



PRIVACY NOTICE FOR VISITORS

PHILIPPINES

Dear Visitors,

Zuellig Pharma is committed to respecting the privacy of every person while also ensuring the safety and security of everyone inside the premises. We encourage you to read this Privacy Notice to understand how we process your personal data once you visit our facilities.

A printed copy of this Privacy Notice shall be readily available in all receiving areas where visitors log their information. By indicating your name on the visitor log sheet, you signify your understanding and provide consent to the processing of your personal data in accordance with this Privacy Notice.

I. GENERAL

This Privacy Notice sets out how the various entities within the Zuellig Pharma group (a non-exhaustive list of our entities in the Philippines is found in Part XII (Contact Us) below (hereinafter collectively referred to as “**Zuellig Pharma**”, “**our**”, “**us**” or “**we**”) collects, uses, discloses, and processes (“**Process**”) the personal data of visitors and/or guests visiting our premises (hereinafter collectively referred to as “**you**”) in compliance with the requirements of Republic Act No. 10173, otherwise known as the “Data Privacy Act of 2012”, its Implementing Rules and Regulations, and other relevant issuances of the National Privacy Commission (collectively “**the Act**”). Unless otherwise indicated in this Privacy Notice, the terms used herein shall have the meaning given to them in our Privacy Policy located at <https://www.zuelligpharma.com/privacy-policy>.

Save as stated herein, our personal data handling practices remain as stated in our Privacy Policy.

II. PROCESSING OF PERSONAL DATA (WHAT PERSONAL DATA WE COLLECT)

We will collect personal data and other information which may be considered as sensitive personal data under the Act that can be used to identify or contact you. Specifically, we will Process the following information:

WHAT PERSONAL DATA WE COLLECT

Visitors and Guests	<ul style="list-style-type: none">• Full Name;• Time of Arrival;• Time of Departure;• Company Name;• Mobile Number• Purpose of Visit;• Type of Identification Card (ID) visually examined by the security personnel;• Photographs and video recordings via CCTV (we do not record audio) installed in common areas and in entry and exit points in our premises.• Body temperature (whenever required by the health authorities)
Visitors and Guests with vehicles	<ul style="list-style-type: none">• Vehicle plate number
Visitors and Guests with firearms	<ul style="list-style-type: none">• Visual examination of Permit to Carry and Firearm License

III. LAWFUL BASIS AND PURPOSE OF PROCESSING (WHY WE COLLECT YOUR PERSONAL DATA)

WHAT ARE OUR LAWFUL BASIS FOR PROCESSING

Zuellig Pharma shall only collect data that is relevant, adequate, and not excessive for the purposes for which such data are obtained. We collect your personal data for one or more of the following purposes:

PURPOSES	LEGAL BASIS
<ul style="list-style-type: none"> • To ensure safety and security of our premises; • To manage access of our visitors to our premises; • To issue visitor and access passes; • To monitor day-to-day transactions involving visitors; • To maintain a record of visitors for security purposes; • To help us investigate reported violations of company policies and other applicable laws; • To respond to inquiries and requests made during your visit; and • To generate statistics useful for planning and service improvement purposes. 	<ul style="list-style-type: none"> • Where it is in our legitimate interest to do so for safety and security of everybody in our premises
<ul style="list-style-type: none"> • To fulfil reportorial requirements if and when required by health authorities for contact-tracing purposes; 	<ul style="list-style-type: none"> • Where it is in our legitimate interest to do so for safety and security of everybody in our premises; and • Where it is required to comply with a legal obligation

IV. CONSEQUENCES OF REFUSAL OR FAILURE TO PROVIDE PERSONAL DATA

Unless stated otherwise, the personal data provided to us are wholly voluntary in nature and you are not under any obligation or duress to do so. However, in some circumstances, if you do not provide us with your personal data described in this Privacy Notice, Zuellig Pharma reserves the right to deny entry to our premises due to security and/or health reasons.

V. DISCLOSURE OF PERSONAL DATA (WHO WE SHARE YOUR DATA WITH)

Zuellig Pharma does not transfer or share your personal data with other persons or organizations, unless required or permitted by law. For us to fulfil the purposes listed above, we may disclose your personal data to the following parties, including but not limited to:

- 5.1. Your employer or the organization or company you are representing to verify information for legal purposes;
- 5.2. Third Parties such as our auditors to check the quality of our service, to demonstrate that we have taken appropriate measures to protect personal data, and to prove our compliance with the Act.
- 5.3. any person, government authority, statutory authority, health authority, police forces, industry regulator or other relevant third party whom we are compelled or required to do so pursuant to any law, or if we have good faith belief that such disclosure is necessary to protect and/or defend our rights and interests or in connection with an investigation of fraud, infringement, piracy, tax avoidance and evasion or other unlawful activity; and

5.4. any other party requested or authorized by you for the above purpose or any other purpose for which your personal data was to be disclosed at the time of its collection or any other purposes directly related to any of the above purposes.

We require all third parties to uphold the security of your personal data and handle it with the highest level of care, in full compliance with the Act. We only allow third parties to process your personal data for specified purposes, and solely and strictly in accordance with our instructions.

You may view further information about disclosure of personal data in Part V (Disclosure of Personal Data) of our Privacy Policy located at <https://www.zuelligpharma.com/privacy-policy>.

VI. PROTECTION OF PERSONAL DATA (HOW DO WE KEEP YOUR PERSONAL DATA SECURE)

Rest assured that we are committed to protecting your personal data. All our personnel are trained about the importance of protecting your privacy.

Our visitor log sheets are stored in a secure manner, where its confidentiality, integrity, and availability are maintained and protected. Access to these log sheets is restricted only to authorized personnel.

You may view further information about how we keep your personal data secure in Part VI (Protection of Personal Data) of our Privacy Policy located at <https://www.zuelligpharma.com/privacy-policy>.

VII. RETENTION OF PERSONAL DATA (HOW LONG WILL WE KEEP YOUR DATA)

We shall retain your data for as long as necessary for the fulfilment of the purposes for which the data was obtained as specified in this Privacy Notice or for the establishment, exercise, or defense of legal claims, or for legitimate business purposes, or as provided by the Act.

We will keep your data in a safe place inside our premises where at least one security personnel are on-duty 24/7. Only authorized Zuellig Pharma personnel and third-party service providers have access to them.

We dispose of the log sheets five (5) years from the date of collection. On the other hand, CCTV footages, are stored for a maximum of ninety (90) days before being automatically deleted. Further details about the way we process personal data via CCTV can be found in our Privacy Notice for CCTV Systems located at: [zuellig-pharma-privacy-notice-for-cctv-systems-philippines-20240828.pdf](https://www.zuellig-pharma-privacy-notice-for-cctv-systems-philippines-20240828.pdf) (sitecorecloud.io). We also have a QR Code to view the full Privacy Notice for CCTV Systems and a printed copy readily available in all receiving areas where visitors log their information.

Zuellig Pharma may retain your personal data for a longer duration in certain circumstances including the following:

- 7.1. Where Zuellig Pharma is legally required to do so;
- 7.2. Where there is a legal basis; or
- 7.3. Where the personal data has an investigative value.

Example: In case there are incidents of misconduct or security incidents, and the log sheets must be preserved for the duration of the investigation, prosecution of the incident or the exercise, enforcement, or in defense of any claim.

You may view further information about our retention of personal data in Part VIII (Retention of Personal Data) of our Privacy Policy located at <https://www.zuelligpharma.com/privacy-policy>.

VIII. DISPOSAL / DESTRUCTION (HOW WE DISPOSE/DESTROY YOUR DATA AFTER THE RETENTION PERIOD)

We dispose of the log sheets after the five-year retention period defined in Part VII above has been reached. The disposal of the log sheets is checked and supervised by our Security Site Lead and Security Manager.

You may find the details about disposal/destruction of the personal data captured via CCTV in our Privacy Notice for CCTV Systems.

IX. PROCEDURE FOR DATA SUBJECT REQUEST

Data subjects who would like to request access or exercise any of their rights to their personal data must submit a request in writing and may contact us as stated in Part XIII below (Contact Us). Please bear in mind that the right of a data subject to request for access is not an absolute right. This is subject to certain exceptions defined by the Act and this Privacy Notice.

X. YOUR RIGHTS (WHAT RIGHTS DO YOU HAVE IN RELATION TO YOUR DATA)

You have certain rights in relation to your personal data in accordance with the Act. You may view further information about your rights in Part VII (Your Rights) of our Privacy Policy located at <https://www.zuelligpharma.com/privacy-policy>.

XI. RIGHT TO COMPLAIN

If you have any concerns or complaints with the way we handle your personal data, we request that you contact us and give us the opportunity to address your complaints. The details on how to contact us are discussed in Part XII below.

If you are not satisfied with our response, you have the right to file a complaint with the National Privacy Commission (NPC) as the supervising authority in respect of the processing of your personal data. You may find further information on filing a complaint with the NPC at <https://privacy.gov.ph/filing-a-complaint/>.

XII. CONTACT US (HOW YOU MAY EXERCISE YOUR RIGHTS)

If you have any questions or concerns about this Privacy Notice and the way we handle your personal data, or if you wish to exercise any of your rights mentioned above, you may contact our Data Protection Officer through the following:

ZUELLIG PHARMA CORPORATION

Address	Km. 14 West Service Road South Superhighway cor Edison Ave. Brgy. Sun Valley, Paranaque City, Philippines
Email Address	phzpdataprivacy@zuelligpharma.com
Tel. No.	+63 (998) 961-8246 / +63 (917) 846-1007

INTERPHARMA SOLUTIONS PHILIPPINES, INC.

Address	Km. 14 West Service Road South Superhighway cor Edison Ave. Brgy. Sun Valley, Paranaque City, Philippines
Email Address	ISPI-DPO@interpharmasolutions.com
Tel. No.	+63 (998) 961-8246 / +63 (917) 846-1007

METRO DRUG INC.

Address	Sta. Rosa Estate, Brgy. Macabling, Sta. Rosa, Laguna, Philippines
Email Address	mdi-dpo@metrodrug.com.ph
Tel. No.	+63 (998) 961-8246 / +63 (917) 846-1007

ZUELLIG PHARMA ASIA PACIFIC LIMITED PHILS. ROHQ

Address	8F Armstrong Corporate Center 134 H.V. Dela Costa St. Salcedo Village, Bel-Air 1209 Makati City
Email Address	zpap-dpo@zuelligpharma.com
Tel. No.	+632 8231 2205 local 510

You may also visit the “[Contact Us](#)” page of our website which you can find in this link: <https://www.zuelligpharma.com/privacy-policy>.

XIII. AMENDMENTS TO THIS PRIVACY NOTICE

Zuellig Pharma reserves the right to modify, update, and/or amend this Privacy Notice at any time. We will take reasonable steps to ensure amendments to this Privacy Notice are communicated by posting all amendments prominently on the Platform and other places we deem appropriate for a reasonable period. Amendments to this Privacy Notice will be effective immediately once published on any of the Platforms unless otherwise noted.

XIV. REGULAR EVALUATION, AUDIT, AND POLICY REVIEW

This policy shall be evaluated, audited, and reviewed every three (3) years or sooner if required by the Act or whenever necessary to improve based on best practices.

