

# COOKIE AND TRACKING NOTICE

Initiate Global Foundation, Inc.  
Last Updated: 1 January 2026

## 1. INTRODUCTION

Initiate Global Foundation, Inc. ("Initiate Global," "we," "us," or "our") uses cookies and similar tracking technologies on our website and related digital platforms to ensure proper functionality, enhance user experience, improve security, and support lawful analytics and outreach efforts.

This Cookie and Tracking Notice ("Notice") explains what cookies are, how we use them, the legal basis for processing related data, and your rights and choices.

This Notice should be read together with our Privacy Policy.

## 2. WHAT ARE COOKIES AND TRACKING TECHNOLOGIES?

### 2.1 Cookies

Cookies are small text files stored on your device (computer, smartphone, or tablet) when you visit a website. They allow the website to recognize your device and remember information about your visit, such as login status, preferences, and security settings.

Cookies may be:

- a. Session Cookies – deleted when you close your browser; or
- b. Persistent Cookies – remain on your device until they expire or are manually deleted.

### 2.2 Other Tracking Technologies

We may also use similar technologies, including:

- a. Pixels and web beacons;
- b. Tags and tracking scripts;

- c. Local storage objects; and
- d. Analytics identifiers.

These technologies collect information about how users navigate and interact with our platform.

### 3. TYPES OF COOKIES WE USE

Category	Purpose	Legal Basis	Examples
Strictly Necessary / Essential	Enable core platform functionality and security	Legitimate interest (security & functionality)	Login session management, donation processing, fraud prevention
Analytics / Performance	Measure usage, diagnose errors, and improve performance	User consent	Google Analytics or similar analytics tools
Marketing / Advertising	Evaluate campaign reach and deliver relevant promotional content	User consent	Meta Pixel, Google Ads conversion tags
Functional / Preference	Remember user settings and preferences	User consent	Language or interface preferences

Strictly Necessary cookies cannot be disabled as they are required for the operation and security of the platform.

Analytics and Marketing cookies are non-essential and are activated only upon your consent.

### 4. PURPOSES OF PROCESSING

We use cookies and tracking technologies to:

- a. Maintain secure login sessions and protect against fraud or unauthorized access;
- b. Process donations reliably and prevent duplicate submissions;
- c. Monitor system performance and troubleshoot technical issues;
- d. Understand traffic patterns and donor engagement trends;
- e. Improve usability, campaign visibility, and overall platform experience;
- f. Measure the effectiveness of communications and outreach campaigns.

Where possible, data is aggregated and anonymized. However, certain identifiers (e.g., IP addresses or device identifiers) may be considered personal data under applicable law.

## **5. LEGAL BASIS FOR PROCESSING**

Under the Data Privacy Act of 2012 (Republic Act No. 10173) and, where applicable, the General Data Protection Regulation (GDPR), our legal bases include:

- Legitimate Interest: For essential cookies required for security, fraud prevention, and platform integrity;
- Consent: For analytics, marketing, and preference cookies;
- Compliance with Legal Obligations: For fraud detection and AML-related monitoring where applicable.

You may withdraw consent at any time without affecting the lawfulness of processing based on prior consent.

## **6. CONSENT AND USER CONTROLS**

When you first visit our website, you will be presented with a cookie banner allowing you to:

- a. Accept All Cookies – enabling all categories;
- b. Customize Preferences – selecting specific categories;
- c. Decline Non-Essential Cookies – enabling only essential cookies.

Your preferences are stored and may be modified at any time through the cookie settings link available on our website.

You may also manage or delete cookies through your browser settings. However, disabling essential cookies may impair core functionality, including campaign creation, secure login, or donation processing.

We currently do not respond to “Do Not Track” signals where technically unsupported by browsers, but users may manually configure privacy settings.

## **7. THIRD-PARTY COOKIES AND CROSS-BORDER TRANSFERS**

Certain cookies are placed by third-party service providers engaged for analytics, security, or marketing purposes. These providers may process data independently under their own privacy policies.

Examples may include:

- a. Google (Analytics and Ads);
- b. Meta (Facebook Pixel);
- c. Payment processors for transaction verification.

Where data is transferred outside the Philippines, we ensure appropriate safeguards are in place, including contractual data protection clauses and vendor compliance with recognized privacy frameworks.

We do not sell personal data collected via cookies.

## **8. DATA RETENTION**

Cookie-related data is retained only for as long as necessary to fulfill the purposes outlined in this Notice, or as required by law. Retention periods vary depending on the type of cookie and applicable regulatory obligations.

## **9. DATA SECURITY**

Information collected through cookies is processed securely in accordance with:

- The Data Privacy Act of 2012 (RA 10173);
- National Privacy Commission (NPC) regulations and circulars;
- PCI DSS standards for payment security (where applicable); and
- Internal data protection and information security controls.

We implement technical and organizational safeguards to protect against unauthorized access, alteration, disclosure, or destruction of data.

## **10. UPDATES TO THIS NOTICE**

We may update this Cookie and Tracking Notice to reflect changes in technology, legal requirements, or vendor relationships.

Any material changes will be communicated via website banner, email notification, or updated consent request where required. Continued use of the website after updates constitutes acknowledgment of the revised Notice.

## **11. CONTACT INFORMATION**

For inquiries regarding cookies, tracking technologies, or data protection rights, you may contact our Data Protection Officer (DPO):

Data Protection Officer  
Initiate Global Foundation, Inc.  
19th Floor, Capital House, 9th Avenue  
corner Lane S, Bonifacio Global City,  
Taguig, Philippines  
Email: [dpo@initiateglobal.org](mailto:dpo@initiateglobal.org)  
Phone: 02-7001-4628