

BRAABBY

GCE TUTORING, CAMEROON

Data Protection Policy

How Braabby holds personal data, and what it does to protect it

LAST UPDATED

1 August 2026

SECTIONS

16

LANGUAGE

English

Drafted against Cameroonian law. To be reviewed by a qualified Cameroonian legal practitioner before being filed or relied upon. legal@braabby.com

This is our internal standard for handling personal data, published so that anyone can hold us to it. Where the Privacy Policy tells a user what we collect and why, this document sets out how the organisation is required to behave: who may see what, how long we keep it, how it is secured, and what happens if something goes wrong.

Who we are

Braabby is an online tutoring platform for the Cameroon GCE (Ordinary and Advanced Level), operated from Cameroon and available at braabby.com. In this document "Braabby", "we", "us" and "our" mean the operator of that platform; "you" means the person accepting this document.

Registered particulars – company name, legal form, RCCM number, taxpayer number and registered office – are filed with the competent Cameroonian authorities and are stated in full on our published company information page. Where this document must name the contracting entity, that entity is the registered operator of Braabby.

Correspondence: legal@braabby.com for legal notices, privacy@braabby.com for data-protection requests, and the in-app Help & Support centre for everything else.

Minors: supervision by a parent or guardian

Braabby teaches school-age learners, and every Braabby teacher is an adult. A learner under 18 may use Braabby ONLY under the direct supervision of a parent or legal guardian. This is a condition of using the platform, not a recommendation, and it applies to every lesson, every message and every payment. (Separately, any student under 21 uses Braabby under the responsibility of a parent or guardian, who accepts these documents on their behalf.)

What direct supervision means

- A parent or guardian must know when each lesson is scheduled, and must be at home and reachable while it takes place.
- Lessons are live video with an adult. The parent or guardian must be able to see and hear the lesson at any moment, and may sit in on any lesson, at any time, without asking. No teacher may object to a parent being present, and no teacher may ask a learner to be alone, to close a door, or to move to a room where they cannot be seen.
- The parent or guardian should read the learner's messages with teachers from time to time. Every conversation stays on Braabby precisely so that a parent can do this.
- The account belongs to the family. The guardian is responsible for what is done through it – bookings, coins, messages and conduct – and should hold the password rather than leave it with a young child.
- A learner under 18 who cannot be supervised in this way should not use Braabby.

What Braabby does on its side

- Every teacher is identity-checked against a government ID and their qualifications are reviewed by a person before they may teach a single lesson.
- All teaching happens in Braabby's own classroom and all messaging happens on Braabby. A teacher may not move a learner to WhatsApp, a personal number, or any channel a parent cannot see. Asking to is a serious breach and grounds for immediate removal.

- Lessons are one-to-one or small groups of no more than three students, and the platform records who attended and for how long.
- Messages may be reviewed where there is a safeguarding concern, as set out in our Privacy Policy.
- A concern about any teacher's conduct can be reported from the lesson or the chat at any time. It reaches a person, and a teacher may be suspended while it is reviewed.

If anything about a teacher's behaviour worries you – a request to talk privately elsewhere, contact outside lesson times, questions that have nothing to do with the subject, or anything that makes a learner uncomfortable – stop the lesson and report it through Help & Support, or email legal@braabby.com. Tell us even if you are not sure. We would far rather review something harmless than miss something that mattered.

1. Scope and responsibility

This policy covers all personal data Braabby processes about students, guardians, teachers, donors, visitors and staff, in any format, anywhere in our systems. It binds every member of staff and every contractor with access to our systems.

Braabby is the DATA CONTROLLER for that data: we decide what is collected and why. Our sub-processors – hosting, storage, email and payment providers – are data processors acting on our instructions.

Data-protection questions and requests go to privacy@braabby.com, which reaches the person responsible for this policy.

2. Legal framework

We process personal data in accordance with Cameroonian law, in particular Law No. 2010/012 of 21 December 2010 on cybersecurity and cybercrime, Law No. 2010/021 of 21 December 2010 governing electronic commerce, and Framework Law No. 2011/012 on consumer protection, under the oversight of the National Agency for Information and Communication Technologies (ANTIC).

3. The data we hold

- IDENTITY AND CONTACT – name, date of birth, city, email address, phone number; for a learner, the guardian's details.
- VERIFICATION – for teachers, an identity document image, certificate images with the years earned, and any work-experience proof. These are held for verification and are never shown publicly.
- LEARNING – subjects, bookings, attendance, lesson history, practice results, library progress, ratings and reviews.
- FINANCIAL – coin balance and ledger, access-fee payments, teacher payouts, and mobile-money numbers. We never hold card numbers.
- COMMUNICATIONS – direct messages, class chat, support tickets and the files shared in them.
- TECHNICAL – sign-in history and devices, security events, and cookieless analytics as described in the Cookie Policy.

4. Why we hold it, and on what basis

- TO PERFORM OUR CONTRACT with you – running lessons, taking payment, paying teachers.
- TO MEET LEGAL OBLIGATIONS – accounting and tax records, and responses to lawful requests.
- FOR OUR LEGITIMATE INTERESTS – keeping the platform secure, preventing fraud, settling disputes fairly, and safeguarding children. These are balanced against your rights, and are the reason a message can be reviewed.
- WITH CONSENT – for a minor's data, given by their parent or guardian, and for optional communications you can switch off.

5. How long we keep it

- Account and profile data – for as long as the account is open.
- Financial records, including the coin ledger and payouts – retained after closure for the period required by Cameroonian accounting and tax law, because they are the record behind payments that were made.
- Lesson history and class chat – retained while they may be needed to settle a dispute or answer a safeguarding question.
- Teacher verification documents – retained while the teacher is active; certificate and identity images are never public and are removed when no longer needed for verification.
- Analytics – held as aggregated daily figures. The identifier behind them is derived from a salt that rotates every 24 hours, so it cannot be linked back across days.
- Support tickets – retained so that a returning customer's history is intact.

When a retention period ends, data is deleted or irreversibly anonymised.

6. How it is protected

- Traffic is encrypted in transit. Passwords are stored only as bcrypt hashes, and session tokens only as hashes – a stolen database yields neither.
- The coin ledger is HMAC hash-chained: every entry is signed and linked to the one before it, so a balance cannot be altered without breaking the chain. Balances are reconciled automatically and an account is frozen where the ledger and the balance disagree.
- Uploaded media is stored on Cloudflare R2, served through our own server rather than by public link, and backed up automatically.
- Rate limiting, brute-force lockout, one-time codes on sensitive actions, and security headers are applied across the platform.
- TWO-STEP SIGN-IN IS MANDATORY FOR EVERY STAFF ACCOUNT in production. A staff member who has not enrolled holds a powerless session: every administrative page and API refuses them.

7. Who inside Braabby can see it

Access follows the principle of least privilege and is enforced in code, not by policy alone. Staff hold one of ten scoped roles, and each role grants only the sections and actions that role needs.

- Administrative actions are written to an AUDIT LOG showing who did what and when.

- Sensitive operations require a Super Admin, including resetting another staff member's two-step sign-in.
- Chat oversight exists so that abuse and safeguarding concerns can be investigated, and it is itself a scoped permission held by a subset of staff – not something every administrator can do.
- A staff member may not disable their own two-step sign-in.

8. Sharing, and international transfers

We do not sell personal data, and we do not share it for advertising. We share only what is necessary with the providers who run the service – hosting, database, media storage, email and SMS delivery, and mobile-money payment – each under contract and acting on our instructions.

Some of those providers operate outside Cameroon, so data may be processed abroad. We choose providers that offer appropriate technical and organisational safeguards, and we require them contractually.

We disclose data to authorities only where the law obliges us, or to protect someone from harm.

9. Your rights

You may ask us to give you a copy of your data, correct it, delete it, restrict how we use it, or object to a particular use. A guardian may exercise these rights for a learner.

Write to privacy@braabby.com or use Help & Support. We will confirm your identity before acting – a data request is itself a way of attacking an account – and respond within one month.

Some data cannot be deleted on request where it is the record behind payments or is required by law. Where that applies we will tell you which data, and why.

10. If something goes wrong

A suspected breach must be reported internally the moment it is noticed. We contain it, assess what data and whose, record it, and notify the competent authority and the people affected where the breach is likely to cause them harm – promptly, and without waiting until the investigation is complete.

We hold automated off-site backups and can restore from them, so that a failure of one system is not a loss of your data.

11. Children

Braabby is used by children, and their data is handled with corresponding care. A minor's account is opened under a guardian's responsibility and consent; identifying details are staged for administrative review before they change; and safeguarding concerns take precedence over convenience.

Governing law & disputes

These terms are governed by the laws of the Republic of Cameroon. They are written to comply with, among others, Law No. 2010/012 of 21 December 2010 on cybersecurity and cybercrime, Law No. 2010/021 of 21 December 2010 governing electronic commerce, Framework Law No. 2011/012 on consumer protection, and applicable OHADA Uniform Acts.

We would always rather resolve a concern amicably. Please first contact us through the in-app Help & Support so we can try to settle the matter directly. If a dispute cannot be resolved amicably, it shall be submitted to the competent courts of Cameroon.

Changes to this document

We may update this document as the platform, our practices or the law change. The date at the top always shows when it was last revised, and the current version is the one published on braabby.com.

Where a change materially affects your rights or what you pay, we will tell you in advance through the platform or by email, and – where the law requires it – ask you to accept the new version before you continue.

Contact us

Questions about this document? Reach us through the in-app Help & Support centre, or by email at legal@braabby.com (privacy matters: privacy@braabby.com). We aim to respond promptly.

This document is a template prepared for Braabby and should be reviewed by a qualified Cameroonian legal practitioner before being relied upon.