

Roam — Privacy Policy

Version 2.1 | Effective Date: March 2026 | Jurisdiction: India

This policy is written in plain English. It tells you exactly what data we collect, why we collect it, and with whom we share it — including Avanse Financial Services Ltd. Please read it before using the service.

1. Who We Are

Roam (operated by Roam Enterprises Pvt. Ltd., Mumbai, India) provides an AI-powered F-1 visa mock interview tool called Sonia. Sonia is distributed as a white-labelled service in partnership with Avanse Financial Services Ltd., an RBI-regulated NBFC.

Data Controller: Roam Enterprises Pvt. Ltd., Mumbai, India

Contact: privacy@roam.college

Grievance Officer: Krish Bajaj, privacy@roam.college — acknowledged within 48 hours, resolved within 30 business days.

2. Data We Collect

We may collect the following information provided by use of Sonia:

- **Identity:** Full name, email address, phone number, and other provided personally identifiable information.
- **Education:** College/university name, intended course of study
- **Interview Data:** Your mock F-1 interview responses (text and/or audio), AI-generated scores and feedback
- **Technical:** IP address, device type, browser, usage logs, and other telemetry to improve the platform.
- **Cookies:** See Section 10.

3. How We Use Your Data

Purpose A — AI Coaching (mandatory to use the service): We process your interview responses to run the mock interview, generate scores, and provide personalized feedback. You must consent to this purpose to use Sonia. Consent is given when you accept these Terms and this Privacy Policy at signup.

Purpose B — Sharing with Avanse Financial Services Ltd. (mandatory to use the service): Avanse promotes and funds the free mock interview service. As part of this arrangement, we share the aforementioned personally identifiable information with Avanse so they can contact you about education loan products. This data sharing is a condition of use. If you do not wish your contact details to be shared with Avanse, do not use Sonia.

Purpose C — Platform Improvement: Anonymized, aggregated data to improve the AI model and user experience. No personal data leaves Roam for this purpose.

Avanse pays Roam per completed conversation conducted on the platform. This is a commercial arrangement. We do not sell your personal data; billing is based on completed conversations, not on leads or loan applications.

4. Consent

Under the Digital Personal Data Protection Act, 2023 (DPDP Act), your consent must be free, specific, informed, and unambiguous.

- Consent is collected via an unticked checkbox at signup — never pre-ticked.
- By ticking the box and creating an account, you consent to Purpose A and Purpose B as described above. Both are conditions of use.
- Withdrawal: See section 8.

5. Data Sharing

a) Avanse Financial Services Ltd.

We share the aforementioned personally identifiable information with Avanse for the purpose of education loan outreach. Avanse is incorporated and operates in India. We do not share your interview responses. Avanse's own privacy policy governs how they handle data once received.

b) Cloud, AI, and Technical Providers

We use Amazon Web Services (AWS) to host and process data. AWS is our sole infrastructure provider for this service. Certain data may be processed on AWS servers, which are operated globally.

For the specific data flow to Avanse: we transmit the aforementioned contact information to Avanse.

Third-Party Processors: We use trusted third-party service providers, including but not limited to OpenAI, AssemblyAI, and cloud/infrastructure providers (e.g., Amazon Web Services), to power certain features such as Sonia. These providers may process data on our behalf and are contractually required to maintain appropriate security and confidentiality safeguards.

c) Legal Requirements

We may share data if required by Indian law or a competent court order.

We do not sell your personal data to any party.

6. Data Storage and International Processing

We use Amazon Web Services (AWS) for hosting and processing. AWS operates data centres globally, including in India (Mumbai region, ap-south-1). We configure our primary infrastructure to use the AWS India region where available.

However, certain AWS managed services may process data in other regions, including the United States, as part of normal infrastructure operations. We cannot guarantee that all processing occurs exclusively within India.

The Indian government has not yet published its list of approved countries for cross-border personal data transfers under the DPDP Act 2023 — those rules are pending. We will

update this policy and our practices when that framework is notified, and will ensure our data flows comply with whatever requirements apply at that time.

If you have questions about where your data is processed, contact us at privacy@roam.college.

7. Data Retention

- Interview responses, AI scores, and provided personally identifiable information: Retained while your account is active. Deleted within 30 days of a deletion request.
- Contact information shared with Avanse: Governed by Avanse's retention policy after the point of sharing.
- Technical/log data: Retained for up to 12 months for security purposes.
- After account closure: All personal data is deleted within 30 days unless retention is required by law.

8. Your Rights Under DPDP Act 2023

You have the right to:

- **Access:** Request a copy of your personal data
- **Correct:** Fix inaccurate or incomplete data
- **Erase:** Request deletion of your data
- **Withdraw Consent:** Via account settings (this will close your account)
- **Portability:** Receive your data in a machine-readable format
- **Complain:** File a complaint with the Data Protection Board of India

We respond to all rights requests within 30 days. Contact: privacy@roam.college

9. Security

We implement industry-standard security measures to protect user data.

- **Encryption:** Data is encrypted in transit using TLS. Data stored on our infrastructure and through our service providers is protected using industry-standard encryption practices.
- **Access Controls:** Access to personally identifiable information (PII) is restricted to authorized personnel on a need-to-know basis and governed by role-based access controls.
- **Document Processing (I-20s):** When documents such as Form I-20 are processed (e.g., via Amazon Textract), they are used solely for parsing and data extraction. These documents are deleted promptly after successful processing and are not retained longer than necessary for this purpose.
- **Data Minimization:** We limit the collection, storage, and retention of personal data to what is necessary to provide our services.
- **Breach Notification:** In the event of a data breach affecting personal data, we will notify affected users and relevant regulatory authorities (including applicable Data Protection Boards) within 72 hours of becoming aware, where required by law.

10. Cookies

- **System cookies:** Certain cookies are required for the platform to operate as intended. For example, session cookies identify users who have signed into the platform, and theme cookies track the user's preferred theme throughout sessions, to name a few. System cookies cannot be disabled.
- **Analytics cookies:** Help us understand platform usage. You can opt out via the cookie banner.

11. Third-Party Disclaimer

Avanse Financial Services Ltd. is an independent entity. Once your data is shared with Avanse under this policy, their own privacy practices apply. We recommend reviewing Avanse's privacy policy at [avanse.com](https://www.avanse.com).

12. Changes to This Policy

If we make material changes, we will notify you by email or require explicit on-platform opt-in when you return to use Sonia. The updated version will be posted with a new version number and effective date at the top.