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|  | CORPORATE POLICIES RECORDS MANAGEMENT POLICY | EFFECTIVITY DATE April 1, 2025 |
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1. OBJECTIVE

- 1.1. The Human Resources Management Department prepared a Records Management Policy to ensure that personal information collected, processed, used, and transferred is secured and protected in compliance with RA10173 or the Data Privacy Act.

2. SCOPE

- 2.1. This policy covers all employees and stakeholders of Pacific Online Systems Corporation (POSC).

3. POLICY

- 3.1. The Company shall observe the Data Privacy Act to ensure that all employees' personal information in the systems is secured and the right of privacy is protected.

4. GUIDELINES

4.1. Hiring Process


- 4.1.1. The Human Resources Management Department (HRMD) 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 the hiring process:

- 4.1.1.1. Resume and Applicant's Certification and Agreement Form.
- 4.1.1.2. Results of examination- HRD shall retain one copy to be used for 201 file.

4.2. Pre-employment/ Onboarding Process

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

- 4.2.1.1. Pre-employment requirements- Newly hired employee shall be required to submit the requirements as part of their onboarding with the company
- 4.2.1.2. Physical Examination- Results of test shall be made by the health provider and must be released to HRMD only. All results will be kept by HRMD and treated with utmost confidentiality.

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4.3. Employment Verification (Background Investigation/ Credit Investigation)

- 4.3.1. Banks, mortgage lenders, and potential employers may conduct verification of employment of current and resigned employees. HRMD will secure a written verification of employment form signed by an authorized representative of the aforementioned requesting institution/s.
- 4.3.2. Once a formal request for verification is received by HRMD, the HRMD Authorized Representative must check the veracity of the request, and may ask for consent from the person being verified, prior to releasing of information. Once the request is valid, the HRMD Authorized Representative shall fill out the form and secure the approval of the HRMD Head. Once approved, information may be released/sent to the requesting institution/s.

4.4. Systems and External Parties


- 4.4.1. All information coming from Human Resource Systems shall be kept confidential and may only be disclosed to the following parties due to operational requirements:
 - 4.4.1.1. HR, Payroll and IT Departments
 - 4.4.1.2. Government institutions (SSS, HDMF, PhilHealth, and BIR)
- 4.4.2. In compliance with the Data Privacy Act, the abovementioned parties should maintain the confidentiality of information to which they have access to.

4.5. Retention Period

- 4.5.1. 201 files of employees will be kept until retirement age. HRMD documents have their corresponding retention period based on the approved retention schedule.

4.6. Disposal of Records

- 4.6.1. The 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 HRMD Head must be secured prior to disposal. HRMD shall shred the documents prior to its disposal.

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5. PROCEDURES

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

For questions and/or clarifications, please email us at hrmd@pacificonline.com.ph