1. The Anti-Money Laundering Act (hereinafter referred to as "AMLA"), as amended, requires all Covered Institutions to obtain, verify, and record information that identifies each person who applies for a loan.
 2. Being a Covered Institution under AMLA, PRS will ask for the User's name, address, date of birth, business, tax identification number, Social Security System or Government Service Insurance System numbers, and other information that will allow PRS to identify the User.
 3. PRS may also ask to see the User's driver's license, passport, or other competent evidence of identity bearing the User photograph and signature in order to comply with AMLA and other applicable laws and regulations.
5. User Data Processing
1. Without limitation to the foregoing, User data may be processed by PRS among others for the following purposes:
 1. Verify the User's identity;
 2. Manage the provision of services being offered by the Website, such as processing the loan application or rendering the loan credit decision, among others;
 3. Evaluate the User's credit standing through external credit report providers and bureaus;
 4. Contact the User;
 5. Transfer the loan proceeds;
 6. Manage and recover outstanding debt;
 7. Update the information regarding the loan granted;
 8. Enhance the User's customer experience and improve, develop and determine customized products to meet customer preferences and needs;
 9. Send commercial communications on the products and services;
 10. Improve the service and contents of the service through statistical analysis and market research;
 11. Abide by any safety, security, public service or legal requirements and processes;
 12. Process information for statistical, analytical, and research purposes;
 13. Any other purpose expressly provided in the Loan Application Form and/or in the General Terms and Conditions as well as in the Promissory Note / Disclosure Statement; and
 14. Other specified and legitimate purposes determined and declared before, or as soon as reasonably practicable after collection of the Personal Information
 2. PRS also uses the User's Non-Personal Information for statistical, analytical, and research purposes to create anonymous and aggregate reports.
 3. User consents that PRS maintains the data provided even when the loan application has not been accepted, in order to ensure compliance with legal obligations and avoid duplication in the new applications treatment.
 4. PRS outsources or contracts the processing of User Data to third parties, such as but not limited to the following parties: vendors, service providers, partners or other telecommunications operators, to fulfill any of the above

purposes. These parties are only authorized to use User Data for such contracted purposes. These parties may have access to User Data for a limited time under reasonable contractual and technical safeguards to limit their use of such information. PRS requires these parties to protect User Data in compliance with this Privacy Policy.

5. PRS does not share User Personal Information with any third parties for their business purposes, such as, including without limitation, marketing and advertising without User's express consent and authorization.
6. Third-Party Links and Other Companies / Organizations
 1. Links to other websites (i.e. third-party links) may appear on which have its own privacy policy and are understood as accepted by clicking on them. This Privacy Policy does not apply to such third-party links that may appear on the Website. The responsibility of PRS with regards to the User's Data extends only to the Website proper.
 2. This Privacy Policy also does not regulate the data processing activities of other companies and organizations that advertise PRS's services.
7. Sharing of Personal Information

PRS may share your Personal Information with third-parties, which includes, but is not limited to the following entities:

 1. Affiliates and/or Members of the corporate family, including subsidiaries, to assist in providing the Services listed in the Website, to help detect and prevent potentially illegal acts and violations of our policies, and to provide proper data analytics on the use of the Website, including marketing communications;
 2. Courts of Law, government officials, law enforcement, or other regulators in relation to a subpoena, court order, or other legal process or requirement under Philippine law or regulation, when PRS needs to do so to comply with such law or regulation, or when PRS believes, in its sole discretion, that the disclosure of Personal Information is necessary to prevent physical harm or financial loss, or to report suspected illegal activity or investigate violations of our Terms and Conditions;
 3. Credit bureaus and collection agencies to report account information, as permitted by law.
 4. Customer support for customer service purposes;
 5. Banking or financial partners, as permitted by law or as required by the contractual business relationship;
 6. Legal department, to ensure compliance with government rules and regulations and to protect us against harm to the rights, property, or safety, the other users of the Website or the public, as required or permitted by law;
 7. Service Providers, to enable service providers under contract with PRS to support our business operations, such as fraud prevention, bill collection, marketing, customer service and technology services.
8. Please note that some of these third parties may be located in other countries with different rules and regulations on processing personal information. By agreeing to

this Privacy Policy you acknowledge that Personal Information can be transferred cross-border to other countries and you are consenting to such transfer.

8. Special Notice - Minors

Use of the Website is not aimed at persons under 18 years old and PRS will not collect, use, provide or process in any other form any personal information of persons under the age of 18 deliberately.

We therefore also ask the User, if under 18 years old, please do not send us personal information (for example, your name, address and email address). If User is under 18 years old and nevertheless wish to ask a question or use this Website in anyway which requires you to submit personal information please get your parent or guardian to do so on your behalf.

9. Accuracy of Personal Information

If the User would like to review, change or delete any Personal Information supplied to PRS, please contact PRS immediately using the contact of the Data Protection Information officer listed below.

10. Personal Information Storage

PRS will retain your Personal Information no longer that it is necessary and relevant for the Services. PRS may also retain Personal Information to comply with the requirements of any laws and regulations, to prevent fraud, to resolve disputes and various troubleshoot problems, and to take other actions permitted or required by applicable laws and regulations. Under our data policies, we will dispose Personal Information in a secured manner and in accordance with applicable laws and regulations, after such Personal Information is no longer necessary and ceases to be relevant for our Services, unless applicable laws and regulations require otherwise, or unless the requested by the user in writing.

11. Security

Security of User's Personal Information is PRS priority. Except as indicated in this Privacy Policy, PRS will not disclose User's Personal Information to third parties without User's express consent. Further, PRS will take all reasonable procedures and exert our best efforts to ensure all Personal Information received shall be kept confidential and secure, whether online or offline. PRS will protect User's Personal Information using a variety of technical and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. PRS may use and amend from time to time various security measures, as new technology becomes available, as appropriate, such as firewalls and data encryption, access controls to data centers.

12. Mobile Accessibility

PRS may offer User the ability to connect with our Services using a mobile device, either through a mobile application or via a mobile optimized website. The provisions of this Privacy Policy apply to all such mobile access and use of mobile devices.

13. User Confidentiality

To further secure the privacy of your Personal Information, we advise to keep your any account details confidential at all times.

14. Privacy Policy Updates

PRS may update or amend this Privacy Policy from time to time by posting a revised version on the Website. User is advised to review this Privacy Policy periodically for

the latest information. Changes to this Privacy Policy are effective from the date of posting. If PRS makes any substantial changes to this Privacy Policy and the way in which PRS will use your Personal Information, PRS will post these changes on the Website and will do its best to notify User of any significant changes. By continuing to use our Services, User accepts and consents to the updated terms of this Privacy Policy.

15. Inquiries and Complaints

If the User believes his account or any personal data may have been misused or abused, or if the User believes that the security and protection of his/her respective personal data may have been compromised, User may lodge inquiries and complaints to the Contact Information below and briefly discuss such matter, together with User's contact details for reference.

If the User is not satisfied with the manner of how the complaint was handled, or if User still believes that there exists a threat of breach of his/her Personal Information, User may directly lodge your complaint with the National Privacy Commission.

16. Contacts

1. For any concern regarding the User's personal data, the duly-designated Data Protection Officer of PRS may be contacted, as follows:

17. Email: info@needmny.com

Contact Number: (02)908 1988

Address: Muelle de Binondo Binondo, Maynila 1006 Kalakhang Maynila