



Lulu Money Data Privacy Policy Statement

Lulu Financial Services (Phils) Inc., operating under the trade name **Lulu Money**, values your privacy and is committed to protecting the personal data you share with us. This Data Privacy Policy explains how we collect, use, store, disclose, and protect your personal data in accordance with **Republic Act No. 10173** or the **Data Privacy Act of 2012**, its Implementing Rules and Regulations, and applicable issuances by the National Privacy Commission (NPC).

1. Scope and Application.

This Privacy Policy applies to all individuals who use or access Lulu Money Services, including the Lulu Money App, website, physical branches, or partner channels in the Philippines.

2. Personal Data We Collect

We may collect the following categories of personal data:

- **Identification Information:** Name, date of birth, nationality, civil status, gender, government-issued IDs (e.g., Passport, PhilSys, UMID)
 - **Contact Information:** Mobile number, email address, home address
 - **Financial Information:** Source of funds, income, transaction history, bank account details
 - **Device Information:** IP address, device ID, mobile OS version, geolocation, browser type
 - **Biometric Data** (if applicable): Facial recognition, fingerprint (for app security)
 - **Transactional Data:** Money transfer records, currency exchange logs, prepaid card usage
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3. Purpose of Data Collection

Your personal data is processed for the following purposes:

- To verify your identity and perform customer due diligence (KYC)
- To fulfill your requested services (remittance, currency exchange, prepaid card, etc.)
- To comply with regulatory requirements from the BSP, AMLC, NPC, and other authorities
- To manage your account and transactions
- To analyze and improve our services and customer support

- To prevent fraud, unauthorized access, and money laundering
 - To send service-related notifications, alerts, and marketing offers (subject to your consent)
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4. Legal Basis for Processing

We collect and process your data based on one or more of the following legal bases:

- Consent provided by you
 - Fulfillment of contractual obligations
 - Compliance with legal or regulatory obligations
 - Legitimate business interests
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5. Data Sharing and Disclosure

Your personal data may be shared with:

- Partner banks, card issuers, payment gateways
- Government agencies (e.g., BSP, AMLC, NPC) for regulatory compliance
- Service providers for IT infrastructure, marketing, security, and analytics
- Other entities in the Lulu International Group (for cross-border compliance or system support)

Disclosure of your personal data to third parties are made only in accordance with the principles of transparency, legitimate purpose, and proportionality under the Data Privacy Act of 2012 and relevant NPC regulations. Any personal information shared to third-parties are necessary and compatible with the declared and lawful purpose for which said data was collected.

Third-party recipients are contractually bound under strict service agreements to implement and maintain stringent data protection measures, consistent with the requirements of the Data Privacy Act of 2012 and other applicable laws and regulations.

6. Data Retention

In compliance with the provisions of the Bangko Sentral ng Pilipinas (BSP) and the Anti-Money Laundering Council (AMLC), we retain relevant records and personal data for a **minimum period of five (5) years** from the date of the transaction or the termination of the business relationship, whichever is later. We will retain your data only for as long as necessary to fulfill the purposes for which it was collected or as required by applicable laws and regulations. After the retention period, personal data will be securely deleted.

7. Data Security

We implement reasonable organizational, physical, and technical security measures to protect your data, including:

- End-to-end encryption
- Firewalls and access controls
- Secure login authentication (PIN, OTP, biometrics)
- Regular audits and penetration testing

However, while we strive to protect your data, no method of transmission over the internet or electronic storage is 100% secure.

8. Your Data Privacy Rights

As a data subject, you have the following rights under the Data Privacy Act:

- **Right to be Informed** – Know why, how, and where your data is processed
- **Right to Access** – Request access to your personal data
- **Right to Object** – Refuse processing under certain conditions
- **Right to Erasure or Blocking** – Have your data removed or blocked when applicable
- **Right to Rectification** – Request correction of inaccurate or outdated data
- **Right to Data Portability** – Obtain your data in a format for transfer to another provider



- **Right to Lodge a Complaint** – File complaints with the National Privacy Commission

To exercise your rights, email us at **DPO.LFSP@ph.lulumoney.com**

9. Use of Cookies and Tracking Technologies

Our website and mobile app may use cookies and similar technologies to improve user experience and analyze usage. You may control cookie settings through your browser preferences.

10. Policy Updates

This Privacy Policy may be updated from time to time to reflect changes in our services, legal requirements, or technology. You will be notified of material changes through the app, website, or email.

11. Contact Us

If you have any questions or concerns regarding this policy or our data protection practices, you may contact:

Data Protection Officer

Lulu Financial Services (Phils) Inc.

Unit 1006, One World Place, 32nd Street, 9th Avenue, Taguig, 1634 Metro Manila

Email: DPO.LFSP@ph.lulumoney.com

Phone: (02) 8511-1835