

## **Privacy Policy**

By participating in the WhatsApp engagement bot launched under the HDFC Housing and Real Estate Technology (“HDFC H@ART”) platform (“**Program**”), you irrevocably and unconditionally consent to the below terms and conditions.

### **A. Purpose**

We believe it is important for you to know how we treat information about you that we may receive when you engage with us. This Privacy Policy is devised to help you feel more confident about the privacy and security of your personal details. 'You' shall mean You, the User of the Program and 'Yourself' interpreted accordingly. 'We' / 'Us' means HDFC Capital Advisors Limited (including our officers, employees, agents, partners, advisors, consultants and affiliates) and 'Our' interpreted accordingly. 'Users' means the Users of the Program collectively and/or individually as the context allows.

If the WhatsApp Bot requests you to provide personal information, adequate security measures will be taken to protect your personal information. We only receive information that You directly provide to Us by participating in the Program or through our existing database. In this Privacy Policy, we refer to all this as the 'User Information'.

### **B. How We may use the User Information**

By entering/ sharing Your User Information, You accept that We may retain Your User Information and that it may be held by Us or any partners/ advisors/ consultants that processes it on Our behalf. We, along with Our partners, shall be entitled to Use Your User Information for the following purposes:

- provide and communicate with You about feedback, follow up on programs participated by You or queries submitted to the team;  
  
respond to your inquiries and communicate with You about our programs and other relevant information
- enforce the legal terms (including without limitation our policies and terms of service) that govern your use of our services, and/or for the purposes for which you provided the User Information;
- prevent fraud or potentially illegal activities (including, without limitation, copyright infringement);
- protect the safety of our other subscribers or Users;
- perform analysis, market research, including statistical analysis of User behaviour which We may disclose to third parties in depersonalised, aggregated form;

- In order to enable Us to comply with any requirements imposed on Us by law; and
- In order to send You periodic communications about programs event and other relevant information.. Such communications from Us may include promotion of programs being organized by third parties.

### **C. Security and Data Storing**

. All security procedures are in place to protect the confidentiality, integrity and availability of Your User Information. We maintain strict physical, electronic, and administrative safeguards to protect Your User Information including your personal information from unauthorized or inappropriate access.

We follow generally accepted standards to collect, store and protect personal data, including the use of encryption. We retain personal data for as long as it is needed, and thereafter for legal and service purposes. These may include retention periods mandated by legal, contractual, or similar obligations; for resolving, preserving, enforcing or defending our legal and contractual rights; needed to maintain adequate and accurate business and financial records or how you access, update, or delete your data, etc.

We will take all reasonable efforts to ensure the confidentiality of personal data, uploaded information etc. and will take reasonable efforts to ensure that the information received from you is not misused. We may also reveals personal data/information shared by you in connection with any lawful process. While we will take the above reasonable measures to guard against misuse of personal data/information submitted to Us by You, we cannot guarantee that someone will not overcome our security measures. Therefore, your sharing of personal data/ information constitutes your acceptance of this risk, and by posting of personal data/information, you waive any right to seek legal relief from Us and/ or Our partners/ affiliates due to any misuse of your information.

### **D. Information Sharing and Disclosures**

We do not sell or share any personally identifiable information shared with us as part of the Program to any third party (public/private). Generally accepted best practices shall be used to protect any information provided to protect from loss, misuse, unauthorized access or disclosure, alteration, or destruction. We may disclose the User Information as follows:

- To service providers or Partners that we have engaged to perform business-related functions on our behalf. This may include service providers that:
  - (a) conduct research and analytics;
  - (b) create content;
  - (c) provide, technical or operational support;
  - (d) conduct or support marketing (such as email or advertising platforms).
  - (e) fulfill user requests;

- (g) host our Services, forums and online communities;
  - (h) administer the WhatsApp Bot.
  - (i) maintain databases; and
  - (j) otherwise support our -programs and or events.
- In response to legal process, for example, in response to a court order or a subpoena, a law enforcement or government agency's request or similar request.
  - With third parties in order to investigate, prevent, or take action (in our sole discretion) regarding potentially illegal activities, suspected fraud, situations involving potential threats to any person, us, or the Program, or violations of our policies, the law, to verify or enforce compliance with the policies governing the Program.
  - We may share the User Information with Our affiliates or group companies, so they can provide, improve and communicate with You about their own, or their marketing partners' products and services.
  - We reserve the right to disclose and transfer the User Information outside India. We will comply with all relevant Data Protection legislation in relation to the period for which We retain any User Information.

#### **E. Opt Out**

If at any point in time, you wish to cease participation in the Program or receiving communication from the Whatsapp Bot, you may do so by typing 'STOP' and sending the message on the Whatsapp Bot. Further, if at any point in time, you wish to withdraw any consent given hereunder, you may write to [proptech@hdfccapital.com](mailto:proptech@hdfccapital.com) in this regard.

#### **F. Governing Law and Jurisdiction**

This Privacy Policy is governed by and operated in accordance with the laws of India. If any of the parties wish to seek legal recourse, they may do so by using the courts of law in Mumbai.

#### **G. Updates**

We may change this privacy policy from time to time and You should check these regularly Your participation in the Program will be deemed to be an acceptance of the privacy policy existing at that time.