

BBBRINGME | LEGAL & POLICY TEMPLATE

PRIVACY POLICY

Personal-data handling for a multi-service marketplace and digital platform

TEMPLATE STATUS: Complete bracketed information, align this document with the actual product design and operations, and obtain Philippine legal review before publication or use.

Included subject areas

- Customer, Provider, event, community and commerce data
- Bookings, payments, messaging, verification and location data
- Sharing, retention, security, rights and complaint process
- Philippine Data Privacy Act-focused template

Prepared for: [BBBRINGME Legal Entity Name] | Effective Date: [Insert Date] | Version: 1.0

1. Introduction and Scope

This Privacy Policy explains how [BBBRINGME Legal Entity Name] (BBBRINGME, we, us or our) collects, uses, shares, retains and protects personal data when you use our website, mobile apps, communications, service marketplace, booking tools, community features, event features, e-commerce functions and related services (collectively, the Platform). This Policy applies to Customers, Providers, merchants, organisers, community members, job applicants, business contacts and visitors, as relevant.

DATA PRIVACY COMMITMENT BBBRINGME will process personal data in accordance with applicable data-protection law, including the Philippine Data Privacy Act of 2012 and its implementing rules, and will apply appropriate safeguards proportionate to the data and processing activity.

1.1 Contact details

Personal Information Controller	[BBBRINGME Legal Entity Name]
Business Address	[Registered Address]
Data Protection Contact / DPO	[DPO Name or Role] - [DPO Email]
General Support	[Support Email / In-App Help Centre]
Effective Date	[Insert Date]

2. Personal Data We May Collect

The personal data we collect depends on your account type, actions, requested Service and the permissions you choose to grant. We collect only data reasonably necessary for the purposes described in this Policy.

Account and identity data: name, username, email, mobile number, profile image, date of birth where needed for eligibility, account credentials and verified identity information.

Provider and business data: business name, service categories, professional qualifications, licences, certifications, insurance details, tax or registration information, portfolio, availability, service areas and verification records.

Booking, transaction and payment data: service requests, quotes, Order details, invoices, payment status, payment method token or reference, subscriptions, refunds, cancellation history, delivery information and support records. Full card data should be handled by the applicable payment provider, not stored by BBBRINGME unless expressly disclosed.

Location and service data: pickup, delivery, service, event or meeting location, geographic service areas, accessibility details and location data where you permit it or the feature requires it.

Communications and content: messages, reviews, ratings, uploaded files, photos, videos, issue reports, recordings where disclosed, and communications with support.

Device and usage data: IP address, device identifiers, browser type, app version, log data, cookies, feature use, crash reports and approximate location derived from IP address.

Safety and compliance data: reports, complaints, verification outcomes, fraud indicators, incident records, sanctions or restriction history, and other information reasonably necessary to protect users and the Platform.

3. How We Use Personal Data

- Create and administer accounts, enable log-in, verify information and maintain Platform security.
- Match Customers with Providers, display listings, administer bookings, deliver confirmations, facilitate communications and provide customer support.
- Process payments, refunds, subscription access, fraud controls and transaction records through BBBRINGME or authorised payment service providers.
- Support community, event, consultation, commerce and marketplace features, including attendee lists, purchase records, delivery arrangements and relevant notifications.
- Assess eligibility, quality, safety, service performance, compliance and policy breaches.
- Improve the Platform, analyse trends, develop features, test systems and prepare aggregated or de-identified analytics.
- Send service, administrative, safety, legal and account-related communications, and marketing where permitted and according to your choices.
- Comply with legal obligations, respond to lawful requests, establish or defend legal claims, and protect the rights, property, users and systems of BBBRINGME and others.

4. Lawful Criteria for Processing

Where required, BBBRINGME will rely on one or more lawful criteria for processing, including your consent, performance of a contract or requested transaction, compliance with legal obligations, protection of vital interests, legitimate interests that are not overridden by your rights, or another basis permitted by applicable law. You may withdraw consent where consent is the basis for processing, subject to any legal or contractual limits.

5. How We Share Personal Data

We may share personal data only as necessary for the purposes described in this Policy and subject to appropriate safeguards. Recipients may include:

- Customers and Providers involved in a booking, Order, event, community or service relationship, to the extent necessary to arrange, perform, support or resolve the relevant transaction.
- Payment processors, banks, wallet providers, identity-verification providers, cloud hosting providers, communication providers, analytics providers, logistics providers and other service providers acting under our instructions or their own disclosed terms.
- Business partners or category operators where you choose to engage with their services and the sharing is necessary to fulfil the request.

- Professional advisers, insurers, auditors, regulators, law enforcement, courts and other authorities where legally required or necessary to protect rights and safety.
- A buyer, successor or proposed transaction counterparty in connection with a merger, acquisition, restructuring or asset sale, subject to lawful safeguards.

6. Public Profiles, Reviews and Community Features

Provider profiles, business details, ratings, reviews, listing content, public posts, event information and community contributions may be visible to other users or the public, depending on your privacy settings and the feature. Do not include sensitive personal information in public profiles, listings, messages or reviews unless necessary and lawfully permitted.

7. Cookies, Analytics and Similar Technologies

We may use cookies, SDKs, pixels, local storage and similar technologies to authenticate users, remember preferences, keep the Platform secure, measure performance, understand usage and deliver relevant communications. Where required, we will provide consent tools or settings for non-essential technologies. You may manage cookies through your browser or device settings, though some features may not function properly if essential technologies are disabled.

8. Data Retention

We retain personal data for as long as reasonably necessary to provide the Platform, meet the purposes described in this Policy, comply with legal, tax, accounting, audit, safety and dispute-resolution requirements, and protect against fraud or misuse. Retention periods vary based on the data type, transaction, legal obligation and whether there is an unresolved issue or claim. We will delete, anonymise or securely archive data when retention is no longer required, subject to lawful exceptions.

9. Security

BBBRINGME uses administrative, organisational, technical and physical safeguards designed to protect personal data against accidental or unlawful loss, alteration, unauthorised access, disclosure or destruction. No system is completely secure. You must use a strong password, protect your device and verification codes, and notify us promptly of suspected unauthorised access.

10. Your Rights and Choices

Subject to applicable law and verification of your identity, you may have rights to be informed, access your personal data, object to processing, correct inaccuracies, erase or block data in certain circumstances, obtain data portability where applicable, withdraw consent, and seek damages where permitted by law. To exercise a right, contact [DPO Email] with enough information for us to verify your request. We may need to retain limited data where required by law or needed for legitimate legal, safety, fraud-prevention or accounting purposes.

11. International Transfers

BBBRINGME or its service providers may process personal data in countries other than the Philippines. Where cross-border processing occurs, we will take steps reasonably designed to ensure an appropriate level of protection and compliance with applicable requirements, including contractual, organisational or technical safeguards where appropriate.

12. Children and Sensitive Personal Information

The Platform is not intended for unsupervised use by children. Where a feature permits participation by a minor, the parent or legal guardian must provide the required consent and supervision. We request that users do not submit sensitive personal information unless it is strictly necessary for a disclosed, lawful purpose and provided through an approved process.

13. Changes and Complaints

We may update this Privacy Policy to reflect changes in law, technology, product design or business operations. The revised Policy will show a new effective date. For questions, concerns or complaints, contact [DPO Email]. You may also have the right to lodge a complaint with the National Privacy Commission of the Philippines, subject to applicable procedures.

Schedule A. Reference Framework and Completion Checklist

This template is written for a Philippine-focused digital platform and should be checked against the final product, business model, payment flow, provider onboarding, customer-support process, and applicable local requirements before publication or signing.

Official reference links for legal review

Data Privacy Act of 2012 and National Privacy Commission resources: <https://privacy.gov.ph/data-privacy-act/>

Internet Transactions Act of 2023: <https://ecommerce.dti.gov.ph/internet-transactions-act-of-2023/>

Internet Transactions Act Implementing Rules and Regulations:
<https://ecommerce.dti.gov.ph/implementing-rules-and-regulations/>

DTI E-Commerce Philippine Trustmark information: <https://trustmark.dti.gov.ph/>

DTI e-commerce regulatory framework resources: <https://ecommerce.dti.gov.ph/ecommerce-philippines-2022/regulatory-framework/>

Before finalising this document

- Replace all bracketed placeholders, including the legal entity name, registered address, support contact, data protection contact, governing law details, fees, booking windows and refund timelines.
- Confirm the Platform role for each product line: marketplace facilitator, direct service provider, merchant of record, subscription provider, payment facilitator, or a combination.
- Review service-specific approvals, permits, qualifications, insurance, age restrictions and safety procedures for automotive, moving, home, entertainment, events, coaching, professional and community services.
- Align the terms with the app interface, checkout flow, cancellation options, privacy notices, cookies, provider verification process and all marketing statements.
- Have Philippine counsel assess consumer-protection, labour classification, tax, payment, intellectual property, advertising, data privacy, local permit and sector-specific obligations.