

# Privacy Policy

duCharcha — Duonomic Digital Innovations Private Limited

Effective Date: April 20, 2026

Last Updated: April 20, 2026

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**This Privacy Policy explains how duCharcha collects, uses, stores, shares, and protects your personal data. By using the App, you consent to the practices described herein.**

## 1. Who We Are

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duCharcha is a structured audio debate and discussion platform operated by Duonomic Digital Innovations Private Limited, registered in Varanasi, Uttar Pradesh, India. References to "we", "us", or "our" in this policy refer to Duonomic Digital Innovations Private Limited.

**Website:** [www.ducharcha.com](http://www.ducharcha.com)

**Email:** [support@ducharcha.com](mailto:support@ducharcha.com)

**Address:** Lane 6, Janakinagar Colony, Patia, Varanasi, Uttar Pradesh – 221106, India

## 2. Data We Collect

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We collect the following categories of personal data:

### 2.1 Data You Provide Directly

- Full name and display name
- Mobile number (used for OTP-based login via WhatsApp/MSG91)
- Email address (if provided during registration)
- Profile photo (if uploaded)
- Payment information — processed entirely by Razorpay; we do not store card or bank details

### 2.2 Data We Collect Automatically

- Device identifiers (device model, OS version, unique device ID)
- IP address and approximate location (city/country level only)
- App usage data — screens visited, features used, session duration
- Push notification tokens (FCM for Android, APNs for iOS)

- Crash logs and error reports via LogRocket
- Audio session metadata — Charcha duration, round counts, participation timestamps

### 2.3 Audio Content

Audio recorded during live Charchas is processed in real-time via LiveKit (WebRTC). Recordings, where enabled for a specific Charcha, are stored temporarily for transcription and highlight generation. Audio is not used for advertising profiling.

### 2.4 Data from Third Parties

- OTP verification data from MSG91 (WhatsApp delivery confirmation only)
- Payment transaction status from Razorpay (amount, status, transaction ID — no card details)
- Analytics signals from MoEngage for push notification and engagement tracking

## 3. How We Use Your Data

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We use your data solely for the purposes listed below. We do not sell your personal data.

- Account creation, authentication, and identity verification
- Enabling and operating live Charcha audio sessions
- Matching Speakers in the challenge queue and scheduling Charchas
- Processing subscription payments and managing billing cycles
- Sending transactional notifications — Charcha invites, round alerts, result updates
- Generating Hall of Fame rankings, certificates, and highlight reels
- Detecting and preventing fraud, abuse, and platform misuse
- Analysing platform performance and improving product features
- Complying with applicable legal and regulatory obligations

## 4. Legal Basis for Processing (India & GDPR)

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For users in India, data processing is governed by the Information Technology Act, 2000 and the Digital Personal Data Protection Act, 2023. For users in the EU/EEA, we rely on the following lawful bases under GDPR:

- Contract performance — processing necessary to deliver the service you subscribed to
- Legitimate interests — fraud prevention, platform security, product improvement
- Consent — marketing communications, optional analytics; withdrawable at any time

- Legal obligation — data retention required by Indian tax and corporate law

## 5. Data Sharing

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We do not sell, rent, or trade your personal data. We share data only in the following limited circumstances:

### 5.1 Service Providers

We engage trusted third-party processors who act on our instructions:

- LiveKit — real-time audio infrastructure (WebRTC)
- AWS — cloud hosting, storage (S3), and serverless compute (Lambda)
- Razorpay — payment processing and subscription billing
- MSG91 — WhatsApp OTP delivery
- MoEngage — push notification delivery and engagement analytics
- LogRocket — session recording and error monitoring
- Cloudinary — media storage and delivery (audio highlights)
- Deepgram / OpenAI Whisper — audio transcription for Charcha highlights
- Google Gemini API — AI-assisted debate analysis and scoring

### 5.2 Legal and Regulatory Disclosure

We may disclose your data to government authorities, courts, or law enforcement agencies when required by applicable law, court order, or to protect the rights, safety, or property of duCharcha or its users. Where legally permissible, we will notify you before such disclosure.

### 5.3 Business Transfers

In the event of a merger, acquisition, or sale of assets, your data may be transferred to the successor entity. You will be notified of any such transfer and your rights under this policy will continue to apply.

## 6. Data Storage and Retention

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- Your account data is retained for the duration of your account and for a period of 3 years following account deletion, as required by Indian tax and corporate regulations
- Audio recordings from Charchas are retained for a maximum of 7 days after the session unless explicitly saved as a highlight by an admin
- Transcription data is retained for 30 days post-session and then deleted
- Payment transaction records are retained for 7 years in compliance with GST and accounting regulations

- Crash logs and session recordings via LogRocket are retained for 90 days

All data is stored on AWS servers. Primary storage is in the AWS Mumbai (ap-south-1) region. Certain third-party processors may store data in other regions in accordance with their own data protection standards.

## 7. Data Security

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We implement industry-standard security measures to protect your data:

- TLS 1.2+ encryption for all data in transit
- AES-256 encryption for data at rest on AWS S3
- OTP-based authentication — no passwords stored
- Role-based access controls — production data accessible only to authorised personnel
- Regular dependency audits and security patching

No system is completely secure. In the event of a data breach affecting your rights or freedoms, we will notify you and the relevant regulatory authority within 72 hours of becoming aware, as required by applicable law.

## 8. Cookies and Tracking

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The duCharcha mobile application does not use browser cookies. The following tracking technologies are used within the App:

- FCM / APNs tokens — for push notification delivery only
- LogRocket session identifiers — for error monitoring and debugging
- MoEngage device identifiers — for push notification targeting and delivery analytics

None of these are used for third-party advertising. You may opt out of MoEngage push notifications via your device notification settings at any time.

## 9. Your Rights

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You have the following rights regarding your personal data. To exercise any of these rights, contact us at [duonomic@gmail.com](mailto:duonomic@gmail.com):

- Access — request a copy of the personal data we hold about you
- Correction — request correction of inaccurate or incomplete data
- Deletion — request deletion of your data, subject to legal retention obligations

- Portability — request your data in a structured, machine-readable format
- Restriction — request that we limit processing of your data in certain circumstances
- Objection — object to processing based on legitimate interests
- Withdraw Consent — withdraw consent for marketing or optional analytics at any time

We will respond to all verified requests within 30 days. Where requests are complex or numerous, we may extend this period by a further 30 days with notice.

## 10. Children's Privacy

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duCharcha is not intended for users under the age of 18. We do not knowingly collect personal data from minors. If you believe a minor has created an account or submitted data without appropriate consent, contact us immediately at [support@ducharcha.com](mailto:support@ducharcha.com) and we will delete the data promptly.

## 11. Cross-Border Data Transfers

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Your data may be processed by third-party service providers operating outside India (including the United States and the European Union). We ensure such transfers are protected by:

- Data Processing Agreements (DPAs) with all third-party processors
- Standard Contractual Clauses (SCCs) for transfers to processors in non-adequate jurisdictions
- Selection of processors who maintain SOC 2, ISO 27001, or equivalent certifications

## 12. Changes to This Policy

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We may update this Privacy Policy from time to time to reflect changes in our data practices or applicable law. Material changes will be communicated via in-app notification at least 15 days before the change takes effect. Your continued use of the App after the effective date constitutes acceptance of the updated policy.

## 13. Grievance Officer

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In accordance with the Information Technology Act, 2000 and rules thereunder, the name and contact details of the Grievance Officer are:

**Name:** Grievance Officer — Duonomic Digital Innovations Pvt. Ltd.

**Email:** [duonomic@gmail.com](mailto:duonomic@gmail.com)

**Address:** Lane 6, Janakinagar Colony, Patia, Varanasi, Uttar Pradesh – 221106, India

**Response Time:** Within 30 days of receipt of complaint

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For all other privacy queries: [support@ducharcha.com](mailto:support@ducharcha.com)

[www.ducharcha.com](http://www.ducharcha.com)