

PRIVACY POLICY

Vytal Fitness ("Vytal") — a sole proprietorship business

Effective Date: _____ [date of publication] Last Updated: _____ [date of publication]

This Privacy Policy explains how Vytal Fitness, operating under the brand name "Vytal" ("we", "us", "the Company"), operating as a sole proprietorship of _____ [Aryan Bhargav], collects, uses, discloses and protects personal data when you use [getvytal.vercel.app](#) and the associated Service. This Policy is framed with reference to the Digital Personal Data Protection Act, 2023 ("DPDPA") and the Digital Personal Data Protection Rules, 2025, which are now the primary law governing personal data processing in India (having, upon notification, superseded the erstwhile Section 43A of the Information Technology Act, 2000 and the SPDI Rules, 2011 made under it). Under the DPDPA, Vytal acts as the "Data Fiduciary" in respect of personal data you provide directly to us, and you (or, where applicable, the individual whose data is submitted) are the "Data Principal".

1. Personal Data We Collect

We collect the following categories of personal data:

- Account information: name, email address, and password/authentication credentials.
- Health and fitness data: body-composition metrics (principally from InBody reports you upload), fitness goals, training experience, dietary preferences, allergies and other self-reported health-related information you choose to provide.
- Usage and technical data: log data, device/browser information, and interactions with the Service, collected to operate and improve the platform.
- Payment-related metadata: transaction references, subscription plan and billing history. We do not collect or store your full card, UPI or bank-account details — these are handled directly by Razorpay on its PCI-DSS-compliant systems.
- Organisation data: where you are added to the Service by an Organisation (e.g. a gym or trainer), that Organisation may submit certain of your information to create and manage your account.

2. Purpose of Processing

We process personal data to: provide and operate the Service, including generating your personalised AI-based workout plans, nutrition plans, fitness assessments and AI-coach responses; authenticate and manage your account; process subscription payments through Razorpay; communicate with you about the Service; monitor and improve platform performance and safety; and comply with applicable legal obligations.

3. Legal Basis, Notice and Consent

We process your personal data on the basis of your free, specific, informed and unconditional consent, obtained at or before the point of collection, in accordance with the DPDPA. We do not use pre-ticked checkboxes or other default/implied mechanisms to record consent.

In accordance with Section 5 of the DPDPA, before or at the time we ask for your consent we will give you a notice — either in full, or as a short "just-in-time" notice with a link to the full version — stating: (a) the personal data we are seeking and the specific purpose for which we propose to process it; (b) how you can exercise your rights to access and correct that data under Sections 11 and 12 of the DPDPA; (c) how you can exercise your rights to erasure, grievance redressal, and consent withdrawal under Sections 13 and 6(4); (d) your right to nominate another individual to exercise your rights under the DPDPA in the event of your death or incapacity (Section 14); and (e) how to file a complaint with the Data Protection Board of India. This notice is separate from, and additional to, this Privacy Policy.

You may withdraw consent at any time by writing to _____ *[privacy/contact email]* or using the withdrawal control in your account settings; withdrawal will not affect processing carried out before withdrawal and may limit our ability to continue providing the Service to you.

4. Sharing of Personal Data

We share personal data with the following categories of third parties, solely to the extent necessary to operate the Service:

- Cloud application-hosting and managed database/authentication providers, to host and run the platform.
- A third-party artificial-intelligence (large-language-model) service provider, to generate your personalised outputs from the data you submit. We do not permit this provider to use your personal data, including health and fitness data, to train or improve its own general-purpose models, and we configure our use of that provider's services accordingly.
- Razorpay, our payment gateway, to process subscription payments.
- An Organisation you are affiliated with (e.g. your gym, academy or trainer), limited to the data reasonably required for that Organisation to manage your membership on the platform.
- Regulators, law-enforcement or judicial authorities, where required by applicable law.

We do not sell personal data. The DPDPA permits transfer of personal data outside India by default, except to countries the Central Government specifically restricts by notification (none are notified as of this Policy's date). Where any of the above providers are located outside India, we nonetheless take reasonable steps — including vendor data-processing agreements and access controls — to ensure they maintain an appropriate standard of protection for your data.

5. Data Retention

We retain personal data for as long as your account remains active. If you close your account or request erasure, we will delete or irreversibly anonymise your personal data within _____ *[retention period, e.g. 90 days]*, except where we are required or permitted to retain it for a longer period to comply with legal, accounting or regulatory requirements (for example, financial records connected to payments), resolve disputes, or enforce our agreements — in which case we retain only what is necessary for that purpose and for no longer than applicable law permits or requires. You may request deletion of your account and associated data as described in Section 7.

6. Children's Data

The Service is intended for users aged 18 and above and is not directed at children. Where an Organisation account (e.g. a sports academy) involves individuals under 18, the Organisation is responsible for obtaining verifiable parental/guardian consent before submitting such individuals' data, consistent with DPDPA requirements for the processing of children's personal data.

7. Your Rights as a Data Principal

Subject to the DPDPA, you have the right to: obtain a summary of the personal data we hold about you and the processing activities carried out (Section 11); request correction or completion of inaccurate or incomplete data (Section 12); request erasure of personal data that is no longer necessary for the purposes for which it was collected (Section 12); withdraw consent at any time (Section 6(4)); nominate another individual to exercise these rights on your behalf in the event of your death or incapacity (Section 14); and file a grievance with us, and if unresolved, with the Data Protection Board of India (Section 13). To exercise these rights, contact _____ *[privacy/contact email]* or our Grievance Officer (see the Contact Us / Grievance Redressal page).

8. Data Security

We implement reasonable security safeguards as required under Section 8(5) of the DPDPA, including access controls, encryption of data in transit, multi-factor authentication for internal system access, and reliance on reputable third-party infrastructure providers, calibrated to the fact that some of the data we process (body-composition and other

health-related information) is capable of causing you significant harm if compromised. Payment-instrument data is never stored by us and is handled solely by Razorpay on its secure, PCI-DSS-compliant systems. No method of transmission or storage is completely secure, and we cannot guarantee absolute security.

9. Personal Data Breach Notification

In the event of a personal data breach, we will notify the Data Protection Board of India and affected users without delay, followed by a more detailed report to the Board within the timeline prescribed under the DPDP Rules, 2025 (currently 72 hours of becoming aware of the breach, unless extended by the Board). Notification to affected users will describe the nature and likely consequences of the breach, the measures we have taken to mitigate it, and steps you can take to protect yourself, communicated through your registered account or contact details.

10. Cookies and Similar Technologies

The Service may use cookies or similar technologies to keep you signed in, remember preferences, and understand usage patterns. You can control cookies through your browser settings; disabling them may affect certain features of the Service.

11. Grievance Officer

In accordance with applicable Indian law, we have designated a Grievance Officer to address complaints regarding this Policy or the handling of your personal data. Contact details are provided on the Contact Us / Grievance Redressal page. Complaints will be acknowledged within 48 hours and, where possible, resolved within one month of receipt.

12. Changes to this Policy

We may revise this Privacy Policy from time to time. Material changes will be notified through the Service or by email. The "last updated" date at the top of the published policy will indicate the latest revision.

13. Contact Us

For any privacy-related question or request, contact us at _____ [privacy/contact email] or through the details on the Contact Us / Grievance Redressal page.

This is a draft prepared to accelerate Vytal's compliance readiness. It has not been reviewed by a lawyer and should be reviewed, adapted and signed off before publication. Every underlined blank must be completed with Vytal's actual details.