Privacy Policy

Effective Date: [August 1st, 2026].

Tulong Technologies Inc. (**"Tulong"** or **"Service Provider"**) operates strictly as a **data processor and service provider** on behalf of **G-Xchange, Inc. ("GCash")**, the accountable organization and data controller for the GCash Overseas Referral Campaign (the **"Campaign"**). All personal information collected through the Campaign is collected, processed and retained by Tulong solely on GCash's instructions and for GCash's purposes. Tulong does not use Campaign personal information for its own independent purposes.

1. Accountable Organization. GCash (G-Xchange, Inc.) is the organization accountable for the personal information collected through this Campaign under applicable privacy legislation, including Canada's *Personal Information Protection and Electronic Documents Act* (PIPEDA). Tulong acts exclusively as a service provider processing personal information on GCash's behalf and under GCash's direction.

2. Information We Collect. On behalf of GCash, Tulong collects the following categories of personal information when you voluntarily submit the sweepstakes entry form: full legal name; Canadian phone number; email address; province of residence; and, if you are selected as a winner, your verified GCash Wallet ID.

3. Purposes of Collection and Use. Personal information is collected and used exclusively for the following purposes, as directed by GCash: (a) to administer the Campaign, including verifying eligibility, conducting draws and processing prize claims; (b) if you have provided separate, express, opt-in consent via an unbundled checkbox, to send you commercial electronic messages (SMS) regarding the GCash app and related promotions, in compliance with Canada's Anti-Spam Legislation (CASL) – **consent to marketing is not a condition of entry or prize award**; and (c) to maintain audit and legal compliance records as required by applicable law. You may withdraw your SMS marketing consent at any time by replying **STOP**.

4. Disclosure. Tulong does not sell, rent or trade your personal information. As a service provider, Tulong may disclose personal information only: (a) to GCash and its authorized sub-

processors, as required to administer the Campaign and fulfil prizes; (b) as required or permitted by applicable Canadian law; or (c) with your explicit consent. No personal information is disclosed for any purpose other than those described in Section 3 above.

5. Cross-Border Processing Disclosure. You are hereby notified that personal information collected through this Campaign will be transferred to and processed in the **Republic of the Philippines**, where GCash's principal operations and data infrastructure are located. Once transferred, that information will be subject to the laws of the Philippines, including the *Data Privacy Act of 2012* (Republic Act No. 10173) and its implementing rules and regulations, which may differ from the privacy laws of your Canadian province or territory. By participating in this Campaign, you acknowledge this cross-border transfer. If you have questions about how your information is protected in the Philippines, please contact GCash's Data Protection Officer using the contact details in Section 8 below.

6. Cookies and Tracking Technologies. This website uses cookies and similar tracking technologies to operate the entry form, prevent fraud and, with your consent, to measure and improve our advertising campaigns. We use the following categories of cookies:

- **Strictly Necessary Cookies:** Required for the entry form, session management and duplicate-entry prevention. These cookies are set automatically and cannot be disabled.
- **Analytics Cookies** (consent required): Used to understand how visitors interact with the site (e.g., Google Analytics). No personally identifiable information is stored in analytics cookies.
- **Advertising / Targeting Cookies** (consent required): Used to serve relevant advertisements and measure campaign performance across platforms such as Meta (Facebook/Instagram) and Google. These cookies may track your activity across other websites. We do not activate advertising cookies until you have provided explicit consent via the cookie consent bar.

You may withdraw or change your cookie consent at any time by clicking the "Manage Cookie Preferences" link in the footer of this page. Withdrawing consent will not affect the lawfulness of any processing carried out before withdrawal. For a complete list of cookies used on this site, including cookie names, durations and providers, please see our Cookie Policy at https://tulongtechpromos.co/cookie-policy

7. Retention. Campaign personal information is retained for a minimum of two (2) years following the close of the Campaign (Jan. 31, 2027) for audit and legal compliance purposes and for a minimum of three (3) years for CASL consent records, after which it is securely deleted or de-identified in accordance with GCash's data retention schedule.

8. Data Subject Access Requests (DSARs) – How to Exercise Your Rights. You have the right to request access to, correction of or deletion of your personal information held in connection with this Campaign. Because GCash is the accountable organization, all DSARs must be directed to GCash in the first instance:

- **GCash Data Protection Officer**

  G-Xchange, Inc.

  8th Floor, W Global Center 30th Street 9th Avenue Bonifacio Global City Taguig City 1635, Philippines

If you are unsure how to reach GCash or require assistance routing your request, you may contact Tulong's Privacy Officer, who will forward your request to GCash within five (5) business days:

- **Tulong Privacy Officer**

  Tulong Technologies Inc.

  contact@tulongtechpromos.co

  215 Spadina Ave, Suite 400 Toronto, ON, Canada

Please note that Tulong, as a service provider, does not have independent authority to fulfil DSARs relating to Campaign data – all such requests are fulfilled by GCash as the accountable organization. Tulong will cooperate fully with GCash in responding to any DSAR.