

# Privacy Policy

Shapoorji Pallonji Real Estate a division of Shapoorji Pallonji Group together with its affiliates, subsidiaries, group companies and associates(hereinafter referred to as “Shapoorji Pallonji Real Estate”) is/are concerned about the privacy of the data and information of the users accessing, offering, selling or purchasing products or services on any of Shapoorji Pallonji Real Estate websites, mobile sites or mobile applications thereof accessible through various internet enabled smart devices (individually and collectively referred to as “Platform”) or otherwise doing business with Shapoorji Pallonji Real Estate. This Privacy Policy applies to Shapoorji Pallonji Real Estate as defined herein and help you understand how we collect, use, store, process, transfer, share and otherwise deal with and protect all your information when you visit any of our Platforms and use any products and services or even otherwise visit the Platforms.

NOTE THAT THIS PRIVACY POLICY IS AN ELECTRONIC RECORD IN THE FORM OF ELECTRONIC CONTRACT IN TERMS OF INDIAN INFORMATION TECHNOLOGY ACT, 2000 AND RULES MADE THEREUNDER (AS AMENDED FROM TIME TO TIME) AND DOES NOT REQUIRE ANY PHYSICAL SIGNATURE OR SEAL.

The term “We” / “Us” / “Our” used in this document refers to Shapoorji Pallonji Real Estate and "You" / "Your" / "Yourself" refers to the user, who visit or access or use (collectively “usage”) any Platform.

## TERMS AND CONDITIONS:

### Acknowledgment:

PLEASE READ THIS PRIVACY POLICY CAREFULLY. HENCE BY VISITING OUR PLATFORM OR BY USING / AVAILING ANY OF OUR SERVICES OR PRODUCTS, YOU INDICATE THAT YOU UNDERSTAND, AGREE AND CONSENT TO THIS PRIVACY POLICY AND YOU HEREBY GIVE YOUR UNCONDITIONAL CONSENT OR AGREEMENT TO SHAPOORJI PALLONJI REAL ESTATE AS PROVIDED UNDER SECTION 43A AND SECTION 72A OF INDIAN INFORMATION TECHNOLOGY ACT, 2000 FOR COLLECTION, USE, STORAGE, PROCESSING, SHARING AND TRANSFER AND DISCLOSURE OF YOUR INFORMATION.

YOU ACKNOWLEDGE THAT YOU HAVE ALL LEGAL RIGHTS AND LAWFUL AUTHORITY TO SHARE THE INFORMATION WITH US AND FURTHER ACKNOWLEDGE THAT BY COLLECTING, SHARING, PROCESSING AND TRANSFERRING INFORMATION PROVIDED BY YOU, SHALL NOT CAUSE ANY LOSS OR WRONFUL GAIN TO YOU OR ANY OTHER PERSON.

IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS / USE OUR PLATFORM OR AVAIL ANY OF OUR SERVICES OR PRODUCTS ON OUR PLATFORM.

## Topics Covered:

This policy is designed to make you understand:

i. The type of information which You share with Us or which We collect during Your usage of our Platform or availing any Product or Services from Our Platform. ii. The purpose of collection, storage, processing and transferring of Your Information by Us. iii. Security measures implemented by Us to protect Your Information as mandated by law. iv. Disclosure, sharing and transfer of Your personal information by Us and purpose of such disclosure, sharing or transfer.

## Controller of Personal Information

Shapoorji Pallonji Real Estate will be the controller of Your Personal Information provided by You or otherwise collected by Us. Your data controller is responsible for the collection, use, disclosure, retention, and protection of your Personal Information in accordance with its privacy standards as well as any applicable laws.

## Information We Collect (Your Information):

We collect Your information during Your usage of Platform or when You avail any of products or services available on or through Platform, either as a registered user or otherwise when you visit any of our other website pages or mobile applications.

## The information collected may consist of:

1) Your Personal Information you provide us:

- Pursuant to the services provided by us, we will ask you to provide certain information as a part of the lead generation process. We will collect this information through various means and in various places through the App Services, including expression of interest forms, account registration forms, contact us forms, or when you otherwise interact with us. We will ask you to provide only such information lawfully and operationally required and necessary to be collected by us for effectively providing the same in the best possible offer.
- Personal information we collect may be in the nature of, inter alia,
  - Name
  - Mobile number
  - Email ID
  - Date of Birth
  - PAN number
  - Address and Pin Code
  - Gender
  - Financial information

The collection and maintenance of any such data/information shall be subject to this Privacy Policy.

## 2) Your Non-Personal information:

a) Usage : How You use Our Platform, such as the types of content that you view or engage with, the features You use, Your searches & results, Your browsing information, the actions You take and the time, frequency and duration of Your activities.

b) Device Information: Information about the computer, mobile, laptop, tablet or any other internet enabled electronic device ("Device") You use to access the Platform. This may include real-time information about the geographic location of Your Device as permitted by You, internet connection, Your IP address, operating systems, platforms, browsing information, Device type, Device ID, network information, metadata and other information associated with other files stored on Your Device, last URL visited, you website search history.

c) Preference: Your preferences and setting such as geographical location, time zone and language.

d) Information from third parties: We may collect, process and store Your user ID associated with any social media account (such as you Facebook and Google accounts) that You use to sign into the Platform or connect with or use with the products or services. When You sign in to Your account with Your social media account information, or otherwise connect to Your social media account with the Product or Services, You consent to Our collection, storage, and use, in accordance with this Privacy Policy, of the information that You make available to Us through the social media interface. This could include, without limitation, any information that You have made public through Your social media account, information that the social media service shares with Us, or information that is disclosed during the sign-in process. Please see Your social media provider's privacy policy and help centre for more information about how they share information when You choose to connect

## Your account.

We may also obtain information about You from third parties such as partners, marketers, third-party websites and researchers and combine that information with information which We collect from or about You.

We may use third-party service providers to serve ads on Shapoorji Pallonji Real Estate's behalf across the internet and sometimes on the Platform. They may collect information about Your visits to the Platform, and Your interaction with the products and services on the Platform.

We may also use third party services for verification of information from credit bureau services to calculate your eligibility for extending curated offers.

e) Cookies and other Electronic Tools: We may use cookies, pixel tags, web beacons, mobile device IDs and similar files or technologies to collect and store information in respect of Your use of the Platform. You can erase or choose to disable/block these cookies through Your Device/browser settings. You can configure Your browser to alert You when we attempt to send You a cookie with an option to accept or refuse the cookie. If You have turned cookies off, You may be prevented from using certain features of the Platform and this may interfere with certain functionality of the Platform.

## Manner of storage of Your Information

Your Information will mostly be stored in electronic form however certain data may be stored in physical form. We may store, collect, use and process Your Information within India and/or outside India subject to compliance under applicable laws. We may enter into agreements with third parties (in or outside of India) to store or process Your Information and such third parties may have their own security measures to safeguard Your Information with security standards as comparable with good industry practices.

## Purpose of Collection, Storage, Processing of Your Information:

Shapoorji Pallonji Real Estate collects Your Information solely for the purpose of providing you the products or services that is connected with the function or activity of the Shapoorji Pallonji Real Estate which includes but not limited to the following (“Purpose”):

- To inform You about various products and services offered on Our Platform and provide customer support to You.
- To address Your queries and resolve Your concerns pertaining to any product or service that You were looking for.
- To send You survey and marketing communications or facilitate various programmes and initiatives launched either by Us or third party which We believe may be of interest to You.
- To facilitate Your usage of Platform (what features You like, etc.) and improve Our products or services, or any other content on the Platform (such as by personalizing content to Your interests), process and complete Your transactions, and make special offers.
- To review Platform performance, diagnose technical problems and do data analysis to make Your experience better.
- To protect the integrity of Our Platform.
- To inform You about change in any term and condition of this Privacy Policy or Terms of Use of any Platform of Shapoorji Pallonji Real Estate.
- To implement information security practices, to determine any security breaches, contaminant or computer virus, to investigate/prevent/take action against illegal activities and suspected fraud.
- To keep You informed about news, events and ideas regarding Your preferences and help You to improve Your knowledge and skills about the preferred content.

- To carry out Our obligations and enforce Our rights arising from any contracts entered into between You and Us.
- To allow You to participate in interactive features offered through Our Platform.
- To contact You about Our own and third-party products and services that may be of interest to You. If You do not want Us to use Your Information in this way, please check the relevant box located on the form on which We collect Your data and/or adjust Your user preferences in Your account profile.
- To produce and share aggregate insights and statistics that do not identify You.
- To enable Us independently or in association with third party to show You tailored ads that are relevant to You.
- To enable Us to display advertisements to our advertisers'/service providers' target audiences. Even though We do not disclose Your Personal Information for these purposes without Your consent, if You click on or otherwise interact with an advertisement, the advertiser may assume that You meet its target criteria.
- To help advertisers and other partners measure the effectiveness and distribution of their ads and services, and understand the types of people who use their services and how people interact with their websites, apps and services. • In any other way We may describe when You provide the Information.
- For any other purpose with Your consent.

To opt-out from Colombia tracking, [click here](#).

To opt-out of Google Analytics tracking and Google data products, [click here](#).

To opt-out of Crazyegg tracking, [click here](#)

To opt-out of Facebook tracking, [click here](#)

To opt-out of Propstory tracking, [click here](#)

## Sharing, Transfer or Disclosure of Your Information:

1) Any service or product provided through Our Platform may be provided either by Shapoorji Pallonji Real Estate. or its vendor, dealer, OEM, channel partners and other third parties (“Other Entities”) which are registered with Shapoorji Pallonji Real Estate. to render the services or provide products through Platform or otherwise. You acknowledge and agree that Shapoorji Pallonji Real Estate may share, disclose, transfer or part with Your Information to Other Entities depending upon the type of Product or Service You are looking for or for one or more of the permissible purposes. Shapoorji Pallonji Real Estate may also share Your Personal or Non-Personal information where it is required to share the same with such Other Entities for providing You the product or service and You provide Shapoorji Pallonji Real Estate, Your unconditional consent to do the same.

2) Shapoorji Pallonji Real Estate. may share statistical data and/or other Non-personal Information or details to facilitate various program or initiatives launched by Shapoorji Pallonji Real Estate, third party service providers, partners or financial institutions, from time to time.

3) We use other third parties such as a credit/debit card processing company, payment gateway, pre-paid cards etc. to enable You to make payments for buying products or availing services on Platform. When You sign up for these services, You may have the ability to save Your card details for future reference and faster future payments. In such case, We may share Your relevant Information as necessary for the third parties to provide such services, including Your name, residence and email address. The processing of payments or authorization is solely in accordance with these third parties policies, terms and conditions and we are not in any manner responsible or liable to You or any third party for any delay or failure at their end in processing the payments.

4) In addition to this, Shapoorji Pallonji Real Estate. reserves the right to share Your Information with any Government Agency or other authorized law enforcement agencies (LEAs) mandated under law to obtain Your Information for the purpose of verification of identity or for prevention, detection, investigation including but not limited to cyber incidents, prosecution, and punishment of offences etc. 5) We may process Your Information outside India ad relay on legally provided mechanisms to lawfully transfer Your Information across borders. 6) We may share Your Information in any other circumstances where We have Your consent.

## Third Party Links:

It is clarified that with Your usage to Our Platform, You might see the links to the third party website / advertisements / electronic communication service, which are provided by the third parties. As the operation of the third party is not under control Shapoorji Pallonji Real Estate, therefore Shapoorji Pallonji Real Estate does not make any endorsement / guarantee of any service or product offered through third party websites nor make any representation related to the any privacy policy or other policies of such third party. Any usage of such third party website or availing any service or product through third party shall be at Your risk and Shapoorji Pallonji Real Estate is not responsible for any loss / damage or otherwise. It is recommended that You should review the privacy policy of such third party websites prior to using such websites.

## Security Measures:

Shapoorji Pallonji Real Estate. takes utmost care to secure Your Information from unauthorised access, usage or disclosure or alteration. We take appropriate steps and security measures to safeguard Your Information and make sure that Your Information is secured as mandated by law. For this purpose, we adopt reasonable security practices and procedures, in line with the industry standard, to include, technical, operational, managerial and physical security controls in order to protect Your personal information from unauthorized access, or disclosure while it is under our control.

While We protect Your Personal information as per industry standards, You acknowledge that the internet or computer networks are not fully secure and that We cannot provide any absolute assurance regarding the security of Your Personal information. Therefore You acknowledge that You shall not hold responsible Shapoorji Pallonji Real Estate in any manner whatsoever for loss of Your Information, or any other data, which You share with Us or which We have with Us if such loss or any damage caused to You because of Force Majeure events. You further acknowledge that any information (including Your personal information) transmitted to Us or from Your use of Platform will therefore be at Your own risk.

It is clarified that Force Majeure events includes any event which is beyond the reasonable control of the Shapoorji Pallonji Real Estate which may include but not limited to sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, computer hacking, unauthorised access to computer, computer system or computer network, computer crashes, breach of security and encryption.

## Your Choices to Control Your Personal Information

- **Change or Correct:** We take all reasonable endeavours to update Our records with latest information as provided by You, however if you see any discrepancy in Your Personal Information, You may edit some of Your Personal Information or contact Us through Our Data Protection Officer/Grievance Officer to have Your Information updated with Us.
- **Object to, or Limit or Restrict, Use:** You can ask Us to stop using or to limit Our use (in partial or full) Your Personal Information (past, existing or future).
- **Deletion:** You can ask Us to erase or delete (in partial or full) Your Personal Information (past, existing or future).
- **Right to Access:** You can ask Us for a copy of Your Personal Information.
- **Account Closure:** If You choose to close Your Account, We will delete Your Personal Information or de-identify it so that it is anonymous and not attributed to you identity. We will retain Your Personal Information after You have closed Your account if reasonably necessary to comply with Our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce Our User Agreement, or fulfil You request to “unsubscribe” from further messages from Us. We will retain de-personalized information after you account has been closed.
- **Withdraw Consent/Opt-out:** At any time, you can withdraw consent that You have provided to Us by going to Your account settings, if you have an account with us or otherwise you may request for Withdrawing you consent by writing an email to us at [info@Shapoorjirealestate.com](mailto:info@Shapoorjirealestate.com). We will only collect and process Personal Information about You where We have lawful bases. Lawful bases

include consent (where You have given consent), contract (where processing is necessary for the performance of a contract with You (e.g. to deliver products or services you have requested)) and “legitimate interests”. Where We rely on You consent to process Personal Information, you have the right to withdraw or decline You consent at any time and where we rely on legitimate interests, You have the right to object.

You may also contact Us using the contact information below, and We will consider Your request in accordance with applicable laws.

Residents in the Designated Countries may have additional rights under their laws.

‘Designated Countries’ refers to countries in the European Union (EU), European Economic Area (EEA) and Switzerland.

## Authorization:

You also acknowledge that all the information provided by You are out of Your free will and in compliance with applicable laws in Your territory. If We found that any of Your Information is in non-compliance with the terms and conditions and Privacy policy, Shapoorji Pallonji Real Estate. reserves the right to remove you non-compliant information from its systems. Further, depending on the seriousness of the non-compliance, We may choose to discontinue some or all of the services being provided to You by Us.

In purview of the Telecom Regulatory Authority of India (TRAI) guidelines, You hereby authorize Shapoorji Pallonji Real Estate. and its affiliates/partners or otherwise who are accessing Your Information by virtue of their association with Shapoorji Pallonji Real Estate to communicate with You through whatsapp, telephone/mobile, Email, SMS or other modes of communication (now available or may be available in future) even if Your number/numbers(s) is/are registered in the National Do Not Call Registry (NDNC) or [www.nccptrai.gov.in](http://www.nccptrai.gov.in)

You also accept that copy rights of the content in terms of copy or images on this website belongs to Shapoorji Pallonji Real Estate and replicating it in any form either by registered or unregistered channel partners or individuals for any form of communication will be considered violation of the Indian Copyright Act no 14 of 1957.

## European Union (EU) privacy/data protection rights

EU General Data Protection Regulation (GDPR) has provided the below rights to the EU residents:

- Right to information - including contact details to the DPO, the purposes for processing Personal Information and the rights of the individual
- Right to access the Personal Information that are processed.



- Right to erasure (“Right to be forgotten”).
- Right to rectification.
- Right to restriction of processing.
- Right to data portability of the Personal Information supplied to Us by the EU resident.
- Right to object (opt-out) to processing (unless otherwise We have compelling legitimate grounds).

EU residents can exercise these rights by raising a request directly at [info@shapoorjirealestate.com](mailto:info@shapoorjirealestate.com) or contact us at the information provided in CONTACT US section with specific requirements.

## Change in terms of Privacy Policy:

Shapoorji Pallonji Real Estate reserves the right to amend or modify this Privacy Policy at any time, as and when the need arises. We request You to regularly check this Privacy Policy from time to time to keep you apprise of changes made. Your continued use of the Platform gives You unconditional acceptance to such change in terms of Privacy Policy.

Particulars of corporate entity, Data Protection Officer/Grievance Officer pursuant to the provisions of Companies Act, 2013 and The Indian Information Technology Act, 2000 and rules made and applicable laws thereunder:

The particulars of various corporate entities of Shapoorji Pallonji Real Estate for the above purposes are as under:

Relationship Properties Pvt. Ltd
Jaykali Developers Private Limited
Phenomenon Developers Private Limited
Forbes And Company Limited
Paikar Real Estates Private Limited
Bengal Shapoorji Housing Dev Pvt Ltd
Behold Space Developers Private Limited

If you have any concern related to this Privacy Policy or collection, storage, retention or disclosure of Your Information under the terms of this Privacy Policy or Terms of Use or any other terms and conditions of Shapoorji Pallonji Real Estate or its other business entities including any queries or grievances, You can contact to Shapoorji Pallonji Real Estate through its Data Protection Officer/Grievance Redressal Officer at the below given details:

Company Name	E-Mail ID	Contact No
Relationship Properties Pvt. Ltd (T1 To T6)	<a href="mailto:info@shapoorjirealestate.com">info@shapoorjirealestate.com</a>	+91 8066019281
Relationship Properties Pvt. Ltd (T7)	<a href="mailto:info@shapoorjirealestate.com">info@shapoorjirealestate.com</a>	+91 8066019281
Jaykali Developers Private Limited	<a href="mailto:info@shapoorjirealestate.com">info@shapoorjirealestate.com</a>	+91 22 61229441
Phenomenon Developers Private Limited	<a href="mailto:info@shapoorjirealestate.com">info@shapoorjirealestate.com</a>	+91 22 61229570
Forbes And Company Limited	<a href="mailto:info@shapoorjirealestate.com">info@shapoorjirealestate.com</a>	+91 22 61229569
Paikar Real Estates Private Limited	<a href="mailto:info@shapoorjirealestate.com">info@shapoorjirealestate.com</a>	+91 22 61229569
Bengal Shapoorji Housing Dev Pvt Ltd	<a href="mailto:kolkata.masshousing@shapoorji.com">kolkata.masshousing@shapoorji.com</a>	+91 33 4030 0000
Behold Space Developers Private Limited	<a href="mailto:info@shapoorjirealestate.com">info@shapoorjirealestate.com</a>	+91 22 50646602

We will strive to address you feedback and concerns in a timely and effective manner.

Please note that the details of the Data Protection Officer/Grievance Officer may be changed by Us from time to time by updating this Privacy Policy.