

## **CONVERGE INFORMATION AND COMMUNICATIONS TECHNOLOGY SOLUTIONS, INC. STOCKHOLDERS PRIVACY NOTICE**

Your privacy is important to Converge Information and Communications Technology Solutions, Inc. (also "Converge", "us", "our", or "we"). As a Personal Information Controller ("PIC"), we are committed safeguard your Personal Data and uphold your privacy rights pursuant to the Data Privacy Act of 2012 ("DPA"), its Implementing Rules and Regulations ("IRR"), the issuances and releases of the National Privacy Commission, and all applicable privacy laws (collectively, "Privacy Laws").

This Privacy Notice outlines the manner by which Converge collects and processes Stockholder Personal Data in relation to the Annual General Stockholder Virtual Meeting.

### **What Personal Data We May Collect**

We adhere to the Data Privacy principles of proportionality, transparency, and legitimacy. Any information or personal data that you voluntarily provide to us will only be used for the purpose stated herein.

Converge may collect and process the following Personal Data from you: your name, address, mobile number, email address, government issued ID, number of the securities account, the certificate of stocks, and number of shares held. Stockholders who will register, attend, and participate in the Annual Stockholders' Meeting.

Azeus Systems Limited or "Convene" platform is an accredited third-party virtual meeting platform engaged and authorized by Converge in the conduct of the virtual Annual Stockholders' Meeting. When you access Convene, the following information may also be collected from you via the internet browser during an ongoing connection for communication between the internet browser and the Convene platform:

- Username and password;
- Session data, such as your login timestamp; and
- Records of accessing any files or documents via the platform.
- Audio and Visual Recording of the Meeting

### **How We Collect Your Personal Data**

We collect your Personal Data by/when you register through the Convene platform, or via our stock and transfer agent, or via the PCD nominee or broker you have chosen.

### **How We Process Your Personal Data**

Convene's virtual meeting platform was engaged and authorized by Converge in the conduct of the virtual Annual Stockholders' Meeting. Apart from providing us with the needed platform for the virtual meeting, Convene is also responsible for the online registration of stockholders and user account authentication of stockholders who will be attending the virtual Annual Stockholders' Meeting carried out by Converge. Please read Convene's Privacy Notice during the registration of your account.

Your Personal Data will be processed to conduct the Annual Stockholders' Meeting. This may include, among others, the preparation of the Annual Stockholders' Meeting, sending notices and communications related to the event, tabulation and validation of votes, and registration of your stockholder account/s.

We will be using your Personal Data to validate if you are a stockholder eligible to participate and vote during the Annual Stockholders' Meeting, which will include verification by our stock and transfer agent.

Furthermore, we will also process your Personal Data for the purposes of complying with the regulatory requirements of the Securities and Exchange Commission, the Philippine Stock Exchange retention requirements, and fulfillment of other legal obligations.

Converge adheres to the data privacy principle of Lawful Processing under Section 12 of the DPA in the collection and processing your Personal Data, as well as its IRR and other applicable Data Protection laws.

### **How We Share Your Personal Data**

Converge may utilize a number of its service providers for the proper handling and management of the Annual Stockholders' Meeting virtual meeting.

Converge has engaged a PIC who will be processing your personal data on our behalf and are contractually bound to maintain confidentiality and security of your Personal Data in compliance with Section 14 of the DPA. This Converge authorized PIC will be responsible for assisting in tabulating the votes for the election of directors during the Annual Stockholders Meeting and other reporting requirements.

Converge may also share or disclose your Personal Data with third parties if we are legally required to comply. This may include summons or orders from public authorities, government bodies, regulatory agencies, or pursuant to court rules and procedures.

### **How Long We Retain Your Personal Data**

We may process and retain your Personal Data for no longer than is necessary in relation to the Annual Stockholders Meeting held by us, and for as long as necessary to comply with our obligations in compliance with applicable laws and, if relevant, to further handle possible claims or disputes arising from the Annual Stockholders' Meeting.

Converge may proceed with the destruction and/or deletion of your Personal Data once the purposes mentioned in this Privacy Notice have been met and will no longer serve any business purpose.

Your Personal Data may also be deleted once the services offered by our authorized third-party service providers have been fulfilled, or in connection with the policies in relation to managing the Annual Stockholders Meeting in compliance with the Revised Corporation Code.

### **International Data Transfers**

Converge protects your Personal Data, regardless of whether it is being processed inside or outside the European Economic Area ("EEA"). We may share your Personal Data with recipients outside the EEA only after having assessed their security posture, reliability and cybersecurity hygiene and after having ensured that your Personal Data is adequately protected. We have executed the necessary agreements with our Personal Information Processors, for example by having them sign the EU Commission approved standard contractual clauses.

### **How We Secure Your Personal Data**

We ensure that your data is secure, protected, and managed accordingly. We also ensure that the appropriate and applicable technical, physical and organizational measures are implemented to safeguard your privacy and security of your personal data, in accordance with this Privacy Notice and our Privacy Laws. We also ensure that contractual agreements are executed with our authorized PICs and PIPs to protect your Personal Data against any unauthorized processing, unlawful alteration,

exposure, destruction and/or loss of your Personal Data.

Our platform provider, Convene, also adheres to these Privacy Laws. To learn more about how they secure your personal data, you may view their Privacy Notice here <https://www.azeusconvene.com/virtual-agm/privacypolicy>.

### **Your Rights as a Data Subject**

We respect and uphold your rights as a Data Subject under the Privacy Laws which includes your right, (i) to be informed, (ii) to obtain a copy of your Personal Data that we of you, (iii) to request for the rectification of your Personal Data, (iv) to remove or delete your Personal Data and/or restrict its further processing, (v) to object to the processing if you have doubts regarding Converge's legitimate interests of processing your Personal Data, and (vi) the right to file or lodge a complaint to National Privacy Commission.

### **Do you have inquiries or complaints?**

For any questions, complaints, comments, requests related to this Privacy Notice, exercise of your rights as a Data Subject, or for any issues and concerns involving the privacy of your Personal Data, please contact:

#### **Data Protection Officer**

Reliance ICT Building, #99 E. Rodriguez Jr. Avenue, Brgy. Ugong,  
Pasig City, Philippines [privacy@convergeict.com](mailto:privacy@convergeict.com)