

**S3 Privacy Policy**

Last updated on April 19, 2023

When you use S3’s services, via the App, you are trusting us with some of your information. We understand this is a big responsibility on our shoulders and we are always working hard to keep your information safe and secure, and give you control over your data.

This Privacy Policy section is meant to help you understand what information S3 collects, why we collect such information and how you have full control to update, manage or delete your information.

1. Introduction

2. Information S3 Collects

3. How the Information is collected

4. Why information is collected

5. User Privacy controls

6. Sharing Your Information and Disclosures

7. Your Information Security

8. Your Information Retention and Deletion

9. Role and details of Data Protection Officer

Introduction

S3 is a comprehensive security and community management platform helping millions of users to make their life safe, secure and convenient. Our various services include:

Community Financial Management: S3 features an end-to-end financial module to simplify management of community finances for Resident Welfare Associations. Residents can also pay their various bills like maintenance bills, Water bills and other Utilities bills via the app.

Visitor Management: S3’s technology enhances security by ensuring that there is a process of visitor approval managed by the residents who can now control who to allow in the premises.

Delivery Management: With S3, users can have their deliveries left at the gate, in case they are not available at home – and pick them up at their convenience. S3 has also partnered with e-Commerce portals to make the entry of delivery personnel faster and more secure.

Security Alert: In case of an emergency, residents can alert their security personnel at the click of a button on the app.

Child Security: Resident parents can require their security guards to check whether their children have their permission to exit the premises (This feature doesn’t require any details of children to be collected).

Material Movement: Resident can generate gate pass for the goods that require to bring out from the community by someone.

Daily Help Management: All residents receive notifications on the entry of their daily help (maids, cooks, nannies), and can also check their monthly attendance. Residents can also pay their daily help’s salary via the app or record a cash payment.

Clubhouse Management & Amenities’ Booking: The management committee of a Residents Welfare Association can use this feature to ensure that the clubhouse area is restricted to residents and their guests, understand usage trends, and even implement a booking feature for certain facilities.

Helpdesk and Communication: With S3 Communication Management, management committee can create opinion polls, send meeting invites and residents can have their complaints resolved by raising an issue to the concerned person as well start a discussion, post an idea or provide feedback.

S3 seamlessly connects the community – the residents, RWA, facility management, security personnel, daily help, visitors and Service Providers – through the app, with a view to improving the security and convenience.

Apart from using our services, all users can use our App in a variety of ways to manage their data privacy.

Information S3 Collects

We would like you to understand that the information collected via the S3 app is to help us provide you with superlative service.

The information S3 collects, and how that information is used, depends on how you use our services and how you manage your privacy controls. For e.g. for standard S3 services, only your flat details along with name and number will be needed.

Information collected on the S3 app:

Residents: Name, Email address, Mobile number, Secondary Mobile number, your apartment/villa number, tenant or an owner, vehicle number (if any) and any other optional information including biography, interests, photographs, reviews, content, communications, posts, listings, payment information, address book etc. as you may have chosen to provide on S3.

Guests: Name and resident flat to be visited. No other guest information is required on S3 App for entry at gate (Note: Individual Resident Welfare Association (RWA)s may mandate additional information such as phone number, photograph, etc. which is totally at discretion of respective RWAs.)

Service Providers to Society/Individual Homes: The name, phone number, resident flat to be visited (if any), vehicle number (if any), entry/exit time, identity proof, visit purpose and photograph. For security reasons, some personally identifiable information of service providers including delivery executives is taken at the gate as per the discretion of the respective RWA and appropriate local laws. Further, certain financial information may be required to facilitate the processing of payments made through our payment service providers. As making payment may require utilization of the services of the payment service providers, you will be subject to the terms of use and privacy policy of such payment service provider, as well.

Additional information: Device and operating system information (including device ID, Android ID etc.), mobile network information, the date, time.

We don’t sell or trade user information in any form to anyone. The information is used solely for the purpose of enabling services and making your experience better on S3 platforms. On a case to case basis we give you great value add from third party partners where information will be shared after your explicit consent.

Should you wish to know more about our policy on guest visitors’ data, click [**here**](Visitors’%20Data%20Privacy%20on%20S3.docx)**.**

S3’s services are an extension of the services offered by the Resident Welfare Association (RWA) (being our direct customer) of the premises. The RWA members will have access to all the information collected for their society on S3 for recording and security purposes. In case any of the RWA members access any of resident data, S3 will transparently convey the same to the user along with the reason for access of the information.

How The Information is collected

S3 provides its services through our mobile app (will be collectively referred to as “Platform”). User information is collected via our platform either directly or indirectly to give great product and service experience.

Direct Information: All personally identifiable information as mentioned in “Information S3 Collects” segment is explicitly collected on the platform where users fill in their details and give necessary consent to be contacted or their information to be used by S3 for serving them better via the platforms. We do not consider personal information to include information that has been made anonymous or aggregated so that it can no longer be used to identify a specific person, whether in combination with other information or otherwise.

Indirect Information: Information like IP address, device data, browsing data and other information as detailed in “Information S3 Collects” is collected while the user is interacting with our platform. The same is collected to make user experience on our platform better. Such non-personally identifiable information (non-PII) may also be provided to third party advertisers to ascertain your interests and serve advertisements on third party platforms.

Why The Information is collected

We use information collected from users to provide our services. On the mobile app information is collected as per our agreement with RWA of societies who act as an extended service provider to all residents within the society.

Following are the key services which will require information collected

Account set up and administration

Verification of your account

Personalization of content, business information or user information

Periodically communicate with you (like new feature/benefits introduction, newsletters, contests, feature usage guidance, compliance requirements, offerings, etc.)

Use by third party advertisers of information to provide interest-based advertisements on third party platforms. No personally identifiable information is shared by S3 without consent from the User.

To provide accurate insights to Users

To provide additional value-added services that you may avail from S3

Legal obligations and meeting internal audit requirements (Non-guest visitor information)

Information is used to improve safety and reliability of services across platforms. This include detecting, preventing and responding to security risks, fraud or any technical issues which can harm our users or S3

User Privacy Controls

S3 ensures that you are in full control of the information we collect and how it is used.

This section describes key controls for managing your privacy across our platforms and services. In addition to this we also provide few other mechanisms by which users can reach out to us to modify or erase their information available with us.

Managing, reviewing, and updating your information: When you’re signed in, you can always review and update information by visiting the services you use. For example, you can change your contact details such as your name, email and phone number.

Choice to Opt-out: We provide all users with options to opt-out from receiving notifications pertaining to Entry/Exit, Payments, Helpdesk, Homes and Amenities. This can be done directly on our platform. The opt-out may not apply to promotional and marketing messages served by or in partnership with the Resident Welfare Associations or their management committees on the notice boards of the relevant society. For removal of such promotional and marketing messages you may reach out directly to the Resident Welfare Association.

Unsubscribing, removing and deleting your information: If you choose to unsubscribe from our platforms or delete any of all of your information, you can delete your apartment and then uninstall the app. In addition to this you may also send an email to admin@s3serv.com for specific information about your account or deletion of your account history. However, such deletion of specific information may require the approval of the RWA and we may still retain some information and records of transaction for specific period as required by any law, contract with RWA or policy as applicable.

Contacting Data Protection Officer: In subsequent sections covering “Role and details of Data Protection Officer (DPO)”, we have full disclosure of how users can reach out to S3 DPO to lodge complaints or communicate any privacy related grievances.

Sharing Your Information and Disclosures

We may disclose personal information that we collect or you provide, as described in this privacy policy, in the following ways:

For General Information Disclosures:

To our subsidiaries and affiliates, which are entities under common ownership for provision of our Services or to comply with applicable laws.

S3 uses Third Party Service Providers to provide variety services on our behalf viz., Communications Services (SMS, Push Notifications, Emails), Banking Partners, Payment Gateways, Analytics Platform, Cloud Services, ANPR/Hardware Integrations, etc. and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.

When user reaches out to S3 customer care for specific query/issues and customer care personnel has to access your information for resolution of your query.

Explicit user consent will be taken by S3 in case we partner with third-party companies, organizations, or individuals outside of S3 to provide additional services or offerings to users. The use of such services may require you to share your name, email, phone number, flat details, vehicle number or other information with these partners. In such cases, S3 will only share your information and offer you the service with your explicit opt-in. The services may contain links to third-party websites. Please be aware that we are not responsible for the content or privacy practices of other websites or services which may be linked on our services. We do not endorse or make any representations about third-party websites or services. Our Privacy Policy does not cover the information you choose to provide to or that is collected by these third parties.

For Legal Reasons: We may need to share or disclose some of your information outside S3 without the consent, if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonable necessary in the following events:

Meet any law, regulation or legal process as applicable or enforceable request from government.

To enforce applicable terms of service, including investigation of potential violations, fraud, security or technical issues/breaches.

Information as necessary with your respective societies’ RWA as per terms of agreement.

Protect against harm to the rights, property or safety of our users, S3, or the public as required or permitted by Law.

Consent: In some cases, we may process some of your information based on the consent you granted to your RWA as represented by them to S3 or expressly to us at the time we collect such data. In case we need to process any of your information we will be clearly indicating to you at the point and time of collection. You have right to withdraw your consent at any given point of time either via platform or writing to us at admin@s3serv.com. If you withdraw your consent, then we will stop processing the relevant Personal Information except to the extent that we have other grounds for processing such Personal Information under applicable laws.

Your information will be shared with another business entity should we (or part of our business/assets) plan to merge with, or be acquired by another business entity or in cases of organization restructuring or amalgamation. In case of such a transaction or re-organization the new business entity will follow this Privacy Policy. All the affected users will be notified before personal information is transferred or becomes subject to different entities’ privacy policy.

You’re Information Security

We build security into each and every system and services to protect your information.

S3 platform and processes are built with strong security features that continuously protect your information. We have multiple real time checks and tests running to help us detect and automatically block security threats from ever reaching you. In case of any detection of threat or risk that we deem you should be aware of; we will notify you and guide you through steps to keep your privacy protected.

We are constantly striving to protect your data from unauthorized access, disclosure, modifications, or destruction of any information we hold, including:

* All information going in and out of the app is 256 bit https encrypted. TLS encryption is used throughout the application for data in motion and data is also encrypted at rest.
* All information is stored in servers with best in class firewalls and needs multiple authentications for any access and no unauthorized person will have access to the same.
* We constantly review our information collection, storage and processing practices, including physical security measures, to prevent unauthorized access to our systems.
* We restrict access to personal information to employees, and external contractors who may need the information in order to process some services. Any internal employee with this access is subject to strict contractual confidentiality obligations and strict actions (up to termination or criminal action) will be taken if they fail to meet these obligations.
* S3 application and data servers do not use public accessible addresses or IP. The access is further secured through a VPN tunnel with 2FA (two factor authentication). All traffic is routed through a WAF (Web Application Firewall) and is checked strictly for malicious traffic.

However, we would like you to understand and accept that data transmission over the internet may be liable to risk and we would assume no liability for any disclosure of information due to errors in transmission issues or unauthorized third-party access to our platforms or databases.

You acknowledge that as a registered user you are responsible for maintaining the security of your Account such as your Account login credentials and passwords, and that you should not provide these credentials to any third party. If it comes to your knowledge that or if you have reason to believe that your Account credentials have been stolen or been made known to others, you must contact us immediately at support@s3serv.com. You acknowledge that you are responsible for all acts done, using your Account login credentials. We are not responsible if someone else accesses your Account on account of your failure to maintain security of your Account credentials.

Your Information Retention and Deletion

The information collected on our platforms is retained for different periods of time depending on what the information is and how it is used and how you configure your settings.

Individual Users can request deletion of their information on termination of their association with S3, provided that S3 may retain such information for 180 days from the date of termination or for such periods as may be required under applicable laws or by virtue of our compliance requirements with our Service Providers or as a result of any dispute, from the date on which you stop availing the services or request deletion, but shall not utilize the information during such period (some information deletion may be subject to RWA approval, S3 will facilitate the approval process):

* All the visitors’ information is retained for a specific period of time (period beyond which the data is deemed not to be reasonably necessary for operation or by law) and this interval will be at least 180 days. S3 may retain such information, where required, for further periods to meet our legitimate business requirements including servicing contractual obligations to RWA/Service Providers, for disputes raised, and for complying with any legal or regulatory requirements, provided that S3 shall maintain the confidentiality of such information and shall not use the same for any other purpose.
* Residents may request at any time that their data on S3 systems be erased. This is referred to as the Right to be forgotten and can be triggered from the S3 app or by writing to admin@s3serv.com. This may be subject to RWA’s approval and S3 will facilitate the approval process.
* Guest visitors can get their details deleted at any given point of time. Details for same is covered in “Role and details of Data Protection Officer”. This may be subject to RWA’s & S3 User’s approval and S3 will facilitate the approval process.
* We keep some data until your society is live on S3 and all such information is deleted if your society is no longer live on our platform, provided that S3 may retain the information for a period of 180 days from the date on which you stop availing the services or such periods as may be required under applicable laws or by virtue of our compliance requirements with our Service Providers or as part of any dispute, but shall not utilize the information during such period other than for the purposes set out herein.
* In case you have left a society on S3, you can delete all your details on our App and uninstall our app. In case of more assistance you can write to info@s3serv.com.
* However, some data we may retain for longer period of time when necessary for legal purposes, such as security, fraud or financial record keeping.

When you delete data or request for deletion of data post termination, we follow a process to make sure that all your data is safely and completely removed from all our servers. We also ensure that none of your information is subject to accidental or malicious deletion. This may lead to some delay between actual requests made and final deletion as we ensure that information deletion is genuine and not accidental from our active and backup systems. Any request to DPO will be replied within 7 days and actioned within 30 days subject to approvals from the RWA, S3 Users and not including the time taken by them in approvals.

Role and details of Data Protection Officer (DPO)

S3 has employed a dedicated data protection and grievance officer who will be responsible for overseeing the company’s data protection strategy and its implementation to ensure compliance with various Privacy law requirements.

Our DPO is responsible for the following:

* Constantly educating the company and employees on important Data Privacy compliances
* Training all staff involved in data processing
* Conduct regular audits to ensure compliance and address any gap or issues proactively
* Monitoring implementation and effectiveness of data protection efforts within company
* Maintaining comprehensive records of all data processing activities, including purposes and necessity of all processing activities, which must be produced on request
* Interfacing with data subjects to address how their information is being used, their right to have their personal data amended or erased and what measures S3 has put in place to protect your personal information.

In case of any issue or grievance related to your data privacy, please contact our DPO at info@s3serv.com or write to Data Protection Office,

Spring Spruce Services Private Limited

GH-08/1, Vrindavan Yojna, Raibareily road,

Lucknow.

Uttar Pradesh-226029 (India).

In case of any grievance arising from the use of the Platforms, please contact the Grievance Officer, the details of which are set forth below-

Grievance Officer: Shivam Singh Chauhan

Contact: info@s3serv.com

From time to time, we may update this Policy to reflect changes in S3’s services and its policies. Any changes will be effective immediately upon the posting such revised Privacy Policy. If we makes any material changes, it will be notified to you by email (sent to the e-mail address specified in your account) or by means of a notice prior to the change becoming effective. We encourage you to periodically review this page for the latest services and privacy policies.

Contact

Spring Spruce Services Private Limited

GH-08/1, Vrindavan Yojna, Raibareily road,

Lucknow.

Uttar Pradesh-226029 (India).

Call +91 84009-99344

info@s3serv.com

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