Sakhi Privacy Policy

Welcome to Sakhi.

This Policy applies to all visitors, data subjects, and others who access our Apps and Services ("User(s)" or "You/r")

Sakhi Health (**"Sakhi"**, **"We"**, **"Us"**, or **"Our"**) operates the website (www.sakhi.health), and Sakhi AI-companion on WhatApp (**"Sakhi App"** or **"App/s"** or **"Mobile Software/s"**).

You may use our Apps to access our services and offerings of AI chatbot (collectively the **"Service(s)" or "Sakhi Service").**

This page informs you of our policies regarding the collection, use, and disclosure of your personal information when you use our App and service. This Privacy Policy aims to fulfil our obligation towards your Right to be Informed. We use your data to provide and improve the service. We will not use or share your data with anyone except as described in this Privacy Policy.

By using our Apps and services, you agree to the use of information as per this privacy policy. Unless otherwise, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Where not specifically called out, use of uppercase / lowercase and bold / not bold would carry the same meaning in this document.

Updates

We may amend this privacy notice from time to time to keep it up to date. Please regularly check these pages on our website for the latest version of this policy and stay updated. By continuing to use Sakhi, you agree to our Terms and Conditions and Privacy Policy.

Do Note:

1. Sakhi is for users in INDIA ONLY

2. Sakhi is NOT to be used for emergency purposes. If in a crisis or emergency, please go to your nearest hospital.

3. The App and service is not to be used by individuals under 18 years of age. Sakhi does not take responsibility for any misrepresentation of age and use.

4. We do not require any personal identifiers or sensitive data hence we do not ask for it. Do not share your personal data, your medical data and any other sensitive data when you use the Sakhi App and Services.

5. Your interaction with the AI Companion is with an Artificial Intelligence system and not a human. Hence, AI Companion is restricted in the means of response.

6. The Service may contain links or other content related to third-party professionals/ providers, websites, advertisers, products and/or services, special offers, or other events or activities offered by third parties that are not owned or controlled by Sakhi. Sakhi has no control over any such professionals/ providers, links, content, web sites, products or services or any Information provided or transmitted via such links, web sites, products or services, or otherwise provided by any such third-party. Sakhi does not endorse or assume any responsibility for any such third-party professionals/ providers, sites, Information, materials, products, opinions or services and will not be responsible or liable for any content, advertising, products or other materials contained therein or the business practices or privacy practices related thereto. If You access a third-party professionals/ providers, website or application from the Service, You do so at Your own risk, and You understand that Sakhi's Terms and Conditions and Privacy Policy do not apply to Your use of such sites.

7. By asking for a Provider/ Professional, you provide your consent to Sakhi to share the details of the Provider/ Professional assigned to the referral code or referral link that you used to access Sakhi. Please note that Sakhi may not be able to provide alternative suggestions of Provider/ Professional.

8. Sakhi does NOT take responsibility for verifying the credentials/ authenticity of any Provider/ Professional suggested during the conversation with the AI-Companion. You consult/access such providers/ professionals at Your own risk and it is solely Your responsibility to verify the credentials/ authenticity of such Providers/ Professionals

9. By opting for a call back, you provide your consent to Sakhi to share your WhatsApp profile name and mobile number to the respective Provider/ Professional. The name and number shared will be the ones provided by You while signing up with WhatsApp.

10. Sakhi is not intended to provide a diagnosis, prognosis, treatment or cure of any condition or disease.

11. Sakhi will not offer medical or clinical advice and only suggest that you seek medical help. Sakhi is designed to offer general mental health advice/ suggestion and support and cannot offer condition specific advice for complex medical conditions such as complex long-term illness, cancer, infertility or genetic disorders among others.

Definitions

Sakhi AI Companion is the text-based AI chatbot service provided in a conversational messaging mode.

Anonymization is the process of removing personal identifiers from data sets so that the person can no longer be identified.

Cookie is a small amount of data stored on your device (computer or mobile device).

Data or **Information** under this Privacy Policy means both personal and non-personal data or information.

Data Protection Laws here means in accordance with the prevailing Data Protection laws in India

Data Subject (or User/You) means any living individual who is using our service and is the subject of Personal Data

Encryption is the process of transforming data into unreadable text so that it is only legible to those possessing an encryption key.

Personal data or **Personal Information** has meaning as defined in applicable data protection laws. It is data about a living person who can be identified from the data and/or other information either in our possession or likely to come into our possession.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data and as defined in applicable data protection laws.

Pseudonymisation means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific user without the use of additional information.

Non-Personal data or **Non-Personal Information** means any data that is made anonymous and does not reveal user specific identity.

What personal data do we process and how do we use it?

We only use your personal data for the purposes for which we collected it. We will use it for another reason, only if compatible with the original purpose. We may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. We may process your personal data without your knowledge and consent, where this is required or permitted by law.

Sakhi AI Companion service delivered over WhatsApp app is meant for only basic support. Sakhi should NOT be used for diagnosis, prognosis or treatment purposes. It is NOT intended to be a replacement for face-to-face psychotherapy or to provide a diagnosis, prognosis, treatment or cure for any disease/condition/disorder or disability or provide any type of state-regulated mental health services. Please take advice from certified medical professionals ONLY.

We may place ads online to test take-up of a specific Service or to market a specific Service using only authorized ad managers. No personal identifiers will be collected and stored by us when you interact with these ads. When we run ads to test service take-up, we may provide access to limited tools or techniques on a standalone web-view. Your engagement on the web-view will be collected and shared with google analytics to identify level of usage.

Sakhi processes the following data when you use the service(s).

Data Types	Source	Processing Purpose	Lawful Basis
Mobile phone number, WhatsApp profile name	Provided by the user during service initiation	To recognize you as a new or existing user on WhatsApp. To associate users to their provided data to provide uninterrupted services. Use WhatsApp profile name to personalize the communication with you. To process data for addressing your data rights. To respond to your inquiries, requests and feedback. To troubleshoot your issues. To provide and improve customer support services. To process to comply with applicable law or regulation.	a. To perform our contract with you (As an end-user, our contract is your agreement to Terms and Conditions and this Privacy Policy) b. Legitimate Interest to troubleshoot, ensure security and user experience.

Random user identifier	Created by Sakhi	To provide additional security by pseudonymization of personal identifiers. To associate users to their provided data to provide uninterrupted services. To administer your account. We are using de-identified data to provide minimal data for internal analytics. To process your data rights.	To perform our contract with you. (As an end-user, our contract is your agreement to Terms and Conditions and this Privacy Policy)
Conversation data (free text messages)	Voluntarily provided by the user.	To analyze for mood and emotional state. To detect context and ensure continuity in conversation. To suggest the right tool, technique and content. To set reminders and notifications. To improve AI algorithm, product and service quality and customer experience. Please note that all the Conversations are with assistant built on OpenAI's platform. Therefore, all the conversation data will be through OpenAI and will be subject to their Terms of Use, Privacy Policy and Safety features.	a. To perform our contract with you. (As an end-user, our contract is your agreement to Terms and Conditions and this Privacy Policy) b. Additional Conditions as prescribed by law
Engagement data (use of service features)	Captured during use of service	To group users as cohorts for cohort-level analysis. To analyze user engagement to help improve the services.	Legitimate Interests

Personal identifiers like Mobile number and Whatsapp profile name will be removed/ redacted from the Conversation data (free text messages) after the end of Your conversation with the AI-Companion. However, You should take all possible precautions NOT to share any personally identifiable information during Your conversation with the AI-Companion.

Only the summary of the conversations will be stored with identifiers. This is done to maintain context for the next conversation, in case You choose to start Your next conversation in continuity to the previous conversation. You may also choose to start a fresh conversation, wherein the summary of the previous conversation will not be used.

Your messages on WhatsApp are always end-to-end encrypted. As per WhatsApp [Privacy Policy (whatsapp.com)](), your messages are typically stored on your device(s) and not on WhatsApp global servers. WhatsApp will temporarily store your messages in encrypted form while they are being delivered. Once your messages are delivered, they are deleted from WhatsApp global servers after 24 hours. We do not share the random user identifier with Whatsapp.

We use AiSensy's secure services to establish communication between our AI Companion and WhatsApp business, in lines with AiSensy Direct API Privacy Policy. Your phone number and WhatsApp profile name are however retained in AiSensy as long as connectivity of service is required and for billing purposes. Please refer to the AiSensy Direct API Privacy Policy (Link: [https://bit.ly/3wktfa0]()) for further details.

Note: WhatsApp allows you to send attachments or voice messages. This is not required by us to provide our service. Please do NOT share such information with us.

You can change your WhatsApp profile name at any time from your WhatsApp account. Clearing the WhatsApp messages will only delete your conversations on WhatsApp and as per WhatsApp data retention policies. To delete your data from Sakhi servers please send us a request on [wecare.sakhi@gmail.com](). Once deleted the data cannot be restored.

Please read WhatsApp [Privacy Policy]() and [Terms and Conditions]() to understand what information WhatsApp collects and processes from you. You can block or delete our business service from your contact list at any time from your WhatsApp account. You can also mute notifications from your chat settings. You can always safeguard your information on WhatsApp using the privacy and [security features]() provided by WhatsApp. Learn more about WhatsApp's [end-to-end encryption]() and [Privacy and Security for business messages]().

How do we share your data with third parties?

To provide you with our services, we use third-party service providers to help store and process your data. We use the following third-party service providers.

3rd party Service Providers

We use the following third-party service providers to provide our services. List of our service providers include:

Service Providers	Purpose
Google Dialogflow	Dialogflow is a comprehensive platform for developing chatbots, voice bots. Read about Google dialogflow privacy compliance [here]().

Mongo Db	MongoDB Atlas is an integrated suite of data services centered around a cloud database that helps in our data requirements. Read about MongoDB security and privacy compliance [here]().
Ai Sensy	We use AiSensy's secure services to establish communication between our AI Companion and WhatsApp business, in lines with AiSensy Direct API Privacy Policy (https://bit.ly/3wktfa0). Read about Ai-Sensy AI privacy compliance [here]().
OpenAI	Read about OpenAI terms of use and privacy policy [here]().
Render	It is cloud platform where our application is deployed. Read about Render privacy compliance [here]().
3rd party background verification consultants	We may use consultants to perform background checks for shortlisted candidates. This includes reference checks and academic checks as part of hiring. We maintain confidentiality agreement with the consultants.
3rd party payment gateway providers	We use payment provider Cashfree and those provided by app stores to process payment when you purchase from us. Use of the Payment providers is governed by their terms of use and privacy policy. Sakhi does not collect and store your credit card related information. We may collect your name, mobile number, email Id to send you confirmations and for operational purposes. Read about Cashfree privacy compliance [here]().
Business Development and Marketing Tools	We use marketing tools for lead identification, lead generation and business operations, for communications in marketing campaigns and other marketing activities. To communicate with our existing or prospective business clients or users. We ensure appropriate consent and opt-outs are provided when we reach out to prospects.

Processing of any of your personal data as per our Legitimate Interests

We may be required to process your personal data in our legitimate interests. We will always weigh your rights and freedom before we process any such requests for purposes of legitimate interest. This processing includes:

- For enforcing our policies;

- For uses and disclosures required by law;

- For disclosures for judicial and administrative proceedings such as court order or subpoena;

- For disclosures for law enforcement purposes or national security requests;

- For disclosure and assistance with an investigation or prosecution of suspected or actual illegal activity;

- For disclosure and use of a litigation hold. To freeze specific data relating to imminent, pending or current legal action, thereby preventing potential evidence alteration or deletion.

- For uses and disclosures for public health reporting purposes;

- For uses and disclosures to prevent serious threat to health or safety;

- For uses and disclosures for research and analytics purposes to study how users use our products and services;

- For any service communications relating to your use of App and services;

- To prevent, detect and repair problems related to the security and the operations of the App;

- For uses and disclosures to prevent fraudulent use of or abuse of the service;

- For uses and disclosures to take adequate security and privacy safeguards;

- For uses and disclosures to ensure App and service availability, accessibility and quality;

- For uses and disclosures to protect your data protection rights;

- For uses and disclosures to protect your, our and others data protection rights, property and safety;

- To use anonymized, non-identifiable user data for benchmarking, research, publications and marketing;

- To develop new services, technologies and products;

- To respond to your enquiries and requests.

In the future, if we are involved in any merger, acquisition, sale of assets, business reorganization, bankruptcy, we may transfer or otherwise share some or all of our assets which may include your data. We will inform you about this through public notice on our website. You have to keep checking our website and stay updated.

However, in such an event of sale or transfer, we shall reasonably ensure that your data with us is stored and used by the transferee in a manner that is consistent with this Privacy Policy and applicable Data Protection Laws. Any such third-party to whom we transfer shall have the right to continue to use the data that you provide us immediately prior to such transfer or sale. On completion of the sale or transfer, the Privacy Policy of the third-party shall apply with respect to Your data.

How do we handle your payment data when you subscribe to our services?

We do not collect, retain and store your personal and card information. Your card processing is handled by third-party payment agencies. We do not collect any personal data from the play stores post-purchase or from any of our third-party payment gateway providers. We may capture the enterprise name for business and operational purposes. Please read their terms and privacy policy before making a payment. The payment confirmation and subscription details are received and processed by us. This is to support you for your subscription-based requests.

How do we handle your data when used for research and analytics purposes?

We use only the required data for research purposes including aggregated data for any publications, to explore new technologies or to build new features or products. This data is anonymized using irreversible redaction of user identifiers (Mobile number and WhatsApp profile name) prior to use. However, You should ensure NOT to share any personally identifiable information during your conversation with Sakhi AI-Companion.

This helps us to improve our product and services and contribute to user-centered mental well-being best practices. You can always write to us at wecare.sakhi@gmail.com to restrict processing and opt-out of your data for research purposes.

Your use of third-party weblinks

The App may carry links to third-party websites and resources. When you click on those links, you may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. We encourage you to read the privacy policy and Terms of use of every external link you visit.

How do we secure your data?

The security of your data is very important to us, and we work hard to secure it. We have implemented adequate technical and organizational safeguards to protect your data. Some of the steps we have taken to secure your data include:

Privacy by Design and Default

1. There is no user registration required. We don't need it hence we don't ask for it.

2. WhatsApp profile name is sufficient to help us personalize our conversation with you.

3. We use pseudonymized identifiers to protect your data and identity.

4. No human eavesdrops during your conversation with the AI companion.

5. The WhatsApp profile names and mobile numbers are irreversibly redacted/ removed from the Conversational data. However, You should ensure NOT to share any personally identifiable information during your conversation with Sakhi AI-Companion.

No method of electronic transmission or method of data storage is perfect or impenetrable. While we try our best to implement controls to protect your personal data, we cannot guarantee its absolute security. To ensure your data is secure, we require your cooperation as well. Please do not copy and share your conversations with unknown people.

How long do we retain your data including personal data?

We may retain one copy of your data even after your subscription ends, if it is reasonably necessary. This could be in any of the following situations:

- to comply with applicable legal and statutory requirements;

- to cater to a returning subscriber;

- to respond to your requests;

- in our backup for a time-bound period;

- to fulfil processing that is in our legitimate interest.

Where not specified we may retain your data for a maximum of 2 years since the last update and as per our internal information retention policies. Sakhi, may at it's own discretion, decide to permanently delete the data of dormant Users and deidentified Conversational data, from time to time.

You may also write to us on wecare.sakhi@gmail.com for permanently deleting your data. Please note that since all the Conversational data (free text messages) are redacted and de-identified, it will not be possible for Us to specifically find Your Conversational data and therefore the question of deleting them does not arise. In case of a written request from you, we will permanently delete your Whatsapp profile name, mobile number, subscription details and any such data that can be identified with You. Please note that this is an irreversible process and once deleted, we cannot retrieve any of the deleted data.

Your data protection rights

You have certain rights under the Data Protection Laws in relation to your Personal data. To exercise any of your rights, you will need to send an email request with requisite details to wecare.sakhi@gmail.com . Please note that we may need to verify you before responding to any requests. After verifying you and examining your request, we will respond to you on the action taken within one calendar month from verification. We may at times be unable to address your request, if we are unable to correctly identify you.

Your individual rights requests may be limited, where:

- denial of access is required or authorized by law;

- grant of access would have a negative impact on other's privacy;

- required to protect your, our or other's rights to property or safety;

- the request is unjustified or excessive.

You can also write to us for any clarification at wecare.sakhi@gmail.com

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Concerns and Complaints

If you have any concerns or grievances about this Privacy Policy you will need to send an email to wecare.sakhi@gmail.com with Attn. to the Data Protection Officer (DPO) and Grievance Officer. We will try to respond to you within 7 working days and help resolve your concerns or complaints. We assure you a time-bound resolution not exceeding one month from the date of your complaint.

Grievance Officer:

Deepak Mohan M

Chief Technology Officer, Sakhi Health

wecare.sakhi@gmail.com

How to contact for additional questions, comments or concerns?

For any product, services, subscription, technical or payment-related issues, please contact us from your email ID to wecare.sakhi@gmail.com with your questions.

Our mail address for all communication is:

Sakhi Health

#30, Meghamalanjali, 2nd Cross

P&T Layout, Vidyanagara

Kurubarahalli, Bengaluru-560060

Keeping your devices secure:

You are also responsible for helping to protect the security of your personal data. You are responsible for maintaining the security of any personal computing device on which you utilize the Services.

Changes to this Privacy Policy

We may modify our Privacy Policy from time to time for various reasons including to improve our privacy practices, to ensure our users right to be Informed, to reflect changes to our service, and to comply with relevant laws. If and when this policy is changed, we will post the updated policy on our Website. It is your responsibility to check our Website periodically for updates or changes to the policy.

We encourage you to review changes carefully. If you agree to the changes, then please continue to use our service. If you, however, do not agree to any of the changes and you no longer wish to use our service, you may choose to discontinue using our services. Continuing to use our services after the revised policy is published on our website constitutes your acceptance of changes and consent to the modified Privacy Policy.

Severability and Exclusion

We have taken every effort to ensure that this Privacy Policy adheres with the applicable Data Protection Laws. The invalidity or unenforceability of any part of this Privacy Policy shall not prejudice or affect the validity or enforceability of the remainder of this Privacy Policy. This Privacy Policy does not apply to any data other than the data collected by Sakhi while providing the services.