

ASM DATA PRIVACY STATEMENT

The SM Prime 2026 Annual Stockholders' Meeting (ASM) Data Privacy Statement shall apply specifically to all the participants, including stockholders, their representatives or proxies, brokers, investors, and SM Prime directors, officers, employees, agents, and all persons who shall access the 2026 Annual Stockholder's Meeting (ASM) of SM Prime Holdings, Inc. (SMPH or the Company).

SMPH shall collect, process, store, and use the personal information of the participants submitted during the online registration and voting processes, which information shall include but not be limited to the name, contact details, government-issued ID information, and the votes cast by the participant-shareholder, for the following limited purposes:

1. Registration and verification of registration for the ASM;
2. Validation of stockholder records for attendance and voting;
3. Tabulation of votes; and
4. Minutes preparation and required disclosures or compliances under other applicable rules and regulations in compliance with Republic Act No. 10173, also known as the Data Privacy Act of 2012, its Implementing Rules and Regulations, other relevant laws and issuances by the National Privacy Commission (collectively, the Applicable Data Protection Laws) and SMPH's Privacy Policy.

The information collected during the registration and voting processes and any and all information collected or recorded during the 2026 ASM of SMPH, shall be retained and deleted by SMPH, in accordance with the Applicable Data Protection Laws and SMPH's Privacy Policy.

For the avoidance of doubt, the collection, processing, storage and use of any personal information shall be governed by and shall only be done in compliance with the Applicable Data Protection Laws.

On the other hand, participants are encouraged to keep information disclosed, discussed and presented during the 2026 ASM of SMPH confidential and private, except that SMPH has the right to disclose the information to government and non-government regulatory entities pursuant to a valid law, regulation or regulatory requirement, to media entities, or third parties for media releases, which disclosure shall, at all times, be made with due regard to the privacy rights of participants.

Participants shall refrain from sharing access to the virtual ASM to unauthorized persons, taking and retaining photographs or video recordings of the proceedings, and to make public any information disclosed during the 2026 ASM of SMPH.

The conduct of the 2026 ASM of SMPH and any and all processes related thereto shall likewise be subject to the SM Prime Group Privacy Policy, which can be accessed [here](#).

By agreeing to the collection, processing, use and storage of your information, participants confirm that they have read and understood the foregoing Data Privacy Statement and that participants agree to be bound by the terms thereof and the terms of the SMPH Privacy Policy. Participants thereby confirm their agreement to hold SMPH, its directors, officers, employees and agent, free and harmless from any damage resulting from any inaccurate information provided or shared by the participants for and during the 2026 ASM of SMPH.

Any person submitting or otherwise disclosing any information in connection with the 2026 ASM of SMPH for or on behalf of another warrants that: (1) such information is accurate; (2) he or she is duly authorized to make such disclosure; and (3) he or she is duly authorized to give consent on behalf of the concerned data subject(s).