

STINGRAY RAFFLES

Privacy Policy

Version 2.0 | Effective

Your privacy at a glance

Stingray Raffles uses personal data to authenticate numbered raffle tickets, administer lawful charity raffles, conduct random draws, verify winners, deliver prizes, prevent fraud and maintain required records. Marketing and optional winner publicity are separate choices and are not conditions of entry.

This Privacy Policy explains how personal data is collected, used, disclosed, retained and protected when you purchase, activate or register a numbered raffle ticket, scan a Stingray Raffles QR code, use a campaign website or mobile application, contact support, participate in a draw or claim a prize. It applies to Stingray Raffles operated in the Cayman Islands and should be read together with the Official Rules for the relevant raffle campaign (the "Official Rules").

Campaign controller	The participating charity or other eligible non-profit organisation identified as the legal raffle stager in the Official Rules (the "Stager").
Technology and administration	Stingray Media Group Ltd. or the Stingray operating entity identified in the Official Rules ("Stingray").
Core entry data	Ticket or QR identifier, mobile number, SMS verification records, eligibility declarations, activation status and security logs.
Marketing	Optional. You may withdraw consent or object to direct marketing at any time without affecting your raffle entry.
Privacy contact	info@stingraymedia.com - use the subject line "Stingray Raffles Privacy Request".

1. Scope and relationship with campaign notices

This Policy applies to personal data processed through Stingray Raffles websites, QR landing pages, mobile applications, ticket activation services, SMS verification services, customer support channels, raffle administration systems and prize-claim processes. It also applies to personal data received from authorised newspaper vendors, participating charities, service providers and public authorities in connection with a raffle campaign.

The Official Rules and any short-form privacy notice displayed at the point of collection may provide campaign-specific details, including the identity and contact details of the Stager, the entry period, the exact data required, winner-announcement practices and any campaign-specific service providers. Where a campaign-specific notice provides more specific information about a particular use of personal data, that notice applies to that use. This Policy does not govern unrelated editorial, radio, marketplace, employment or other Stingray Media services.

2. Who is responsible for your personal data

Responsibility depends on which organisation decides why and how particular personal data is used. The Official Rules will identify the Stager for each campaign.

Organisation	Privacy role
The Stager	Ordinarily acts as the primary data controller for the ticket-sale relationship, raffle entry, eligibility rules, random draw, winner verification, prize fulfilment, complaints and campaign records.
Stingray	Acts as a data processor when it handles campaign data solely on the Stager's documented instructions. Stingray may also act as an independent data controller for platform security, fraud prevention, technical operations, support, legal compliance, service analytics and its own optional direct marketing.
Caymanians First Charitable Foundation	Where appointed for a campaign, may act as an independent data controller for eligibility review, fiduciary oversight, governance, audit and reconciliation. It should receive only the data reasonably needed for those functions.
Authorised vendors	May act as agents of the Stager for ticket distribution, sale and reconciliation. A vendor that collects personal data for its own purposes is separately responsible for that processing and must give an appropriate notice.

Where two organisations jointly determine the purposes and essential means of a processing activity, they will act as joint data controllers and will document their respective responsibilities. The essence of any applicable joint-controller arrangement will be made available on request.

3. Personal data we collect

We collect only data that is reasonably necessary for the relevant campaign and the purposes described in this Policy. Depending on how you participate, this may include:

- Ticket and purchase data: the unique ticket number, QR token or serial number; campaign and newspaper issue; sale or activation date and time; vendor or distribution point; ticket status; refund, cancellation or chargeback information; and whether a ticket has already been registered, transferred, voided or claimed.
- Registration and contact data: mobile telephone number, country code, SMS one-time passcode status, optional email address, optional name, communication preferences and records showing your acceptance of the Official Rules and this Policy.
- Eligibility data: confirmation that you are at least 18 years old and ordinarily resident or otherwise eligible under the Official Rules. We may collect supporting evidence only when reasonably necessary, particularly from a potential winner.
- Technical and usage data: IP address, browser type, device type, operating system, app version, time zone, language, referring page, session identifiers, cookie or local-storage identifiers, interaction logs, crash data and security events.
- Winner and prize-claim data: full legal name, date of birth, residential address, proof of identity, proof of Cayman Islands residence or other eligibility, signature, claim correspondence, prize-payment instructions, tax or financial information where legally required, and a signed prize receipt or release.

- Support, complaint and investigation data: messages, call notes, attachments, identity-verification data, dispute details, evidence of ticket ownership and records of how a matter was resolved.
- Fraud and compliance data: duplicate-ticket or copied-QR indicators, failed verification attempts, suspicious device or network signals, sanctions or legal checks where required, internal investigation notes and information received from law enforcement or regulatory authorities.
- Marketing and publicity data: marketing choices, campaign engagement, optional profile information and, only where separately agreed, a winner photograph, quotation, interview, voice recording or story.

4. How we obtain personal data

We obtain personal data directly from you when you activate or register a ticket, request an SMS code, use the platform, contact us, claim a prize or choose to receive marketing. We may also obtain data from:

- the Stager, the Caymanians First Charitable Foundation or another authorised campaign administrator;
- newspaper vendors and other authorised ticket distributors, primarily for ticket-sale and reconciliation records;
- SMS, hosting, cybersecurity, analytics, payment and prize-fulfilment providers;
- your device or browser through cookies, local storage, application logs and similar technologies; and
- public authorities, law enforcement, professional advisers, auditors or publicly available sources where necessary for legal compliance, fraud prevention or the defence of legal rights.

A QR code or numbered ticket should contain a unique campaign identifier or token. We do not need to place your name, mobile number or other directly identifying personal data inside the printed QR code itself.

5. Why we use personal data and our lawful bases

The Cayman Islands Data Protection Act requires a lawful condition for processing personal data and an additional condition where sensitive personal data is involved. We rely on the following conditions, as applicable:

Purpose	Data typically used	Lawful condition
Register and authenticate a numbered ticket; confirm acceptance of the Official Rules; maintain the valid-entry register.	Ticket identifier, mobile number, SMS verification record, eligibility declarations, timestamps.	Performance of the raffle contract; steps requested before entering that contract; legitimate interests in reliable administration.
Conduct the random draw, notify a potential winner and administer the claim.	Valid ticket register, contact data, draw record, claim communications.	Performance of the raffle contract; compliance with legal obligations; legitimate interests in fair and transparent administration.
Verify age, residence, identity and ticket ownership; deliver and account for the prize.	Identity and residence evidence, ticket ownership evidence, payment details and receipt.	Performance of contract; legal obligation; legitimate interests in preventing ineligible or fraudulent claims.
Protect the platform and prevent copied tickets, duplicate registrations, misuse, fraud and security incidents.	Device, network, ticket, authentication and investigation data.	Legitimate interests in security and fraud prevention; legal obligations; establishment, exercise or defence of legal rights.
Maintain raffle, financial, audit, tax, NPO and regulatory records; respond to lawful requests.	Campaign register, draw certificate, winner and prize records, reconciliation and supporting records.	Compliance with legal obligations; legitimate interests in governance, accountability and dispute resolution.
Provide support and resolve questions, complaints, refunds or disputes.	Contact details, communications, ticket and transaction records.	Performance of contract; legitimate interests in customer service and dispute management; legal rights.

Purpose	Data typically used	Lawful condition
Measure service performance and improve reliability, accessibility and user experience.	Usage, diagnostics and aggregated or pseudonymised analytics.	Legitimate interests, balanced against your rights; consent where required for non-essential cookies or similar technologies.
Send Stingray Raffles news, reminders or other direct marketing not necessary to administer your entry.	Contact details, preferences and campaign engagement.	Consent. You may withdraw consent or require us to stop direct marketing at any time.
Publish optional winner photographs, interviews or stories beyond the minimum announcement required for the raffle.	Name, image, voice, quotation and biographical details selected for publication.	Separate, voluntary consent; legitimate interests only for the minimum transparency announcement described in Section 9.

6. Information you must provide

Where the Official Rules require ticket activation or registration, the unique ticket identifier, required eligibility declarations and a verified contact method are necessary to create a valid entry. If you do not provide that information, we may be unable to register the ticket or include it in the draw.

A potential winner must provide the information reasonably required to verify identity, age, residence, ticket ownership and compliance with the Official Rules. Failure to provide required verification by the claim deadline may result in the prize being withheld or awarded in accordance with the Official Rules. Marketing consent and optional publicity are not required to enter, win or receive a prize.

7. Sensitive personal data

Stingray Raffles is not designed to collect sensitive personal data as a routine part of entry. Identity documents, complaint materials or fraud investigations may incidentally reveal sensitive personal data, such as racial or ethnic origin or alleged offences. We limit access to that information, use it only where a condition in Schedule 3 of the Data Protection Act is satisfied, and delete or de-identify it when it is no longer needed.

Please do not send medical information, political opinions, religious beliefs or other sensitive personal data unless we specifically request it for a lawful and necessary purpose.

8. Random draws, fraud controls and automated processing

A draw may use software to select one or more valid numbered tickets at random. The draw is based on ticket identifiers in the valid-entry pool and is not intended to evaluate a participant's personal characteristics, behaviour, creditworthiness or other traits.

Automated controls may identify duplicate tickets, repeated failed verification attempts, suspicious device activity or other indicators of misuse. A flag does not automatically establish wrongdoing. Where a proposed decision would significantly affect you - for example, disqualifying an entry or denying a prize - we will ordinarily provide human review, explain the relevant reason where lawful and allow you to submit information for reconsideration. You may also exercise any applicable rights concerning solely automated decisions under the Data Protection Act.

9. Winner announcements and publicity

To demonstrate that a raffle was conducted fairly and to allow a winner to come forward, the Stager may publish the winning ticket number and the draw date through the campaign website, newspaper, radio, social media or other channels identified in the Official Rules. This minimum announcement does not require publication of the winner's identity.

After a winner is verified, the Official Rules may permit a limited identity announcement, such as the winner's first name and last initial, district or island, where reasonably necessary for transparency and fraud prevention. We will not publish copies of identity documents, home addresses, telephone numbers, bank details or other claim evidence.

A full name, photograph, video, audio interview, quotation or personal story will be used for promotional publicity only with a separate, voluntary permission. A winner may decline optional publicity without losing the prize. Withdrawal of publicity consent will apply prospectively and may not remove material already lawfully printed or published where removal is not reasonably practicable.

10. Direct marketing

Operational messages required to register a ticket, deliver an SMS code, confirm an entry, notify a potential winner, manage a claim or address security are service communications and are not direct marketing.

We send optional advertising, fundraising appeals, promotions or similar communications to an individual only where we have a lawful basis, ordinarily your affirmative consent. Marketing consent is separate from raffle entry. You may unsubscribe through the method in the communication, reply "STOP" where supported, or email info@stingraymedia.com. We may retain a minimal suppression record so that we can respect your request and avoid contacting you again for marketing.

The Stager, Stingray and participating charities will not treat one organisation's marketing permission as permission for another organisation unless that sharing and the identities of the recipients were clearly disclosed when you made the choice.

11. Cookies, QR codes and similar technologies

Our websites and applications may use cookies, local storage, software development kits and similar technologies. These technologies may be used to keep a session secure, prevent duplicate ticket claims, remember privacy choices, diagnose errors, measure service performance and, with consent where required, provide analytics or marketing.

- Strictly necessary technologies operate to provide security, authentication, load balancing and core raffle functions.
- Analytics technologies help us understand performance and usage. We prefer aggregated or pseudonymised data and use consent where required.
- Advertising or cross-context tracking technologies are not required for raffle entry and will be used only after an appropriate choice is presented.

You can manage non-essential technologies through the consent tool, application settings or browser controls. Blocking necessary technologies may prevent ticket registration, authentication or other core functions. Where a mobile application requests camera access, the camera is used to scan a QR code; any additional device permission will be explained when requested.

12. When we share personal data

We disclose personal data only where necessary for the purposes in this Policy, where you direct us to do so or where law permits or requires disclosure. Recipients may include:

- the Stager and its authorised campaign personnel;
- Stingray and the Caymanians First Charitable Foundation, to the extent each performs the role described in the Official Rules;
- authorised newspaper vendors and ticket distributors, limited to sale, validation, refund and reconciliation information reasonably needed for their role;
- hosting, database, SMS, email, identity-verification, cybersecurity, analytics, customer-support, payment, banking, audit and prize-fulfilment providers;
- independent draw witnesses, auditors, accountants, insurers, legal advisers and other professional advisers;
- the Office of the Ombudsman, the Registrar of Non-Profit Organisations, law enforcement, courts, tax authorities or other competent authorities where disclosure is lawful and necessary; and
- a successor or prospective successor in a genuine corporate restructuring or transfer, subject to confidentiality and appropriate safeguards.

We do not sell or rent raffle participant personal data. We do not disclose your contact details to unrelated charities, advertisers or commercial partners for their own marketing unless you have been clearly informed and have made an appropriate choice.

A service provider that processes personal data for a controller must act under a written contract, use the data only on documented instructions, maintain appropriate security and return or delete data as required at the end of the service.

13. International transfers

Some technology, communications, support or professional-service providers may process personal data outside the Cayman Islands. Before making an international transfer, the responsible data controller will assess whether the destination provides an adequate level of protection or will rely on another lawful transfer mechanism available under the Data Protection Act.

Safeguards may include written contractual protections, approved terms, confidentiality duties, access controls, encryption, data minimisation, transfer-risk review and limiting the data to what the recipient needs. Where consent is used as the transfer condition, we will explain the relevant transfer and request a valid consent. You may contact us for available information about the countries involved and the safeguards used for a particular campaign.

14. Retention and deletion

We retain personal data only for as long as reasonably necessary for the purpose for which it was collected, including the time needed to complete the draw and prize claim, resolve disputes, prevent repeat fraud, meet NPO and financial-record duties and comply with law. The following are our ordinary retention periods unless the Official Rules, a legal hold or another legal requirement requires a different period:

Record category	Ordinary retention period
Incomplete activation or failed SMS verification	Up to 90 days after the last activity, except associated security data may be retained longer where needed to investigate abuse.

Record category	Ordinary retention period
Valid ticket registration, entry and draw records	24 months after the campaign closes or the final prize-claim deadline, whichever is later.
Security, fraud and investigation records	Ordinarily 24 months after the event or case closure; longer where an investigation, legal claim or repeat-abuse risk remains active.
Identity-document images used for a prize claim	Deleted or irreversibly redacted as soon as verification and any required review are complete, ordinarily no later than 90 days after prize payment or final claim denial, unless law or a dispute requires longer retention.
Winner, prize, reconciliation, financial and audit records	At least five years from the end of the relevant financial year where NPO financial-record rules apply, and ordinarily no more than seven years unless a longer period is required by law or a legal claim.
Support requests and complaints	24 months after closure, unless the matter forms part of a legal, regulatory, fraud or insurance record that must be retained longer.
Marketing records	Until consent is withdrawn or the purpose ends. A minimal suppression record may be kept for as long as necessary to honour an opt-out.
Backups	Removed through the normal secure backup rotation, ordinarily within 90 days after deletion from active systems, unless an isolated backup must be preserved for security or legal reasons.

At the end of the applicable period, data is securely deleted, anonymised or, where it must be preserved, isolated and restricted to the required purpose. Anonymised information that can no longer identify an individual may be retained for statistics, governance and service improvement.

15. Security

We use technical and organisational measures designed to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction, alteration or damage. Depending on the sensitivity and risk, those measures are designed to include:

- unique, traceable ticket identifiers and controls against duplicate activation or copied QR codes;
- encryption in transit and, where appropriate, at rest; tokenisation or pseudonymisation of ticket and account identifiers;
- role-based access, least-privilege permissions, multi-factor authentication for administrative access and periodic access review;
- audit logs, monitoring, backup and recovery procedures, vulnerability management and incident-response processes;
- staff confidentiality and privacy training; and
- due diligence and written data-processing obligations for service providers.

No system can be guaranteed completely secure. You should keep SMS codes and any account credentials confidential, protect the original numbered ticket and notify us promptly if you believe a ticket, device or account has been compromised.

16. Personal data breaches

We maintain procedures to identify, contain, investigate and document personal data breaches. Where the Data Protection Act requires notification, the responsible data controller will notify the affected individual and the

Cayman Islands Ombudsman without undue delay and no later than five days after the controller should, with reasonable diligence, have become aware of the breach. The notice will describe the nature and consequences of the breach, measures taken or proposed, and recommended steps to reduce possible harm.

17. Your data-protection rights

Subject to the Data Protection Act, applicable exemptions and the circumstances of the request, you may have the right to:

Right	What it means
Be informed	Receive clear information about the identity of the data controller and the purposes for which personal data is processed.
Access	Request confirmation of whether your personal data is processed, a copy of relevant data and information about its use and disclosure.
Rectification, blocking, erasure or destruction	Ask that inaccurate data be corrected and, where the legal conditions are met, that processing be blocked or data erased or destroyed.
Stop or restrict processing	Object in writing to processing likely to cause unwarranted substantial damage or distress, subject to statutory exceptions.
Stop direct marketing	Require us at any time to cease or not begin processing your personal data for direct marketing.
Automated decisions	Object to certain decisions that significantly affect you and are based solely on automated evaluation, and request reconsideration where the Act applies.
Complain and seek redress	Complain to the Cayman Islands Ombudsman and pursue any compensation or other remedy available under law.

To exercise a right, send a written request to info@stingraymedia.com with the subject line "Stingray Raffles Privacy Request" and identify the campaign and ticket number, where available. You may also contact the Stager using the details in the Official Rules. We may request information reasonably necessary to confirm your identity and locate the relevant data. We will not ask for more identity information than is proportionate to the request.

Access requests are ordinarily handled within 30 days after receipt of a valid written request and any information reasonably needed to verify identity or locate the data. The period may be extended by up to a further 30 days where the Regulations permit and you will be informed of the reason. Requests are ordinarily free, although a reasonable fee may be charged, or a request refused with reasons, where it is manifestly unfounded or excessive as defined by the Regulations. Rights are not absolute; we may retain or withhold data where an exemption, another person's rights, legal privilege, fraud prevention, regulatory duties or legal claims require it.

18. Children and age-restricted participation

Stingray Raffles is intended only for persons aged 18 or older. The Data Protection Regulations define a child as a person under 18, and the Official Rules require adult eligibility. We do not knowingly register children. If we learn that a person under 18 has attempted to register, we may invalidate the entry and delete the personal data, except for a limited record needed to prevent repeated misuse, protect the child or comply with law.

19. Third-party sites, payments and services

A campaign may link to an independent bank, payment provider, app store, social-media platform, map, messaging service, charity website or other third party. A third party that determines its own purposes for personal data is an independent data controller and its own privacy notice applies. A link or integration does not mean that Stingray or the Stager controls the third party's privacy practices.

Unless a campaign expressly states otherwise, Stingray Raffles does not store full payment-card details. Card or bank information entered directly into an independent payment interface is processed by the relevant payment provider under its own terms and privacy notice.

20. Changes to this Policy

We may update this Policy to reflect changes in law, regulatory guidance, campaign design, technology, service providers or security practices. The version and effective date at the beginning of the Policy identify the current edition. Material changes will be communicated through the platform, the relevant campaign page, email or another reasonable method before they take effect where required. We will not use previously collected data for a materially incompatible new purpose without providing an appropriate notice and, where required, obtaining consent.

21. Contact us

For questions, requests or complaints concerning personal data processed through Stingray Raffles, contact:

Stingray Media Group Ltd.
 38 Godfrey Nixon Way
 P.O. Box 31910
 Grand Cayman KY1-1208
 Cayman Islands
 Email: info@stingraymedia.com
 Subject line: Stingray Raffles Privacy Request

The Stager for a particular raffle is identified in that campaign's Official Rules. Requests concerning the Stager's controller activities may be sent directly to the Stager or through the Stingray contact above for routing.

You may also complain to the Cayman Islands Ombudsman, the independent supervisory authority for data protection:

Office of the Ombudsman, 5th Floor, Anderson Square, 64 Shedden Road, George Town; P.O. Box 2252, Grand Cayman KY1-1107; telephone +1 345 946 6283; email info@ombudsman.ky; website <https://ombudsman.ky/data-protection>.

22. Official Cayman Islands references

The following official sources provide the principal legal and regulatory framework referenced in this Policy. Links were checked as of the effective date shown above.

Cayman Islands Data Protection Act (2021 Revision):

https://legislation.gov.ky/cms/images/LEGISLATION/PRINCIPAL/2017/2017-0033/2017-0033_2021%20Revision.pdf

Cayman Islands Data Protection Regulations, 2018:

https://legislation.gov.ky/cms/images/LEGISLATION/SUBORDINATE/2019/2019-0017/2019-0017_SL%2017%20of%202019.pdf

Cayman Islands Ombudsman - Data Protection: <https://ombudsman.ky/data-protection>

Cayman Islands Ombudsman - Personal Data Breaches: <https://ombudsman.ky/data-protection-organisation/personal-data-breaches>

Cayman Islands Non-Profit Organisations Act (2020 Revision):

https://legislation.gov.ky/cms/images/LEGISLATION/PRINCIPAL/2017/2017-0037/2017-0037_2020%20Revision.pdf