Privacy Policy — Univentis Sales Platform

Nov 13, 2026 ·

Draft for Univentis Medicare Limited to review and publish on univentismedicare.co.in. It covers the Head Office portal, the Stockist portal and the Univentis Field app. Text in [square brackets] is for Univentis to fill in or confirm.

Univentis Medicare Limited

CIN: U24232MH2015PLC402722 · Website: https://www.univentismedicare.co.in

Effective Date: [date of publishing] · Last Updated: [date of publishing] · Version: 1.0

Governing Law

This Policy is designed to comply with the Digital Personal Data Protection Act, 2023 (DPDPA) and the Digital Personal Data Protection Rules, 2025 (DPDP Rules), notified by the Ministry of Electronics and Information Technology (MeitY) on 13 November 2025, including all phases of their implementation up to full enforcement in May 2027. Obligations under the Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (SPDI Rules) continue to apply until formally replaced. It also meets the privacy requirements of the Google Play Store and the Apple App Store.

1. Introduction

Univentis Medicare Limited ("Univentis", "we", "us" or "our") is a pharmaceutical company. This Privacy Policy explains what personal data our sales platform collects, why we collect it, who can see it, how long we keep it, and the rights you have over it.

Univentis is the Data Fiduciary for this platform: we decide why and how your personal data is used. The platform is developed and run for us by Embolo Technologies Private Limited ("Embolo"), which acts as our Data Processor and handles personal data only on our instructions.

2. The Platform This Policy Covers

The platform is used only by Univentis staff and by the stockists and depots we work with. Members of the public cannot sign up.

System	Who uses it	What it is for
Univentis Field (Android app)	Sales Executives and their managers (FLM, SLM, ZSM)	Daily field work: visits, orders, shops, tour plans, expenses and the day's route
Head Office Portal (website)	Head office staff, depot staff and managers	Managing staff, shops, stockists, products, prices, orders, approvals, targets and reports

System	Who uses it	What it is for
Stockist Portal (website)	Stockists	Viewing the catalogue and schemes, and placing and tracking their orders

3. Definitions

- **Personal Data:** any data about an individual who can be identified from it, such as a name, mobile number or location.
- **Data Principal ("you"):** the person the personal data is about. This includes our staff, the people who use the portals for a stockist or depot, and the owners and staff of shops whose details our staff record.
- **Data Fiduciary:** Univentis Medicare Limited, which decides the purpose and means of processing.
- **Data Processor:** a company that processes personal data on our behalf, such as Embolo.
- **Processing:** anything done with personal data, including collecting, storing, using, sharing and deleting it.
- **Personal Data Breach:** any unauthorised access to, or loss, change or disclosure of, personal data.

4. Legal Basis and Consent

4.1 Basis for Processing

We process personal data only on one of these lawful bases under the DPDPA:

- **Employment (legitimate use, Section 7(i)):** for our staff, we process personal data for the purposes of employment. This covers assigning territories, recording field visits and the day's route, approving expenses and allowances, setting targets and paying incentives, and protecting the company from loss or misuse.
- **Voluntarily provided data (legitimate use, Section 7(a)):** stockists, depots and shops give us their business contact details so that we can supply them and take their orders. We use those details only for that purpose.
- **Consent:** where neither of the above applies, we ask for your free, specific, informed and clear consent before processing, through an affirmative action such as tapping "Allow".
- **Legal obligations:** where a law requires us to keep or share data, for example GST and accounting records.

4.2 Notice Before We Collect

Before data is collected, the platform tells you what is collected and why. For example, before the Univentis Field app records your location in the background, it shows a screen explaining that your location is recorded during your working day, even when the app is closed or not in use, and why. Only then does it send you to your phone's settings to allow it. The same notice is in this Policy, which is linked from the sign-in screen of the app and the portals. It is always available at [address of this published Policy].

4.3 Withdrawing Consent or Turning Off Access

Where processing is based on consent, you may withdraw it at any time, as easily as you gave it, by writing to the Grievance Officer (Section 14). You can also turn off the app's camera or location access in your phone's settings at any time. Because field visits and the day's route are part of a Sales Executive's work, the app will ask for these again and cannot record your visits without them. Withdrawing does not affect processing that already happened.

4.4 Records

We keep records of sign-ins, device approvals and changes made in the platform, so that we can show how and when data was collected and used.

5. Personal Data We Collect

5.1 Staff Accounts

Head office creates every account; nobody can sign up in the app or the portals. A staff account holds your name, employee code, mobile number, email (if given), role and grade, headquarter, division, reporting manager and, for depot staff, the depot. We keep the dated history of these (when you joined, and each promotion, transfer and change of manager), and the pages head office has opened or closed for you. Targets set for you, and incentives earned, paid or adjusted with their notes, are kept with your account. Accounts for people who use the Stockist Portal hold their name, mobile number, email and the stockist they act for.

5.2 Sign-in and Devices

- **One-time codes:** you sign in with a 6-digit code sent to your email or, for a mobile number, on WhatsApp. There are no passwords. Codes stop working after 5 minutes and are stored only in a one-way scrambled (hashed) form.
- **Sign-in records:** what was typed to sign in, whether it worked, and when.
- **Devices:** an ID the app or browser creates for the device, its name and platform, the app or browser details, the internet (IP) address it used first and last, and when it signed in and out. A staff account works on one phone at a time, and a new phone needs head office's approval.
- **Change records:** when anyone adds or changes data in the platform, we record who did it, when, from which internet (IP) address, and what the data was before and after.
- **Technical logs:** our servers record the IP address and time of each request, and what was asked for, to keep the service running and safe.

5.3 Location (Univentis Field App)

- The app records your location only after you start your working day. It then records it regularly, including in the background, even when the app is closed or not in use, until you mark exit for the day, and in any case at midnight.
- We never record your location outside your working day, and we record only what the purposes in this section need.
- While it records, a notification stays on your phone.
- Each point holds the latitude, longitude, accuracy and time.

- We use it to show which shop you visited, to note when an order is booked away from the shop, to record your route, to work out distance-based allowances, and to show head office and your managers your latest location on the live map during working hours.
- When you add a new shop, the app also saves the shop's location.

5.4 Work Records

Orders you book, with any later changes or cancellations and their reasons; the shops you add; reports you raise about a shop (for example, that it has closed or is listed twice); your visits and tour plans, including colleagues you plan to work with; when you start and end your day; changes to your plan; expenses you claim (amount, category, note and bill photo); and requests such as beat distance changes, with who approved them, when, and any note they added. For stockists: the orders they place in the Stockist Portal, with their approval, dispatch and invoice details.

5.5 App Features and Device Access

Univentis Field — Android App

- **Camera:** to photograph the front of each new shop you add, and the bills for expenses you claim. Photos are taken in the app; it does not read other photos on your phone. Photos are seen by your managers and head office, and never shared with shops or stockists.
- **Location, including in the background:** as described in Section 5.3.
- **Notifications:** to show that your location is being recorded.
- **Storage on the phone:** the app keeps a copy of the data you need to work without signal (your shops, products, prices and work not yet sent). Your sign-in is kept in the phone's secure storage. Work not yet sent stays on the phone after you sign out, so it can be sent when you sign in again.
- **Not used:** the app does not read your contacts, messages, call logs, microphone or files, it has no advertising, and it contains no advertising or analytics tracking tools.

Head Office Portal and Stockist Portal — Websites

- **Sign-in cookie:** keeps you signed in. See Section 15.
- **Map tiles:** the Head Office Portal's live map loads map images from OpenStreetMap, which receives your browser's IP address. Staff locations are not sent to it.
- **Fonts:** the portals load fonts from Google Fonts, which receives your browser's IP address.

5.6 Stockists, Depots, Shops and Doctors

For stockists, depots, shops (chemists) and dispensing doctors we keep business details: name, code, address, city, district and state, GSTIN, drug licence and FSSAI numbers, phone number, email, map location and a photo of the shopfront. Where a business is run by an individual, these details are personal data and this Policy applies to them. Staff are asked to photograph only the shopfront, not people. When head office approves, rejects or merges a shop record, the decision and any note are kept with it.

5.7 Communications

We send sign-in codes by email or on WhatsApp, and invitations to new users by email. We do not read your WhatsApp messages or contacts.

6. How We Use Your Personal Data

We use personal data only for these purposes, and not for anything incompatible with them:

- **Running the platform:** signing you in, approving devices, and showing each person only the pages and data their role allows.
- **Field work:** visits, beats, shops, orders, stockist and depot routing, schemes and tour plans.
- **Attendance and allowances:** the start and end of the working day, the day's route and distance, expenses and their approval. Allowances are calculated automatically from your route and are approved by your managers. We keep this data complete and accurate, because it decides your allowances and incentives.
- **Performance:** targets, incentives and sales reports.
- **Supply:** stockist orders and depot fulfilment.
- **Security:** recording who changed what, enforcing one phone per staff account, and preventing misuse.
- **Legal compliance:** keeping GST and accounting records and answering lawful requests from authorities.

We do not sell personal data, and we do not use it for advertising.

At a glance, each kind of personal data and why we use it:

Personal data	Why we use it
Name, employee code, mobile number, email, role, headquarter, division, manager	To create your account, sign you in, and show you your territory and pages
One-time codes, sign-in and device records	To sign you in securely and keep one approved phone per staff account
Location during the working day, including in the background	To confirm shop visits, record the day's route and work out distance-based allowances
Photos of shopfronts and expense bills	To show a new shop exists and to support expense claims
Orders, visits, tour plans, expenses, targets and incentives	To run field sales, approve expenses and pay incentives
Business details of stockists, depots, shops and doctors	To supply them, take their orders, and check their licences and GST

7. Children

The platform is meant only for adults: our staff and the businesses we work with. It is not intended for anyone under 18. If we learn that we hold personal data of a child, we will delete it unless the law requires us to keep it.

8. Who We Share Personal Data With

8.1 Within Univentis

Your managers up the reporting line see your work data, such as visits, route, orders and expenses. Head office sees the data needed to run sales across the company. Depot staff see the orders for their depot. Stockists see the orders and details that concern their own business.

8.2 Data Processors

These companies process personal data for us, only on our instructions, and are bound by written terms to keep it secure and use it for nothing else:

- **Embolo Technologies Private Limited:** develops, runs and supports the platform.
- **Cloud hosting provider:** hosts the servers, the database and the photos, in India.
- **Email service:** delivers sign-in codes and invitations by email.
- **WhatsApp messaging provider, and WhatsApp itself:** deliver sign-in codes on WhatsApp.

8.3 Map and Font Services

OpenStreetMap (map images for the live map) and Google Fonts (text fonts for the portals) receive only your browser's IP address when a page loads them.

8.4 Legal Authorities

We share personal data with courts, regulators or government bodies when the law requires it, and only as much as is required.

8.5 Business Transfers

If Univentis is merged, acquired or restructured, personal data may pass to the new owner, who must protect it as this Policy does.

9. Where Your Data Is Stored

The platform's servers, database and photos are located in India. WhatsApp sign-in codes pass through WhatsApp's systems, and map images and fonts come from services that may be outside India; these receive only the minimum needed (a mobile number and code, or an IP address). Any transfer outside India is made only as permitted under Section 16 of the DPDPA, and never to a country the Government of India has restricted.

10. How Long We Keep Personal Data

10.1 Principles

We keep personal data only as long as its purpose needs it, or longer where a law requires. After that we delete it or make it anonymous. As the DPDP Rules require, records of processing are kept for at least one year.

10.2 Retention Schedule

Data	How long we keep it	Why
Staff account and profile: name, employee code, contact details, role, headquarter, manager	While you work for Univentis, and 3 years after your last working day	To settle dues, allowances and any dispute after you leave; 3 years is the usual time limit for most legal claims in India
Sign-in, device and other change records, and technical server logs	1 year from the date of each record	The DPDP Rules require these logs to be kept for at least one year
One-time sign-in codes	5 minutes, in hashed form only	A code is needed only until it is used or expires
Location points of the day's route	1 year from the day recorded; after that only the day's total distance is kept, with the expense record	To check visits and allowance claims during the year; detailed tracking is not needed for longer
Visits, tour plans, and day start and end times	3 years from the date	For performance reviews and questions about past work
Shop locations and shopfront photos	While the shop is our customer, and 1 year after it stops	Needed only while we serve the shop
Business details of stockists, depots, shops and doctors	While we do business with them; after that, only as part of the order and accounting records below	Needed to supply them; the law requires the transaction records
Orders, expenses, bill photos, allowances, targets and incentives, with their approvals and change history	8 years from the end of the financial year they belong to	The Companies Act requires account books and vouchers for 8 years, and GST law for about 6 years
Privacy requests and complaints	3 years after the request or complaint is closed	To show how each request was handled, for example to the Data Protection Board

Data	How long we keep it	Why
Work stored on a phone by the app	Until it is sent to the server; everything is removed when the app is uninstalled	The phone keeps only what is needed to work without signal

10.3 Erasure

When a period ends, the data is deleted, or anonymised so that it can no longer identify anyone (for example, to keep yearly sales totals). If a law, a court order or an ongoing investigation needs some data for longer, we keep only that data until the need ends, and then delete it. Where the DPDP Rules require us to tell you before we erase your data, we will.

11. Your Rights

Under the DPDPA you have these rights. To use any of them, write to the Grievance Officer (Section 14). We first confirm who you are. We acknowledge your request within 48 hours and answer within 30 days. There is no fee.

11.1 Access

You can ask for a summary of the personal data we hold about you, what we do with it, and the companies we share it with.

11.2 Correction and Updating

You can ask us to correct wrong data, complete missing data and update old data. Staff can also ask head office directly.

11.3 Erasure

You can ask us to erase personal data we no longer need, or that you gave on the basis of consent you have withdrawn. We cannot erase records a law requires us to keep, such as accounting and GST records, until that period ends. Accounts are created by head office, so the apps have no sign-up and no delete button of their own; to have your account and its data deleted, write to the Grievance Officer.

11.4 Withdrawing Consent

Where we rely on your consent, you can withdraw it at any time (Section 4.3).

11.5 Grievance Redressal

You can complain to our Grievance Officer about how we handle your data. If you are not satisfied with the answer, you can complain to the Data Protection Board of India. The Board works as a digital office: complaints are filed online, through the link given on the website of the Ministry of Electronics and Information Technology (meity.gov.in).

11.6 Nomination

You can nominate a person to use these rights for you if you die or become unable to act. Write to the Grievance Officer to register a nominee.

12. Security of Personal Data

We protect personal data with reasonable security safeguards, as the DPDP Rules require:

- All traffic between the apps, the portals and the servers is encrypted (HTTPS).
- The database and photo storage cannot be reached from the internet, only through the platform.
- Sign-in codes and sign-in tokens are stored only in hashed form; there are no passwords to steal.
- Each person sees only the pages and data their role allows, and head office decides those rights.
- A staff account works on one phone at a time, and a new phone needs head office's approval.
- Sign-ins and changes are logged, and the logs are kept for at least one year.
- Our Data Processors must keep the same standard of security.

No system is completely secure, but we work to prevent, detect and contain any misuse.

13. Personal Data Breaches

If a personal data breach happens, we will, as the DPDP Rules require:

- Tell the people affected without delay: what happened, when, the likely impact, what we are doing about it, what they can do to protect themselves, and whom to contact.
- Inform the Data Protection Board of India without delay, and send it a detailed report within 72 hours.
- Report to CERT-In where the law requires it.

14. Grievance Officer

Univentis has appointed a Grievance Officer to answer questions and complaints about personal data and to handle requests under Section 11.

Grievance Officer: [Name], [Designation], Univentis Medicare Limited

Email: [privacy email address] (Subject: “DPDPA Privacy Request”) · **Phone:** [phone number]

Address: [registered office address]

Response time: acknowledgement within 48 hours, answer within 30 days. If you are not satisfied, you can complain to the Data Protection Board of India.

Univentis has not been designated a Significant Data Fiduciary. If it is, it will appoint a Data Protection Officer based in India and meet the extra obligations that apply.

15. Cookies and Local Storage

- **Portals:** the Head Office Portal and the Stockist Portal use only essential storage: a sign-in cookie that keeps you signed in, and the browser's local storage to remember the device, screen

settings and, in the Stockist Portal, an order not yet placed. They use no advertising or tracking cookies.
- **App:** the Univentis Field app stores data on the phone as described in Section 5.5.

16. Third-Party Links

The app can open Google Maps to give you directions to a shop. When you tap it, the shop's location is passed to Google Maps, and Google's privacy policy applies to what happens there. The same applies to any other outside website the platform links to.

17. Changes to This Policy

When we change this Policy, we update the Last Updated date and the version number at the top. For important changes, we will also tell you in the app, in the portals or by email. Earlier versions are available on request.

18. DPDPA Phased Implementation — Our Commitments

- **Phase 1, from November 2025:** the Data Protection Board of India is set up. We recognise its authority.
- **Phase 2, November 2026:** registration of Consent Managers opens. We will consider using a registered Consent Manager.
- **Phase 3, May 2027, full enforcement:** all obligations apply: notices, consent, rights, security safeguards, breach reporting, children's data and transfers abroad. We commit to full compliance by then.

19. Miscellaneous

19.1 Governing Law and Jurisdiction

This Policy is governed by the laws of India, including the DPDPA and the IT Act. Data protection complaints go to the Data Protection Board of India and, on appeal, to the Telecom Disputes Settlement and Appellate Tribunal (TDSAT). Other disputes are subject to the courts at [city].

19.2 Severability

If any part of this Policy is found invalid, the rest remains in force.

19.3 Language

This Policy is written in English. You can ask for it in any language listed in the Eighth Schedule to the Constitution of India. If versions differ, the English version applies.

Contact Details

Univentis Medicare Limited

[Registered office address]

Phone: +91 172 419 4500 · Email: info@univentismedicare.co.in · Contact page: https://www.univentismedicare.co.in/contact.php

Drafting Notes — Remove Before Publishing

For Univentis to fill in or confirm:

- Grievance Officer: name, designation, email and phone (Section 14)
- Registered office address, and the city for courts (Section 19.1)
- Retention periods in Section 10.2 (proposed by Embolo): confirm them with HR and accounts
- Effective date
- Review by Univentis's legal advisor
- Publish as a normal web page at univentismedicare.co.in/privacy-policy (not a PDF), and link the footer's “Privacy Policy” to it
- Fill in the address of this published Policy (Section 4.2), and check the Data Protection Board's complaint link just before publishing (Section 11.5)

For Embolo to do before the Policy goes live:

- Set the platform to delete or anonymise data on the confirmed retention periods (today nothing is deleted automatically)
- Add the Privacy Policy link to the sign-in pages of both portals, and point the app's link to the published page
- Schedule daily backups of the database and photos