Privacy Policy

HashtagHotshot — how we handle personal data

Effective	4 October 2026	**Contact**	support@hashtaghotshot.com
Version	1.0	**Service**	login.hashtaghotshot.com

Registered entity, registered office and CIN / GSTIN: to be completed. Grievance Officer: to be completed — see Section 18.

THIS POLICY IS FOR EVERYONE, NOT ONLY OUR CUSTOMERS.

HashtagHotshot is used by businesses to create and publish social media content. Doing that means we handle information about people who never signed up with us - a business's customers, its staff, people in its photographs, and people named on the websites and documents it gives us. Section 15 is written for you. It tells you what we are likely to hold and how to have it removed.

1. About This Policy

1.1 This policy explains what personal data HashtagHotshot collects, why we collect it, who we share it with, how long we keep it, how we protect it, and what you can ask us to do about it.

1.2 It is a notice, not a contract. You are not asked to agree to it. It is given under Section 5 of the Digital Personal Data Protection Act, 2023, and it applies whether or not you have an account with us.

1.3 Our Terms and Conditions are a separate document and govern the agreement between us and a business that registers for the Service. They are at https://login.hashtaghotshot.com/terms.pdf. Where the two documents describe the same thing, this policy is the fuller statement of how we handle data, and the Terms govern the contractual obligations between us and a customer.

1.4 Words in capitals that are not defined here carry the meaning given to them in the Terms and Conditions.

1.5 We will update this policy as the Service changes. Section 17 says how we tell you.

2. In Short

A summary, for orientation only. The sections that follow are what actually applies.

What we do with it	We use a business's catalogue, website and business details to generate social media content for it, and - only once that business approves a specific post - we publish that post to the social accounts it has connected.
Who sees it	Our cloud host, the AI providers that generate the content, and a small number of named service providers. Nobody else. Section 9 lists them.
Where it goes	Stored in India. Generation is not local: prompts and images are sent to AI providers abroad, including in the United States and the European Union. Section 10.
What we never do	We do not sell personal data. We do not share it for anyone else's advertising. We do not use it to train our own or our providers' general AI models.
Your choices	You can ask us for a copy of your data, to correct it, or to delete it. Section 13 says how, and Section 18 says how to complain if we get it wrong.
If you never signed up with us	Section 15 is for you.

3. Whose Information This Covers

3.1 Four groups of people, and what applies to each differs:

(a) PEOPLE WHO RUN A BUSINESS ON HASHTAGHOTSHOT - the person who registers, and anyone they authorise to use the account. We decide how and why their data is used, so we answer to them directly.

(b) PEOPLE WHO VISIT OUR WEBSITE OR CONTACT US - including anyone who emails support, without ever creating an account.

(c) PEOPLE WHOSE DATA A CUSTOMER GIVES US - a business's own customers, staff, suppliers and reviewers, people pictured in its catalogue or event photographs, and people named in the documents and website pages it asks us to read. The business decides what to give us; we act on its instructions. Section 4 explains what that means for you, and Section 15 explains what to do about it.

(d) PEOPLE WHOSE DATA REACHES US WITHOUT ANYONE DECIDING TO SEND IT - principally where we read a business's website at its request and that page happens to name other people. This is not hypothetical and we do not treat it as an edge case; see Section 15.3.

3.2 This policy does not cover what a business does with content after we generate it, what a social media platform does with a published post, or any website we link to. Those are governed by that business's or that platform's own policies.

4. Who Is Responsible for Your Data

4.1 Two different relationships exist, and which one applies decides who you should approach.

4.2 WHERE WE DECIDE (we are the Data Fiduciary). For the data of our own account holders, our website visitors, and anyone who contacts us - group

(a) and (b) in Section 3.1 - we decide how and why the data is used. Ask us directly, at support@hashtaghotshot.com.

4.3 WHERE THE BUSINESS DECIDES (we are the Data Processor). For data a business uploads, connects or asks us to read - group (c) - that business is the Data Fiduciary. It chose to collect your data, it chose to give it to us, and it is responsible for having a lawful basis to do so. We use it only to provide the Service to that business.

4.4 WHAT THAT MEANS IF YOU ARE IN GROUP (c). Approach the business you dealt with first - it holds the relationship and the record of why it has your data. But you do not have to start there and we will not turn you away: tell us at support@hashtaghotshot.com and we will identify what we hold, tell the business, and help remove it. Section 15 sets out what we will do ourselves and what only the business can do.

4.5 We are not able to tell you *why* a business holds your data, or on what basis. We do not know. Only that business can answer that.

5. What We Collect

5.1 **BUSINESS AND ACCOUNT INFORMATION.** Business name, trading and registered address, sector, opening hours, logo and brand assets, the contact name, email address and phone number of the person registering, and the equivalent for anyone they authorise.

5.2 **CATALOGUE AND CONTENT YOU GIVE US.** Product images and photographs, product names, descriptions, prices and variants, uploaded documents, pasted text, your website address, and the prompts, instructions, tone and brand preferences you enter. Any of these may contain personal data if you put it there.

5.3 **INFORMATION WE RETRIEVE ON YOUR INSTRUCTION.** The public contents of a website address you give us; your Google Business Profile, including its reviews and questions; your connected store's products, images, descriptions and prices; and what the social platforms you connect expose about the pages and profiles you link, including basic analytics on your posts.

5.4 **WHAT THE SERVICE GENERATES.** Drafts and generated content, mathematical representations (embeddings) of your catalogue and documents, content plans, quality and safety scores, job records and error logs.

5.5 **HOW YOU USE THE SERVICE.** Sign-in and authentication records, IP address, device, browser and operating system, timestamps, which pages and features you used, request and response metadata, performance and diagnostic telemetry, and crash reports.

5.6 **BILLING.** Your plan and tier, credit balance and consumption, invoices, transaction identifiers, and the non-sensitive descriptors of a payment method - for example the last four digits and card network.

WE NEVER SEE OR STORE YOUR FULL CARD NUMBER, CVV, UPI PIN OR NET BANKING CREDENTIALS. Our payment gateway collects those from you directly, under its own terms and its PCI-DSS obligations.

5.7 **WHEN YOU CONTACT US.** Your name, email address, the content of your message, and anything you attach to it.

5.8 **WHAT WE DO NOT WANT.** We do not ask for, and the Service is not designed to hold, government identifiers, financial account details, health or medical records, biometric data, or data about caste, religion or sexual orientation. Do not upload them. If you have, tell us and we will remove them.

6. Where It Comes From

6.1 Directly from you, when you register, upload, type, connect an account or write to us.

6.2 From your own connected accounts, when you authorise us: your store, your Google Business Profile, and the social accounts you link.

6.3 From public web pages, when you give us a website address and ask us to use it. We read what is publicly visible at that address.

6.4 Automatically, as you use the Service - the usage and device data in Section 5.5.

6.5 From our payment gateway, which tells us that a payment succeeded and gives us a transaction reference, but not your payment credentials.

7. Why We Use It, and on What Basis

7.1 We use personal data for these purposes and no others:

To run the Service	Create and authenticate your account, hold your catalogue, generate the content you ask for, show you drafts, and publish what you approve to the accounts you connected.
To bill you	Meter credits, take payment, issue invoices, handle refunds, and meet our tax and accounting obligations.
To support you	Answer your questions, investigate faults, and tell you about things that need your attention - a draft awaiting approval, a failed post, a credit balance running out.
To keep it secure	Detect and prevent unauthorised access, abuse and fraud, maintain audit trails, and investigate incidents.
To improve it	Understand which features are used and where the Service is slow or failing. This uses aggregated and de-identified information wherever it can.
To obey the law	Respond to lawful requests, meet our statutory reporting duties, and establish or defend a legal claim.

7.2 **OUR BASIS FOR USING IT.** Where we are the Data Fiduciary, we rely on your consent, given when you register or when you choose to use a feature; on the necessity of processing to provide a service you have asked for; and, for security, billing records and statutory reporting, on our legal obligations. Where the GDPR applies, the corresponding bases are consent, performance of a contract, legal obligation, and our legitimate interest in securing and improving the Service.

7.3 **YOU CAN WITHDRAW CONSENT.** Where we rely on your consent you may withdraw it at any time (Section 13). Withdrawing it does not undo what we did lawfully before, and for some processing it will mean we can no longer provide the Service to you.

7.4 **WE DO NOT PROFILE OR ADVERTISE TO YOU.** We do not build advertising profiles, we do not sell or rent personal data, we do not share it for anyone else's marketing, and we do not make decisions about you by purely automated means that produce legal or similarly significant effects.

8. How AI Processing Works

This section is specific to what the Service is, and it is the part most worth reading.

8.1 **WHAT GETS SENT.** To generate a post, we send an AI provider the material that post needs: the written prompt, the relevant product details and prices, the catalogue images chosen for it, and any reference media. We send what the task requires, not your whole catalogue.

8.2 **WHICH PROVIDERS.** We use several, and which one runs depends on the plan, the tier and the kind of content. They currently include OpenAI, Anthropic, Replicate, fal and Google. The specific models change over time as better or cheaper ones appear.

8.3 **TRAINING.** We contract with these providers on terms which, for the business and API tiers we use, do not permit them to train their general models on our customers' inputs or outputs. Providers typically retain an input briefly for abuse monitoring and legal compliance, under their own terms. We select and configure providers with this in mind. We do not control their internal practices and cannot guarantee them.

8.4 **WE DO NOT TRAIN ON YOUR DATA EITHER.** We do not use your catalogue, your documents, your images or your content to train or fine-tune any model of our own.

8.5 **SEARCH INDEXES.** To find the right products for a post, we convert your catalogue and documents into mathematical representations (embeddings) and store them in a managed vector database, alongside identifiers and short fragments of the original text. These are derived from your data and are deleted with it.

8.6 **GENERATED CONTENT CAN BE WRONG.** AI output can state things that are untrue, including about people. It can also generate an image of a person who does not exist but resembles someone real. No content is published anywhere until the business reviews and approves it - that is the control - but it means a draft may briefly contain something inaccurate about a person. If that has happened to you, Section 15 applies.

8.7 **NO HUMAN AT HASHTAGHOTSHOT READS YOUR CONTENT ROUTINELY.** Generation is automated end to end. Our staff access customer content only to investigate a fault you have reported, to respond to a report of abuse, or where the law requires it - and under confidentiality obligations in every case.

9. Who We Share It With

9.1 We share personal data only with the following, and only so far as each needs it to do its job:

Cloud hosting and infrastructure	Hosts the application, the database, generated media and logs, and provides encryption, secret storage, task queues and scheduling. May hold any of the data in Section 5.
Generative AI providers	Receive the prompts, product details, catalogue images and reference media needed for a specific piece of content. Currently OpenAI, Anthropic, Replicate, fal and Google.
Vector search	Stores the embeddings and text fragments described in Section 8.5.
Web content retrieval	Retrieves the public pages of a website address you give us, where our own retrieval fails.
Search indexing	Indexes your account's content so you can search it in the app.
Social publishing integration	Holds your platform connections and transmits approved content to Facebook, Instagram and LinkedIn when you tell it to.
Commerce and profile integrations	Shopify and Google, for the store and Google Business Profile connections you choose to make.
Maps and location	Resolves addresses, time zones and location context.
Payments	Razorpay, which processes payments and holds the payment credentials we never see.
Communications	Email and push notification providers, which deliver transactional messages such as approval reminders, failure notices and receipts.

9.2 A current list naming each of these, with its role and the country it operates from, is available on request at support@hashtaghotshot.com.

9.3 Each is bound by a written contract to use the data only to provide its service to us, to keep it confidential, and to protect it. None of them is permitted to use it for its own purposes.

9.4 WE ALSO DISCLOSE:

(a) to our professional advisers and auditors, under confidentiality;

(b) where the law, a court, or a lawful government or regulatory request requires it - and we will tell you where we are lawfully able to;

(c) to establish, exercise or defend a legal claim; and

(d) to an acquirer, if the business is sold or merges, on terms no less protective than this policy, with notice to you.

9.5 WE DO NOT SELL PERSONAL DATA, and we do not share it for anyone else's advertising or marketing. There is no exception to this.

10. Where Your Data Goes

10.1 **STORED IN INDIA.** Our primary hosting region is in India (Mumbai). Your catalogue, generated media, database records and logs are stored there.

10.2 **GENERATION IS NOT LOCAL.** Several of the AI providers in Section 9.1, and some other service providers, operate outside India - including in the United States and the European Union. When content is generated, the prompts, product details and images that generation needs are sent to them and processed there.

10.3 By using the Service you ask us to make those transfers. We make them under written terms with each provider and, where required, under recognised transfer safeguards. Where the GDPR applies, transfers out of the EEA or UK are made under the European Commission's Standard Contractual Clauses; ask us at support@hashtaghotshot.com for a copy of the agreement.

10.4 If your organisation cannot permit its data to leave India, or a particular jurisdiction, the Service in its current form is not suitable for you.

11. How Long We Keep It

11.1 While your account is active we keep your data, because the Service needs it: your catalogue is the input to every future post, and your published history shapes what we plan next and stops us repeating ourselves.

11.2 Specific periods:

Archived items:	10 days after archiving, where automatic clearance is switched on for the account
Job and run records:	90 days
Security logs:	180 days
Backups:	overwritten on their ordinary cycle, within 35 days
After account close:	deleted or irreversibly anonymised within 30 days

11.3 **WHAT OUTLASTS DELETION.** Billing, invoicing and tax records, for as long as tax and company law requires. Anything we need to establish, exercise or defend a legal claim, or that is under a legal hold, for as long as that need lasts. Aggregated and irreversibly de-identified statistics, which no longer identify anyone and are not personal data.

11.4 **DELETING SOMETHING HERE DOES NOT UNPUBLISH IT.** If a post was published to a social platform, deleting it in HashtagHotshot does not remove it from that platform, from anyone's feed, from a search engine's cache, or from a screenshot. The Service can recall a published post where the platform's own tools allow it. Once something is public, removal can never be assured.

12. How We Protect It

12.1 What we do:

(a) data is encrypted in transit, and encrypted at rest using our cloud provider's managed encryption;

(b) API keys, platform access tokens and other secrets are held in a dedicated managed secret store, granted to each service on a least-privilege basis rather than at project level, and are not embedded in anything we ship to a browser or a phone;

(c) every request is authenticated, and data is separated by account so that one account cannot read another's;

(d) the services that generate content and run scheduled work are not reachable from the public internet;

(e) when we fetch a web address you have given us, a guard validates the destination so the request cannot be turned against internal systems;

(f) access, errors, jobs and provider calls are logged and monitored;

(g) staff access is limited to those who need it, under confidentiality obligations;

(h) we patch, rotate keys and revoke access on a defined process, and review the platform and its integrations periodically.

12.2 NO SYSTEM IS PERFECTLY SECURE, and we do not claim otherwise. Section 12.1 describes the measures we take, not a guaranteed outcome.

12.3 **IF SOMETHING GOES WRONG.** If a breach affects your personal data we will tell you without undue delay and in any event within 72 hours of confirming it, describing what happened, what data was affected, what it is likely to mean for you and what we are doing. We will also report to the Data Protection Board of India and to CERT-In where the law requires.

12.4 **WHAT YOU CAN DO.** Use a strong, unique password, turn on multi-factor authentication where we offer it, give account access only to people who need it, remove it when they leave, and do not upload personal data the Service does not need.

13. Your Rights, and How to Use Them

13.1 Where we are the Data Fiduciary (Section 4.2) you may:

(a) ask what personal data of yours we hold and get a copy of it;

(b) have it corrected, completed or updated if it is wrong;

(c) have it erased, where we no longer need it for the purpose it was collected for or where you withdraw the consent it rests on;

(d) withdraw a consent you have given, at any time, as easily as you gave it;

(e) nominate another person to exercise these rights on your behalf if you die or become incapable of exercising them; and

(f) complain to us, and then to the Data Protection Board of India (Section 18).

13.2 WHERE THE GDPR OR UK GDPR APPLIES you also have the rights to restrict processing, to object to processing based on legitimate interests, to data portability, and to lodge a complaint with your local supervisory authority.

13.3 **HOW TO ASK.** Write to support@hashtaghotshot.com from the email address on your account, or tell us enough to identify you if you do not have one. Say what you want. You do not need to use any particular form of words.

13.4 **WHAT HAPPENS NEXT.** We acknowledge within 3 days and respond within 30 days. If we need more time we will tell you why before that deadline passes. We do not charge for this. If a request is repeated or excessive we may charge a reasonable fee or decline it, and we will explain which and why.

13.5 WE MAY NEED TO VERIFY WHO YOU ARE before acting, in proportion to how sensitive the request is - we will not hand someone else your data on the strength of an email.

13.6 **IF THE DATA IS A CUSTOMER'S, NOT OURS.** Where a business is the Data Fiduciary (Section 4.3) the decision is theirs, so we will refer you to them and tell them you have asked. We will still do what we can ourselves - see Section 15.

14. Children and Vulnerable People

14.1 HashtagHotshot is a service for businesses. It is not directed at children and we do not knowingly allow anyone under 18 to hold an account.

14.2 **WE DO NOT WANT CHILDREN'S DATA IN THE SERVICE.** Our customers are told not to upload it. The law requires verifiable parental or guardian consent before a child's personal data is processed, and before the data of a person with a disability who has a lawful guardian is processed. We cannot obtain that consent on a customer's behalf and we do not try to.

14.3 This matters more than it might sound. Schools, coaching centres, paediatric clinics, children's retailers and activity providers hold records that name children - results sheets, class photographs, attendance registers, testimonials - and those are exactly the files someone might upload as "catalogue material" or publish on a website we are asked to read.

14.4 IF A CHILD'S DATA HAS REACHED US, tell us at support@hashtaghotshot.com and we will remove it from our active systems and search indexes without waiting to establish who was at fault. A parent or guardian does not need to go through the business first.

15. If You Are Not Our Customer

Written for people who never signed up with HashtagHotshot and have found that we hold something about them.

15.1 **HOW THIS HAPPENS.** There are three routes, and they are different:

(a) A BUSINESS UPLOADED IT. Your name, photograph, review, testimonial or contact details were in a file a customer gave us - a catalogue, a brochure, an event photograph, a document.

(b) A BUSINESS CONNECTED AN ACCOUNT. You reviewed a business on its Google Business Profile, or messaged it, and we hold that so the business can answer you.

(c) WE READ A PAGE THAT NAMED YOU. A business gave us its website address and asked us to use it. We read the public pages at that address. If one of them named you, that text may have been extracted into the business's profile and used as background for generated content.

15.2 **WHAT WE WILL DO.** Write to support@hashtaghotshot.com describing yourself and, if you know it, the business concerned. We will:

(a) acknowledge within 3 days;

(b) search our systems for data matching what you have told us;

(c) tell you what we found, or that we found nothing;

(d) remove it from our active systems, our search indexes and our generated drafts where we are able to do so without the business's instruction - and we treat route (c) above as a case where we are; and

(e) tell the business, so it can deal with anything only it controls.

We will not require you to contact the business first.

15.3 ROUTE (c) IS OUR RESPONSIBILITY, NOT THE BUSINESS'S. Where personal data reached us because our own retrieval of a public page pulled it in, no one chose to send it to us and we do not treat it as the customer's problem to fix. We will remove it on request and we will not ask you to justify the request.

15.4 **WHAT ONLY THE BUSINESS CAN DO.** We cannot tell you why a business holds your data, change what it does outside HashtagHotshot, or remove a post it has already published to a social platform. For those, you need the business, and we will identify it to you so you can ask.

15.5 **YOU CAN COMPLAIN TO US ANYWAY.** Section 18 applies to you in full, whether or not you have ever been our customer.

16. Cookies and Similar Technologies

16.1 Our website and application use cookies and similar technologies to keep you signed in, remember your session and preferences, keep the Service secure, and understand how it is used.

16.2 STRICTLY NECESSARY ones - authentication, session, security - are required for the Service to work and cannot be switched off without breaking it.

16.3 EVERYTHING ELSE, including analytics, is used only where you consent. You may withdraw that consent at any time, in your browser settings or in the Service.

16.4 We do not use advertising cookies and we do not allow third parties to track you across other websites through ours.

17. Changes to This Policy

17.1 We will update this policy as the Service changes - a new feature, a new provider, a change in the law.

17.2 The current version is always at https://login.hashtaghotshot.com/privacy.pdf, with its version number and date at the top.

17.3 For a change that materially affects how we use personal data we will give at least 30 days' notice by email to account holders and by notice in the Service before it takes effect. Lesser changes - corrections, clarifications, a renamed provider - take effect when posted.

17.4 Superseded versions are retained and available on request.

18. How to Contact Us, and How to Complain

18.1 FOR ANYTHING ABOUT YOUR DATA, including a request under Section 13 or a removal under Section 15:

support@hashtaghotshot.com

Put "Privacy" in the subject line. One address handles privacy, support, billing and security; the subject line is how it reaches the right person.

18.2 **GRIEVANCE OFFICER.** Appointed under the Information Technology Act, 2000 and the rules made under it, and the Digital Personal Data Protection Act, 2023:

Grievance Officer:	[to be completed]
Email:	support@hashtaghotshot.com
Address:	[to be completed]
Hours:	Monday to Friday, 10:00 to 18:00 IST, excluding public holidays

Write to the email address above with "Grievance" in the subject line. We will acknowledge within 48 hours and resolve within 15 days of receipt.

18.3 **IF WE DO NOT RESOLVE IT.** You may complain to the Data Protection Board of India. You are not required to exhaust our process first, though it is usually quicker.

18.4 IF THE GDPR APPLIES TO YOU, you may also complain to the supervisory authority in the country where you live or work.

18.5 **POSTAL ADDRESS.** Our registered office will be published here once the operating entity is registered. Until then, write to the email address above; we will not treat an emailed grievance as improperly made for want of a postal address.

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