

## PRIVACY NOTICE – PROMOS

Sunprime Finance Inc. ("we", "us", "our") values your privacy and complies with the Data Privacy Act of 2012 (R.A. 10173), its Implementing Rules and Regulations, and other relevant issuances of the National Privacy Commission (NPC). This Privacy Notice explains how we collect, use, store, share, and protect your personal information when you participate in this promo.

### 1. Collection of Personal Information

We collect the following personal information through the official online registration form:

- Full name
- Address
- Contact number (mobile and/or email)
- Other details necessary to verify eligibility and process prize claims

Your submission of the registration form constitutes your consent to the collection and processing of this information.

### 2. Purpose of Processing

Your personal data will be used solely for legitimate and specific purposes related to this promo, including:

- Validating entries and verifying eligibility;
- Conducting the raffle draw through a certified Random Number Generator (RNG);
- Notifying winners through registered mail, email, and SMS;
- Coordinating prize release and fulfillment; and
- Preparing reports for audit, compliance, and regulatory submission (e.g., to DTI).

### 3. Data Storage and Protection

All collected data are stored in a secure, encrypted database, protected by multi-factor authentication (MFA) and access control mechanisms. Only authorized personnel have access, and all actions are recorded through audit logs.

Regular data backups are conducted daily to prevent loss or corruption, in compliance with our IT and data security protocols.

### 4. Data Sharing and Disclosure

We do not sell, rent, or disclose your personal data to unauthorized third parties.

Your data may only be shared with:

- Authorized internal departments for promo administration;
- Third-party auditors or regulatory representatives (e.g., DTI) who oversee draw fairness and compliance;
- Government authorities, if required by law or regulation.

All third parties are bound by strict confidentiality and data protection agreements.

### 5. Retention and Disposal

Your personal data will be retained only for as long as necessary to fulfill the promo's purposes, including verification, audit, and reporting requirements. After completion of the promo and the lapse of required retention periods, your data will be securely deleted or anonymized following industry best practices.

### 6. Rights of Data Subjects

As a data subject, you have the right to:

- Be informed about how your data is collected and used;
- Access and obtain a copy of your personal data;
- Correct or rectify inaccurate or incomplete data;
- Withdraw consent or object to processing;
- Erase or block data that is no longer necessary or unlawfully processed; and
- Lodge a complaint with the National Privacy Commission for violations of your privacy rights.

Requests may be sent to our Data Protection Officer.



## 7. Contact Information

For inquiries or to exercise your data privacy rights, please contact:

Data Protection Officer (DPO) : [compliance@fhl.world](mailto:compliance@fhl.world)

Sunprime Finance Inc.