LEGAL

Privacy Policy

What we collect, why, who sees it and how long we keep it. We follow Kenya's Data Protection Act, 2019.

Version 1.0 · Effective 24 October 2026 · Beyond Borders Freelancers, registered in Kenya, BN-B8S6PQRM

In short

- We collect only what we need to run your trades safely and to meet the law.
- We never sell your information or use it for advertising.
- The other person in a trade does not see your email address or your WhatsApp numbers.
- Trade and payment records are kept for at least seven years, because anti-money-laundering law requires it.
- You can ask to see, correct or delete your information at any time.

1. Who we are

BBscrow is run by **Beyond Borders Freelancers**, registered in Kenya (BN-B8S6PQRM), Juja, Kiambu County. We decide how your personal information is used, and we are responsible for it under Kenya's **Data Protection Act, 2019**. Contact: isbeyondborders@gmail.com.

2. What we collect

- **Your account:** the email address, name and account ID from your Google sign-in. If you add a passkey, we keep only its public key: your fingerprint or face never leaves your device.
- **Your profile (optional):** a display name, a profile photo, and up to two WhatsApp numbers that mediators may use to reach you about a dispute.
- **Your trades:** what was traded, amounts, fees, dates, the trade code, payout and refund details (M-Pesa numbers and the M-Pesa registered name, or wallet addresses), M-Pesa payment codes and receipts.

- **Messages and evidence:** trade chat messages, photos and videos you send, the rules you add, and anything you give in a dispute.
- **Reviews and rewards:** ratings and reviews, reward points, invites and reward payouts.
- **Verification (only when needed):** for larger trades or checks, a government ID, a selfie, date of birth and, if needed, proof of address or of where the money came from.
- **Technical:** your internet address and basic browser details, used for security, to limit abuse and to check your country. Your browser also stores your sign-in and settings on your device.

3. Why we use it

- To run your trades: take payments, hold them, pay out or refund, send receipts and notifications. *(Our contract with you.)*
- To keep BBscrow safe: check names before payouts, prevent fraud and impersonation, block sanctioned places, and decide disputes. *(Our legitimate interest and legal duties.)*
- To meet the law, including the Proceeds of Crime and Anti-Money Laundering Act: verify identity where required, keep records, and report suspicious activity. *(Legal obligation.)*
- For optional features you choose, such as a profile photo, WhatsApp numbers or message translation. *(Your consent, which you can withdraw.)*
- To answer you when you contact support, and to improve BBscrow.

We **never sell** your personal information, and we do not use it for advertising.

4. Who can see it

- **The other person in your trade** sees your display name, photo, rating, the trade details and the chat. They do not see your email address or your WhatsApp numbers.
- **BBscrow staff and mediators** see what they need to run trades, check payments and decide disputes, including the chat, evidence and your WhatsApp numbers. Admin access is protected by a passkey.
- **The public** can see USDT transactions on the blockchain (addresses and amounts, not your name). A trade receipt is shown publicly only if both of you allow it, and then without names, numbers or addresses.
- **Authorities,** when the law requires it or to prevent crime.

5. Services we use

We use trusted providers to run BBscrow. Each gets only what it needs:

- **Google**: sign-in, and hosting of the website. Our pages also load fonts from Google.
- **Render**: the servers and database that run BBscrow.
- **Safaricom (M-Pesa)**: payment prompts, payments into our till and payouts.
- **BNB Smart Chain**: the public blockchain that holds USDT trades.
- **Cloudflare**: storage of photos and videos sent in chats and profile photos.
- **OpenAI**: only if someone in your trade turns on chat translation, your messages to them are sent to OpenAI to be translated. Translation is off unless they switch it on.
- **Telegram**: alerts to BBscrow staff about payments to check, payouts to send and disputes, with the trade details needed to act.
- **Payout partners** such as exchanges, only when you choose to be paid through them.

6. Information sent outside Kenya

Some of these providers store information outside Kenya, for example in the United States or Europe. We use them only where they protect information to a standard required by the Data Protection Act, and only as far as needed to run BBscrow.

7. How long we keep it

- **Trade, payment and verification records**, including the chat and evidence of a trade: at least **seven years** after the trade or after your account is closed, as anti-money-laundering law requires.
- **Your profile** (display name, photo, WhatsApp numbers): until you remove it or close your account.
- **Security records** such as internet addresses: only as long as needed for security. Our count of blocked visits by country holds no personal information.

8. Your rights

Under the Data Protection Act you can ask us to:

- tell you what information we hold about you and give you a copy;
- correct anything that is wrong;

- delete your information, except what the law requires us to keep;
- stop using it for a purpose you object to, or withdraw a consent you gave;
- send it to you in a format you can take elsewhere.

Email isbeyondborders@gmail.com from the email address of your BBscrow account. We reply within the time the law allows. If you are not satisfied, you can complain to the **Office of the Data Protection Commissioner** (odpc.go.ke).

9. How we protect it

- Everything travels over encrypted connections (HTTPS).
- You sign in with Google or a passkey: we never store passwords. Releasing or cancelling a USDT trade needs a fresh confirmation from you.
- Each person can only open their own trades. Staff access is limited and protected by a passkey.

No system is perfectly secure. If a breach puts your information at risk, we will tell you and the Data Protection Commissioner as the law requires.

10. Browser storage and cookies

BBscrow uses your browser's storage to keep you signed in and to remember settings such as your language. We do not use advertising or tracking cookies.

11. Children

BBscrow is not for anyone under 18. If we learn that a child is using it, we close the account.

12. Changes to this policy

We will update this page when what we do with information changes, and show the date at the top. If a change matters, we will tell you in the app first.