

Subject: Data Privacy Act- Records Management Policy	Division: HUMAN RESOURCES DEPARTMENT	Number: HRD Reference no. 2017-042
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I. **POLICY STATEMENT**

The Company shall observe the Data Privacy Act to ensure that all employees' personal information in Information and Communications Systems are secured and right of privacy is protected.

II. **OBJECTIVE**

Human Resources Department prepared a Records Management Policy to ensure that personal information collected, processed, used and transferred are secured and protected in compliance with RA 10173 or the Data Privacy Act.

III. **COVERAGE**

1. Belle Corporation
2. Premium Leisure and Amusement, Inc.

IV. **POLICY GUIDELINES**

1. Hiring Process
Human Resources Department (HRD) shall obtain the consent of all its applicants to secure and process personal data in the course of the hiring process. Consent can be substantiated by written, electronic or recorded means. The following information will be obtained as part of hiring process:
 - Resume and Applicant's Certification and Agreement Form (**Annex A**)
 - Results of examination- HRD shall retain one copy to be used for 201 file
 - Compensation and Benefits Declaration Form- HRD will use the form to benchmark job offer to be made to the candidate.
2. Pre-employment/ On boarding Process

All correspondences in the course of the employment relationship of an employee with the company shall form part of employee's 201 file and shall be kept confidential by HRD. The following information will be obtained as part of pre-employment process:




- Pre-employment requirements (*Annex B*)- Newly hired employee shall be required to submit the requirements as part of their onboarding with the company
 - Physical Examination- Results of test shall be made by the health provider and must be released to HRD only. All results will kept by HRD and treated with utmost confidentiality.
3. Employment Verification (Background Investigation/ Credit Investigation)
Banks, mortgage lenders, potential employers may conduct verification of employment of current and resigned employees. HRD will secure a written verification of employment form signed by authorized representative of aforementioned requesting institution/s.

Once a formal request for verification is received by HRD, HR Authorized Representative must check veracity of request, and may ask consent from person being verified, prior releasing of information. Once request is valid, HR Authorized Representative shall fill out the form and secure approval of HR Head. Once approved, information may be released/sent to requesting institution/s.

4. Systems and External Parties
All information coming from Human Resource Systems (iHRIS, ATLAS, Oracle) shall be kept confidential and may only be disclosed to the following parties due to operational requirements:
- SMIC HR, Payroll and IT Departments
 - BPOI (*as endorsed by SMIC Payroll*)
 - Government institutions (SSS, HDMF, Philhealth and BIR)

In compliance with the Data Privacy Act, the abovementioned parties should maintain the confidentiality of information to which they have access to.

5. Retention Period
201 files of employees will be kept until retirement age. HRD documents have their corresponding retention period based on the approved retention schedule (*Annex C*).
6. Disposal of Records
Schedule of disposal of documents will be based on the approved retention schedule. Documents ready for disposal shall be logged properly and approval from the HRD Head must be secured prior to disposal. HRD shall shred the documents prior to its disposal.

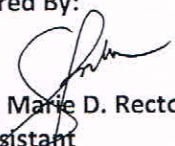
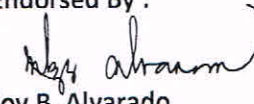

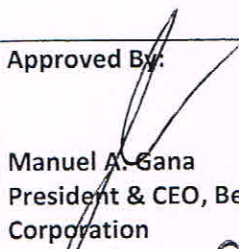
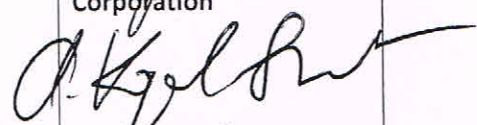
V. PROCEDURES

Person Responsible	Activities
HR Department	<ul style="list-style-type: none"> • Collects data from employees and applicants • Encodes personal in system for timekeeping and payroll process

	<ul style="list-style-type: none"> • Safeguards employees' and applicants' files to ensure confidentiality of personal data and to prevent its use for unauthorized purposes. • Releases information to concerned personnel/department/parties only if with approved formal request to prevent use for unauthorized purposes • Retain and dispose HR documents based on the approved retention schedule • Require employees to hold personal information under strict confidentiality within the duration of employment or even after resignation or termination of employment • Enforces administrative sanctions based on existing Code of Conduct.
Employee	<ul style="list-style-type: none"> • Operate and hold personal information under strict confidentiality during the duration of employment or even after resignation or termination of employment

VI. EFFECTIVITY

This policy shall take effect immediately. All existing practices that are in conflict and/or contradictory to the provision/s of this policy shall be deemed amended and superseded.

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