

## **PRIVACY POLICY**

At Greater Noida Awas Yojna (hereinafter referred to as “GNAY”, “we”, “us”, etc.), a company incorporated under the provisions of Companies Act, 1956, having our registered office at H.No 60, Gali No - 03, Chhalera, sector 44, NOIDA - 201301 and having corporate identity number 09AHFPC2677K2Z3, Trade name - GNAY, we value your trust and respect your right to privacy.

This Privacy Policy provides you with details about the manner in which your data is collected, stored and used by us. You are advised to read this Privacy Policy carefully. If you do not agree to the terms of this Privacy Policy, please do not further use or access GNAY website/applications.

### **General**

This privacy statement is applicable to website and applications (mobile and hybrid, hereinafter referred to “applications”) of GNAY. This Privacy Policy applies regardless of whether you use a computer, mobile phone, tablet, or television or any other media or computer resource to access our Services. It also applies to those who register on our website/applications in connection with use of our services, or whose data GNAY otherwise receives in connection with its services. It is important that you read the Privacy Policy carefully because whenever you use our website/applications, your Personal Data will be processed (if at all) in accordance with this policy.

### **Personal Data and its collection**

Personal Data, means and includes, any data relating to identified or identifiable living person (‘data subject’ here in referred as you/your’) including but not limited to, name, address, mailing address, telephone number, email ID, bank account details including details linked to credit/debit payment instruments, information about your mobile phone, any personal details that may have been voluntarily provided by the customer, whether to Unique Identification Authority of India (UIDAI), Credit Information Bureau of India Limited (CIBIL) or any other agency including any other Credit Information Companies (CIC).

### **Information Collected when you use our Website**

We collect information about you or your usage to provide better services to all of our users. We collect information in the following ways:

- a) Many of our services require you to register \ sign up for an account on GNAY. When you do, we will ask for Personal Data, such as, but not limited to your name, email address, contact number, PAN, Passport number to create/ update your account
- b) When you use the GNAY website to contact GNAY or give feedback through or give a Testimonial, we will ask for Personal Data such as Name, Email ID and Contact number.

- c) We collect data about the services that you use and how you use them. This data includes log information and location information
- d) We may collect your data through campaigns and publicly available sources
- e) When you communicate with GNAY or use the GNAY platform to communicate with other members, we collect data about your communication and any data you choose to provide
- f) If you choose to sign in with your social media account to access GNAY, or otherwise connect your social media account with the services of GNAY, you consent to our collection, storage, and use, in accordance with this Privacy Policy, of the data that you make available to us through the social media interface. Please see your social media provider's privacy policy and help centre for more information about how they share data when you choose to connect your account.

### **Information Collected when you use our Applications**

- a) When you download our mobile application or use our hybrid application (related to our various services) we collect the below information, but not limited to –
  - Email ID
  - Name
  - Address
  - Country/City
  - Mobile Number
- b) GNAY does not collect Personal Data about individuals except when such individuals specifically provide such data on a voluntary basis. Upon such voluntary disclosure of Personal Data, we may further verify, collate or receive data about you from publicly and commercially available sources (as permitted by law), which we may combine with other data we receive from you. We may also receive data about you from third-party social networking services if you are already connected with those services.

### **Lawful Basis of Processing**

We may process your data because:

- a) We have a contract with you
- b) You would have given us express permission to do so
- c) We must have provided services to you after you have purchased something from us
- d) We must have provided services to you because you have availed for one of our offers
- e) To comply with the law.

## **Use of Personal Data**

- a) We use Personal Data to provide you with solutions you explicitly requested for, to resolve disputes, troubleshoot concerns, help promote safe services, assess your interest in our services, inform you about offers, products, services, updates, customize your experience, detect and protect us against errors, fraud and other criminal activity, enforce our terms and conditions, etc.
- b) We may also use your Personal Data to send you offers regarding various services/facilities which GNAY or its group companies may, from time to time, launch. Your consent will be taken before we send you any such communication.
- c) We may occasionally ask you to complete optional online surveys. These surveys may ask you for contact information and demographic information (like zip code, age, gender, etc.). We use this data to customize your experience at GNAY. Since the surveys will be optional, any Personal Data you provide will be voluntarily given by you. All such data shall be transmitted and stored by us in an encrypted manner in accordance with all applicable laws to ensure the secrecy and confidentiality of the Personal Data and such Personal Data shall not be shared or used except as contemplated herein.

## **Cookies and Other Tracking Technologies**

- a) Some of our Web pages utilize “cookies” and other tracking technologies. A “cookie” is a small text file that may be used, for example, to collect data about Web site activity. Some cookies and other technologies may serve to recall Personal Data previously indicated by a Web user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them.
- b) You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser, but please note that if you choose to erase or block your cookies, you will need to re-enter your original user ID and password to gain access to certain parts of the Web site.
- c) Tracking technologies may record information such as Internet domain and host names; Internet protocol (IP) addresses; browser software and operating system types; clickstream patterns; and dates and times that our site/application is accessed. Our use of cookies and other tracking technologies allows us to improve our website/applications and your Web experience. We may also analyse data that does not contain Personal Data for trends and statistics.
- d) For more information about our use of cookies please refer to our Cookie Policy

## **Information Sharing and Disclosure**

- a) We restrict access to your Personal Data to employees who we believe reasonably need to know that data in order to fulfil their jobs to provide, operate, develop, or improve our products or services.
- b) GNAY does not rent, sell, or share Personal Data about you with other people or non-affiliated companies except:

- to provide products or services you've requested,
  - when we have your permission,
  - or under the following circumstances:
- c) We provide the data to trusted partners who work on behalf of or with GNAY under confidentiality agreements. These companies may use your Personal Data to help GNAY communicate with you about offers from GNAY and our marketing partners. However, these companies do not have any independent right to share this data
  - d) We may disclose your Personal Data to agents or contractors of GNAY and/or its group companies/affiliates to enable processing of transactions or communications with you "on need" basis. Your aforesaid information may be further used for assessment and analysis of our market, customers, products, and services and to understand the way people use our Services so that we can improve them and develop new products and services. However, it shall be on the basis that the agents are required to keep the information confidential and will not use the information for any other purpose other than to carry out the services they are performing for GNAY and/or its group companies/affiliates
  - e) We may share your Personal Data with MAKAAAN DEVELOPERS group and/or its affiliates for providing details on latest offers from our other entities
  - f) We respond to subpoenas, court orders, Government Authorities, law enforcement authorities for legal processes or to establish or exercise our legal rights or defend against legal claims where it becomes necessary to do so to protect the rights or property of GNAY and/or its group companies/affiliates, etc.
  - g) We believe it is necessary to share data in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of GNAY terms of use, or as otherwise required by law
  - h) We transfer data about you if GNAY is acquired by or merged with another company. In this event, GNAY will notify you before data about you is transferred and becomes subject to a different privacy policy

### **Consent to International Transfer of Data**

When you use or participate in any of our Services and/or provide us your details, your data may be transferred outside India for processing consistent with this Privacy Policy. Please note that the data protection laws of countries to which your data may be transferred will be at least same level as that of India.

### **Third-Party Links and Content on Services**

Our Services may link to third-party websites/applications and services that are outside our control. Further, GNAY, its group companies, its affiliates, and their directors and employees ("GNAY Group") accept no liability and will not be liable for any loss or damage arising directly or indirectly (including special, incidental or consequential, punitive, or exemplary loss, damage or expenses) from your use of any application or any site or inability to use by any party, howsoever arising, and including any loss, damage or expense arising from, but not limited to, any defect, error, omission, interruption,

imperfection, fault, mistake or inaccuracy with any online application, its Contents (material, information, data, money market movements, news items, etc.) or associated services, or due to unavailability of any application or any part thereof or any Contents or associated services even if GNAY Group are advised of the possibility of such damages, losses or expenses.

### **Minors**

- a) To use the Site/Application you agree that you must be the minimum age (described in this paragraph below) or older.
- b) The minimum age for these purposes shall be 16, however if local laws require that you must be older in order for GNAY to lawfully provide the services in the Site/Application to you then that older age shall apply as the applicable minimum age.
- c) In all jurisdictions outside the European Union, if you are under the age of 18 or the age of majority in your jurisdiction, you must use GNAY under the supervision of your parent, legal guardian or responsible adult.

### **Data Retention**

- a) Your Personal Data processed by GNAY are kept in a form which permits your identification for no longer than is necessary for the purposes for which the Personal Data are processed in line with legal, regulatory, contractual or statutory obligations as applicable.
- b) At the expiry of such periods, your Personal Data will be deleted or archived to comply with legal/contractual retention obligations or in accordance with applicable statutory limitation periods.

### **Control over Your Information**

- a) We also provide you with the ability to control your Personal Data in accordance with European Union's General Data Protection Regulation, which includes the right to access, modify, erase, restrict, transmit, or object to certain uses of your data.
- b) You have the ability to update your profile and related Personal Data at any time. Also, you may review, update, correct, delete or object your Personal Data collected through the website/applications or service by e-mailing us at [privacy-GNAY2021@GMAIL.COM](mailto:privacy-GNAY2021@GMAIL.COM)
- c) If you have privacy concerns regarding access to or the correction of your Personal Data, please contact us at the contact information mentioned within the section called "Data Privacy Issues and Whom to Contact" of this policy.
- d) In your request, please make clear what Personal Data you would like to have changed, whether you would like to have your Personal Data that you have provided to us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Data that you have provided to us.

- e) While the majority of questions and issues related to access or requests can be handled quickly, complex requests may take more research and time. In such cases, issues will be addressed, or you will be contacted regarding the nature of the problem and appropriate next steps, within 30 days.

### **Security and Confidentiality**

- a) GNAY makes sure at all times to implement reasonable security practices and procedures (such as managerial, operational, physical and technical) for the purpose of protection and safeguarding of your Personal Data as the same is of vital importance to GNAY. At GNAY, we are strongly committed to protecting the personal and financial information that you submit to us.
- b) GNAY shall ensure to safeguard the security and confidentiality of any data you share with us. Any of your personally identifiable data obtained by us shall not be used or shared other than for the purposes to which you consent. However, despite our utmost efforts to protect your Personal Data, GNAY cannot warrant the security of any data you transmit to us through our online services/ applications. By accepting this Privacy Policy, you accept that such transmission of your Personal Data is done at your own risk.
- c) Lastly, you are requested to help us protect your data privacy by maintaining the secrecy of the username and password you use for any of our Services.

### **Social media**

- a) GNAY operates channels, pages and accounts on some social media sites to inform, assist and engage with customers. GNAY monitors and records comments and posts made on these channels about GNAY in order to improve its products and services.
- b) Please note that you must not communicate to GNAY through such social media sites the following information:
  - a. sensitive Personal Data including (i) special categories of Personal Data meaning any information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation and (ii) other sensitive Personal Data such as criminal convictions and offences and national identification number ;
  - b. Excessive, inappropriate, offensive or insulting information towards individuals.
- c) GNAY is not responsible for any information posted on those sites other than the information posted by its employees on its behalf. GNAY is only responsible for its own use of the Personal Data received through such sites

## **Consent**

- a. Consent is often referred to as an individual's choice to "opt-in" or "opt-out" the use of their Personal Data and is usually obtained by a "check box" or signature confirming the individual understands and agrees to the processing of their Personal Data. At times, express written consent from you may be required based on the information processing activity. Whenever required, we take consent from you prior to:
  - a. collecting, using, or processing your Personal Data, including sensitive Personal Data, in certain ways or sharing the your Personal Data with any third party (sensitive Personal Data is data revealing an your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning sex life or sexual orientation);
  - b. transferring your Personal Data outside of your country of residence;
  - c. using or placing web cookies on your computer or other electronic devices.

## **Should You Want To Opt Out**

- a. If we possess your contact information, we may want to keep you posted about our products, services and events, through email. Should you prefer not to keep up to date with GNAY news and latest information on services and receive such marketing materials, please send an email to [unsubscribe-GNAY2021@gmail.com](mailto:unsubscribe-GNAY2021@gmail.com)
- b. However, such withholding of information or withdrawal of consent may result in us not being able to provide services and facilities and we reserve its right to take appropriate action with respect to any obligations or in relation to any contract under which such Personal Data was sought.
- c. We will update your preferences as soon as reasonably practical. However, do note, if you opt out of our emailing list, as described here, we may not be able to remove your Personal Data from all databases of GNAY or other 3rd parties. For that, you would need to raise a request to erase your data as mentioned in the above section (control over your information).

## **Disclaimer**

GNAY shall not be liable for any loss or damage sustained by reason of any disclosure (inadvertent or otherwise) of any information concerning the user's account and / or information relating to or regarding online transactions using credit cards / debit cards and / or their verification process and particulars nor for any error, omission or inaccuracy with respect to any information so disclosed and used whether or not in pursuance of a legal process or otherwise. GNAY does not store any Credit\ Debit card details. Any other personal and sensitive Personal Data shared by you which is not asked by GNAY during registration, either mandatorily or optionally; accounts to wilful and intentional furnishing; and GNAY will not be liable for breach of such information.

**No contractual obligation**

Please note that this Privacy Policy does not create any contractual or other legal rights in or on behalf of any party, nor is it intended to do so.

**Intellectual Property Rights**

Please note that GNAY retains all rights (including copyrights, trademarks, patents as well as any other intellectual property right) in relation to all data provided on or via this web site/applications (including all texts, graphics and logos).

**Changes to this Privacy Policy**

GNAY reserves the right to change or update this Privacy Policy or any other of our policies/practices at any time without giving any prior notification; hence, you are requested to review the Privacy Policy periodically, to make sure that you are aware of any such changes. This Privacy Policy shall apply uniformly to GNAY website and IREL applications or any other media used by GNAY for its Services. Any changes or updates will be effective immediately upon posting the same on our web site at [www.greaternoidaawasyojna.com](http://www.greaternoidaawasyojna.com)

**Data Privacy Issues and Whom to Contact**

If you have any questions, comments or concerns about this Privacy Policy or about how we handle your Personal Data, please get in touch with us at [privacy-GNAY2021@gmail.com](mailto:privacy-GNAY2021@gmail.com)