

BOCO

Privacy Policy

1. Introduction

BOCO (operated by **BOCO SA (Pty) Ltd**, Registration No. 2025/967932/07, a company incorporated in the Republic of South Africa) is committed to protecting the personal information of all users of our Platform, wherever they are located in the world. We comply with the **Protection of Personal Information Act 4 of 2013 (POPIA)** as our primary legal framework, and we additionally meet our obligations under the **EU/UK General Data Protection Regulation (GDPR)**, the **Australian Privacy Act 1988**, the **California Consumer Privacy Act (CCPA/CPRA)**, and all other applicable data protection laws in jurisdictions from which we actively accept clients.

This Privacy Policy explains what personal information we collect, why we collect it, how we use and protect it, and what your rights are as a data subject. It applies to all users of the BOCO website and mobile application (collectively, the “Platform”), including coaches and clients, regardless of where you are located.

By accessing or using our Platform, you acknowledge that you have read and understood this Privacy Policy. If you do not agree with any part of this Policy, please do not use the Platform.

2. Who We Are

2.1 Responsible Party

BOCO SA (Pty) Ltd is the Responsible Party (as defined under POPIA) and the Data Controller (as defined under GDPR) for all personal information processed through the BOCO Platform:

Entity Name	BOCO SA (Pty) Ltd
Registration Number	2025/967932/07
Physical Address	2 Highwoods, 10 Seventh Avenue, Highlands North, Johannesburg, Gauteng 2192.
Email Address	support@myboco.app
Website	www.myboco.app
Primary Regulator	Information Regulator of South Africa
Governing Law	Laws of the Republic of South Africa

2.2 Information Officer (POPIA) / Data Protection Contact

As required by POPIA (section 55), BOCO has appointed an Information Officer responsible for ensuring compliance with this Policy and the Act. EU/UK users may also contact this person for GDPR-related queries:

Information Officer	Cindy Seabrook
Email	support@myboco.app

3. Personal Information We Collect

We collect personal information that is adequate, relevant, and not excessive for the purposes described in this Policy (POPIA section 10; GDPR Article 5). What we collect depends on whether you are a coach or a client.

3.1 Information You Provide Directly

- Full name, email address and contact number
- Date of birth (for age verification — our Platform is strictly 18+ globally)
- Physical or postal address
- Banking and payment details (coaches: payout processing; clients: payment via PayGate)
- Professional qualifications, certifications and accreditation details (coaches only)
- Criminal clearance information
- Profile information including biography, photograph and service descriptions (coaches only)
- Communications you send to us or through the Platform

3.2 Information Collected Automatically

- Device identifiers, IP address, browser type and version
- Usage data including pages visited, features used and session duration
- Log data and error reports
- Approximate location data (general region only, not precise location, unless you separately consent)
- Cookies and similar tracking technologies — see Section 10 and our full Cookies Policy at www.myboco.app/cookies

3.3 Information from Third Parties

- PayGate provider — transaction verification and payment processing
- Background screening provider — criminal clearance verification (coaches only)
- Professional accreditation bodies — verification of coach credentials
- Social media platforms — if you log in or connect via social sign-on

3.4 Special Personal Information

POPIA (section 26) and GDPR (Article 9) place additional restrictions on special categories of personal information. BOCO processes the following special personal information:

Category	Purpose	Lawful Basis
Criminal records (coaches only)	Assessing suitability to provide coaching services on the Platform	Explicit consent
Health information (if voluntarily provided in coaching profile)	Enabling relevant coach-client matching	Explicit consent

We do not otherwise intentionally collect special personal information. Where you voluntarily provide any other special personal information through the Platform, you consent to its processing for the purposes described in this Policy.

4. How We Use Your Personal Information

We process your personal information only for specific, lawful purposes, and only to the extent necessary for those purposes:

4.1 Purposes and Lawful Bases

Purpose	POPIA Basis	GDPR Basis
Create and manage your account	Contractual necessity	Contract (Art.6(1)(b))
Facilitate bookings between coaches and clients	Contractual necessity	Contract (Art.6(1)(b))
Process client payments via PayGate; remit coach payouts by bi-monthly EFT	Contractual necessity	Contract (Art.6(1)(b))
Verify identity and qualifications of coaches (KYC)	Legal obligation; legitimate interest	Legal obligation (Art.6(1)(c))
Conduct criminal background screening of coaches	Explicit consent	Explicit consent (Art.9(2)(a))
Communicate about bookings, account and services	Contractual necessity	Contract (Art.6(1)(b))
Send service-related notifications	Contractual necessity	Legitimate interest (Art.6(1)(f))
Provide customer support and resolve disputes	Legitimate interest; legal obligation	Legitimate interest (Art.6(1)(f))
Improve the Platform and conduct analytics	Legitimate interest	Legitimate interest (Art.6(1)(f))
Comply with SA and international legal obligations	Legal obligation	Legal obligation (Art.6(1)(c))
Enforce our Terms and Conditions; prevent fraud	Legitimate interest	Legitimate interest (Art.6(1)(f))

4.2 Marketing Communications

We may send you marketing communications if you have provided explicit consent. You may withdraw consent and opt out at any time by clicking the unsubscribe link in any marketing email, updating your communication preferences in your account settings, or contacting us at support@myboco.app. Withdrawal of marketing consent does not affect service-related communications.

5. Sharing of Personal Information

We do not sell your personal information to any third party. We share your personal information only as described below.

5.1 Between Coaches and Clients

When a booking is made, limited profile information (name, professional biography, qualifications, profile photograph and session contact details) is shared between the coach and client to enable delivery of the coaching service. Both parties are responsible for handling each other's personal information lawfully and only for the purpose of the booked session.

5.2 Third-Party Service Providers (Operators)

We engage third-party operators who process personal information on our behalf under data processing agreements. These include:

- PayGate provider — processing client payments (PCI DSS compliant)

- FICA @ WORK — criminal clearance verification for coaches
- Supabase — platform infrastructure and data storage
- Email and communication service providers — transactional and marketing communications
- Analytics providers — Platform usage analysis and improvement

All operators are contractually required to process personal information only on BOCO's instructions and in compliance with applicable data protection law, including POPIA and GDPR where applicable.

5.3 Legal Requirements

We may disclose personal information where required by South African law, court order, or where necessary to protect the rights, property, or safety of BOCO, our users, or the public.

5.4 Business Transfers

In the event of a merger, acquisition, or sale of assets, personal information may be transferred as part of that transaction. We will notify users of any such change in accordance with this Policy and applicable law.

6. Cross-Border Transfers of Personal Information

BOCO is operated from South Africa. It is sometimes necessary for us to transfer your personal information to countries outside of South Africa, the United Kingdom (UK), and the European Economic Area (EEA). This may include countries that do not provide the same level of data protection as your home jurisdiction.

We will transfer personal information across international borders only where:

- Adequacy Decisions / Binding Laws: The recipient country is subject to a law or binding corporate rules that provide an adequate level of protection substantially similar to POPIA (Section 72), or has been granted an adequacy decision by the UK Government or European Commission; or
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- Appropriate Contractual Safeguards: We have entered into a data transfer agreement with the recipient containing approved contractual clauses that guarantee the protection of your rights (such as the European Commission's Standard Contractual Clauses, the UK International Data Transfer Agreement (IDTA), or specific POPIA-compliant operator agreements); or
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- Contractual Necessity or Consent: The transfer is strictly necessary to perform our contract with you (e.g., executing international bookings), or you have given us your explicit consent to the transfer.

You can contact our Information Officer if you would like more information about the specific transfer mechanisms used or a copy of the safeguards protecting your data abroad.

7. Retention of Personal Information

We retain personal information only for as long as necessary for the purposes for which it was collected, or as required by applicable law.

Category	Retention Period	Legal Basis
Active account data	Duration of account + 5 years	Contractual; legitimate interest
Transaction and financial records	7 years	Income Tax Act 58 of 1962 (SARS)
KYC and identity verification records	5 years from verification date	FICA; legitimate interest

Criminal clearance records	Coach relationship + 1 year, then secure deletion	POPIA proportionality; explicit consent scope
Support and dispute records	3 years from resolution	Legitimate interest; CPA
Marketing consent records	Until withdrawn + 2 years	POPIA accountability

When personal information is no longer required and no legal retention obligation applies, it is securely deleted or irreversibly anonymised. For EU/UK users exercising the right to erasure, we will action deletion requests within 30 days subject to any overriding legal retention obligations.

8. Security of Personal Information

BOCO implements appropriate technical and organisational measures to protect personal information against unauthorised access, loss, misuse, alteration or destruction (POPIA section 19; GDPR Article 32). Our measures include:

- Encryption of data in transit (TLS/SSL) and at rest
- Access controls and multi-factor authentication
- Regular security assessments and vulnerability management
- Staff training on data protection obligations
- Incident response procedures

In the event of a personal information breach that poses a risk to data subjects, BOCO will notify the Information Regulator of South Africa and affected data subjects without undue delay. For EU/UK users, we apply the GDPR standard of notification to the relevant supervisory authority within 72 hours of becoming aware of the breach where feasible (GDPR Article 33).

9. Your Rights as a Data Subject

Your rights depend on your location. All users have rights under POPIA. Users in the EU, UK, Australia, Canada, and California have additional rights under applicable local law. We honour all rights regardless of which law applies to you.

Right	Who It Applies To	How to Exercise
Access — obtain a copy of your personal information	All users (POPIA s23; GDPR Art.15; CCPA; APPs)	Contact Information Officer — 30-day response
Correction — correct inaccurate or incomplete data	All users (POPIA s24; GDPR Art.16)	Contact Information Officer — 30-day response
Deletion / Erasure — request deletion of your data	GDPR users (Art.17); CCPA users; All users where retention period expired	Contact Information Officer — 30-day response
Data Portability — receive your data in machine-readable format	GDPR users (Art.20); CCPA users; Quebec residents	Contact Information Officer
Restriction of Processing — limit how we process your data	GDPR users (Art.18)	Contact Information Officer
Object to Processing — object on grounds of legitimate interest	All users (POPIA s11; GDPR Art.21)	Contact Information Officer — 30-day response

Withdraw Consent — withdraw previously given consent	All users	Account settings or contact Information Officer
Automated Decision-Making — not be subject to solely automated decisions with legal effects	GDPR users (Art.22)	Contact Information Officer — low risk at MVP
Non-Discrimination — not be discriminated against for exercising rights	California (CCPA) users	Contact Information Officer
Lodge a Complaint — complain to a supervisory authority	All users	See Section 9.1 below

To exercise any right, contact our Information Officer at the details in Section 2.2. We will respond within 30 days (extendable by a further 30 days with written notice).

9.1 Supervisory Authorities

You have the right to lodge a complaint with a data protection supervisory authority. Contact details for relevant authorities:

Jurisdiction	Authority	Contact
South Africa (all users)	Information Regulator of South Africa	www.inforegulator.org.za inforeg@justice.gov.za JD House, 27 Stiemens Street, Braamfontein, JHB 2001
European Union	Your local EU Member State supervisory authority	See: edpb.europa.eu/about-edpb/about-edpb/members_en
United Kingdom	Information Commissioner's Office (ICO)	www.ico.org.uk 0303 123 1113
Australia	Office of the Australian Information Commissioner (OAIC)	www.oaic.gov.au
Canada	Office of the Privacy Commissioner of Canada (OPC)	www.priv.gc.ca
California, USA	California Privacy Protection Agency (CPPA)	www.cppa.ca.gov

10. Payment Processing and Fund Handling

BOCO acts as the merchant of record for all transactions processed through the Platform. When you make a payment as a client, that payment is processed by our PayGate provider and funds are received into BOCO's business bank account.

BOCO is not a bank, payment institution, registered financial services provider, or trust account holder. Funds received on behalf of coaches are held in BOCO's business account and disbursed to coaches by EFT on a bi-monthly payout cycle, net of BOCO's platform commission, subject to the BOCO Payout Schedule and Process Policy. A two-week holding period applies between session delivery and payout to allow for dispute and refund resolution.

Card and payment details are handled by our PayGate provider in accordance with Payment Card Industry Data Security Standards (PCI DSS). BOCO does not store card numbers or full payment credentials on its own systems.

For international clients, payment may be displayed and charged in ZAR. Currency conversion is handled by the PayGate provider at the prevailing exchange rate at the time of transaction. BOCO is not responsible for foreign transaction fees charged by your bank or card issuer.

11. Cookies and Tracking Technologies

Our Platform uses cookies and similar tracking technologies. A cookie is a small text file stored on your device. Our full Cookies Policy is available at www.myboco.app/cookies and explains what cookies we use, why, and how to manage them.

We obtain your consent before setting any non-essential cookies. Our cookie consent banner allows you to accept all cookies, reject all non-essential cookies, or customise your preferences. You may update your preferences at any time. This approach meets the requirements of both POPIA and GDPR for cookie consent.

12. Additional Rights for California Residents (CCPA/CPRA)

If you are a California resident, you have the following additional rights under the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA):

- Right to know what personal information we collect, use, disclose, and sell
- Right to delete personal information we hold about you (subject to exceptions)
- Right to correct inaccurate personal information
- Right to opt-out of the sale or sharing of personal information
- Right to limit use of sensitive personal information
- Right to non-discrimination for exercising your CCPA rights

BOCO does not sell or share your personal information with third parties for their own marketing purposes. We do not and will not sell personal information as defined under the CCPA. To exercise your California rights, contact our Information Officer at the details in Section 2.2.

13. Additional Information for Australian Residents

If you are located in Australia, BOCO's handling of your personal information is also subject to the Australian Privacy Act 1988 and the Australian Privacy Principles (APPs). BOCO's practices are designed to comply with the APPs.

Where BOCO discloses personal information to overseas recipients (including cloud hosting providers and third-party processors), BOCO takes reasonable steps to ensure those recipients comply with privacy standards equivalent to the APPs, or obtains your consent to the disclosure.

If you have a privacy concern that is not resolved to your satisfaction, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au.

14. Children's Privacy

The BOCO Platform is strictly for users aged 18 years and older. This age minimum applies globally without exception. We do not knowingly collect personal information from any person under the age of 18. If you are under 18, do not register or provide personal information through the Platform.

If we become aware that we have inadvertently collected personal information from a person under 18, we will delete that information immediately. This global 18+ minimum exceeds the age of digital consent requirements under GDPR (16), COPPA (13), and other applicable laws.

15. Updates to this Privacy Policy

We may update this Policy from time to time to reflect changes in our practices, legal requirements, or Platform features. Where changes are material, we will provide prominent notice on the Platform and, where required, notify you by email or seek fresh consent. For EU/UK users, material changes that alter the basis on which we process your data will be communicated at least 30 days before taking effect.

The version number and review date at the top of this Policy indicate when it was last updated. Your continued use of the Platform after any update constitutes your acceptance of the revised Policy, subject to applicable mandatory notice requirements.

16. Contact Us

For any questions, concerns, or requests relating to this Privacy Policy or our data processing practices, please contact our Information Officer:

Information Officer	Cindy Seabrook
Email	support@myboco.app
Physical Address	2 Highwoods, 10 Seventh Avenue, Highlands North, Johannesburg, Gauteng 2192.
Website	www.myboco.app