

BillWatch PH

Privacy Policy

Version 1.0 | Draft for Legal Review | Effective date to be confirmed

Important - legal review required before publication

This draft is tailored to the current BillWatch PH beta and PWA architecture. It is not a substitute for legal advice. The final operator/entity, Data Protection Officer, exact data-retention schedule, production service-provider list, and payment processor (when BillWatch Plus launches) must be confirmed before publication.

1. Who We Are

BillWatch PH is an electricity-intelligence service that helps users monitor electricity consumption, record meter readings, upload electricity bills, track budgets, and view estimates and projections based on the information available to the service. BillWatch PH is currently offered as a web application and installable Progressive Web App (PWA).

For this draft, 'BillWatch', 'we', 'us' and 'our' refer to the operator of BillWatch PH. [LEGAL REVIEW REQUIRED: insert the exact legal name and registration details of the Personal Information Controller before publication. The current founder-led project is associated with Z33 Consumer Goods Trading in the Philippines for interim business purposes, but the final BillWatch operating entity has not yet been finalized.]

2. Scope of This Privacy Policy

This Privacy Policy applies when you visit billwatchph.com, create or use a BillWatch account, use the installed PWA, upload bills or meter images, record readings, set budgets, enable notifications, contact support, or otherwise interact with BillWatch PH. It does not govern third-party websites or services that BillWatch may link to.

3. Personal Data We Process

Category	Examples
Account and identity data	Name or profile name, email address, user/account identifier, authentication information and account settings.
Property and electricity data	Property label, electricity provider, billing-cycle dates, bill amount, kWh usage, effective cost per kWh, meter readings, budgets and related electricity history.
Uploaded documents and images	Electricity bill images/PDFs, meter photographs, and information visible in those uploads. Bills may contain names, service addresses, account/reference numbers or other information.
OCR and derived data	Values extracted from uploaded bills or meter images, OCR confidence/classification, validated readings, calculated consumption, projections and prediction-accuracy records.
Device and technical data	IP address, browser and device type, operating system, PWA/standalone status, security logs, timestamps and diagnostic information.
Notification data	Push-notification permission status, push subscription identifiers/tokens and notification preferences when you opt in.
Support and communications	Messages, feedback, bug reports and other information you send to BillWatch.
Commercial data, when applicable	BillWatch Plus plan status, subscription entitlement, transaction reference and limited payment metadata from a payment provider. BillWatch should not store full card details directly unless specifically disclosed.

Sensitive personal information

BillWatch does not intentionally ask you to provide sensitive personal information that is unnecessary for the service. Please avoid uploading documents that contain unrelated sensitive information. If a bill or other upload incidentally contains protected or sensitive information, BillWatch will process it only to the extent necessary for the declared service purpose and subject to applicable safeguards.

4. Why We Process Your Data and Our Lawful Bases

Purpose	Typical lawful basis
Create and maintain your account; authenticate you; provide	Performance of our service relationship/contract; consent where

BillWatch features	required.
Process bills and meter images using OCR; calculate usage, current bill position and projections	Performance of the service you request; consent where required for uploaded personal data.
Store your electricity history so you can compare cycles and view prediction accuracy	Performance of the service; legitimate interests in providing continuity and improving reliability, subject to your rights.
Send push notifications you choose to enable	Consent. You can disable notifications in BillWatch or your device/browser settings.
Secure BillWatch, prevent abuse, investigate errors and maintain logs	Legitimate interests in security, fraud prevention, service integrity and legal compliance.
Measure product performance and improve features	Legitimate interests in improving the service, using proportionate data and, where practical, aggregated or de-identified information.
Provide customer support and respond to complaints	Performance of the service; legitimate interests in resolving issues and complying with consumer obligations.
Process BillWatch Plus payments when launched	Performance of the subscription contract and legal/accounting obligations.
Comply with law, lawful requests, tax/accounting or regulatory obligations	Compliance with legal obligations.

Where Philippine law requires consent for a particular processing activity, we will request consent before or at the appropriate time. Where we rely on legitimate interests, we will consider whether those interests are overridden by your fundamental rights and freedoms.

5. How BillWatch Predictions and Automated Processing Work

BillWatch uses automated calculations to estimate your current electricity-bill position and, when enough valid data exists, a projected month-end bill. Inputs may include your historical bills, current meter readings, billing-cycle timing, calculated consumption, effective cost information and other validated values already in your BillWatch history.

These calculations are informational. They are not used by BillWatch as the sole basis for a decision that has legal or similarly significant effects on you, such as approving credit, determining employment, setting utility service eligibility or denying a benefit. BillWatch displays confidence/limitations where relevant and may withhold an estimate when the available data is insufficient.

BillWatch does not use your electricity usage, bill amounts, meter readings, budgets, predictions or household consumption patterns to build behavioral advertising profiles.

6. OCR and Uploaded Bills or Meter Images

- When you upload or photograph an electricity bill or meter, the image may be transmitted to authorized cloud/OCR processing infrastructure so that BillWatch can extract the relevant values.
- OCR can make mistakes. BillWatch may ask you to review, edit or confirm extracted values before saving or using them.
- Digital meter test/segment displays or other invalid readings may be classified and rejected to reduce the risk of saving a false reading.
- Do not upload documents or images that you do not have the right to use or that contain unrelated personal data belonging to another person.

7. Cookies, Browser Storage and PWA Data

BillWatch may use cookies, local storage or similar browser technologies that are necessary to keep you signed in, maintain secure sessions, remember preferences, support the installed PWA and enable optional push notifications. The current PWA does not intentionally provide offline caching of authenticated BillWatch pages or electricity data.

If analytics technologies are added or materially changed, this Privacy Policy and any required consent mechanism should be updated before those tools are enabled.

8. Service Providers and Recipients

We may disclose or make personal data available only as reasonably necessary to the following classes of recipients:

- **Backend, database and authentication providers.** BillWatch currently uses Supabase services for backend/database/authentication functions.
- **Identity providers.** If you choose a third-party sign-in option such as Google, that provider processes authentication and may provide BillWatch with the profile information permitted by the sign-in scope.
- **Hosting, CDN, security and infrastructure providers.** These providers help deliver and protect billwatchph.com and the PWA.
- **OCR/AI processing providers.** Where used, they process bill or meter images and extracted values only for the service function requested.

- **Payment processors.** When BillWatch Plus or other paid services launch, payment providers may process payment information under their own privacy terms.
- **Professional advisers and authorities.** Lawyers, accountants, auditors, regulators, courts or government bodies where disclosure is lawful and necessary.
- **Successors in a business transaction.** If BillWatch is reorganized, incorporated, financed, merged, sold or transferred, data may be transferred subject to applicable law and appropriate notice.

BillWatch does not sell your personal data.

9. Sponsored Content and Advertising Privacy

The Free version of BillWatch may display clearly labelled sponsored content. BillWatch Plus, when launched, is intended to be ad-free.

- BillWatch does not select ads based on your electricity bill amount, kWh usage, budgets, meter readings, projections, property consumption pattern or BillWatch Insights.
- BillWatch may measure basic campaign statistics such as impressions and clicks, preferably in aggregated form, for sponsor reporting and service administration.
- Simply viewing a sponsor card should not give the advertiser your BillWatch account data or electricity history.
- If you tap an external 'Learn More' link, you leave BillWatch. The advertiser's website may receive ordinary technical information associated with that web request and will apply its own privacy policy.
- An advertiser may also be a strategic partner or investor. That commercial or investment relationship does not permit access to your private electricity data and must not influence BillWatch calculations, predictions or insights.

10. International or Cross-Border Processing

Some technology providers may store or process data outside the Philippines. Where cross-border processing occurs, BillWatch will use reasonable contractual, organizational and technical measures intended to protect personal data consistently with the Philippine Data Privacy Act and applicable National Privacy Commission requirements.

11. Data Retention

BillWatch will retain personal data only for as long as reasonably necessary for the purpose for which it was collected, to provide and secure the service, to maintain records requested by the user, to comply with legal obligations, or to establish, exercise or defend legal claims.

Retention schedule must be confirmed before publication

The live policy should state practical retention periods by category (for example: active account data, deleted-account data, backups, security logs, support records and payment/accounting records). Do not publish a fixed period unless the product and operations can actually honor it. Counsel and the technical team should confirm the production deletion/back-up workflow first.

12. Security

BillWatch uses reasonable and appropriate organizational, physical and technical safeguards intended to protect the confidentiality, integrity and availability of personal data. Measures may include access controls, encrypted network connections, authentication, role-based access, secure cloud infrastructure, logging and incident-response procedures.

No internet service can guarantee absolute security. If a personal data breach meets the requirements for mandatory notification, BillWatch will follow applicable National Privacy Commission reporting and data-subject notification requirements.

13. Your Data Privacy Rights

Subject to applicable law and any valid exceptions, you may have the right to:

- Be informed about the processing of your personal data.
- Object to certain processing.
- Access personal data BillWatch holds about you.
- Correct inaccurate or incomplete personal data.
- Request erasure, blocking or deletion where the legal conditions are met.
- Obtain a portable copy of eligible data processed electronically in a commonly used format.
- Withdraw consent where processing is based on consent, without affecting lawful processing already performed.
- File a complaint with the National Privacy Commission or seek other remedies available under law.

To exercise a privacy right, contact us using the details below. BillWatch may need to verify your identity before acting on a request. Some requests may be limited where retention or processing remains necessary for legal obligations, security, legitimate business purposes or legal claims.

14. Account Deletion

Users should be provided a clear method to request account deletion. Deletion does not necessarily require immediate destruction of every record where BillWatch has a lawful reason to retain a limited record, for example to comply with law, prevent fraud, resolve disputes or preserve accounting records. Residual copies may also remain temporarily in secure backups until they cycle out.

15. Children's Privacy

BillWatch is intended primarily for household account holders and persons capable of managing an electricity account. Users under 18 should not create a BillWatch account or submit personal data without the involvement and consent of a parent or legal guardian where required by law.

16. Changes to This Privacy Policy

We may update this Privacy Policy as BillWatch changes. If a change materially affects how personal data is processed, we will provide reasonable notice through the service, email or another appropriate channel before the change takes effect where required.

17. Governing Privacy Framework

This Privacy Policy is intended to be read consistently with Republic Act No. 10173 (Data Privacy Act of 2012), its Implementing Rules and Regulations, applicable issuances of the National Privacy Commission, and other Philippine laws that may apply to BillWatch's online services.

Contact

Privacy and legal contact (interim): founder@billwatchph.com. Business correspondence address: Unit 1206, 12th Floor, Trade and Financial Tower, 7th Ave. cor. 32nd St., Bonifacio Global City, Fort Bonifacio, Taguig City 1634, Philippines.

Publication blocker

Before this document goes live, counsel should confirm the exact legal name of the BillWatch PH operator / Personal Information Controller, its registration details, the designated Data Protection Officer or privacy contact, and whether the above correspondence address is the correct statutory/business address.