

Betterteem Data Privacy Policy

Updated as of June 2025

We are committed to protecting the privacy of our clients, users, and visitors at BETTERTEEM GROUP SERVICES INC.

Our Data Privacy Policy governs your visit and use of the Betterteem website, platform, and applications and explains how we collect, safeguard, and disclose information that results from your use of the Betterteem platform in compliance with the Data Privacy Act of 2012 ("DPA"), its Implementing Rules and Regulations ("IRR"), and issuances by the National Privacy Commission. This Data Privacy Policy has been adopted on June 15, 2025.

1. Introduction

Betterteem Group Services Inc. ("us," "we," or "our") owns and operates www.betterteem.com (hereinafter referred to as "Service").

We use your data to provide and improve the service offering of Betterteem. By using the Betterteem platform, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Subscriber Agreement.

The privacy practices described in this Privacy Policy are primarily intended for individuals in the Philippines and are designed to comply with Republic Act No. 10173, also known as the Data Privacy Act of 2012, and its implementing rules and regulations. When accessing our websites and mobile applications and/or availing of our services from outside the Philippines, you acknowledge and agree that your information may be transferred to and processed in the Philippines, following the legal and regulatory standards for data protection that may differ from your current or home jurisdictions.

2. Definitions

- a. SERVICE means "www.betterteem.com" or "the Betterteem platform," a website and mobile application owned and operated by Betterteem Group Services Inc.
- b. PERSONAL DATA means data about a living individual who can be identified from those data or from those and other information either in our possession or likely to come into our possession.
- c. USAGE DATA is data collected automatically, either generated using the Betterteem platform or from the Betterteem infrastructure itself (for example, the duration of a page visit).
- d. COOKIES are small files stored on your device (computer or mobile device).
- e. DATA CONTROLLER means a natural or legal person who, alone or jointly or in common with other persons, determines the purposes for which and how any personal data is, or is to be, processed. For the purpose of this Privacy Policy, Betterteem Group Services Inc. is the Data Controller of your data.
- f. DATA PROCESSORS OR SERVICE PROVIDERS means any natural or legal person who processes the data on behalf of the Data Controller. We may utilize the services of various service providers to process your data more effectively.
- g. DATA SUBJECT is any living individual who is the subject of Personal Data.
- h. THE USER is the individual using the Betterteem platform. The User corresponds to the Data Subject, who is the individual to whom the Personal Data pertains.

3. Information Collection and Use

We collect various types of information for various purposes to provide and improve the Betterteem service delivery. This may include Personally Identifiable Information that can be used to contact or identify you ("Personal Data"). Personally Identifiable Information may include, but is not limited to:

- 3.0.1. Email Address
- 3.0.2. First, Middle, and Last Name
- 3.0.3. Date of Birth

- 3.0.4. Marital Status
- 3.0.5. Gender
- 3.0.6. Phone Number
- 3.0.7. Address, City, Province, Country, ZIP/Postal code
- 3.0.8. Compensation History
- 3.0.9. Employment History
- 3.0.10. Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials, and other information that may be of interest to you. You may opt out of receiving any or all of these communications by defining your subscription options.

3.1. Usage Data

We may also collect information that your browser sends whenever you visit the Betterteem platform or when you access our services through any device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g., IP address), browser type, browser version, the pages of the Betterteem platform that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data. When you access the Betterteem platform with a device, this Usage Data may include information such as the type of device you use, your unique device ID, the IP address of your device, your device operating system, the type of Internet browser you use, unique device identifiers, and other diagnostic data.

3.2. Location Data

We may use and store information about your location if you permit us to do so ("Location Data"). We use this data to provide our service features, improving and customizing the Betterteem service delivery.

You can enable or disable location services when using the Betterteem platform at any time through your device settings.

3.3. Tracking Cookies Data

We use cookies and similar tracking technologies to track activity on the Betterteem platform and hold certain information.

Cookies are files with a small amount of data that may include a unique anonymous identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies, such as beacons, tags, and scripts, are also used to collect and track information and improve and analyze our service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may be unable to use some portions of the Betterteem platform.

Examples of Cookies we use:

- 3.3.1. Session Cookies: We use Session Cookies to operate the Betterteem platform.
- 3.3.2. Preference Cookies: We use Preference Cookies to remember your preferences and settings.
- 3.3.3. Security Cookies: We use Security Cookies for security purposes.
- 3.3.4. Advertising Cookies: Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.
- 3.3.4. Other Data

While using the Betterteem platform, we may also collect the following information: gender, age, date of birth, place of birth, citizenship, actual address, telephone number (work, mobile), details on education, qualification, professional training, employment agreements, information on bonuses and compensation, information on marital status, family members, office location, and other data.

4. Use of Data.

Betterteem Group Services Inc. uses the collected data for various purposes:

- 4.0.1. to provide and maintain the Betterteem platform;
- 4.0.2. to notify you about changes to the Betterteem platform and our services;
- 4.0.3. to allow you to participate in interactive features of Betterteem when you choose to do so;
- 4.0.4. to provide customer support;
- 4.0.5. to gather analysis or valuable information so that we can improve the Betterteem platform;
- 4.0.6. to monitor the usage of the Betterteem platform;
- 4.0.7. to detect, prevent, and address technical issues;
- 4.0.8. to fulfill any other purpose for which you provide it;
- 4.0.9. to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- 4.0.10. to provide you with notices about your account and/or subscription, including expiration and renewal notices, email instructions, etc.;
- 4.0.11. to provide you with news, special offers, and general information about other goods, services, and events that we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information;
- 4.0.12. in any other way we may describe when you provide the information;
- 4.0.13. for any other purpose with your consent.

5. Retention of Data

We will retain your Personal Data only for as long as it is necessary for the purposes set out in this Privacy Policy in conjunction with the Betterteem Data Processing Agreement and Subscribers Agreement. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when it is used to strengthen security or improve the functionality of our Service, or when we are legally obligated to retain this data for longer periods.

6. Transfer of Data

Your information, including Personal Data, may be transferred to and maintained on computers located outside of your region/state, province, country, or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside the Philippines and choose to provide information to us, please note that we transfer and process your data, including Personal Data, in the Philippines, Hong Kong, Singapore, and Australia.

Your consent to this Privacy Policy, followed by your submission of such information, represents your agreement to that transfer and processing. Betterteem Group Services Inc. will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and Data Processing Agreement, and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place, including the security of your data and other personal information.

7. Disclosure of Data

We may disclose personal information that we collect or you provide:

- 7.0.1. **Disclosure for Law Enforcement.** Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities.
- 7.0.2. **Business Transaction.** If we or our subsidiaries are involved in a merger, acquisition, or asset sale, your Personal Data may be transferred.
- 7.0.3. **Other cases.** We may also disclose your information also:
 - 7.0.3.1. to our subsidiaries and affiliates;

- 7.0.3.2. to contractors, service providers, and other third parties we use to support our business;
- 7.0.3.3. to fulfill the purpose for which you provide it;
- 7.0.3.4. for the purpose of including your Company's logo on our website;
- 7.0.3.5. for any other purpose disclosed by us when you provide the information;
- 7.0.3.6. with your consent in any other cases;
- 7.0.3.7. if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others.

8. Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

9. Your Data Protection Rights Under Republic Act No. 10173 or the Data Privacy Act of 2012

We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it removed from our systems, please email us at privacy@betterteem.com.

In certain circumstances, you have the following data protection rights:

- 9.0.1. the right to access, update, or to delete the information we have on you;
- 9.0.2. the right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete;
- 9.0.3. the right to object. You have the right to object to our processing of your Personal Data;
- 9.0.4. the right of restriction. You have the right to request that we restrict the processing of your personal information;
- 9.0.5. the right to data portability. You have the right to be provided with a copy of your Personal Data in a structured, machine-readable, and commonly used format;
- 9.0.6. the right to withdraw consent. You also have the right to withdraw your consent at any time when we rely on your consent to process your personal information;

Please note that we may request you to verify your identity before responding to such requests, and we may not be able to provide service without the necessary data.

9. A. What personal information do we have about you? If you make this request, we will return to you:

- 9.A.1. The categories of personal information we have collected about you.
- 9.A.2. The categories of sources from which we collect your personal information.
- 9.A.3. The business or commercial purpose for collecting or selling your personal information.
- 9.A.4. The categories of third parties with whom we share personal information.
- 9.A.5. The specific pieces of personal information we have collected about you.
- 9.A.6. A list of categories of personal information we have sold, along with the category of any other company we sold it to. If we have not sold your personal information, we will inform you of that fact.
- 9.A.7. A list of categories of personal information that we have disclosed for a business purpose, along with the category of any other company we shared it with.

Please note that you are entitled to request this information from us up to two times within a rolling 12-month period. When you make this request, the information provided may be limited to the personal information we collected about you in the previous 12 months.

9. B. To delete your personal information. If you make this request, we will delete the personal information we hold about you as of the date of your request from our records and direct any service providers to do the same. In some cases, the deletion may be accomplished through the de-identification of the information. If you

choose to delete your personal information, you may not be able to use certain functions that require your personal information to operate.

9. C. To stop selling your personal information. We don't sell or rent your personal information to any third parties for any purpose. We do not sell your personal information for monetary consideration. However, under some circumstances, a transfer of personal information to a third party or within our family of companies without monetary consideration may be considered a "sale." You are the only owner of your Personal Data and can request disclosure or deletion at any time.

If you submit a request to stop selling your personal information, we will stop making such transfers.

Please note that if you ask us to delete or stop selling your data, it may impact your experience in using the Betterteem platform, and you may not be able to participate in certain programs or membership services that require using your personal information to function. But in no circumstances will we discriminate against you for exercising your rights.

To exercise your data protection rights described above, please email your request(s) to privacy@betterteem.com.

10. Service Providers

We may employ third-party companies and individuals to facilitate our Service ("Service Providers"), provide Service on our behalf, perform Service-related services, or assist us in analyzing how the Betterteem platform is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

11. Analytics

We may use third-party Service Providers to monitor and analyze the use of the Betterteem platform.

12. CI/CD tools

We may use third-party Service Providers to automate the development process of our Service.

13. Behavioral Remarketing

We may use remarketing services to advertise on third-party websites after you visit our Service. We and our third-party vendors use cookies to inform, optimize, and serve ads based on your past visits to the Betterteem platform.

14. Links to Other Sites

The Betterteem platform may contain links to other sites we do not operate. If you click a third-party link, you will be directed to that third-party site. We have no control over and assume no responsibility for any third-party sites or services' content, privacy policies, or practices. We strongly advise you to review every site's privacy policy.

15. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on our official website. We will inform you via email and prominent notice on the Betterteem platform before the change becomes effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

16. Contact Us

If you have any questions about this Privacy Policy, please contact us by email at privacy@betterteem.com.