

Privacy Notice

Collection and Use of Personal Data

The use of this App and the processing of personal data are governed by applicable Philippine laws, including the Rules and Regulations of Republic Act No. 10173 or the Data Privacy Act of 2012.

To administer employee wellness programs and provide related services, LLIBI may collect and process personal information such as your name, department, contact information, participation records, event registrations, achievements, rewards, incentives, and other information that you voluntarily provide through the App. The processing of your personal information is necessary for the administration of employee wellness programs. Where the processing involves health-related or other sensitive personal information, LLIBI shall obtain your voluntary and express consent or rely on other lawful bases under applicable law.

Health-Related Information and Consent

Certain wellness programs or activities may require you to voluntarily provide or upload health-related information or other sensitive personal information, including, but not limited to, fitness or wellness information, annual physical examination (APE) results, health screening results, and other health-related documents relevant to your participation. This may include information relating to your physical activity or exercise, nutrition, lifestyle habits, and other wellness indicators that you voluntarily provide through the App or in connection with wellness programs.

By voluntarily submitting or uploading such health-related or other sensitive personal information through the App, you expressly consent to LLIBI's collection, use, processing, and storage of such information solely for the purpose of administering the applicable wellness program, facilitating your participation, monitoring program participation, awarding incentives or prizes, recognizing achievements, and complying with applicable legal or regulatory requirements. Such information will be accessible only to authorized LLIBI personnel on a need-to-know basis. The App is hosted on a secure cloud platform, and your personal data may be stored or processed on servers located outside the Philippines, subject to appropriate organizational, physical, and technical security measures and applicable data protection requirements.

Protection and Retention of Personal Data

Your personal data, including any sensitive personal information you voluntarily provide, will be accessed only by authorized personnel with a legitimate business need to know and will be protected through appropriate organizational, physical, and technical security measures designed to prevent unauthorized access, disclosure, alteration, misuse, or loss.

LLIBI will retain your personal data for as long as you remain an active employee. If you are tagged as inactive or resigned in the applicable HR system, your personal data will generally be retained for up to three (3) years thereafter, unless a longer retention period is required or permitted by law. After the applicable retention period, your personal data will be securely deleted, destroyed, or anonymized, as appropriate.

You may withdraw your consent to the processing of your sensitive personal information at any time by contacting the LLIBI Data Protection Officer (DPO) through privacy@llibi.com, subject to applicable legal and contractual limitations. Withdrawal of consent will not affect the lawfulness of processing conducted before such withdrawal but may affect your continued participation in certain wellness programs or the availability of related services.

Your Rights as a Data Subject

As a data subject, you have the following rights:

- The right to be fully informed, to access your personal and/or sensitive personal information, and to request for a copy of the personal and/or sensitive personal information we have on file.
- The right to request for your personal and/or sensitive personal information to be rectified or updated, to ensure that your personal and/or sensitive personal information on file is reliable, accurate, complete, and as current as possible.
- The right to request for your personal and/or sensitive personal information to be you may not be eligible to participate in the wellness activities.
- The right to report any misuse of your personal and/or sensitive personal information.

User Responsibilities and Access

To maintain the confidentiality and integrity of information within the App, users are expected to provide accurate information and are prohibited from using data mining, automated extraction tools, or any other means of unauthorized access to information available through the App.

LLIBI reserves the right to suspend or terminate access to the App where there is suspected fraud, unauthorized access, misuse, or any activity that may compromise the security or integrity of the App or facilitate the investigation of such incidents.

Contact Information

If you have questions regarding the processing of your personal data, wish to exercise your rights as a data subject, or would like to report a personal data breach or security incident, please contact the LLIBI DPO through the following:

- E-mail: privacy@llibi.com
- Address: 15/F Burgundy Corporate Tower, 252 Sen. Gil Puyat Ave., Makati City, Metro Manila, Philippines.

Liability

LLIBI makes reasonable efforts to ensure the availability, accuracy, and security of this App. However, LLIBI shall not be liable for any loss, damage, or inconvenience arising from the User's misuse of the App, the submission of inaccurate information, interruptions in service, technical failures, or unauthorized access despite the implementation of reasonable security measures.

Version: 14 July 2026