

Privacy Policy

Version 1.0 · Effective 5 October 2026

This Privacy Policy explains how **Mole Edtech Private Limited** ("**Mole**", "**we**", "**us**", "**our**"), with its registered office at **Unit No. 11, Bldg P5, Sector-5 MLCP Retail Shop, Khoni, Kalyan, Thane 421204, Maharashtra, India**, collects, uses, shares and protects your personal data when you use the Mole mobile application, the website at **app.moleedtech.com**, and related services (together, the "**Platform**").

Mole is an online marketplace that connects students ("**Students**") with independent tutors ("**Educators**") for live, one-to-one video learning sessions ("**Sessions**").

This policy is published in accordance with the Digital Personal Data Protection Act, 2023 ("**DPDP Act**"), the Information Technology Act, 2000 and the rules made under it, including the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.

By creating an account or using the Platform, you agree to the collection and use of your personal data as described in this policy. If you do not agree, please do not use the Platform.

1. Who this policy applies to

- **Students**, including Students under 18 years of age (see [Section 9](#)), and their parents or lawful guardians.
- **Educators** who offer Sessions on the Platform.
- Anyone who visits our website or contacts us.

2. Personal data we collect

2.1 Data you give us

Category	Examples	Who
Account & identity	Mobile number, name, email address (optional), preferred languages	All users

Category	Examples	Who
Learning profile	Grade / class, exam boards, subjects of interest, referral code used	Students
Professional profile	City, qualifications, teaching level, subjects and topics, bio, LinkedIn URL, demo video clips, rates and availability	Educators
Verification documents	Government-issued ID, selfie photograph, education proof (degree / certificate)	Educators
Payout details	Bank account holder name, account number, IFSC code, account type	Educators
Payments	Booking amounts, transaction references. Card, UPI and net-banking credentials are entered directly with our payment processor (Razorpay); we never see or store them.	Students
Session content	Audio and video of Sessions, in-session chat messages, screen shares, quiz questions and answers	Students & Educators
Feedback & support	Ratings, reviews, dispute descriptions, reports, messages to our support team	All users

2.2 Data we collect automatically

- **Location:** approximate or precise device location (with your permission), used to show nearby Educators and region-appropriate pricing. You can turn this off in your device settings at any time.
- **Device & technical data:** device model, operating system, app version, push-notification token, IP address, and log data needed to operate and secure the Platform.
- **Usage data:** bookings, Sessions attended, wallet and coin activity, and notifications sent to you.

We do **not** use third-party advertising or advertising trackers, and we do not sell your personal data.

2.3 Data from others

- **Referrals:** if someone refers you, we record the referral code.
- **Payment processor:** payment status and transaction identifiers from Razorpay.
- **Messaging providers:** delivery status of OTP, SMS, WhatsApp and voice notifications.

3. How we use your personal data

We process personal data only for the following purposes:

1. **Account & login:** to create your account and verify your mobile number using a one-time password (OTP).
2. **Providing the marketplace:** to show Educator profiles, match Students with suitable Educators by subject, language and location, and to manage bookings, reminders, Session extensions and Educator reassignment if an Educator does not join.
3. **Running live Sessions:** to connect Students and Educators by real-time video, chat and screen sharing, and to confirm the end of a Session.
4. **Recordings:** to record Sessions so that Students can review them and so that disputes can be investigated (see [Section 6](#)).
5. **Payments, wallet and payouts:** to process payments, maintain wallet balances, promotional credits and Mole Coins, issue refunds and credits, and calculate and pay Educator earnings.
6. **Educator verification:** to verify the identity and qualifications of Educators before they can teach, as a safety measure for Students.
7. **Quizzes & rewards:** to run post-Session quizzes and credit rewards.
8. **Communication:** to send booking updates, OTPs, reminders and service notices by push notification, in-app notification, SMS, WhatsApp or phone call.
9. **Safety, trust & disputes:** to investigate reports, disputes and misuse, and to enforce our [Terms & Conditions](#).
10. **Improving the Platform:** to fix bugs, maintain security and understand how features are used.
11. **Legal compliance:** to comply with applicable law, tax and accounting obligations, and lawful requests from authorities.

Legal basis. We process your data on the basis of your **consent** (given when you sign up and accept this policy), and for **legitimate uses** permitted under the DPDP Act, such as complying with law or responding to a medical emergency. You may withdraw consent at any time (see [Section 8](#)). Withdrawing consent may mean we can no longer provide some or all of the Platform to you.

4. Who we share your data with

We share personal data only as needed to run the Platform:

- **Between Students and Educators:** when you book or accept a Session, the other party sees your name and the information needed for the Session (for example, a Student's grade and topic). Educator public profiles (name, photo, bio, qualifications, ratings, rates) are visible to

Students. **We do not share your phone number, verification documents or bank details with other users.**

- **Service providers (data processors)** who act on our instructions under contract:

Provider	Purpose
Razorpay	Payment processing
LiveKit	Real-time video, audio and Session recording
Twilio / Meta (WhatsApp)	OTP, SMS, WhatsApp messages and voice calls
Google Firebase	Push notifications
Amazon Web Services	Cloud hosting, database and file storage
Sentry	Error and crash monitoring (technical diagnostics only)

- **Legal and safety:** with courts, law-enforcement or government authorities where required by law, or to protect the rights, safety or property of our users, the public or Mole.
- **Business transfers:** if Mole is involved in a merger, acquisition or sale of assets, personal data may be transferred under the same protections described here.

Some of our service providers may store or process data outside India. Where they do, we take steps to make sure your data receives a comparable level of protection, and we comply with any restrictions notified by the Government of India under the DPDP Act.

5. How we protect your data

We use reasonable security practices, including encryption of data in transit (HTTPS/TLS), access controls, signed authentication tokens, and limiting staff access to verification and payout data to authorised personnel only. Payment card data is handled only by our PCI-DSS-compliant payment processor.

No system is completely secure. If a personal data breach occurs, we will notify affected users and the Data Protection Board of India as required by law.

6. How long we keep your data

We keep personal data only for as long as it is needed for the purposes described in this policy, including providing the Platform, resolving disputes and preventing misuse, or for longer where the law requires it (for example, payment and tax records). Session recordings are kept

for a limited period and then deleted automatically. When data is no longer needed, we delete or anonymise it.

7. Promotional credits and coins

Wallet credits (for example welcome or referral credits) and Mole Coins may expire. Expiry and usage limits are shown in the app and described in our [Terms & Conditions](#).

8. Your rights

Subject to applicable law, you have the right to:

- **Access:** get a summary of the personal data we hold about you and how we process it.
- **Correction & updating:** correct inaccurate or incomplete data. Most profile data can be edited in the app.
- **Erase:** ask us to delete your personal data. Data we must keep by law, such as payment records, is retained only for that purpose.
- **Withdraw consent:** at any time, as easily as you gave it.
- **Grievance redressal:** raise a complaint with our Grievance Officer (see [Section 12](#)).
- **Nominate:** nominate another person to exercise your rights in the event of your death or incapacity.

Deleting your account. You can request deletion of your account and associated data in the app under **Profile → Delete account**, or by writing to moleedtech@gmail.com from your registered details. We will verify your identity and delete your data within 30 days, except where we must retain it by law. Step-by-step instructions are on our [Delete account](#) page.

If you are not satisfied with our response, you may complain to the **Data Protection Board of India**.

9. Children and Students under 18

Many of our Students are school students under 18 years of age ("**children**" under the DPDP Act).

- A child may use the Platform only with the **verifiable consent of a parent or lawful guardian**. By allowing a child to register, the parent or guardian consents to the processing described in this policy and accepts our Terms & Conditions on the child's behalf.
- A parent or guardian gives consent when registering the child, or by allowing the child to register and use the Platform. We may ask for additional verification of the parent's or

guardian's consent.

- We do **not** track children's behaviour for advertising, and we do not show targeted advertising to children.
- We process children's data only for providing tutoring Sessions and related services, and with additional care.
- Parents and guardians may contact us to review, correct or delete their child's data, or to withdraw consent.

If we learn that we have collected a child's data without valid parental consent, we will delete it.

10. Permissions used by the mobile app

Permission	Why
Camera & microphone	Live video Sessions; taking a selfie or photo of documents for Educator verification
Photos / files	Uploading verification and education documents, profile photos
Location (while in use)	Showing nearby Educators and regional pricing
Notifications	Booking updates and reminders
Calendar (iOS)	Adding Session reminders to your calendar
Foreground service / screen capture	Keeping a live Session running and sharing your screen during a Session

You can change permissions at any time in your device settings. Some features will not work without them.

11. Changes to this policy

We may update this policy from time to time. The version number and effective date at the top show the latest version. If we make material changes, we will notify you in the app and may ask you to accept the updated policy before continuing to use the Platform.

12. Grievance Officer and contact

In accordance with the Information Technology Act, 2000, the rules made under it, and the DPDP Act, you can reach our Grievance Officer at:

- **Email:** moleedtech@gmail.com
- **Address:** Grievance Officer, Mole Edtech Private Limited, Unit No. 11, Bldg P5, Sector-5
MLCP Retail Shop, Khoni, Kalyan, Thane 421204, Maharashtra, India

We will acknowledge your complaint within **24 hours** and resolve it within **15 days** of receipt.

For any other privacy questions, write to moleedtech@gmail.com.