

SIMPLeTPA DATA PRIVACY NOTICE

WHO WE ARE

SIMPLeTPA (“we”, “us”, or “our”) is an Administrative Services Only (ASO) company that helps administer healthcare benefit plans for companies and their members.

We respect your privacy and are committed to protecting your personal data in accordance with the Data Privacy Act of 2012 and related regulations (“Data Privacy Laws”).

We process personal data following the principles of transparency, legitimate purpose, and proportionality.

WHAT THIS PRIVACY NOTICE COVERS

This Privacy Notice explains how SIMPLeTPA collects, uses, stores, shares, retains, and protects your personal data when you use our platform, services, or communicate with us.

Under applicable Data Privacy Laws:

- Personal Data includes both personal information and sensitive personal information.
- Personal Information refers to information that identifies you or can reasonably identify you.
- Sensitive Personal Information includes information such as health records, government-issued identifiers, and other information classified by law as sensitive.
- Processing refers to any action involving personal data, including collection, use, storage, sharing, updating, or deletion.

YOUR CONSENT

By checking the boxes in the “Member Consent and Declarations” section during registration, you acknowledge and agree that such electronic confirmation constitutes your valid consent, acknowledgment, and acceptance, as applicable, under Philippine law, including the Electronic Commerce Act and applicable Data Privacy Laws, and shall have the same legal effect as a handwritten signature where permitted by law.

WHY WE PROCESS YOUR PERSONAL DATA

We process personal data only when allowed by law and when necessary for legitimate business and healthcare administration purposes, including:

1. providing healthcare benefit administration and related services;
2. processing claims, reimbursements, authorizations, and member support requests;
3. managing accounts and maintaining platform security;
4. complying with legal, regulatory, tax, audit, and reporting obligations;

5. preventing fraud, misuse, or unauthorized activities;
6. protecting our legal rights and responding to disputes or legal proceedings; and
7. communicating service updates, operational notices, and, where permitted, marketing materials.

Certain processing activities may be based on your consent. Where consent is required by law, you may withdraw your consent subject to applicable legal and operational requirements.

WHAT PERSONAL DATA WE MAY COLLECT

Depending on the services provided, we may collect:

Personal Information

- name
- contact details
- address
- date of birth
- gender
- employer information
- photographs or identification documents

Sensitive Personal Information

- health and medical information
- healthcare utilization and claims records
- PhilHealth or other government-issued identifiers
- financial or payment-related information where necessary

Account and Technical Information

- username and password
- browser and device information
- IP address
- session and usage data
- platform activity and access logs

Transaction and Service Information

- claims and reimbursement information
- healthcare provider interactions

- customer support communications
- records of transactions and requests

We may also collect information from:

- employers or plan sponsors;
- healthcare providers;
- insurers or partners;
- authorized representatives;
- publicly available sources; or
- third parties legally authorized to share information with us.

We only collect personal data reasonably necessary for legitimate operational, healthcare administration, legal, or regulatory purposes.

HOW WE COLLECT YOUR PERSONAL DATA

We generally collect personal data when:

- you register or use SIMPLETPA;
- you submit claims or requests;
- you communicate with us;
- your employer or healthcare provider submits information related to healthcare administration;
- you use our website or platform; or
- you subscribe to updates or marketing communications.

Subject to applicable law, we may maintain records of communications, transactions, or support interactions for quality assurance, compliance, security, and operational purposes.

HOW WE USE YOUR PERSONAL DATA

We use your personal data to:

- administer healthcare benefits and claims;
- provide customer support and account services;
- verify identity and prevent fraud;
- improve our platform, systems, and user experience;
- maintain security and operational integrity;
- comply with legal and regulatory obligations;
- investigate violations, complaints, or suspicious activity; and

- communicate operational updates and permitted marketing materials.

We do not sell your personal data.

WHEN WE MAY SHARE YOUR PERSONAL DATA

We may share your personal data with:

1. employers, plan sponsors, healthcare providers, insurers, brokers, agents, and authorized representatives involved in healthcare benefit administration;
2. service providers and vendors that support our operations, such as cloud hosting, payment processing, IT support, customer support, or analytics providers;
3. government authorities, regulators, courts, or law enforcement agencies when required by law or necessary to protect legal rights or safety; and
4. parties involved in mergers, acquisitions, reorganizations, or similar business transactions.

Third parties processing personal data on our behalf are required to implement appropriate confidentiality and security safeguards.

CROSS-BORDER DATA TRANSFERS

Some of our service providers or systems may store or process personal data outside the Philippines.

When this happens, we implement reasonable organizational, contractual, and technical safeguards to help ensure that your personal data remains protected in accordance with applicable Data Privacy Laws.

HOW LONG WE KEEP YOUR PERSONAL DATA

We retain personal data only for as long as necessary to:

- provide our services;
- comply with legal and regulatory obligations;
- resolve disputes;
- maintain records;
- enforce agreements; or
- protect legal rights.

Retention periods may vary depending on operational, legal, healthcare, tax, accounting, or contractual requirements.

When personal data is no longer required, we securely delete, anonymize, or dispose of it using appropriate security measures.

HOW WE PROTECT YOUR PERSONAL DATA

We implement reasonable physical, technical, and organizational safeguards to protect personal data from unauthorized access, disclosure, misuse, loss, or destruction.

These safeguards may include:

- access controls and authentication systems;
- encryption and secure storage;
- confidentiality obligations for employees and service providers;
- security monitoring and testing; and
- privacy and cybersecurity training.

Access to health-related and sensitive personal information is limited to authorized personnel, healthcare providers, insurers, client representatives, and service providers who require such access for legitimate healthcare administration, operational, compliance, or support purposes.

While we work to protect your data, no system can guarantee absolute security.

YOUR RIGHTS UNDER THE DATA PRIVACY ACT

Under applicable Data Privacy Laws, you may have the right to:

1. be informed about how your data is processed;
2. access your personal data;
3. correct inaccurate or incomplete information;
4. object to certain types of processing;
5. request deletion or blocking of personal data where legally allowed;
6. request data portability; and
7. file a complaint with the appropriate regulatory authority.

HOW TO EXERCISE YOUR RIGHTS

For questions, requests, or concerns regarding your personal data, you may contact our Data Protection Officer:

Email: dpo@simpletpa.com

Address:

7F Unit B 8Rockwell
Hidalgo Drive, Rockwell Center
Makati City, Philippines 1210

WITHDRAWING CONSENT OR MARKETING OPT-OUT

Where processing is based on consent, you may withdraw your consent by contacting our Data Protection Officer.

Please note that certain processing activities may continue where required for:

- healthcare benefit administration;
- claims processing;
- legal or regulatory compliance;
- fraud prevention;
- security;
- record retention; or
- protection of legal rights.

If you opt out of marketing communications, we will stop sending marketing materials unless otherwise permitted by law.

MINORS

SIMPLeTPA does not knowingly collect personal data directly from minors without the involvement of a parent, legal guardian, or authorized representative.

COOKIES AND ANALYTICS

We use cookies and similar technologies to:

- remember user preferences;
- improve website functionality;
- understand how users interact with our platform; and
- improve security and performance.

Some cookies may be provided by third-party analytics providers.

Most browsers allow you to manage or disable cookies through browser settings, although some platform features may not function properly if cookies are disabled.

CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time to reflect changes in our services, operations, or legal requirements.

Updated versions will be posted through appropriate channels, including our website or platform.

SIMPLLeTPA Data Privacy Notice

Version 3.1

Effective Date: May 6, 2026

Version History:

- Version 3.0 - February 24, 2025
- Version 2.0 — April 1, 2023
- Version 1.0 — October 28, 2022