

FAR EASTERN UNIVERSITY, INCORPORATED (FEU)**PRIVACY NOTICE TO STOCKHOLDER**

For stockholders, beneficial owners, proxies, representatives, brokers, investors, directors, officers, employees, agents, and other persons involved in stockholder-related activities and transactions.

PLEASE READ: This Notice explains how FEU collects, uses, stores, shares, retains, and protects personal data in connection with stockholder-related activities and transactions, and how data subjects may exercise their rights.

1. Introduction

Far Eastern University, Incorporated (FEU or the Company) respects your privacy and is committed to protecting your personal data. FEU processes personal data in accordance with Republic Act No. 10173, or the Data Privacy Act of 2012, its Implementing Rules and Regulations, applicable issuances of the National Privacy Commission, other relevant laws and regulations, and FEU's Privacy Policy.

This Notice applies to stockholders and other persons who interact with FEU in connection with stockholder-related activities and transactions, including beneficial owners, proxies, representatives, brokers, investors, directors, officers, employees, agents, and other authorized persons.

2. Who We Are

Far Eastern University, Incorporated is the personal information controller for the personal data described in this Notice.

Information	Details
Organization	Far Eastern University, Incorporated (FEU)
Office / Address	Nicanor Reyes Street, Manila, Philippines
Contact	Atty. Anthony Raymond A. Goquingco Corporate Secretary and Compliance Officer SH Information Update: stockholdersupdate@feu.edu.ph Other Matters: corpsec@feu.edu.ph (02) 8777-7338

3. Personal Data We Process, Sources, Purposes, and Legal Bases

FEU processes personal data only for specified and legitimate stockholder-related purposes and on an applicable legal basis.

Depending on your relationship and your transactions with FEU, FEU may process the following personal data:

- Name, age, date of birth, civil status, nationality, address, signature, and contact details
- Government-issued identification information and copies of identification documents submitted for identity verification
- Stockholder and account information, including share ownership, and transaction records

- Information concerning beneficial owners, proxies, representatives, heirs, and other authorized persons
- Dividend, payment, tax, and delivery information, where applicable
- Communications, requests, instructions, inquiries, complaints, and information-update records
- Registration, attendance, access, participation, proxy, and voting information relating to stockholders' meetings and other stockholder-related events and activities
- Photographs, audio recordings, video recordings, and other information collected or recorded during the stockholder related activities
- Other information reasonably necessary to administer stockholder records, transactions, rights, and activities and to comply with legal, regulatory, disclosure, and corporate-governance requirements

FEU may further obtain personal data from:

- You directly, including through forms, correspondence, online portals, meetings, and transactions with FEU
- Stockholders, beneficial owners, proxies, representatives, heirs, brokers, nominees, custodians, and other authorized persons
- FEU's stock and transfer book, corporate, accounting, transaction, meeting, and other official records
- FEU personnel and service providers supporting stockholder records, verification, transactions, communications, payments, meetings, and related functions
- The stock transfer agent, banks, payment providers, couriers, depositories, and other parties involved in stockholder-related transactions
- Government agencies, regulators, courts, and other lawful sources, when applicable

The principal processing activities are summarized below.

Personal Data Processed	Source	Purpose of Processing	Legal Basis
Name, address, signature, telephone number, phone number, email address	Data subject directly; authorized representative; FEU records or service provider	Maintain and update stockholder records; verify identity; communicate notices, reports, instructions, and other stockholder information	Compliance with legal and regulatory obligations; legitimate interests in maintaining accurate records and communicating with stockholders; consent or another lawful basis where required
Date of birth, civil status, nationality Government-issued identification information (TIN)	Data subject directly or through an authorized representative	Verify identity, submitted information, authority, and eligibility for stockholder-related transactions or activities	Compliance with legal and regulatory obligations; legitimate interests in preventing fraud and unauthorized transactions; consent or another lawful basis where required
Stockholder share ownership, certificate, subscription, transfer, and transaction records transfer agent	Data subject; authorized representative; stock transfer agent; broker, nominee, custodian, depository, or FEU corporate records	Maintain the corporate records; administer share ownership, subscriptions, transfers, transmissions, and related transactions	Compliance with the Revised Corporation Code, applicable SEC rules, FEU's Articles of Incorporation and By-Laws, and other applicable requirements

Personal Data Processed	Source	Purpose of Processing	Legal Basis
Stockholder transaction records	Data subject; authorized representative; FEU records; bank, payment provider, courier, or stock transfer agent	Determine entitlement; process and deliver dividends or other distributions; comply with tax, accounting, audit, and reporting requirements	Compliance with legal and regulatory obligations; legitimate interest in accurately administering stockholder payments and entitlements
Photographs, audio and video recordings.	Captured during the meeting or activity or provided by the data subject	Facilitate and document the activity; prepare minutes and official records; maintain evidence of proceedings; FEU publications, media releases, publicity, promotional materials, or official communications	Consent, where required; Compliance with legal, regulatory, disclosure, and corporate-governance obligations; legitimate interests in maintaining accurate and secure records

4. Children's Privacy

FEU's stockholder-related activities and transactions are intended for stockholders and other authorized persons and are not ordinarily directed to children. FEU does not intend to collect a child's personal data unless the child is a stockholder, beneficial owner, heir, dependent, visitor, or otherwise has a legitimate and authorized involvement in a stockholder-related activity or transaction.

Where FEU processes a child's personal data in connection with a stockholder-related activity or transaction, FEU will apply appropriate safeguards, limit access to authorized persons, involve a parent or legal guardian where legally appropriate, and process only the information reasonably necessary for the relevant purpose. A parent or legal guardian may exercise applicable privacy rights on behalf of the child, subject to verification of authority and applicable law.

5. Sharing and Disclosure of Personal Data

FEU may disclose personal data only as necessary for the purposes described in this Notice, as required or permitted by law, or with appropriate consent. Recipient categories include:

Recipient Category	Purpose of Sharing
Authorized FEU directors, officers, employees, agents, and personnel	Maintenance and updating of stockholder records; identity and authority verification; administration of stockholder transactions, communications, payments, meetings, voting, recordkeeping, security, legal compliance, and corporate-governance functions
Third-party service providers and personal information processors	Stock transfer, identity verification, information technology, hosting, records management, communications, payments, delivery, meeting access, voting, recording, security, and other stockholder-related support services

Recipient Category	Purpose of Sharing
Government agencies, regulators, and other competent authorities	Compliance with valid legal, regulatory, disclosure, reporting, audit, or investigative requirements
Media entities or the public	Publication of photographs, recordings, or media releases with the participant's consent where required
Other parties authorized by law or by the participant	Purposes covered by the applicable authority or consent

FEU requires service providers that process personal data on its behalf to comply with applicable data privacy laws, FEU privacy requirements, and appropriate confidentiality and security obligations. FEU regularly reviews their compliance, as applicable.

6. Retention and Protection of Personal Data

6.1 Retention

Copies of government-issued identification documents submitted to FEU will be used solely for identity verification and securely deleted upon completion of the verification process.

Other personal data collected or recorded in connection with stockholder-related activities and transactions will be retained for two (2) years from the data subject's last stockholder-related engagement with FEU, or longer when required by applicable law, regulation, legal obligation, or a lawful need to establish, exercise, or defend legal claims. Upon expiration of the applicable retention period, the data will be securely deleted or disposed of in accordance with FEU's Privacy Policy.

6.2 Protection

FEU implements reasonable and appropriate organizational, physical, and technical safeguards designed to protect personal data against unauthorized access, disclosure, alteration, loss, misuse, or destruction. These measures include:

- Encryption of personal data during transmission and storage
- Access controls that restrict personal data to authorized personnel
- Regular audits and security assessments to support compliance with data protection policies and procedures

6.3 Personal Data Breaches

FEU will assess and manage any personal data breach in accordance with applicable law and National Privacy Commission requirements. Where notification is legally required, FEU will notify the National Privacy Commission and affected data subjects within the period prescribed by applicable rules, and will provide the information required by those rules, including the nature of the breach, the personal data involved, and measures taken to address and mitigate the incident.

7. Rights of Data Subjects

Subject to the conditions and limitations under applicable laws and regulations, you may exercise the following rights:

Right	Description
Right to Be Informed	Know whether and how FEU processes your personal data.
Right of Access	Request access to personal data FEU holds about you and obtain information concerning its processing.
Right to Object	Object to certain processing, where applicable, including processing based on consent or legitimate interest.
Right to Rectification	Request correction of inaccurate or incomplete personal data.
Right to Erasure or Blocking	Request suspension, withdrawal, blocking, removal, or destruction of personal data where the legal conditions are met.
Right to Data Portability	Obtain qualifying personal data in a commonly used electronic or structured format where applicable.
Right to Damages	Claim compensation where you suffer damage due to inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of personal data, subject to applicable law.
Right to Lodge a Complaint	File a complaint with the National Privacy Commission if you believe your personal data has been processed in violation of applicable privacy law.

To exercise a right, contact FEU's Data Protection Officer using the details in Section 8. FEU may request information reasonably necessary to verify your identity, authority, and the scope of your request before acting on it.

8. Contact Us and Updates to this Notice

8.1 Privacy Inquiries and Requests

For privacy inquiries, concerns, complaints, or requests to exercise a data-subject right, contact:

Contact	Details
Data Protection Officer	Michael Liggayu
Email	dataprivacy@feu.edu.ph
Telephone	(02) 8777-7338 local 208

Please describe your concern or request and provide sufficient information for FEU to identify the relevant personal data and verify your identity or authority. FEU will handle requests in accordance with applicable law and its procedures.

8.2 Updates to this Notice

FEU may update this Privacy Notice when necessary to reflect changes in stockholder-related processes, legal or regulatory requirements, or privacy practices. The revised version will be made available through appropriate FEU or stockholder communication channels and will indicate its effective date.

Effective date: September 28, 2026

9. Consent, Where Applicable

Most stockholder-related processing described in this Notice is undertaken to comply with FEU's legal and regulatory obligations or for FEU's legitimate interests in securely administering stockholder records, transactions, communications, meetings, and other related activities. Consent will be requested only for processing activities that require it. Refusal or withdrawal of optional consent will not affect processing that FEU may lawfully undertake on another legal basis.