

# COVER SHEET

SEC Registration Number

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**COMPANY NAME**

[illegible]**PRINCIPAL OFFICE** ( No. / Street / Barangay / City / Town / Province )[illegible]

Form Type

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Department requiring the report

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Secondary License Type, If Applicable

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|  | N | A |  |
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## LETTER

## COMPANY INFORMATION

Company's Email Address

claire.depasion@joh.ph

Company's Telephone Number

373-3038

Mobile Number

|     |
|-----|
| N/A |
|-----|

No. of Stockholders

34

Annual Meeting (Month / Day)

|                 |
|-----------------|
| Any day in June |
|-----------------|

Fiscal Year (Month / Day)

DECEMBER 31**CONTACT PERSON INFORMATION**

The designated contact person **MUST** be an Officer of the Corporation

Name of Contact Person

Ortrud T. Yao

Email Address

ortrud ting@joh.ph

Telephone Number/s

373-3038

Mobile Number

|     |
|-----|
| N/A |
|-----|

**CONTACT PERSON'S ADDRESS**

4/F 20 Lansbergh Place, 170 Tomas Morato Avenue cor. Scout Castor St., Quezon City

**NOTE 1:** In case of death, resignation or cessation of office of the officer designated as contact person, such incident shall be reported to the Commission within thirty (30) calendar days from the occurrence thereof with information and complete contact details of the new contact person designated.

**2: All Boxes must be properly and completely filled-up. Failure to do so shall cause the delay in updating the corporation's records with the Commission and/or non-receipt of Notice of Deficiencies. Further, non-receipt of Notice of Deficiencies shall not excuse the corporation from liability for its deficiencies.**



JOLLVILLE HOLDINGS CORPORATION

20 December 2018



**SECURITIES AND EXCHANGE COMMISSION**  
**Markets and Securities Regulation Department**  
Secretariat Building, PICC Complex  
Roxas Boulevard, Pasay City

Attention : Atty. Vicente Graciano P. Felizmenio, Jr.  
Director

Re : Report on Compliance with Data Privacy and Protection Laws and Regulations

Gentlemen:

In response to the requirement for publicly-listed companies to submit a report on compliance with certain rules and regulations, we submit herewith the reply of **JOLLVILLE HOLDINGS CORPORATION** (the 'Company'):

- 1. Does the Company have information technology, business continuity and disaster recovery plans, and risk management systems?**

**If yes, please provide SEC a copy of the results of such review and audit.**

**If no, please inform us why the Company does not have these systems.**

We would like to manifest to the Honorable Commission that the adverted rules in the Securities Regulation Code Implementing Rules and Regulation (SRC IRR) requiring audit and review by an independent firm of a Company's information technology, trading, business continuity, disaster recovery plans and risk management systems pertains to Broker Dealers (SRC Rule 28), Exchanges (SRC Rule 33), Transfer Agents (SRC Rule 36), Self-Regulatory Organizations and other market participants (SRC Rule 39), Clearing Agencies and Depositories (SRC Rule 42). This requirement, therefore, is inapplicable to the Company, being none of the above.

- 2. Have you conducted a self-assessment if your Company is covered by the Data Privacy Act either as a personal information controller (PIC) and/or personal information processor (PIP)?**

**If your company is covered by the DPA, have you done the following: registration with NPC as a PIC and/or PIP; Appointed or designated a Data Protection Officer for your Company; other activities your company have done to comply with the Data Privacy Act and its implementing rules and issuances.**

**If you determined that your Company is not covered by the DPA, please tell us the basis or reason for such determination.**





**JOLLIVILLE HOLDINGS CORPORATION**

The Company has conducted a self-assessment of its legal obligations under the Data Privacy Act as a PIC. The Company is a PIC, being the processor of the personal data of its own employees, directors, officers, stockholders and individual owners of sole proprietorship businesses (clients). The processing undertaken by the Company is limited to the requirements of its business operations. The Company does not act as a PIP for any other PIC.

The Company is aware that all PICs are required to comply with the requirements of the law and has signified its commitment by designating the undersigned as its Data Protection Officer, in compliance with the requirements of the Data Privacy Act. The Company understands that all PICs are covered by the DPA and are therefore required to follow the law, even if not all PICs are required to register with the National Privacy Commission (NPC). Under Section 47 of the Implementing Rules and Regulations of the Data Privacy Act, a PIC/PIP shall be required to register its Data Processing Systems with the NPC if it fulfills either of the following conditions: (1) the Company employs at least two hundred fifty (250) employees, or (2) the Company employs fewer than two hundred fifty (250) employees but the data processing it carries out is likely to pose a risk to the rights and freedoms of data subjects, is not occasional or involves the sensitive personal information of at least one thousand (1000) individuals. Not having fulfilled the conditions for registration, the Company has not registered its Data Protection Officer and Data Processing Systems with the NPC. The Board and Management of the Company, however, have, among other things, set in place policies and rules pertaining to data privacy, revised company forms and contracts to conform to the requirements of the DPA, etc.

The Company would also like to manifest, however, that the Company was constrained to submit this report so near the deadline seeing as how no formal notice either from this Honorable Commission or the Philippine Stock Exchange (the 'Exchange') informing the Company of this requirement was received by the Company. The only notice the Company received from the Exchange was contained in PSE Circular No. 2018-0052 (Re: SEC Report on DPA Compliance) which only reiterated the Exchange's reminder to comply with the Data Privacy Act and to have the Company's information technology, trading, business continuity, disaster recovery and risk management subjected to regular review and audit.

We trust that the foregoing sufficiently addresses the reporting requirement to the Honorable Commission.

Very truly yours,



**MARIA JOY A. TING**  
Data Protection Officer



21 November 2018

**PHILIPPINE DEPOSITORY AND TRUST CORP.**

37/F, Tower 1, The Enterprise Center  
6766 Ayala Avenue cor. Paseo de Roxas  
1226 Makati City

Attention : **MS. MA. THERESA B. RAVALO**  
*OIC President and COO*

SUBJECT : **SUGGESTED CHECKLIST FOR COMPLIANCE WITH DATA  
PRIVACY AND PROTECTION LAWS AND REGULATIONS**

Gentlemen:

In our letter dated 05 October 2018, we asked concerned institutions to submit to this Department, **within 30 days from receipt hereof**, a report on the steps they have taken to comply with the requirements of the data privacy laws and data protection regulations, and to ensure that each activity or potential problem area in the market is adequately addressed pursuant to SRC Rules 28.1.2.4.18 & 28.1.2.5.2(p) (Broker Dealers), SRC Rules 33.1.1.21 & 33.1.1.26.2 (Exchanges), SRC Rule 36.4.1.2.6 (Transfer Agents), SRC Rule 39.1.1.5.6 (SROs & other market participants) and SRC Rule 42.1.1.32 (Clearing Agency & Depository).

**For Exchanges, Broker Dealers, Transfer Agents, Depositories, Clearing Agencies,** your report may provide information on the following questions:

1. Have you subjected the company's information technology, trading, business continuity and disaster recovery plans, and risk management systems to **regular review and audit by an independent firm** since November 11, 2015 (effectivity of 2015 SRC IRR)?

If yes, please provide the SEC a copy of the results of such review and audit.

If no, please explain why did the company not done this review and audit?

2. Have you conducted a self-assessment if your company is covered by the Data Privacy Act either as personal information controller (PIC) and/or personal information processor (PIP)?



If your company is covered by the DPA, have you done the following: Registration with NPC as PIC and/or PIP; Appointed or designated a Data Protection Officer for your company; Other activities your company have done to comply with the Data Privacy Act and its implementing rules and issuances.

If you determined that your company is not covered by DPA, please tell us the basis or reason for such determination.

**For listed companies and other market participants**, your report may provide information on the following questions:

1. Does company have information technology, business continuity and disaster recovery plans, and risk management systems?

If yes, please provide the SEC a copy of the results of such review and audit.

If no, please inform us why does the company not have these systems?

2. Have you conducted a self-assessment if your company is covered by the Data Privacy Act either as personal information controller (PIC) and/or personal information processor (PIP)?

If your company is covered by the DPA, have you done the following: Registration with NPC as PIC and/or PIP; Appointed or designated a Data Protection Officer for your company; Other activities your company have done to comply with the Data Privacy Act and its implementing rules and issuances.

If you determined that your company is not covered by DPA, please tell us the basis or reason for such determination.



Considering the clarifications on the format of the report and the requests for extension from affected entities, the deadline for submission of report is extended until **December 21, 2018**.

Thank you.

Very truly yours,

  
VICENTE GRACIANO P. FELIZMENIO JR.  
Director