

ABOT KAMAY DIGITAL INC.

PRIVACY POLICY

AKD-POL-004 | Republic Act No. 10173 – Data Privacy Act of 2012

Version 1.0 — Effective Date: [Date]

Republic of the Philippines

Plain English Summary: When you use our free WiFi, we collect basic technical information (device ID, ads watched) to run the service. We do not sell your personal data to third parties for marketing purposes. We keep logs for up to 6 months for security reasons. You have rights over your data. Contact us at: [DPO Email].

Buod sa Filipino: Kapag ginamit mo ang aming libreng WiFi, nangongolekta kami ng ilang teknikal na impormasyon para mapatakbo ang serbisyo. Hindi namin ibinebenta ang iyong personal na data para sa mga layuning pangmarketing. Pinapanatili namin ang mga log sa loob ng hanggang 6 na buwan. Mayroon kang mga karapatan sa iyong data.

1. WHO WE ARE

Abot Kamay Digital Inc. ("AKD," "we," "us," or "our") is a One Person Corporation registered in the Philippines that operates a free WiFi advertising network ("Network" or "Platform") at various partner locations across the Philippines.

AKD is the Personal Information Controller (PIC) responsible for your personal data collected through the Platform, as defined under Republic Act No. 10173 (Data Privacy Act of 2012).

Data Protection Officer (DPO): [DPO Name] | [DPO Email] | [DPO Phone]

2. WHAT DATA WE COLLECT

Data Type	What It Is	When Collected
Device Identifier (MAC Address)	A unique hardware identifier for your device	When you connect to the Network
Assigned IP Address	The temporary internet address assigned to your device	When you connect
Session Data	Date and time of connection, session duration, data volume	During each Network session
Ad Interaction Data	Which advertisements you viewed, whether you completed viewing	During ad viewing on the Portal
Device Information	Device type, operating system version	When you connect
Optional Registration Data	Mobile number or email address, if you voluntarily register	Only if you create an account

What we do NOT collect: We do not collect your name, national ID, banking information, precise location, browsing history after you connect to the internet, or app usage data beyond what is needed to run the ad portal.

3. WHY WE COLLECT YOUR DATA (LEGAL BASIS)

Purpose	Data Used	Legal Basis
Providing the Network (granting WiFi access after ad viewing)	Device ID, session data, ad interaction data	Performance of service / Consent (via Portal Terms)
Fraud prevention and security monitoring	Device ID, IP address, session data	Legitimate interest; RA 10175 compliance
Billing advertisers accurately	Aggregate ad view counts (anonymized)	Legitimate interest
Compliance with Philippine law	Connection logs, device ID	Legal obligation
Service notifications (if registered)	Mobile number / email	Consent

4. HOW LONG WE KEEP YOUR DATA

Data Type	Retention Period	Reason
Connection Logs (device ID, IP, timestamps)	180 days (up to 12 months if required by law)	Security, fraud prevention, RA 10175 cooperation
Ad Interaction Data	24 months	Advertiser billing, revenue reporting, audit
Optional Registration Data	Duration of account + 12 months	Service delivery
Security Incident Records	5 years	Legal compliance, NPC obligations

5. WHO WE SHARE YOUR DATA WITH

We do not sell personal data to third parties for marketing purposes. We may share limited data with:

Recipient	What Is Shared	Why
Venue Partners (site operators)	None — Partners do not receive personal data from the Platform	N/A
Advertisers	Aggregate, anonymized campaign performance data only	Advertiser billing and reporting
Cloud / hosting providers (sub-processors)	Platform data stored securely	Infrastructure operation
Philippine law enforcement / government	Connection logs and session data, as required	Legal obligation (RA 10175, court orders)
NPC	Breach notifications, compliance reports	Legal obligation under RA 10173

6. CHILDREN'S PRIVACY

Our Network is available to the public, including persons under 18. We do not knowingly collect personal data from children under thirteen (13) years of age without verifiable parental or guardian consent. If you believe we have collected your child's data, contact our DPO at [DPO Email] for immediate deletion. We implement content restrictions to protect minors from age-inappropriate advertising.

7. YOUR RIGHTS UNDER RA 10173

Right	Description
Right to be Informed	You have the right to know what personal data we collect, why, and how — which is the purpose of this Privacy Policy.
Right of Access	You may request a copy of the personal data we hold about you by contacting our DPO.
Right to Rectification	If your personal data is inaccurate or incomplete, you may request correction.
Right to Erasure	You may request deletion where data is no longer necessary, subject to legal retention requirements.
Right to Object	You may object to processing for direct marketing or where processing is based on legitimate interest.
Right to Data Portability	Where technically feasible, you may request a machine-readable copy of your personal data.

To exercise any right, contact our DPO at [DPO Email]. We respond within fifteen (15) Business Days. To file a complaint with the NPC: info@privacy.gov.ph | privacy.gov.ph | (02) 8234-2228.

8. DATA SECURITY

We implement the following measures to protect your data: encryption of data in transit (TLS/HTTPS); access controls and authentication for administrative systems; regular security assessments and vulnerability monitoring; physical security of server infrastructure; and staff training on data privacy obligations.

9. COOKIES AND TRACKING

Our captive portal may use session cookies solely to maintain your authenticated session and track ad viewing completion. We do not use cross-site tracking cookies, advertising tracking pixels from third parties, or persistent tracking identifiers. Third-party advertisers are prohibited from embedding tracking pixels or data collection tools without AKD's prior written approval.

10. LAW ENFORCEMENT REQUESTS

We may disclose personal data to Philippine law enforcement, courts, or government authorities when required by: a lawful court order or subpoena; a valid law enforcement request under RA 10175; or any applicable Philippine law. We will notify you of such disclosure where legally permissible.

11. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. Material changes will be notified via Portal notice and the "Effective Date" above will be updated. Continued use of the Network after any change constitutes acceptance.

12. CONTACT US

Contact	Details
Data Protection Officer (DPO)	[DPO Name] [DPO Email] [DPO Phone]
Abot Kamay Digital Inc.	[Company Address], Philippines SEC Reg. No.: [Number]
National Privacy Commission (NPC)	info@privacy.gov.ph privacy.gov.ph (02) 8234-2228

AKD-POL-004 Version 1.0 | Abot Kamay Digital Inc. | Philippine Law

This document should be reviewed by a licensed Philippine attorney before execution.