

# VONET Privacy Policy

**Last Updated:** 25 January, 2026

**Effective Date:** 25 January, 2026

**Version: 0.1.0**

## 1. INTRODUCTION

Welcome to **VONET** (the "App"). This Privacy Policy explains how **VONET** ("we", "us", "our", or "Data Fiduciary") collects, uses, stores, protects, and discloses your personal data.

This Privacy Policy is prepared in compliance with the **Digital Personal Data Protection Act, 2023** ("DPDPA").

**By using this App, you acknowledge that you have read, understood, and consent to the practices described in this Privacy Policy.**

## 2. SCOPE AND APPLICABILITY

### 2.1 GEOGRAPHIC SCOPE

2.1.1. This Privacy Policy applies to all users of **VONET** who are located in India.

2.1.2. This App is designed exclusively for the Indian market and collects data only from users with Indian mobile numbers.

2.1.3. This policy covers personal data collected through:

- App registration and usage
- User-generated content (posts, images)
- Technical information from your device

## 2.2 AGE REQUIREMENT

**You must be at least 18 years of age to use this App.**

By using the App, you represent and warrant that:

- You are 18 years of age or older
- You have the legal capacity to enter into this agreement
- All information you provide is accurate and truthful

**Important:** We do not knowingly collect personal data from individuals under 18 years of age. If we discover that a user is under 18, we will immediately:

- Terminate their account
- Delete their personal data from our systems
- Remove them from all backup systems within 60 days

## 3. DEFINITIONS (AS PER DPDPA 2023)

- **Personal Data:** Any data about an individual who is identifiable by or in relation to such data
- **Data Principal:** The individual (you) to whom the personal data relates
- **Data Fiduciary:** The entity (us) which determines the purpose and means of processing personal data
- **Processing:** Any operation performed on personal data including collection, storage, use, and erasure
- **Consent:** Free, specific, informed, and unambiguous agreement by the Data Principal

## 4. PERSONAL DATA WE COLLECT

### 4.1 MANDATORY INFORMATION (Required to use the App)

We collect the following personal data that is necessary for providing our services:

<b>Data Type</b>	<b>Purpose</b>	<b>Legal Basis</b>
<b>First Name</b>	User identification and personalization	Consent & Legitimate Use
<b>Last Name</b>	User identification and personalization	Consent & Legitimate Use
<b>Mobile Number</b>	Authentication, account security, OTP verification	Consent & Legitimate Use

## 4.2 OPTIONAL INFORMATION (User's Choice)

Users may choose to provide additional information such as:

- Profile picture
- About, Education, Organisation worked with etc.
- Other profile information

*Note: Providing optional information is entirely voluntary and not required to use core App features.*

## 4.3 USER-GENERATED CONTENT

- **Posts:** Text content and images you voluntarily create and share
- **Interactions:** Likes, comments, shares, reposts etc.

## 4.4 AUTOMATICALLY COLLECTED INFORMATION

When you use the App, we automatically collect:

### **Technical Information:**

- IP address
- App version, if app is already installed

### **Usage Information:**

- Features used
- Time spent on the App
- Error logs and crash reports
- Performance data

**Purpose:** To provide, maintain, improve, and secure the App.

## 4.5 SMS/OTP INFORMATION

- We use third-party SMS gateway services to send OTP for authentication
- We do not read your SMS messages
- We only send OTP to your registered mobile number
- Standard SMS charges from your telecom operator may apply

## 5. HOW WE USE YOUR PERSONAL DATA

We process your personal data for the following purposes:

### 5.1 PRIMARY PURPOSES

- **Account Creation and Authentication:** To create and verify your account
- **Service Delivery:** To provide core App functionalities
- **User Identification:** To identify you within the App
- **Communication:** To send important service-related notifications

### 5.2 SECONDARY PURPOSES

- **App Improvement:** To analyze usage patterns and improve features
- **Security:** To detect, prevent, and address fraud and security issues
- **Bug Fixing:** To identify and fix technical issues during beta phase
- **Analytics:** To understand user behavior and App performance
- **Legal Compliance:** To comply with applicable laws and regulations

### 5.3 BETA TESTING PURPOSES

As this is a beta version:

- We collect additional diagnostic data to identify bugs
- We may analyze feature usage to prioritize development
- We use feedback to improve the App before public release

## 6. LEGAL BASIS FOR PROCESSING (DPDPA COMPLIANCE)

We process your personal data based on:

- 6.1. **Your Consent:** You provide explicit consent when you register and use the App
- 6.2. **Legitimate Use:** Processing is necessary for a purpose specified by law or for providing services you have requested
- 6.3. **Compliance with Law:** To comply with legal obligations under Indian law

## 7. DATA SHARING AND DISCLOSURE

### 7.1 DATA PROCESSORS (SERVICE PROVIDERS)

We may share your data with trusted third-party service providers who assist us in operating the App:

- **Cloud Hosting Providers:** For data storage and server infrastructure
- **SMS Gateway Services:** For sending OTP messages
- **Analytics Services:** For understanding App usage (anonymized where possible)
- **Customer Support Tools:** If you contact us for support

**Safeguards:** All service providers are contractually bound to:

- Process data only for specified purposes
- Maintain confidentiality and security
- Comply with applicable data protection laws
- Not use data for their own purposes

### 7.2 LEGAL DISCLOSURES

We may disclose your personal data if required to:

- Comply with applicable laws, regulations, or legal processes
- Respond to court orders, government requests, or law enforcement
- Protect our rights, property, or safety
- Prevent fraud, security threats, or illegal activities

- Enforce our Terms of Service

## **7.3 BUSINESS TRANSFERS**

In the event of a merger, acquisition, or sale of assets, your data may be transferred to the acquiring entity. We will notify you of any such change.

## **7.4 PUBLIC CONTENT**

Any content you post publicly on the App (posts, images) will be visible to other users. Exercise caution when sharing information publicly. We may share and make available such content on our website for search and SEO purpose.

# **8. DATA RETENTION AND BACKUPS**

## **8.1 DATA RETENTION DURING ACTIVE USE**

### **Active Accounts:**

- Personal data retained while your account is active
- Used to provide services and improve user experience

### **Inactive Accounts:**

- Accounts inactive for 12 consecutive months may be automatically deleted

## **8.2 AUTOMATED BACKUP SYSTEMS (Production Environment Only)**

We maintain backup systems for disaster recovery and service reliability:

### **Data Backups:**

- We do take back up at regular intervals to retain app data.

## **8.3 ACCOUNT DELETION AND DATA ERASURE**

### **When You Delete Your Account:**

Within 90 days of your deletion request, we permanently delete:

- Name (First, Last, Title)
- Mobile Number
- Email Address (if provided)
- Profile Picture
- Location (City, State, Country)
- Professional Information (Designation, Organisation)
- Bio/About Section
- All other personally identifiable information

### **Backup Systems (60 Days):**

- Personal data removed from backup systems within 60 days
- Ensures disaster recovery capability during transition period
- All backups encrypted and access-controlled

### **Public Content Anonymization:**

- Posts, comments, and public interactions remain visible
- Attribution changed to "Anonymous User"
- No link between content and your personal identity
- After 90 days: True anonymization (no re-identification possible)

### **Pseudonymization During Transition:**

During the 90-day period, your posts are temporarily pseudonymized (displayed as "Anonymous User" but technical database link remains for content moderation). After 90 days, your user record is permanently deleted, making re-identification impossible - this is true anonymization compliant with DPDPA 2023.

### **Legal Hold Exception (Rare Cases <0.1%):**

In exceptional circumstances, we may be required to preserve your data beyond 90 days ONLY if:

- Valid court order or subpoena is received
- Law enforcement issues formal preservation request
- Your account is subject to ongoing legal investigation
- Required by specific regulatory or legal obligation

### **Important Notes:**

- Legal holds apply to less than 0.1% of users
- You will be notified if a legal hold is placed (unless prohibited by law)
- Legal holds are not automatic - they require formal legal process
- Duration varies (typically 2-5 years) based on legal matter
- Data under legal hold remains encrypted and access-restricted

### **No Reactivation:**

Account deletion is permanent. You cannot recover your account or data after deletion. However, you may create a new account at any time using the same mobile number.

## **9. DATA SECURITY**

### **9.1 SECURITY MEASURES**

We implement reasonable security practices and procedures to protect your personal data.

### **9.2 BETA VERSION SECURITY NOTICE**

As this is a beta version:

- Security features are still being tested and improved
- **DO NOT share highly sensitive personal or financial information**
- We cannot guarantee absolute security during the beta phase

### **9.3 YOUR RESPONSIBILITY**

- Keep your mobile device secure with passwords/biometrics
- Do not share your OTP with anyone
- Log out when using shared devices
- Immediately report suspected unauthorized access

### **9.4 USER SAFETY TOOLS**

VONET provides tools to help you stay safe:

- **Block Users:** You can block any user who bothers you. Blocked users cannot see your content, send you messages, or find you in search.

- **Report Users:** You can report users who violate our policies. Our team reviews all reports within 24 hours.
- **Report Content:** You can report inappropriate posts using the report button on each post.

For complete details on blocking, reporting, and our content moderation policies, please refer to our **Terms of Service**.

## 10. YOUR RIGHTS UNDER DPDPA 2023

As a Data Principal, you have the following rights:

### 10.1 RIGHT TO ACCESS

You have the right to:

- Know what personal data we hold about you, and purpose of it. We have already explain it in this policy document.

### 10.2 RIGHT TO CORRECTION

You have the right to:

- Correct inaccurate or incomplete personal data
- Update your profile information

### 10.3 RIGHT TO ERASURE ("Right to be Forgotten")

You have the right to:

- Request deletion of your **personal data** (name, mobile number, profile information)
- Have your account and associated personal identity erased

#### **What Gets Erased:**

- Personal identification information (name, mobile number)
- Profile information and account settings
- Private data and preferences

#### **What Remains as "Anonymous User":**

- Public posts, comments, likes, and reposts you created
- Content interactions and public engagement history
- This content will be dissociated from your personal identity

**Limitations:** We may retain certain personal data if:

- Required by law
- Needed for legal claims
- Part of anonymized aggregated data
- Public content remains available without personal identifiers (as detailed in Section 9.2)

**Grievance Officer Contact:**

- Email: [contact@vonet.in](mailto:contact@vonet.in)

## 11. CONSENT MANAGEMENT

### 11.1 HOW WE OBTAIN CONSENT

- We obtain your explicit consent during registration
- You must accept this Privacy Policy to use the App
- Consent is free, specific, informed, and unambiguous

### 11.2 WITHDRAWAL OF CONSENT

You may withdraw your consent at any time by:

- Deleting your account

**Effect of Withdrawal:** Upon consent withdrawal, we will cease processing your personal data, except where retention is required by law. You will no longer be able to use the App.

## 12. COOKIES AND TRACKING TECHNOLOGIES

12.1. The App may use cookies, local storage, or similar technologies to:

- Remember your preferences

- Analyze usage patterns
- Improve user experience

12.2. You can manage cookie preferences through your device settings.

12.3. Disabling cookies may limit certain App functionalities.

## **13. THIRD-PARTY LINKS**

13.1. The App may contain links to third-party websites or services.

13.2. We are not responsible for the privacy practices of third parties.

13.3. We encourage you to review privacy policies of any third-party sites you visit.

## **14. INTERNATIONAL DATA TRANSFERS**

14.1. Your data is primarily stored and processed within India.

14.2. Some service providers may be located outside India.

14.3. We ensure adequate safeguards are in place for any international transfers as required by DPDPA.

## **15. CHANGES TO THIS PRIVACY POLICY**

15.1. We may update this Privacy Policy from time to time.

15.3. Continued use of the App after changes constitutes acceptance.

15.4. For significant changes, we may seek fresh consent.

## 16. COMPLIANCE WITH DPDPA 2023

We are committed to compliance with DPDPA 2023 and:

- Process personal data lawfully, fairly, and transparently
- Collect data only for specified and legitimate purposes
- Ensure data accuracy and completeness
- Implement appropriate security safeguards
- Enable Data Principal rights
- Maintain accountability and transparency
- Appoint a Grievance Officer for complaint resolution

## 17. BETA PHASE PRIVACY CONSIDERATIONS

### Important Notice for Beta Users:

17.1. As this is a beta version, our data practices are still evolving.

17.2. We collect additional diagnostic data to improve the App.

17.3. Security measures are being continuously enhanced.

17.4. **Recommendation:** Do not share highly sensitive, personal, or confidential information during the beta phase.

17.5. We may reset or delete test data upon public launch (with prior notice).

## 18. CONTACT US

For any questions, concerns, or requests regarding this Privacy Policy or your personal data:

### General Inquiries:

- Email: [contact@vonet.in](mailto:contact@vonet.in)

## **19. GOVERNING LAW**

This Privacy Policy is governed by the laws of India, including:

- Digital Personal Data Protection Act, 2023
- Information Technology Act, 2000
- Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011

Any disputes shall be subject to the exclusive jurisdiction of courts in Ahmedabad, Gujarat, India.

**BY USING VONET, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTOOD, AND CONSENT TO THIS PRIVACY POLICY AND THE COLLECTION, USE, AND DISCLOSURE OF YOUR PERSONAL DATA AS DESCRIBED HEREIN.**

**VONET**