



GLOBE Privacy Policy

I. PURPOSE

At Globe Telecom, Inc. (“GLOBE”), we put customers at the heart of everything we do. We know how important your personal data is to you, and we want you to know that you can trust us to protect it. It is our policy and duty to uphold data privacy rights and to protect your personal data from unlawful and/or unauthorized use while we are its custodians. At the core of this policy is a Privacy Management Program that aims to systematically address every facet of personal data processing to minimize risks to your data while fostering a culture of privacy as part of our corporate governance responsibilities.

In compliance with the Data Privacy Act of 2012 and its Implementing Rules and Regulations, our Privacy Management Program establishes the framework for managing personal data across GLOBE to ensure lawful, fair, and transparent processing; maintain data accuracy and confidentiality; and safeguard against unauthorized access, use, or disclosure.

This framework ensures that the objectives, targets, and programs for each management system are cohesive and aligned with the organization's strategic goals. The resulting Privacy Policy enables GLOBE to maintain its position as the network of choice by ensuring the secure and resilient delivery of critical products and services.

II. SCOPE OF APPLICATION

This policy applies to all GLOBE Board of Directors, key officers, employees, and third parties and can function as a guide for our subsidiaries and affiliates under Globe. Accordingly, we ensure that all third parties we engage adhere to the same privacy and data protection standards and principles set forth in this Policy.

III. COLLECTION, AND USE OF PERSONAL DATA

We collect and use your personal data for various purposes including product and service delivery, enhancement, development, improvement, promotion, and even fraud prevention. We also use automated operations to achieve these ends. Regardless of the purpose and the means, our Privacy Management Program ensures that you know exactly what data we collect and use; how we do so; why we do so; who gets to see that data; how long we hold on to it; and the reasons we rely on to make its collection and use lawful.

While we use the services of third parties to help us in the processing of your personal data, we contractually ensure that they use your data only for such purposes and that they abide by our information security and data privacy policies and procedures. Otherwise, it is our policy to never share your personal data with external parties unless we obtain your consent or are otherwise required or allowed by law to do so.



IV. INFORMATION SECURITY AND DATA PRIVACY OBJECTIVES

Through this Privacy Policy, GLOBE commits to the following objectives:

- Providing the resources required to develop, implement, and continually improve our privacy management program;
- Upholding the privacy and security of the personal data of our customers, employees, partners, and stakeholders;
- Complying with all applicable legal, regulatory, and contractual requirements regarding privacy and data protection;
- Collecting and processing personal data only for legitimate purposes and in accordance with applicable data privacy laws and regulations;
- Ensuring that data subjects are informed about how their personal data is collected, used, stored, shared, and retained or disposed of through clear and accessible privacy notices;
- Aligning with our Information Security Management System (ISMS) and Business Continuity Management System (BCMS) by ensuring privacy and security controls support resilience against security incidents and data breaches;
- Upholding the rights of data subjects to be informed about, to object to the use of, to access, to delete/erase or block data, to the data portability of, to correct, or to update their personal data;
- Implementing appropriate organizational, physical, and technical security measures to safeguard personal data against unauthorized access, use, disclosure, alteration or destruction;
- Ensuring our third parties, including vendors, suppliers, and partners, adhere to GLOBE's privacy practices;
- Promoting security awareness, education, and training to ensure that all employees and third parties understand their roles in safeguarding personal data they handle;
- Timely identifying, assessing, managing and reporting personal data breaches and security incidents in accordance with the law; and
- Regularly reviewing, evaluating, and continually improving our privacy practices and controls to ensure compliance with evolving legal standards, technological advancements, and best practices in data protection.

V. COMMUNICATION, TRAINING, AND AWARENESS

Policies related to GLOBE's Privacy Management Program are made readily and easily available to all officers, employees, and third-party users. This policy and any amendments thereto will also be posted through the internal communication channels and the corporate website of Globe. All covered persons are responsible for reading and implementing this policy at all times.

The Privacy Policy will be reviewed periodically and whenever significant changes occur.



VI. RELEVANT POLICIES

The GLOBE Privacy Policy is composed of internal governance documents and external-facing policies that collectively defines its privacy framework:

I. Internal Policies and Governance Documents

- Privacy Manual
- Privacy Management Program
- Information Security Manual
- Employee Privacy Policy
- Integrated Management System Manual

II. External Policies

- Manual of Corporate Governance
- Code of Conduct
- Acceptable Use Policy
- Business Continuity Management Policy
- Environmental Sustainability Policy
- Health and Safety Policy
- Energy Management Policies

VII. HOW TO REACH US

Should you wish to exercise any of your data subject rights or have any questions or concerns regarding our privacy practices, you may contact our Data Protection Officer through email at privacy@globe.com.ph or through our address Globe Telecom, Inc., The Globe Tower, 32nd Street corner 7th Avenue, Bonifacio Global City, 1634 Taguig City, Metro Manila, Philippines

Approved by:

Atty. Irish Salandanan-Almeida
Chief Privacy Officer

Anton Reynaldo Bonifacio
Chief Information Security Officer and Chief Artificial Intelligence Officer
March 2026