

Doingid Privacy Policy

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1. Introduction

1.1 Who We Are

Doingid Lanka (PVT) LTD (“Doingid”, “the Company”, “we”, “us”, or “our”) operates the platform Doingid.lk / Doingid.com (the “Platform”), which provides digital tools for publishing and browsing service listings, submitting requests, and connecting providers and clients within Sri Lanka.

Our mission is to support a safe and transparent ecosystem for both residents and guests of Sri Lanka to find, offer, and promote services in compliance with local law.

This Privacy Policy explains how Doingid collects, uses, stores, and protects personal information of users (“Users”, “you”) when you visit or use our website, submit listings, requests, or participate in the referral program.

Doingid Lanka (PVT) LTD is a company duly incorporated under the laws of the Democratic Socialist Republic of Sri Lanka, and acts as the Data Controller under the Personal Data Protection Act, No. 9 of 2022 (PDPA).

Legal reference:

The PDPA governs the collection, processing, storage, and cross-border transfer of personal data within Sri Lanka. Doingid follows the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, and accountability as outlined in Sections 4–12 of the Act.

1.2 Scope of This Policy

This Privacy Policy applies to all activities related to Doingid’s services, including:

- the use of the website Doingid.lk / Doingid.com and its forms (submissions, listings, feedback, support requests);
- the participation in the Doingid Referral Program;
- communication through official Doingid channels (email, chat, or ticketing system); and
- future modules (escrow system, AI-based risk detection, arbitration tools) once officially launched.

This Policy does not apply to:

- transactions and communications conducted directly between Users outside the Platform (for example, when arranging offline service delivery independently);
- websites or services operated by third parties, even if accessed via Doingid links or integrations (e.g., Stripe, FirstPromoter).

Where Doingid integrates with third-party systems (payment gateways, analytics, or affiliate tools), such parties process data under their own privacy policies, which comply with the PDPA or other applicable international frameworks (e.g., GDPR for EU-based vendors).

1.3 Definitions

For clarity, the following key terms are used throughout this Policy:

- “Personal Data” means any information that can identify a natural person directly or indirectly (e.g., name, email address, NIC/passport number, phone number, payment token, IP address), as defined in Section 65 of the PDPA.
- “Processing” means any operation performed on Personal Data — including collection, recording, storage, use, disclosure, and deletion.
- “Data Controller” means the person or entity that determines the purposes and means of processing (Doingid Lanka (PVT) LTD).
- “Data Processor” means a third party that processes data on behalf of Doingid (e.g., Stripe, FirstPromoter, hosting providers).

- “Resident” means a person or business entity officially registered or domiciled in Sri Lanka.
- “Foreigner” or “Guest” means a user temporarily residing in Sri Lanka or accessing the Platform from abroad.
- “Platform” means Doingid’s website and its related systems and services.
- “Service Listing” refers to any post offering or requesting a service published by a User.
- “Referral Program” means Doingid’s affiliate system for rewarding Users for attracting new paying participants.

1.4 Age Restrictions

The Platform is intended for individuals aged 18 years or older.

We do not knowingly collect Personal Data from persons under 18. If Doingid becomes aware that such data has been collected, it will be deleted in accordance with Section 27(1)(c) of the PDPA and applicable child protection laws of Sri Lanka.

2. Categories of Data We Collect

2.1 Data You Provide to Us

When using the Platform (e.g., submitting a listing, filling out a request form, contacting support, or joining the referral program), you may provide the following information:

- Name and contact details (email, phone number);
- National Identity Card (NIC) or Passport number (for verification where applicable);
- Residence or business address (if entered voluntarily);
- Description of service offered or requested;
- Media files (images or examples of work);
- Optional “volunteer” flag, indicating that the service is offered or requested on a voluntary basis;
- Payment-related identifiers (order ID, transaction token, status);
- Communication content (messages with support or within forms).

All data is provided voluntarily by the User. However, certain elements (e.g., email and payment confirmation) are required to complete a paid posting or participation in the referral program.

2.2 Automatically Collected Data

When you visit the Platform, we automatically collect technical data to ensure security, analytics, and service improvement. This includes:

- IP address, device information, browser type and version, operating system, language;
- access times, referral URLs, and activity logs;
- approximate geolocation (country/city level);
- cookies and similar technologies (used for login persistence, analytics, and marketing where consented).

This processing is carried out under Sections 5(a) and 6 of the PDPA for the legitimate interests of the Controller (site functionality, security, analytics).

A detailed explanation of cookie usage and consent management is available in our Cookie Notice.

2.3 Data from Third Parties

We may receive certain Personal Data from trusted third parties who help us provide the Platform, including:

- Payment processors (e.g., Stripe, Sampath IPG, local gateways) — payment status, transaction reference, fraud screening results;
- Referral partners (FirstPromoter) — referral IDs, clicks, conversions, reward eligibility;
- Analytics services (e.g., Google Analytics, Meta Pixel) — aggregated traffic insights without direct identifiers;
- Email/SMS providers — message delivery confirmations and communication metadata.

All such processors operate under data processing agreements consistent with Section 22 of the PDPA and are required to implement appropriate technical and organizational safeguards.

3. Purposes and Legal Bases for Processing

In compliance with the Personal Data Protection Act, No. 9 of 2022, Doingid processes Personal Data only for lawful and proportionate purposes.

3.1 Providing and Operating the Platform

- To register and publish service listings;
- To process payments and manage invoices;
- To verify eligibility of Users (residents/foreigners) where required;
- To communicate about listings, requests, or account-related updates.

Legal basis: Section 5(a) PDPA – Processing necessary for the performance of a service requested by the User.

3.2 Communication and Support

- To respond to inquiries submitted via contact or feedback forms;
- To provide technical support and assist in resolving issues;
- To notify Users about system updates, changes in policies, or planned releases.

Legal basis: Section 5(b) PDPA – Processing necessary for legitimate business interests (communication, service quality).

3.3 Security, Fraud Prevention, and Compliance

- To detect and prevent fraud, abuse, or policy violations;

- To enforce moderation and ensure compliance with local laws;
- To maintain audit logs and comply with regulatory requests.

Legal basis: Sections 6 and 23 PDPA – Legitimate interests of the Controller and compliance with legal obligations.

3.4 Research and Development (Future Systems)

- To analyze anonymized usage data for improving the Platform;
- To collect feedback and real case reports (errors, conflicts, suggestions) for developing AI-based mediation, escrow, and arbitration tools.

Legal basis: Section 5(b) PDPA – Legitimate interest;

Section 12(2) – Anonymization of data before further processing for research and innovation.

3.5 Consent-Based Processing

For specific optional features (e.g., cookies, marketing newsletters, volunteer tagging), Doingid obtains explicit, informed consent from Users in accordance with Section 13 of the PDPA.

Users can withdraw consent at any time without affecting the lawfulness of prior processing.

3.6 Legal Obligations

We may process and retain data to:

- comply with accounting, tax, and recordkeeping laws of Sri Lanka;
- respond to lawful requests from regulatory or judicial authorities;
- maintain records required for potential dispute resolution.

Legal basis: Section 5(c) PDPA – Compliance with legal obligations under Sri Lankan law.

4. How We Use Your Data

Doingid processes your Personal Data only for clearly defined, legitimate, and proportional purposes consistent with our mission — to provide a transparent and secure platform for service exchange between residents and guests in Sri Lanka.

We do not sell, rent, or trade your Personal Data.

All processing is performed under contractual, technical, and legal safeguards compliant with the Sri Lanka Personal Data Protection Act, No. 9 of 2022 (PDPA).

4.1 Service Operation and Delivery

We use your Personal Data to:

- publish and manage service listings and requests;

- moderate and review content before publication to ensure compliance with Platform rules;
- process payments for listing publication and refunds when applicable;
- identify and manage Users participating in the referral program;
- maintain transaction and communication logs for service continuity.

This includes automated and manual review of listing content to remove contact information, spam, or prohibited materials, as required by Doingid moderation policy.

Minor editorial or technical adjustments (formatting, typo corrections) are made only to improve clarity and readability.

4.2 Communication and User Support

We may contact you to:

- respond to your inquiries, complaints, or feedback;
- confirm or update information related to your listings, payments, or referral participation;
- inform you of scheduled maintenance, updates, or policy revisions;
- request voluntary input or suggestions for improving future Doingid services (e.g., escrow, mediation, or AI-driven moderation tools).

We also collect and analyze anonymized user feedback to better understand the needs of our local and foreign audiences.

4.3 Analytics and Improvement

To continuously improve our services, we analyze:

- aggregated site activity, search behavior, and listing performance;
- error logs and loading performance;
- use of forms, submission rates, and drop-offs;
- referral traffic and marketing campaign results.

These analyses are performed using anonymized or pseudonymized data where possible.

Our legitimate interest (under Section 6 of the PDPA) is to ensure the Platform remains safe, reliable, and efficient.

4.4 Marketing and Promotions

Doingid may use your contact information to send you:

- system announcements, feature releases, and educational content;
- optional newsletters or offers (only with your consent).

You can withdraw consent at any time via unsubscribe links or by contacting support@doingid.com.

We may display non-personalized ads or promotional blocks near listings, but this does not involve sharing your identifiable data with advertisers.

4.5 Legal and Regulatory Purposes

We may use or retain your Personal Data where necessary to:

- comply with local tax, accounting, and consumer protection regulations;
- respond to lawful requests from authorities, courts, or regulators;
- enforce our Terms & Conditions, prevent fraud, or handle disputes;
- ensure compliance with the Computer Crimes Act No. 24 of 2007, the Electronic Transactions Act No. 19 of 2006, and other relevant Sri Lankan laws.

5. Data Sharing and Disclosure

Doingid values your trust and only shares your data where necessary to provide services, ensure compliance, or protect our rights.

We disclose Personal Data only under controlled conditions and with contractual safeguards ensuring confidentiality, integrity, and lawful use.

5.1 Service Providers and Processors

We engage third-party service providers (“Processors”) who assist in operating our Platform, subject to data protection agreements consistent with Section 22 of the PDPA.

These may include:

Category	Purpose	Example Providers
Payment Processing	Transaction handling, fraud prevention	Stripe, Sampath IPG
Referral Tracking	Affiliate program management	FirstPromoter
Hosting & Infrastructure	Cloud storage, web hosting, uptime monitoring	AWS / DigitalOcean / Google Cloud
Analytics	Site traffic and behavior insights	Google Analytics, Meta Pixel
Customer Support	Ticketing, email distribution, chat forms	HubSpot, Gmail
Legal & Compliance	Identity or tax verification (if required by law)	Local authorities / legal advisors

All such entities are required to:

- process data solely under Doingid’s documented instructions;
- maintain appropriate technical and organizational security measures;

- delete or return data upon completion of services;
- ensure cross-border compliance when located outside Sri Lanka.

5.2 Public Listings and Search Results

When you publish a listing, its title, description, and optional images become visible to the public on Doingid.lk and may appear in search results (internal or external, e.g., Google).

We recommend that Users avoid including personal contact information in listing text.

Any personal data you voluntarily include in public listings becomes publicly available under your own responsibility.

5.3 Legal Obligations and Rights Protection

Doingid may disclose information when required to:

- comply with a legal obligation, warrant, or government request;
- enforce our Terms & Conditions;
- protect the safety, rights, or property of Doingid, our users, or the public;
- prevent or investigate fraud, abuse, or illegal activity.

All such disclosures will follow the principles of necessity and proportionality established by Sections 23 and 24 of the PDPA.

5.4 Business Transfers

In the event of a merger, acquisition, restructuring, or sale of assets, user data may be transferred as part of the transaction, provided the recipient ensures equivalent data protection safeguards and respects all user rights.

5.5 No Sale of Personal Data

Doingid does not sell or trade Personal Data for monetary value.

Limited sharing for analytics and advertising purposes may occur under consent-based arrangements, consistent with Section 5(b) of the PDPA and international “legitimate interest” standards.

6. Cross-Border Data Transfers

6.1 Processing Locations

Doingid operates primarily in Sri Lanka, but uses secure, compliant cloud infrastructure and services located in other jurisdictions, including:

- United States (Stripe, FirstPromoter, AWS);
- Singapore (regional hosting and redundancy);

- European Union / United Kingdom (analytics, legal archiving).

This means your Personal Data may be processed or stored outside Sri Lanka.

6.2 Legal Basis for Transfer

In accordance with Sections 26–28 of the PDPA, Doingid ensures that any cross-border transfer of Personal Data occurs only when:

- the recipient country provides adequate data protection; or
- appropriate contractual and organizational safeguards (such as Standard Contractual Clauses or equivalent) are in place; or
- explicit User consent has been obtained.

All processors engaged by Doingid must comply with these requirements and provide written assurances of data security and confidentiality.

6.3 Safeguards and Accountability

Doingid applies the following safeguards to protect your information during international transfer:

- Encryption during transmission (TLS 1.2 or higher);
- Access controls and restricted data access;
- Data minimization — only necessary data is shared;
- Annual security and compliance reviews of all processors;
- Logging and monitoring of cross-border data flows.

6.4 Data Residency Requests

Sri Lankan Users may request information on where their Personal Data is stored or processed.

Requests can be submitted via info@doingid.com, and Doingid will provide details on applicable hosting regions and protection measures in accordance with Section 27(1)(a) of the PDPA.

7. Cookies and Similar Technologies

7.1 Types of Cookies Used

Doingid uses cookies and similar tracking technologies to ensure proper operation of the Platform, improve usability, and analyze aggregate traffic patterns.

The main types include:

- Strictly Necessary Cookies – required for core functionality (e.g., payment processing, security sessions).
- Functional Cookies – remember your preferences, such as language or region.
- Analytics Cookies – help us understand how visitors use the Platform to improve performance.

- Marketing Cookies – used, with your consent, to measure the effectiveness of promotional campaigns and referral traffic.

Cookies may be first-party (set by Doingid) or third-party (set by integrated services like Stripe, FirstPromoter, or Google Analytics).

7.2 Your Choice

When you first visit the Platform, you are presented with a cookie banner that allows you to accept or decline non-essential cookies. You may also manage or delete cookies through your browser settings at any time. Disabling certain cookies may affect site functionality. Detailed information on cookie categories, duration, and purposes is available in our Cookie Notice, which forms an integral part of this Privacy Policy.

8. Data Retention

8.1 Retention Periods

Doingid retains Personal Data only as long as necessary for the purposes for which it was collected, or as required by applicable laws.

Typical retention periods are:

Data Category	Typical Retention	Legal / Operational Basis
Listings, requests, and metadata	up to 24 months after removal	legitimate interest (Section 6 PDPA)
Payment and invoice records	up to 7 years	accounting/tax regulations
Referral program data	while participation is active + 2 years	contractual & audit
Support communications	up to 12 months after closure	service quality monitoring
Logs and analytics data	6–18 months	security and performance

8.2 Deletion and Anonymization

After expiry of the retention period, data is securely deleted or anonymized so that it can no longer identify an individual, in accordance with Section 12(2) PDPA.

Users may also request deletion earlier (see Section 9).

9. Your Rights

Doingid respects your rights under the Sri Lanka Personal Data Protection Act, No. 9 of 2022 and comparable international standards (e.g., GDPR).

Depending on your residence, you may exercise the following rights regarding your Personal Data:

9.1 Right of Access and Information

You may request confirmation of whether we hold Personal Data about you and obtain a copy of such data (Section 30 PDPA).

9.2 Right to Rectification

You may request correction of inaccurate or incomplete Personal Data.

9.3 Right to Erasure (“Right to Be Forgotten”)

You may request deletion of your data when it is no longer necessary for the purposes for which it was collected or when consent is withdrawn.

9.4 Right to Restrict or Object to Processing

You may object to certain types of processing based on legitimate interest, or request that processing be limited while a dispute is resolved.

9.5 Right to Withdraw Consent

Where processing is based on consent (e.g., marketing or cookies), you may withdraw it at any time without affecting prior lawful processing.

9.6 Right to Data Portability

You may request an electronic copy of your Personal Data in a structured, commonly used, machine-readable format.

9.7 Complaint to the Regulator

If you believe Doingid has violated your privacy rights, you may contact the Data Protection Authority of Sri Lanka once it becomes fully operational under Part VIII of the PDPA, or reach out to us directly (see Section 10).

Requests can be submitted via info@doingid.com.

We will respond within 30 days, as required by Section 32 PDPA.

10. Data Security and Contact Information

10.1 Security Measures

Doingid employs administrative, technical, and physical safeguards designed to protect Personal Data from unauthorized access, alteration, disclosure, or destruction.

These include:

- SSL/TLS encryption of all data transmissions;
- firewalls and intrusion-detection systems;
- role-based access controls and staff confidentiality agreements;
- regular vulnerability assessments and backups;
- limited retention of sensitive identifiers (NIC, passport, payment tokens).

While we take reasonable steps to ensure security, no system can be guaranteed 100% secure. Users share information at their own risk, and Doingid cannot be held liable for breaches beyond its reasonable control, as recognized under Section 24(2) PDPA.

10.2 Incident Response

In the unlikely event of a data-breach incident likely to cause risk to individuals, Doingid will notify the Data Protection Authority of Sri Lanka and affected users without undue delay, following Section 25 PDPA.

10.3 Contact Us

For privacy inquiries, data-access requests, or complaints, please contact:

Doingid Lanka (PVT) LTD

No. 251, Kottage Watta, Babaragoda, Kalahe, Wanchawala, Galle, Sri Lanka

info@doingid.com

10.4 Governing Law and Jurisdiction

This Privacy Policy and all processing activities are governed by the laws of Sri Lanka.

In the event of an unresolved dispute, Doingid may, where applicable, submit matters to arbitration in Singapore under the SIAC Rules, ensuring neutrality and international standards of fairness.

11. Special Provisions

11.1 Volunteer and Non-Commercial Activities

The Platform allows Users to mark listings or requests as “Volunteer Service” or “Accept Volunteers.”

This feature is designed to support community cooperation and social initiatives within Sri Lanka.

When a User publishes or accepts a volunteer listing:

- Doingid does not act as an employer, intermediary, or contracting party;
- any voluntary contribution is made without monetary obligation, and Doingid is not responsible for confirming or enforcing such arrangements;
- the User may, in the future, become eligible for Doingid Recognition or Bonus Programs, which may include digital credits, referral rewards, or other goodwill benefits — entirely at the Company's discretion.

Doingid may use aggregated, anonymized data from volunteer activities for social impact analytics, program development, and public communication (without identifying individuals).

11.2 Children and Minors

The Platform is intended for individuals aged 18 and above.

Doingid does not knowingly collect or process Personal Data of minors.

If we become aware that a minor under 18 has submitted data, we will promptly delete it from our records in accordance with Section 27(1)(c) of the PDPA and notify, if possible, the parent or guardian.

Exceptionally, in the case of community or educational volunteering initiatives coordinated by verified organizations, Doingid may process limited data of minors only through authorized institutional partners, under strict parental consent and compliance with local child-protection laws.

11.3 Automated Processing and AI Tools

Doingid may use artificial intelligence ("AI") or automated analytical systems to:

- detect spam, fraud, or policy violations;
- improve content moderation and categorization;
- analyze aggregated trends for platform enhancement.

All automated tools operate under human oversight and are subject to fairness, transparency, and non-discrimination principles under Sections 6 and 12(3) of the PDPA.

Doingid does not make fully automated decisions that have legal or significant personal effects without human review.

11.4 Third-Party Links and Integrations

The Platform may include links to or integrations with external websites and applications (e.g., Stripe, FirstPromoter, Google Analytics). These sites operate independently and are governed by their own privacy policies. Doingid is not responsible for their practices or content. We encourage

Users to review the privacy statements of any third-party sites they visit. The presence of a link does not imply endorsement or partnership unless explicitly stated.

11.5 Public and Community Content

Some areas of the Platform may allow Users to post public feedback, testimonials, or other content visible to the community.

Please note:

- such content becomes publicly accessible;
- Doingid cannot prevent third parties from copying, re-sharing, or indexing it;
- Users are advised not to post sensitive or identifying information in public sections.

Doingid reserves the right to moderate or remove community content that violates these Terms or applicable law.

12. Updates and Policy Changes

12.1 Regular Review

Doingid reviews and updates this Privacy Policy periodically to reflect:

- legislative changes (e.g., PDPA enforcement, tax or e-commerce regulation);
- new platform features (e.g., escrow system, AI mediation tools);
- changes in third-party data processors or infrastructure.

The effective date at the top of this page will always indicate the latest version.

12.2 Notification of Changes

If Doingid makes substantial updates (e.g., new data categories, additional processing purposes, or expanded sharing), we will:

- notify Users via the Platform or email (for registered accounts);
- publish it on platform;
- require renewed consent where legally necessary.

By continuing to use the Platform after such notification, you are deemed to have accepted the updated Policy.

13. Legal Framework and Jurisdiction

13.1 Governing Law

This Privacy Policy and all data-processing activities are governed by the laws of the Democratic Socialist Republic of Sri Lanka, including the Personal Data Protection Act, No. 9 of 2022, the Electronic Transactions Act, No. 19 of 2006, and other relevant regulations.

13.2 Dispute Resolution

Doingid seeks to resolve all privacy concerns through good-faith dialogue with Users.

If mutual resolution cannot be achieved:

- domestic Users' disputes will be resolved under Sri Lankan arbitration procedures in Colombo;
- cross-border or international cases may, by mutual agreement, be referred to arbitration under the Singapore International Arbitration Centre (SIAC) rules, ensuring neutrality and fairness.

The language of arbitration shall be English.

13.3 Final Clause

If any provision of this Privacy Policy is found invalid or unenforceable under applicable law, the remaining provisions shall remain valid and enforceable.

This Privacy Policy constitutes the entire understanding between Doingid and the User regarding data protection and supersedes any prior versions.

APPROVED BY

Name: Ludmila Munteanu

Title: Founder

Signature: _____

Date: 18 / 11 / 2025

