

Privacy Notice

Effective on **AUGUST 9, 2017**; last updated on **OCTOBER 3, 2018**

C'EST ÇA GIFTWORKS respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when interacting with us including when you visit our website and tell you about your privacy rights and how the law protects you.

ILI HOLDINGS CORPORATION ("**C'est Ça Giftworks**") complies with the Data Privacy Act of 2012 and is committed to safeguarding your privacy and ensuring that you continue to trust C'est Ça Giftworks with your personal information. When you interact with us, you may share personal information with us which allows identification of you as an individual (e.g. name, email, address, telephone number). This is known as "personal information".

This notice ("**Privacy Notice**") sets out:

- 1 Scope and acceptance of this Privacy Notice
- 2 Information collected by C'est Ça Giftworks
- 3 Children's personal information
- 4 Why C'est Ça Giftworks collects personal information and how it uses it
- 5 Sharing of personal information by C'est Ça Giftworks
- 6 Your rights
- 7 Cookies and other tracking technologies
- 8 Information security and retention
- 9 Contact us

1 Scope and acceptance of this Privacy Notice

This Privacy Notice applies to the personal information that we collect about you for the purposes of providing you with our products and services we offer.

By using C'est Ça Giftworks Sites (as defined below) or by giving us your personal information, you accept the practices described in this Privacy Notice. If you do not agree to this Privacy Notice, please do not use C'est Ça Giftworks Sites (as defined below) or give us any personal information.

C'est Ça Giftworks Sites reserves the right to make changes to this Privacy Notice at any time. We encourage you to regularly review this Privacy Notice to make sure you are aware of any changes and how your personal information may be used.

2 Information collected by C'est Ça Giftworks

C'est Ça Giftworks may collect personal information about you from a variety of sources, including through:

- Online and electronic interactions with us, including via C'est Ça Giftworks website, text messaging, or through C'est Ça Giftworks branded pages on third party social networks (e.g. Facebook, Instagram) (**C'est Ça Giftworks Sites**);
- Offline interactions with us, including via direct marketing campaigns, hard copy registration cards, competition entries and contacts through C'est Ça Giftworks consumer services hotline; and
- Your interaction with online targeted content (such as advertisements) that C'est Ça Giftworks, or service providers on our behalf, provide to you via third party websites or social networks.

2.1 Information that you provide to us directly

This is information that you provide to us with your consent for a specified purpose, including:

- Personal contact information, including any information allowing C'est Ça Giftworks to contact you in person (e.g. name, home or (e)mail address, and phone number);
- Demographic information, including date of birth, age, gender, location (e.g. zip code, city and state and geo-location);
- Payment information, including to make purchases (e.g. credit card number, expiration date, billing address);
- Consumer feedback, including information that you share with C'est Ça Giftworks about your experience in using C'est Ça Giftworks products and services (e.g. your comments and suggestions, testimonials and other feedback related to C'est Ça Giftworks products); and
- Consumer-generated content, including any content (e.g. photos, videos and personal stories) that you create and then share with C'est Ça Giftworks (and perhaps others) by uploading it to a C'est Ça Giftworks Site.

2.2. Information that we collect when you interact with C'est Ça Giftworks Website

We use cookies and other tracking technology which collect certain kinds of information when you interact with a C'est Ça Giftworks Site.

2.3 Information collected from other sources

We may collect information about you from other legitimate sources for the purpose of providing you with our products and services. Such sources include third party C'est Ça Giftworks promotional partners, public sources and third party social networking sites with whom you have given consent for the disclosure of information relating to you and where otherwise lawfully permitted. Such information may include:

- personal contact information; and

- any personal information that is part of your profile on a third party social network (e.g. Facebook, Instagram) and that you allow that third party social network to share with us (e.g. name, email address, gender, birthday, city, profile picture, user ID, friend list). You can learn more about the information that we may obtain about you by visiting the website of the relevant third party social network.

We may also receive personal information about individuals when we acquire other companies.

3 Children's personal information

C'est Ça Giftworks does not knowingly solicit or collect personal information from children below the age of 12. If C'est Ça Giftworks discovers that it has accidentally collected personal information from a child below 12, it will remove that child's personal information from its records as soon as reasonably possible. However, C'est Ça Giftworks may collect personal information about children below the age of 12 years of age from the parent or custodian directly and therefore with their explicit consent.

4 Why C'est Ça Giftworks collects personal information and how it uses it

C'est Ça Giftworks collects and uses personal information only as necessary for the purposes for which it was obtained. C'est Ça Giftworks may use your personal information for some or all of the following purposes:

- Orders - to process and ship your orders and to inform you about the status of your orders.
- Account maintenance - to create and maintain your accounts with us, including administering any consumer loyalty or rewards programs that are associated with your account.
- Consumer service - to provide you with consumer service, including responses to your inquiries, complaints and general feedback about our products. Consumer service may be provided through various forms of communication, including via email, letter, telephone and online chat features.
- Consumer engagement - to get you more actively engaged with our products and services. This may involve the use or publication of consumer-generated content.
 - Personalisation - C'est Ça Giftworks may combine personal information about you collected from one source (e.g. a website) with information collected from another source (e.g. an offline event). This provides C'est Ça Giftworks with a more complete view of you as a consumer, which, in turn, allows C'est Ça Giftworks to serve you better and with greater personalisation, including in respect of the following:

Websites - to improve and personalise your experience on websites, using information such as account login information, technical computer information, and/or previous website usage information;

Products - to improve C'est Ça Giftworks' products, tailor them to your needs and come up with new product ideas. This includes the use of demographic information, consumer profiling information and consumer feedback; and

Interest-based advertising - to serve you advertisements tailored to your interests. One way C'est Ça Giftworks does this is to match activities or information collected on C'est Ça Giftworks Sites with information collected about you on third party sites (i.e. data-matching). This type of advertising is also known as "online behavioural advertising" or "targeted advertising". Such personalisation is typically performed via cookies or similar technologies.

- Marketing communications – to provide you with marketing communications where you have opted-in to receiving such communications (including information about C'est Ça Giftworks, its products and services, competitions and promotions). These can be shared via electronic means (e.g. SMS, emails and online advertising) and via post.

If you opt-in to receiving SMS, your mobile service provider's policy for receiving SMS will apply, which may be at a fee.

- Social features – to offer you a number of social features, including the following:

- *Website community features on a C'est Ça Giftworks Site*

When you visit a C'est Ça Giftworks Site with a community feature and upload or share recipes, pictures, videos, artwork or other content, C'est Ça Giftworks may use and display the personal information that you share on such sites.

- *Other specific purposes*

We may use your personal information for other specific business purposes, including to maintain the day-to-day operation and security of C'est Ça Giftworks Sites, to conduct demographic studies or audits, and to contact you for consumer research.

5 Sharing of personal information by C'est Ça Giftworks

C'est Ça Giftworks does not share your personal information with any third party that intends to use it for direct marketing purposes, unless you have provided specific consent in relation to this.

C'est Ça Giftworks may share your personal information with third parties for other purposes, but only in the following circumstances:

5.1 Affiliates

C'est Ça Giftworks may provide your personal information to its affiliates or related companies for legitimate business purposes.

5.2 Service providers

C'est Ça Giftworks may engage service providers, agents or contractors to provide services on its behalf, including to administer C'est Ça Giftworks Sites and services available to you. These third parties may come to access or otherwise process your personal information in the course of providing these services.

5.3 Partners and joint promotions

C'est Ça Giftworks may run a joint or co-sponsored program or promotion with another company and, as part of your involvement in the activity, collect and use your personal information.

Your personal information will only be shared with another company if you have opted in to receive information directly from that company. C'est Ça Giftworks encourages you to read the privacy notice of any such company before sharing personal information. If you do not want your personal information to be collected by or shared with a company other than C'est Ça Giftworks, you can always choose not to participate in such activity. If you do opt-in to communications from such a company, remember that you always have the right to opt-out and you would need to contact that company directly to do so.

5.4 Legal requirements and business transfer

C'est Ça Giftworks may disclose your personal information if it is required to do so by law or if, in C'est Ça Giftworks' good faith judgment, such legal disclosure is reasonably necessary to comply with legal processes or respond to any claims.

In the event of a full or partial merger with, or acquisition of all or part of C'est Ça Giftworks by another company, the acquirer would have access to the information maintained by that C'est Ça Giftworks business, which could include personal information.

6 Your rights

You are afforded rights in relation to your personal information under the Data Privacy Act of

2012, including the right to access, correction, and objection to the processing, including the right to lodge a complaint with the National Privacy Commission.

You have a right to request access to your personal information. You may send us (info@cestcagiftworks.com) a request for access. Depending on the nature of the request, C'est Ça Giftworks may charge a reasonable fee for providing access to your personal information.

You also have the right to request that C'est Ça Giftworks correct any inaccuracies in your personal information. You can send us (info@cestcagiftworks.com) a request to rectify your information, or send a message via SMS, online chat, or social network sites.

7 Cookies and other tracking technologies

7.1.1 What are cookies?

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

7.1.2 How and why do we use cookies?

We use cookies to improve the use and functionality of C'est Ça Giftworks Sites and to gain a better understanding of how visitors use C'est Ça Giftworks Sites and the tools and services offered on them. Cookies help us tailor C'est Ça Giftworks Sites to your personal needs, to improve their user-friendliness, gain customer satisfaction feedback and to communicate to you elsewhere on the internet.

7.1.3 What types of cookies may be used on C'est Ça Giftworks Sites?

We may use the following types of cookies on C'est Ça Giftworks Sites:

Session cookies - These are temporary cookie files which are erased when you close your browser. When you restart your browser and go back to the site that created that cookie, the website will treat you as a new visitor.

Persistent cookies – These cookies stay on your browser until you delete them manually or until your browser deletes them based on the duration period set within the cookie. These cookies will recognize you as a return visitor.

Necessary cookies - Necessary cookies are strictly necessary for the operation of a C'est Ça Giftworks Site. They enable you to navigate around the site and use our features.

Cookies that send information to us - These are the cookies that we set on a C'est Ça Giftworks Site and they can only be read by that site. This is known as a “First Party” cookie.

We also place cookies on C'est Ça Giftworks advertisements which are placed on other websites owned by third parties (e.g. Facebook). We obtain information via those cookies when you click on or interact with the advertisement. In this situation C'est Ça Giftworks is placing a “Third Party” cookie. C'est Ça Giftworks may use the information obtained by these cookies to serve you with advertising that is relevant and of interest to you based on your past online behaviour.

Cookies that send information to other companies - These are cookies that are set on a C'est Ça Giftworks Site by our partner companies (e.g. Facebook or advertisers). They may use the information collected from these cookies to anonymously target advertising to you on other websites, based on your visit to the C'est Ça Giftworks Site. For example, if you use a social widget (e.g. the Facebook icon) on a C'est Ça Giftworks Site, it will record your “share” or “like”. Facebook (as the company setting the cookie) will collect the information.

7.1.4 Examples of cookies used on this Website

Cookie used/ type and category	Purpose	What informat ion is collected ? ?	Details
Performance Cookies <u>Type:</u> Analytics <u>Category:</u> Persistent Session Third party	Help us understand how visitors interact with our Website by providing information about the areas visited, time spent and any issues encountered, such as error messages. This helps us improve the performance of our websites.	All information is collected and aggregated anonymously.	Google Analytics; https://developers.google.com/analytics/devguides/collection/analyticssjs/cookie-usage DoubleClick; https://support.google.com/adSense/answer/2839090?hl=en
Social Sharing Cookies (sometimes called “Third Party” cookies, or “Social Widgets”)	Social sharing offered on the Website is run by third parties. These third parties may drop cookies on your computer when you use social sharing features on the Website, or if you are already logged into them. These cookies help improve your experience on the Website.	These cookies may collect personal information that you have voluntarily disclosed, such as	__Facebook; https://www.ghostery.com/en/apps/facebook_social_plugins Twitter; https://www.ghostery.com/en/apps/twitter_button

<p><u>Type:</u> Social Media/Sharing</p> <p><u>Category:</u> Third Party</p>	<p>They allow you to share comments/ratings/pages /bookmarks and help to provide access to social networks and social online tools more easily.</p>	<p>your username.</p>	
<p>Targeting/Advertising</p> <p><u>Type:</u> Cross Site Tracking</p> <p><u>Category:</u> Persistent Session Third party</p>	<p>These cookies are used to deliver content via targeted advertising that is relevant to you and your interests or to limit the number of times you see a particular advertisement.</p> <p>These cookies also help us measure the effectiveness of advertising campaigns on C'est Ça Giftworks and Non- C'est Ça Giftworks websites. We may share this information with other parties, including our agencies.</p>	<p>These cookies track users via their IP address.</p>	<p>DoubleClick; https://www.ghostery.com/en/apps/doubleclick</p>
<p>Miscellaneous</p> <p><u>Type:</u> Flash Cookies</p> <p><u>Category:</u> Persistent Third Party</p>	<p>Flash cookies may store your preferences such as volume control or high game score, or display content based upon what you view on the Website in order to personalize your visit. Our third party partners provide certain features on the Website such as promotions, and games and use Flash Cookies to collect and store your information.</p>	<p>These cookies may collect anonymous and personal information</p>	<p>To learn how to manage privacy and storage settings for Flash Cookies please click here: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html#117118</p>

7.1.5 Other similar technologies

C'est Ça Giftworks Sites also make use of other tracking technologies including IP addresses, log files and web beacons, which also help us tailor C'est Ça Giftworks Sites to your personal needs.

IP addresses

An IP address is a number that is used by computers on the network to identify your computer every time you log on to the Internet. We may record IP Addresses for the following purposes: (i) troubleshoot technical concerns, (ii) maintain website safety and

security (iii) better understand how our websites are utilized, and (iv) to better tailor content to your needs depending on the country you are in.

Log Files

We (or a third party on our behalf) may collect information in the form of logs files that record website activity and gather statistics about a user's browsing habits. These entries are generated anonymously, and help us gather (among other things) (i) a user's browser type and operating system, (ii) information about a user's session (such as the URL they came from, the date and time they visited our website, and which pages they've viewed on our website and for how long), and, (iii) other similar navigational or click-stream information (e.g. site traffic reporting and unique visitor counts).

Web Beacons

We may use web beacons (or clear GIFs) on the C'est Ça Giftworks Sites. Web beacons (also known as "web bugs") are small strings of code that provide a method of delivering a graphic image on a web page for the purpose of transferring information back to us. We use web beacon information for a variety of purposes, including information as to how a user responds to email campaigns (e.g. the time the email is opened, where the user links to from the email), site traffic reporting, unique visitor counts, advertising and email auditing and reporting, and personalization.

7.1.6 Manage your cookies/preferences

You should ensure that your computer setting reflects whether you are happy to accept cookies or not. You can set your browser to warn you before accepting cookies, or you can simply set it to refuse them. You do not need to have cookies on to use or navigate through many parts of C'est Ça Giftworks Sites although you may not have access to all the features on C'est Ça Giftworks Sites if you do so. See the 'help' button on your browser (e.g. Internet Explorer, Firefox) for how you can do this. Remember that if you use different computers in different locations, you will need to ensure that each browser is adjusted to suit your cookie preferences.

As a web beacon forms part of a webpage, it is not possible to 'opt-out' but you can render them ineffective by opting out of the cookies they set.

Additionally, where available, you can exercise your choice in allowing for cookies to be placed on your computer or to opt-out of cookies by visiting the following sites and selecting which company's cookies you would like to opt out of:

<http://www.aboutads.info/choices/#completed> or <http://www.youronlinechoices.eu/>

8 Information security and retention

8.1 Information security

In order to keep your personal information secure, C'est Ça Giftworks has implemented a number of security measures, including:

- **Secure operating environments** - C'est Ça Giftworks stores your information in secure operating environments and only accessible to C'est Ça Giftworks employees, agents and contractors on a need-to-know basis. C'est Ça Giftworks also follows generally accepted industry standards in this respect.
- **Encryption for payment information** - C'est Ça Giftworks uses industry-standard encryption to provide protection for sensitive financial information, such as credit card information sent over the Internet (e.g. when you make payments through C'est Ça Giftworks website).
- **Prior authentication for account access** - C'est Ça Giftworks requires its registered consumers to verify their identity (e.g. login ID and password) before they can access or make changes to their account. This is aimed to prevent unauthorized accesses.

Please note that these protections do not apply to personal information you choose to share in public areas such as on community websites.

8.2 Retention

C'est Ça Giftworks will only retain your personal information for as long as it is necessary for the stated purpose, taking into account also our need to answer queries or resolve problems, provide improved and new services, and comply with legal requirements under applicable laws.

This means that we may retain your personal information for a period of 10 years after your last interaction with us. When the personal information that we collect is no longer required, we destroy or delete it in a secure manner.

9 Contact us

C'est Ça Giftworks acts as “data protection officer” for the personal information it processes in the framework of this Privacy Notice. If you have any questions or comments regarding this Privacy Notice or C'est Ça Giftworks’ personal information collection practices, please contact us by:

- phone at **(02) 647-1054 or at (+63) 917 579 4919**
- email at **info@cestcagiftworks.com**
- mail at **1 Comets Loop, Blue Ridge B, Libis, Quezon City**

Copyright © 2018 C'est Ça Giftworks'