

CARE PANDA INC. DATA PRIVACY POLICY

Compliance with the Data Privacy Act of 2012 (Republic Act No. 10173)

Version 1.4 • Effective 18 October 2026 • Registered in Parañaque City, Philippines

Care Panda Inc. ("Care Panda", "we", "us", or "our"), with registered office at 9th Floor, Sinocan Corporate Center, Aseana Business Park, Tambo, Parañaque City 1701, Philippines, is committed to safeguarding the personal data and sensitive personal information of all visitors, Clients, Care Partners, Care Recipients, and representatives who interact with the Care Panda Platform (thecarepanda.com, app.thecarepanda.com).

This Data Privacy Policy (the "Policy") sets forth our policies and practices regarding the collection, processing, storage, sharing, and protection of personal data in compliance with Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012 (DPA), its Implementing Rules and Regulations (IRR), and the regulatory issuances of the National Privacy Commission (NPC) of the Philippines.

1. Personal Information Controller (PIC)

For the purposes of the DPA, Care Panda Inc. acts as the Personal Information Controller (PIC) for account, booking, verification, customer support, and financial transaction records processed across the Platform.

Care Panda has designated a registered Data Protection Officer (DPO) to oversee privacy governance:

Data Protection Officer: Atty. Joy Huiso

Office of the DPO, Care Panda Inc.

9th Floor, Sinocan Corporate Center, Aseana Business Park, Tambo, Parañaque City 1701, Philippines

Email: hello@thecarepandaph.com

2. Personal Data We Collect

- **Account & Identity Data:** Full legal name, email address (primary account identifier), verified mobile number, date of birth, home address, and government identification numbers.
- **Care Profile Data:** Care recipient names, emergency contact details, primary language, service locations, shift preferences, and special care instructions.
- **Sensitive Personal Health Information:** Medical conditions, physical mobility limitations, dietary allergies, cognitive state, and prescribed medication schedules provided to facilitate appropriate care delivery. This information is classified as Sensitive Personal Information under Section 3(l) of RA 10173 and is processed strictly upon explicit consent.
- **Care Partner Professional Credentials:** Government-issued PRC nursing licence numbers, PRC board verification data, NBI clearance certificates, educational diplomas, training certifications, and contact details of professional character references.
- **Payment & Financial Data:** Payment methods are tokenized and processed securely by our PCI-DSS Level 1 certified payment gateway (PayMongo). Care Panda never stores full debit/credit card numbers or CVVs on its servers. We retain only transaction references, payment timestamps, and last four digits.

- **Booking & Operational Data:** Shift dates, hours, check-in and check-out timestamps, GPS coordinates captured at shift commencement/completion for safety verification, Care Credits ledger balances, and voluntary tip disbursements.

3. Purposes and Lawful Bases of Processing

- **Contractual Performance (Sec. 12(b)):** To establish user accounts, verify identity, match Clients with qualified Care Partners, coordinate bookings, and execute shift dispatch.
- **Explicit Consent (Sec. 13(a)):** To process health-related details and care requirements strictly to ensure the physical safety and appropriate care of the Care Recipient.
- **Legal Obligation (Sec. 12(c)):** To comply with Philippine tax reporting, Bureau of Internal Revenue (BIR) regulations, anti-fraud rules, and statutory record-keeping mandates.
- **Legitimate Interests (Sec. 12(f)):** To safeguard user security, prevent off-platform circumvention, investigate safety incidents, audit billing integrity, and enhance platform performance.

4. Information Sharing and Disclosure

- **Client-Partner Coordination:** Care Partners receive only the essential care instructions, service address, and recipient care notes necessary to execute a confirmed booking. Clients receive the partner's verified professional profile, qualifications summary, ratings, and contact info.
- **Authorized Service Providers:** We share data with accredited service providers bound by Data Processing Agreements, including PayMongo (payment gateway), Supabase (encrypted database hosting), Cloudflare (network security and CDN), and Resend (transactional email dispatch).
- **Legal & Law Enforcement:** We disclose records when required by valid court order, subpoena, National Privacy Commission directive, or law enforcement agency in response to an active safety emergency.
- **No Data Selling:** Care Panda maintains a strict policy: We do not sell, rent, monetize, or trade your personal data to any third party for marketing or advertising purposes.

5. Security Safeguards and Data Retention

- **Technical Safeguards:** All web and mobile traffic is encrypted in transit using Transport Layer Security (TLS 1.3). Database records are encrypted at rest using industry-standard AES-256 encryption. Database access is strictly partitioned using PostgreSQL Row Level Security (RLS).
- **Organizational Safeguards:** Access to sensitive user records is limited to authorized personnel on a role-based, need-to-know basis, subject to non-disclosure obligations and automated audit logging.
- **Retention Schedule:** Financial, booking, and tax transaction records are retained for ten (10) years in compliance with Philippine tax and accounting regulations. General account records are maintained while the account remains active.
- **Account Deletion (48 Hours):** Users may request account and data deletion at any time via in-app settings or by emailing hello@thecarepandaph.com. Deletion requests are fulfilled within 48 hours, subject only to statutory financial retention requirements.

6. Data Subject Rights Under RA 10173

As a data subject under Philippine law, you have the right to:

- Be informed whether personal data pertaining to you is being processed.
- Reasonable access to your personal data upon written request.
- Dispute the inaccuracy or error in your personal data and have it corrected.

- Suspend, withdraw, or order the blocking, removal, or destruction of your data.
- Obtain a portable electronic copy of data being processed.
- Lodge a formal complaint with the National Privacy Commission (NPC) at privacy.gov.ph if you believe your statutory privacy rights have been violated.

7. Cookies and Local Storage

The Platform uses essential first-party session cookies and secure browser local storage exclusively for user authentication, session security, and language preferences. Care Panda does not deploy third-party advertising trackers or behavioral profiling pixels.

8. Privacy Inquiries and Contact

To exercise your data subject rights or submit privacy-related complaints, contact:

Data Protection Officer: Atty. Joy Huiso

Care Panda Inc., 9th Floor, Sinocan Corporate Center, Aseana Business Park, Tambo,
Parañaque City 1701, Philippines

Email: hello@thecarepandaph.com

National Privacy Commission: <https://privacy.gov.ph>