

PRIVACY POLICY

This Privacy Policy ("Policy") explains how personal, business, and relate information is collected, used, processed, stored, protected, and disclosed in the course of providing the services availed of by the Client/User from the Freelancer (the "Service Provider"), which includes but not limited to the use of automated systems, workflows, lead capture mechanics, booking systems, and course creation (hereinafter referred to as the "Services").

This Policy applies to all Clients, prospective Clients, Users, and other data subjects who interact with or avail of the Services of the Freelancer through all applicable digital platforms, including but not limited to GoHighLevel, websites, forms, landing pages, booking systems, and communication tools as the case may be.

By accessing the Services of the Service Provider, or by providing personal data, the Client/User acknowledges that he/she has read, understood, and agreed to this Policy.

I. SCOPE AND APPLICABILITY

This Policy applies to all Clients/User; individuals representing corporate or business entities; those whose personal data is processed in connection with the Services; the data collected through automation systems, workflows, lead capture forms, calendars, booking systems, course sites, and all other applicable platforms.

II. COLLECTED INFORMATION

Only data that is necessary, relevant, and lawful for the provision of the Services shall be collected.

- i. Personal and Contact Information:
 - a. Full Name;
 - b. Email Address;
 - c. Contact Number; and
 - d. Other Relevant Contact Information as Voluntarily Provided.
- ii. Business Information:
 - a. Business Name;
 - b. Business Contact Details;
 - c. Nature of Business or Industry; and
 - d. Business-Related Preferences, Requests, and Requirements that are relevant to the delivery of Services.
- iii. Financial and Transaction-Related Information:
 - a. Budget Allocation and Negotiation for Services Availed;
 - b. Payment-related Information necessary to fulfill Contractual Obligations; and
 - c. Other relevant and related information as needed.

The Service Provider does not intentionally collect sensitive personal information unless required by applicable laws or explicitly necessary for the Services availed of.

III. PURPOSE AND LEGAL BASIS OF PROCESSING DATA

Personal data is collected and processed for the following purposes:

- i. To provide, manage, customize, and improve the Services;
- ii. To communicate with Clients/Users regarding inquiries, projects, updates, and Client/User support;
- iii. To configure and maintain automation systems, workflows, booking systems, and all applicable digital tools as may be necessary to the operations of the Service Provider;

- iv. To comply with applicable laws, regulations, and lawful government orders; and
- v. To protect legitimate business interests and enforce contractual rights, as the case may be.

Data processing is carried out based on consent, contractual necessity, compliance with legal obligations, and legitimate interests, as applicable.

IV. USE OF THIRD-PARTY PLATFORMS, TOOLS, AND PARTNERS

The Service Provider, and consequently the Services rendered, may make use of third-party platforms, including but not limited to GoHighLevel, for automation, lead capture, booking systems, and course-related functionalities and services.

In addition, personal data collected, including any and all information given, may be shared with authorized contractors or collaborators engaged by the Service Provider for the sole purpose of performing the Services engaged for and those directly related to the provisions of the Services.

Personal data processed through these platforms is handled in accordance and with reference to their respective privacy policies, security measures, and data processing standards. The Service Provider does not control how third-party platforms independently process data beyond the scope of the Services provided.

V. DATA SHARING AND DISCLOSURE

Personal data may be shared only under the following circumstances:

- i. With the Client/User's consent;
- ii. For referrals, limited strictly to basic contact information as defined herein;
- iii. With third-party platforms or as may be necessary for the delivery and performance of the Services as the case may be;
- iv. When required by law, regulation, lawful order of the courts, or any other regulating agency; and
- v. When necessary to protect legal rights, prevent fraud, or address security issues.

VI. CROSS-BORDER DATA TRANSFERS

Due to the use of third-party platforms, cloud-based platforms, and international tools, personal data of the Client/User may be stored or processed outside of the Philippines.

Reasonable safeguards are implemented to ensure that cross-border data transfers comply with applicable data protection standards and afford a comparable and adequate level of protection.

VII. DATA RETENTION

Personal data is retained only for as long as necessary to fulfill the purposes for which it was collected, comply with legal and regulatory requirements, or resolve disputes.

Personal data that is no longer necessary shall be securely deleted or anonymized in accordance with applicable standards.

VIII. DATA SECURITY MEASURES

Reasonable organizational, physical, and technical measures are implemented to protect personal data against loss, misuse, unauthorized access, alteration, disclosure, or destruction.

While reasonable efforts are made to protect personal data, including personal sensitive information, the Client/User hereby acknowledges that no method of transmission or storage is completely secure.

IX. RIGHTS OF DATA SUBJECTS

The Client/User, as the data subject, has the right to:

- i. Be informed about the processing of their personal data and information;
- ii. Access to personal data collected from them or related to them;
- iii. Request correction or updating of inaccurate or incomplete data;
- iv. Reasonably object to certain types of processing;
- v. Request deletion or blocking of personal data, subject to the limits provided by law, regulation, and any lawful court order or other legal limitations as the case may be; and
- vi. Withdraw consent when processing is based on consent.

Requests may be submitted to the Service Provider through any and all applicable and active channels or platforms.

X. POLICY UPDATES

This Policy may be updated to reflect changes in laws, regulations, or business practice. Updated versions of this Policy shall take effect upon publication or notice to the Client/User.

XI. APPLICABLE LAW AND EXCLUSIVE VENUE

This Policy shall be governed by and construed in accordance with the laws of the Republic of the Philippines including, but not limited to, Republic Act No. 10173 or the “Data Privacy Act of 2012”.

XII. CONTACT INFORMATION

For inquiries, requests, or concerns regarding this Policy or the processing of personal data under any engagements with the Service Provider exclusively, the Client/User may contact the Service Provider through any and all applicable communication channels or platforms as the case may be.