



| PRIVACY POLICY

1. Introduction and Scope

Manasya ("we", "us", or "our") is committed to protecting the privacy, confidentiality, and dignity of every student who uses our platform. This Privacy Policy describes how we collect, use, store, share, and protect personal information and sensitive personal data when you access or use the Manasya website, mobile application, and related services (collectively, the "Platform").

This Policy applies to:

- All visitors to the Manasya website and application
- Students who register and create an account
- Users who access counselling, journaling, or community features
- Any individual whose data is processed by Manasya

By using the Platform, you consent to the practices described in this Policy. If you do not agree, please discontinue use of the Platform. This Policy is compliant with the Information Technology Act, 2000 ("IT Act"), the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 ("SPDI Rules"), and the Digital Personal Data Protection Act, 2023 ("DPDP Act") as and when applicable provisions are notified.

2. Information We Collect

2.1 Information You Provide Directly

When you use Manasya, you may provide the following information:

- Registration details: username or alias (we do not require your real name), email address, age range, and educational institution (optional)
- Profile information: year of study, field of study, and self-reported stress or mental health concerns
- Journal entries: personal reflections, thoughts, and diary content entered voluntarily into the platform
- Session details: appointment requests, session notes, and feedback provided after counselling sessions
- Communications: messages exchanged with licensed counsellors through our secure in-platform messaging system
- Support requests: information shared when you contact our support team

2.2 Information Collected Automatically

When you access the Platform, we may automatically collect:

- Device information: device type, operating system, and browser type
- Usage data: pages visited, features used, session duration, and interaction logs
- Log data: IP address, access timestamps, and error reports
- Cookies and similar technologies: session cookies for authentication and preference cookies for your experience

2.3 Sensitive Personal Data or Information (SPDI)

Under Indian law, mental health information constitutes Sensitive Personal Data or Information (SPDI). The following categories of data on our platform are treated with the highest level of protection:

- Mental health conditions, symptoms, or diagnoses disclosed by you
- Psychological assessments or screening responses
- Counselling session notes and transcripts
- Journal entries containing personal emotional content
- Any medical history voluntarily shared with a counsellor

We do not collect your Aadhaar number, PAN, financial information, or biometric data.

3. Anonymity and Pseudonymity

Manasya is designed to allow students to seek support anonymously. Specifically:

- You may register using a pseudonym or alias. You are not required to provide your legal name.
- Your username/alias is what is visible to counsellors, not your real name.
- We internally assign a unique account identifier that is separate from any personally identifiable information you choose to withhold.
- Your educational institution is optional and is never shared with counsellors without your explicit consent.

However, please note that if you voluntarily disclose identifying information within journal entries, session messages, or other content, we cannot prevent identification from that disclosure. We encourage you to share only what you are comfortable with.

4. How We Use Your Information

We use collected information for the following purposes:

- Service delivery: to match you with suitable counsellors, schedule and conduct sessions, and provide the journaling and safe-space features
- Personalisation: to remember your preferences and tailor your experience

- Safety: to detect, investigate, and prevent misuse, abuse, or harm on the Platform
- Improvement: to analyse anonymised and aggregated usage patterns to improve our services
- Communication: to send you service notifications, appointment reminders, and policy updates
- Legal compliance: to comply with applicable Indian laws, court orders, or government authority requests
- Research (optional, with consent): to contribute to anonymised mental health research in India, only with your separate explicit consent

We do not use your mental health data, journal entries, or counselling session content for advertising, marketing profiling, or sale to third parties.

5. Data Sharing and Disclosure

5.1 With Counsellors

Licensed counsellors on the Platform will have access to information you share with them directly in sessions and messages. Counsellors are bound by our Counsellor Agreement, professional ethics codes, and applicable confidentiality obligations under Indian law.

5.2 With Service Providers

We may share limited data with trusted third-party service providers who assist us in operating the Platform, including cloud hosting providers, email delivery services, and analytics tools. All such providers are contractually bound to maintain confidentiality and security standards no less stringent than ours. They are prohibited from using your data for any purpose other than providing services to Manasya.

5.3 Legal Obligations and Safety

We may disclose your information without your consent in the following limited circumstances:

- To comply with a court order, legal process, or lawful request from a government authority under Indian law
- To prevent an imminent threat to your life or the life of another person, in accordance with our Duty of Care obligations and professional ethics standards
- To investigate fraud, security breaches, or violations of our Terms of Service

In the event of a mandatory legal disclosure, we will, where lawfully permitted, notify you before complying.

5.4 No Sale of Data

Manasya does not sell, rent, lease, or trade your personal data or SPDI to any third party, under any circumstances.

6. Data Retention

We retain your data as follows:

- Account information: retained for the duration of your active account, and for 3 years after account deletion to comply with legal obligations
- Journal entries: retained until you delete them. You may delete individual entries or all entries at any time from your account settings
- Session notes and counselling records: retained for 7 years in accordance with mental health professional standards and applicable Indian regulations
- Automatically collected data and logs: retained for up to 12 months

Upon expiry of the applicable retention period, we will securely delete or anonymise your data so that it can no longer be associated with you.

7. Data Security

We implement industry-standard and legally mandated security measures to protect your data, including:

- Encryption of data in transit using TLS 1.2 or higher
- Encryption of sensitive data at rest using AES-256 encryption
- Access controls ensuring only authorised Manasya personnel and bound counsellors can access relevant data
- Regular security audits and vulnerability assessments
- Multi-factor authentication for counsellor and administrator accounts
- Incident response procedures as required under the SPDI Rules

Despite our best efforts, no system is completely secure. In the event of a data breach that is likely to result in a risk to your rights, we will notify you and the relevant Indian authorities in accordance with applicable law.

8. Your Rights

Under Indian data protection law, you have the following rights with respect to your personal data:

- Right of access: request a copy of the personal data we hold about you
- Right to correction: request correction of inaccurate or incomplete information
- Right to erasure: request deletion of your data, subject to legal retention requirements

- Right to withdraw consent: withdraw consent for processing at any time, where processing is consent-based
- Right to grievance redressal: file a complaint with our Grievance Officer if you believe your data rights have been violated

To exercise any of these rights, contact us at: privacy@manasya.in. We will respond within 30 days of receiving your request.

9. Cookies Policy

Manasya uses strictly necessary cookies to maintain your session and authenticate you on the Platform. We do not use advertising cookies or cross-site tracking technologies. You may configure your browser to refuse cookies, but this may affect your ability to use certain features of the Platform.

10. Children and Minors

Manasya is intended for students who are 13 years of age or older. Students under 18 years of age ("Minors") may use the Platform. However:

- Minors under 18 are encouraged to have a parent or guardian review this Privacy Policy
- We do not knowingly collect data from children under 13 years of age
- If we become aware that a user is under 13, we will promptly delete their account and associated data

For Minor users between 13 and 18, Manasya complies with applicable Indian regulations, including requirements under the DPDP Act, 2023 regarding verifiable parental consent where mandated.

11. Grievance Officer

In accordance with the IT Act and SPDI Rules, Manasya has appointed a Grievance Officer for privacy-related concerns:

Name: Grievance Officer, Manasya

Email: grievance@manasya.in

Response Time: We will acknowledge your grievance within 24 hours and resolve it within 30 days.

12. Changes to This Policy

We may update this Privacy Policy from time to time. When we do, we will update the effective date at the top of this document and notify registered users via email or in-app notification. Continued use of the Platform after the effective date of the updated Policy constitutes your acceptance of the changes.

By using the Manasya Platform, you acknowledge that you have read, understood, and agreed to both the Privacy Policy and these Terms of Service.