

# Staunch Trainer Privacy Policy

**Effective Date:** April 15, 2025

**Last Updated:** April 15, 2025

Staunch Health & Fitness Private Limited ("Company", "we", "us", or "our") respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use the Staunch Trainer mobile application ("App") as a Trainer. It also describes your rights regarding your personal data and how you can contact us with any concerns.

This policy applies exclusively to the Trainer version of the Staunch app and complies with app marketplace guidelines for Android and iOS platforms as well as India's Digital Personal Data Protection Act, 2023 (DPDPA).

## 1. Information We Collect

We collect various types of personal and sensitive information to deliver our services effectively and in compliance with applicable laws:

### a. Personal Information:

- Full name
- Mobile number
- Email address
- Date of birth
- Address and location data
- Profile photo
- Bio and professional information
- Languages known
- Areas of expertise/categories

### b. Identity Verification and Professional Information:

- PAN number, name, and date of birth (for KYC verification)
- Aadhaar verification through OTP-based consent (we do NOT store Aadhaar numbers)
- Aadhaar-derived fields stored include name, gender, year of birth, address, and photo
- Police clearance certificate
- Work experience details
- Certification documents and images
- All KYC and bank account verification is performed securely through Sandbox API.  
[Sandbox Privacy Terms](#)

### c. Media Uploads:

- Profile images
- Introduction videos
- Testimonial videos
- Transformation videos
- Certification documents
- These are stored securely on our servers.

d. Service Delivery Information:

- Location data
- Trainer availability slots
- Expertise categories

e. Bank Account Details:

- Account holder name
- Account number
- IFSC code
- These are collected to process trainer payouts, verified through Sandbox APIs, and stored securely.

f. Device and App Usage Data:

- Device type, OS version, IP address, crash reports, and usage data via Firebase Analytics and Firebase Crashlytics.

g. Login and Authentication:

- Initial user sign-in is managed via Firebase Authentication using a mobile number or email
- Our backend generates authentication cookies for subsequent logins to maintain secure sessions
- Authentication tokens are stored securely and encrypted

h. Communication Data:

- Firebase Cloud Messaging is used to send push notifications about sessions and important updates.

## 2. How We Use Your Information

We use the information we collect for the following purposes:

- To register and manage your Trainer account
- To verify your identity and professional eligibility
- To process payouts and maintain financial records
- To facilitate communication with Clients through platform features
- To match you with appropriate clients based on your expertise, availability, and location

- To showcase your professional qualifications and transformation results
- To improve app functionality, performance, and support
- To notify you of updates, policy changes, or session information
- To comply with legal obligations including KYC norms

### **3. Legal Basis for Processing**

Under the DPDPA 2023, we process your personal data on the following legal grounds:

- Consent: When you provide explicit consent to process your data for specific purposes
- Legitimate Business Interests: Where processing is necessary for our legitimate business purposes
- Contractual Necessity: To fulfill our contractual obligations to you
- Legal Obligation: To comply with applicable laws and regulations

### **4. Sharing of Information**

We do not sell or rent your personal information to third parties. We may share your data with:

- Government authorities as required by law
- Our trusted service providers (e.g., Firebase, AWS, Sandbox API) for technical operations
- Our internal staff for support, moderation, and quality assurance under strict confidentiality
- Potential clients (limited to your professional profile, expertise, availability, and public credentials)

We ensure that any third-party with whom your data is shared follows adequate data protection standards.

### **5. Storage and Security**

We take your data security seriously and implement technical and organizational measures to protect it:

- All sensitive and personal data is encrypted during transmission and at rest
- Verified KYC data and banking info are stored on secure servers with restricted access
- Authentication cookies and tokens are encrypted and securely stored
- Uploaded files (photos, videos, documents) are stored securely on our servers
- Regular audits and access control practices are implemented

## 6. Data Retention

We retain your information as long as your account is active or as necessary to fulfill legal, contractual, and operational requirements. If you request deletion or if your account becomes inactive, we may retain certain data for a reasonable period as required by law or for audit and dispute resolution purposes.

## 7. Your Rights Under DPDPA 2023

As a Data Principal under the Digital Personal Data Protection Act, 2023, you have the following rights:

a. Right to Information about data collection and processing b. Right to Access your personal data that we hold c. Right to Correction of inaccurate or incomplete data d. Right to Erasure of your personal data (with certain exceptions) e. Right to Withdraw Consent previously provided f. Right to Grievance Redressal through our designated officer

To exercise these rights, please contact our Data Protection Officer using the details provided in Section 12.

Please note that while we respect and uphold your rights, some data such as verified PAN or Aadhaar fields may not be editable for compliance reasons, and certain information may be retained as required by law even after account deletion.

## 8. Children's Privacy

The Staunch Trainer App is intended for users aged 18 and above. We do not knowingly collect data from individuals under the age of 18.

## 9. Use of Cookies and Tracking

While the Trainer App does not use cookies directly, Firebase and third-party SDKs may use tracking technologies for analytics and crash monitoring purposes. These are used solely to improve service performance and stability. Our backend generates authentication cookies for maintaining secure sessions after initial Firebase authentication.

## 10. Data Protection Measures

In compliance with DPDPA 2023, we implement the following measures:

- Regular security assessments and audits
- Staff training on data protection principles
- Documented data processing procedures
- Breach detection and notification protocols
- Restricted access to personal data based on need-to-know principles

## **11. Changes to This Policy**

We may update this Privacy Policy periodically to reflect changes in legal, regulatory, or operational requirements. We will notify you through the App or by email if significant changes are made. Continued use of the App after any updates constitutes your acceptance of the revised policy.

## **12. Data Protection Officer and Contact Information**

For questions, feedback, or to exercise your rights regarding your personal data, please contact our Data Protection Officer:

Data Protection Officer

Shamnad Abubacker

CEO, Staunch Health & Fitness Private Limited

Email: [shamnad@staunch.fit](mailto:shamnad@staunch.fit)

Address: SHA MANZIL, 16/9, CHERUKODU, VILAPPIL, VILAPPILSALA PO, TRIVANDRUM, Thiruvananthapuram, Kerala, India, 695573

Phone: +91 9886163131

Website: <https://www.staunch.fit/>

## **13. Breach Notification**

In the event of a data breach that may pose a risk to your rights and freedoms, we will notify you and the relevant authorities as required by law without undue delay.

## **14. International Data Transfers**

Your data is primarily stored and processed in India. However, some of our service providers may process data outside India. In such cases, we ensure that appropriate safeguards are in place to protect your personal data in accordance with DPDPA requirements.

## **15. Grievance Redressal**

If you have any concerns or complaints about how we handle your personal data, you may:

1. Contact our Data Protection Officer using the details in Section 12
2. Submit a formal grievance, which will be acknowledged within 7 days
3. Receive a decision on your grievance within 30 days

If you are not satisfied with our response, you may escalate your concern to the Data Protection Board of India once established.

## 16. Account Deletion Request

If you wish to permanently delete your Staunch Trainer account and associated personal data, you can submit a request using the form below. All verified requests will be reviewed and processed within **7 working days**.

 [Submit Account Deletion Request](#)

Please ensure the contact information you provide in the form matches your registered account details. Note that certain information may be retained for legal or regulatory purposes, as outlined in our Privacy Policy.

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This Privacy Policy is structured in accordance with Indian privacy norms, the Digital Personal Data Protection Act, 2023, and best practices, and is designed to meet the requirements of the Google Play Store and Apple App Store.