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PRIVACY NOTICE FOR CLOSED CIRCUIT TELEVISION VIDEO ("CCTV") SYSTEMS

PHILIPPINES

I. GENERAL

Zuellig Pharma respects the right of all Data Subjects to be informed about the collection, use, disclosure, storage, and other processing (“**Processing**”) of personal data by CCTV pursuant to Republic Act No. 10173, otherwise known as the “Data Privacy Act of 2012”, its Implementing Rules and Regulations, NPC Advisory No. 2020-04 and NPC Circular No. 2024-02 on Closed Circuit Television Systems, and other relevant issuances of the National Privacy Commission (collectively “**the Act**”).

This Privacy Notice aims to provide guidance regarding the utilization of CCTVs that are put in place and to explain how the various entities within the Zuellig Pharma group [(a non-exhaustive list of our entities in the Philippines is found at Part XX (Contact Us) below] (hereinafter collectively referred to as “**Zuellig Pharma**”, “**our**”, “**us**” or “**we**”) handle the Personal Data and protect the rights of the data subjects who may be captured by the CCTV in accordance with the Act.

Save as stated herein, our personal data handling practices remain as stated in our Privacy Policy located at <https://www.zuelligpharma.com/privacy-policy>.

II. APPLICABILITY

This policy applies to all individuals who enter the premises of Zuellig Pharma which includes but are not limited to employees, clients, customers, third party service providers, and visitors.

III. DEFINITION OF TERMS

The following terms in this Privacy Notice shall have the following meanings:

<i>Closed-Circuit Television or CCTV</i>	: shall mean closed-circuit television or camera surveillance systems in a fixed or stationary location that can capture images of individuals or other information relating to individuals.
<i>Data Subject Request (DSR)</i>	: shall mean any request pertaining to personal data held by Zuellig Pharma about a particular individual.
<i>Requestor</i>	: shall mean the individual who requested information about a Data Subject who may or may not be the owner of the Personal Data requested.

All other capitalized terms in this Privacy Notice shall have the meaning given to them in our Privacy Policy located at <https://www.zuelligpharma.com/privacy-policy>.

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

Zuellig Pharma placed CCTVs within the premises to monitor specific areas for purposes detailed in this Privacy Notice. These CCTVs capture and record visual images which can be used to identify data subjects. The Processing of images/footages obtained from CCTVs are considered as processing of personal data under the Act.

V. LAWFUL BASIS AND PURPOSE FOR 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. CCTVs are primarily for the protection of Zuellig Pharma and the provision of a safe environment for our employees, clients, customers, third party service providers, and visitors. CCTVs are installed and operated 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 monitor compliance with Zuellig Pharma's policies and procedures in the workplace;• To assist in capturing information that can be used in crime prevention, detection, investigation, prosecution of offenses;• To help us investigate reported violations of applicable laws;• To respond to inquiries and requests made during your stay in our premises;• To aid in taking and defense of litigation;• Dispute Resolution; and• Ancillary purposes such as resource allocation and management	<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;• Where it is required to comply with a legal obligation;

VI. CCTV SIGNAGES

CCTV Signages shall be posted near the areas that are monitored and as close to the CCTV cameras where practicable. The CCTV Signage shall briefly describe the CCTV processing, the purpose for which the surveillance is being carried out, our contact details, and a QR Code where this Privacy Notice can be viewed in full.

A printed copy of this Privacy Notice shall likewise be readily available in all receiving areas where visitors log their information.

VII. LOCATION OF THE CCTV

All CCTV equipment is tested, and only designated areas identified below are monitored.

7.1. To ensure that the CCTV systems capture footages in a manner consistent with the Act, we take into consideration the location and angles of the cameras. The CCTV shall only be used to monitor the following designated areas:

- 7.1.1. Entry points in and around the premises of Zuellig Pharma;
- 7.1.2. Exits including emergency exits;
- 7.1.3. Perimeter – Front and back
- 7.1.4. Receiving areas where security guards require visitors to log their information;
- 7.1.5. Parking lots and waiting areas;
- 7.1.6. Elevators and Escalators within the premises;

- 7.1.7. Corridors and hallways;
- 7.1.8. Server rooms;
- 7.1.9. Warehouse;
- 7.1.10. Loading and unloading bay/dock;
- 7.1.11. Other areas as required by the business.

7.2. Zuellig Pharma does not have CCTVs on toilets, lactation or breast-feeding rooms, changing rooms and other areas that unreasonably intrude on the privacy of individuals.

VIII. CCTV SYSTEM DESCRIPTION

8.1. The CCTVs are in operation twenty-four (24) hours a day, seven (7) days a week.

8.2. These CCTVs record the movement in the captured area including the time and location. However, CCTVs do not record audio.

IX. VIDEO QUALITY

The CCTV images shall be of a certain quality that is effective for the purposes described in Part V above.

X. 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 in Part V above, we may disclose your personal data to the following parties, including but not limited to:

10.1. Your employer or the organization or company you are representing to verify information for legal purposes;

10.2. 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.

10.3. any person, government authority, statutory authority, health authority, police, 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

10.4. any other party requested or authorised 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>.

XI. 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.

Footages recorded by our CCTV are stored in a secure manner, where its confidentiality, integrity, and availability are maintained and protected. Access to the areas where the CCTV footages are stored are also secured and restricted only to authorized personnel defined in Part XII below.

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>.

XII. LIST OF ROLES AND USER ACCESS

The CCTV images are accessible only to the following persons:

ACCESS	AUTHORIZED USER
Full system access to all CCTV camera features and programming activities, live view, playback, and export	Security Personnel OnePH Security Manager OnePH Security Site Lead and/or Warehouse Engineer
Live view and playback	Security Personnel

XIII. RETENTION PERIOD (HOW LONG WILL WE KEEP YOUR DATA)

13.1. Zuellig Pharma retains personal data only for as long as necessary to fulfil the purposes for which the CCTV footages were obtained. Our CCTV system utilizes Digital Video Recorder (DVR) or Network Video Recorder (NVR) that store footage on hard drives. We store the CCTV footages for a maximum period of ninety (90) days. After 90 days, the footage shall be overwritten in a continuous recording cycle thereby making recovery impossible. However, Zuellig Pharma may keep CCTV footages for a longer duration in certain instances including the following:

- 13.1.1. Where Zuellig Pharma is legally required to do so;
- 13.1.2. Where there is a legal basis; or
- 13.1.3. Where the footage has an investigative value.

Example: In case there are incidents of misconduct or security incidents, and the recordings 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>.

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

After the retention period defined in Part XIII above has been reached, the system is designed to automatically overwrite the oldest footage with new recordings. Zuellig Pharma's disposal/deletion process for CCTV images is fully automated. This means that after the retention period, the oldest footage will be deleted without the need for physical disposal or destruction.

XV. PROCEDURE FOR HANDLING INCIDENTS

15.1. Any violations of Zuellig Pharma policies and procedures by employees that are captured by CCTV shall be handled in accordance with Zuellig Pharma's Employee Discipline Guidelines.

15.2. Any criminal activity captured by CCTV shall be handled in accordance with Zuellig Pharma's Code of Conduct, and in accordance with the requirements of a criminal investigation.

XVI. PROCEDURE FOR DATA SUBJECT REQUEST

Data subjects whose images are captured by CCTV have a right to reasonable access and/or to be provided a copy of his/her own personal data from the footage. If there are other identifiable individuals captured in the CCTV, we will ensure that the privacy of these individuals is protected by employing security measures (Example: data masking).

Data subjects or any Requestor who would like to request access to CCTV images must submit a request in writing and may contact us as stated in Part XVII 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.

XVII. YOUR RIGHTS (WHAT RIGHTS DO YOU HAVE IN RELATION TO YOUR PERSONAL 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>.

XVIII. 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. For details on how to contact us, please see 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. For further information on filing a complaint with the NPC at <https://privacy.gov.ph/filing-a-complaint/>.

XIX. 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. Macablang, 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>.

XX. 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 of time. Amendments to this Privacy Notice will be effective immediately once published on any of the Platforms unless otherwise noted.

XXI. 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.

