

At **Godrej & Boyce Manufacturing Company Limited** (hereinafter referred to as “**Godrej**” or “**We**”), we take your privacy very seriously and are committed to protect your personal data. The connected hotel lock solution (“**Product**”), which is a locking solutions device that is to be operated through the **Advantis VAVE**. This Privacy Policy covers the aspect of privacy for the Product and the App and constitutes how we collect, use, disclose, process, transfer, and store your personal data when you use the Product and the App. In order to use the App, you will be required to accept and consent to the terms of this Privacy Policy and your use of the App signifies your continued acceptance thereof. It is important that you fully understand our personal data and information collection and usage practices and ensure that you are ultimately able to exercise control over the personal data and information you provide to us. You are advised to carefully read the Privacy Policy before using the App.

Please note that the App may contain links to third party applications / digital platforms which are provided for your convenience. We are only responsible for the privacy practices and security of our own App. We recommend that you check the privacy and security policies and procedures of each and every other application / digital platform that you visit.

## 1 COLLECTION AND USE OF PERSONAL DATA AND INFORMATION

- A. Personal data and information is data that can be used to identify or contact an individual/s, either from that information alone or in conjunction with other related information including but not limited to name, address, e-mail address, user name, telephone number, age, gender, nationality, information, posts and other content you submit to our App. A Communication device means and includes cell phones, computer, laptop, personal digital assistance or combination of both or any other device used by you to communicate, send and/or transmit any text, video, audio or image. Personal data and information is collected from you in order to provide you with our products and/or services. Please note, if you don't choose to provide us with the requested personal data, we will be unable to offer you our products or services. All personal data and information that we collect about you will be recorded, used, and protected by us in accordance with applicable data protection legislation and this Privacy Notice.
- B. When you use and/or register on the App through any communication device, the following information is collected from you and stored securely on AWS cloud managed by our third-party service provider (“**Servers**”) – (i) email; and/or (ii) mobile number; and/or (iii) Profile picture; and/or (iv) Address and/or (vi) GST number and/or (vii) Product serial number during registration and/or (viii) audio-video, images and/or (ix) your Wi-Fi information, internet connection and/or (x) the equipment you use to access the App.
- C. Information that may be collected automatically and/or manually from the computer or mobile devices you use to access the App shall include:
  - i. Your Wi-Fi Router details including name and password and/or server's IP address from where the App is being accessed, the type of browser (Internet Explorer, Firefox, Opera, Google Chrome etc.), the operating system of Your system and the website you last visited before visiting to Platform, and your computer, Internet connection and mobile device, other browsing information (connection, speed, connection type etc.), device type, device's unique device identifier, mobile network information and the device's telephone number;
  - ii. Details of your use of the App, including location data, traffic data, logs and other communication data and the resources that you use and access on or through the App;

- iii. We also may seek permission to access metadata and other information associated with other files stored on your mobile device. This may include, for example, personal contacts and address book information;
- iv. We may also collect real-time information about the location of your device, as permitted by you;
- v. Unique mobile device identifier (e.g. IDFA or other device IDs on Apple devices like the iPhone and iPad), if you're using the App on a mobile device, we may use mobile device IDs (the unique identifier assigned to a device by the manufacturer), instead of cookies, to recognize you. Unlike cookies, mobile device IDs cannot be deleted from records. We may share it with advertising companies and they may use device IDs to track your use of App, track the number of advertisements displayed, measure advertising performance and display advertisements that are more relevant to you. We may also share it with analytics companies which may use mobile device IDs to track your usage of the App;
- vi. Other information relating to your activity on the App, such as your search queries, comments, domain names, search results selected, number of clicks, pages viewed and the order of those pages, how long you visited the App, the date and time you used the App, error logs, and other similar information;
- vii. Your locations details including the latitude, longitude or altitude of your mobile device, GPS location;
- viii. Bluetooth related information including Godrej locks visible nearby;
- ix. In case of mobile application users, the online or offline status of your App.

D. We may supplement the information that you provide with other information that we obtain from our dealings with you or which we receive from other organisations, for example, our sponsors, vendors and partners.

E. In broad terms, we use your personal data for the following purposes:

- i. to administer and provide products and services you request or have expressed an interest in;
- ii. to communicate with you in the event that any products or services you have requested are unavailable;
- iii. for fraud screening and prevention purposes;
- iv. for record keeping purposes;
- v. to carry out market research so that we can improve the products and services we offer;
- vi. to track your activity on our App,digital platforms;
- vii. to create an individual profile for you so that we can understand and respect your preferences;
- viii. to personalise and improve your experience on our App,digital platforms;
- ix. to personalise and/ tailor any communications that we may send you;
- x. for profiling purposes to enable us to personalise and/or tailor any marketing communications that you may consent to receive from us.

F. When we provide you with products or services we may collect and store any personal data and information that you provide to us. We may, for example, keep a record of your name, address, delivery address, email address, and the telephone number. We may also record details of any disability or health needs that you may have. Such collected information will be used in accordance with the terms of this notice.

G. When information is collected from you such as your name, e-mail address (Personal Data), we will use it in accordance with the terms of this notice and for the purpose of fulfilling your requirement. This information may be shared with other Godrej and Boyce Manufacturing Company Limited businesses and/or its vendors and partners, but only if necessary to fulfill your request or for related purposes.

- H. All personal information collected from you at the time of registration and subsequently will be retained for as long as your account remains in existence. All application generated log information which is collected will be retained on the mobile device for a period of 30 days from the date of collection after which it will be purged from the App. All other information collected and uploaded to the cloud server will be purged from this server 90 days after being uploaded. The customer profile data and information such as name, profile detail, email id, mobile number and address shall remain retained in the Server.

## **2. DEVICE INFORMATION COLLECTION**

- A. We collect information from the communication device you use to access our App and the information that we obtain from these communication device.
- B. When you sign up with us for an online account, register to receive marketing communications from us (and/or our sponsors and partners), fill in one of our forms (whether online or offline) or otherwise expressly provide us with your personal data, we may collect and store any personal data that you provide to us and may use it to personalise and improve your experience on our App, provide products and services you request from us, and carry out profiling and market research.
- C. When you interact with our App /digital platforms, we may also automatically collect the following information about your visit. This is primarily to help us better understand how you use our digital platforms to enable us create better content and more relevant communications:
  - i. how you have reached our App, digital platform and the internet protocol (IP) address you have used
  - ii. your browser type, versions and plug-ins, and your operating system
  - iii. your journey through our digital platform, including which links you click on and any searches you made, how long you stayed on a page, and other page interaction information
  - iv. what content you like or share
  - v. which adverts you saw and responded to
  - vi. which pop up or push messages you might have seen and responded to
  - vii. your subscription status
  - viii. information collected in any forms you complete
- D. We may also infer your country of location from the IP address you have used to access our digital platforms and we may analyse which marketing activity led to your taking specific action on our digital platforms (e.g. downloading the app).

## **3. OFFERS AND OPPORTUNITIES FROM US AND OUR PARTNERS**

- A. We want you to be the first to know about new products and services, and occasional offers from our partners. We may share these offers with you only with your prior consent. You can unsubscribe from receiving these offers by emailing us. Please note, if you don't choose to receive this information, we will be unable to keep you informed of new services, products, events or special offers that may interest you and our ability to inform you of ticketing opportunities may be affected.

## **4. LEGITIMATE PROCESSING OF INFORMATION:**

- A. We may process your personal information for legitimate interests, including providing you with services and for service improvement purposes.
- B. It may be deemed necessary to process personal information for the following (*but not limited to*) purposes of legitimate interests by us or our third parties such as:
  - i. To deliver services in respect to requests raised by you.
  - ii. To prevent misuse or fraudulent activities on our platforms.
  - iii. To uphold performance of contracts to which the data subject is a part of .
  - iv. In interests deemed to protect the vital interest of the data subject.
  - v. In order to maintain compliance with legal obligations to which Godrej is a subject or where required by law.
- C. We take special consideration to ensure that the legitimate processing of information do not override the fundamental rights and freedoms of the data subjects.

## 5. CHILDREN

- A. We understand the importance of taking extra precautions to protect the privacy and safety of children using Godrej's products and services. The App does not provide information or any products specifically targeting children.
- B. If you are under the age of 16, you must first tell your parent or legal guardian that you wish to register on our digital platforms and get their consent. You must make sure that your parent or legal guardian knows and agrees each time before you:
  - i. email us, or ask us to email anything to you;
  - ii. send any information to us;
  - iii. enter any competition or game that requires information about you or offers a prize;
  - iv. purchase an official membership; or
  - v. offer or agree to buy anything online.
- C. Once we receive appropriate authorization or consent from your parents or legal guardian, we may collect your date of birth and retain that with your name and other details you may provide. This is so we can ensure we treat you in an age appropriate way in line with this Privacy Notice.

## 6. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

- A. As a global business, Godrej may share your personal data with Godrej's subsidiaries, vendors, partners, service providers and other trusted third parties based within and outside the country in which you live so that they may process that data on our behalf as necessary, in connection with providing our products and services to you, fulfilling contractual arrangements and legal or regulatory requirements. Godrej requires that its service providers and such other third parties keep your personal data confidential and that they only use the personal data in furtherance of the specific purpose for which it was disclosed.
- B. We may share your personal data with:
  - i. law enforcement or government authorities where they have followed due legal process to request us to disclose the information
  - ii. third party providers of services and web analytics tool providers, if you have any queries about our third party service providers, then you may contact us. (contact details included in the later part of this notice).

## **7. TRANSFERRING YOUR PERSONAL DATA**

- A. We may transfer your personal data to servers located outside the country in which you live or to affiliates or other trusted third parties based in other countries so that they may process personal data on our behalf. By using a Godrej site or otherwise providing Godrej with personal data, you agree to us doing so in accordance with the terms of this Privacy Notice and applicable data protection laws and regulations. Godrej will ensure to a reasonable extent that anyone processing your personal data outside your country of origin is required to implement measures to protect it and is only entitled to process it in accordance with Godrej's instructions.

## **8. DATA SECURITY**

- A. The App is equipped with industry standard security features to protect the confidentiality and security of your information. All the back-end APIs are secured with SSL certificates .All the data communications happen over secured channels.

## **9. RETENTION OF PERSONAL DATA**

- A. You are responsible for providing the App/Godrej with accurate and complete personal data. Please notify us of any changes to your personal data. Godrej shall take reasonable steps to ensure that your personal data is kept accurate, complete, and current.
- B. We will retain your personal data for the period necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law.

## **10. COOKIES**

- A. In common with many other App operators, we use standard technology called 'cookies' on our App and the same is also used by third party applications. Cookies are small pieces of information available on our App and/or third party applications that are stored by your browser on your computer's hard drive and they are used to record how you navigate this App on each visit.
- B. We automatically collect and temporarily store the following information about your visit:
  - i. the name of the domain you use to access the Internet;
  - ii. the date and time of your visit;
  - iii. the pages you use via App; and
  - iv. the address of the web App you came from when you came to visit
- C. We use this information for statistical purposes and to help us make our App more useful to visitors. Unless it is specifically stated otherwise, no additional information will be collected about you.

## **11. SAFEGUARDING YOUR PERSONAL DATA**

- A. We take all reasonable precautions to keep your personal data secure and require any third parties that handle or process your personal data for us to do the same. Access to your personal data is restricted to prevent unauthorised access, modification or misuse and is only permitted among our employees and authorised agents on a need-to-know basis.

## **12. YOUR PRIVACY RIGHTS AND WHO TO CONTACT**

- A. We provide you with reasonable access to view and review your personal data and request correction and deletion where appropriate. In order to protect your privacy, we

will take reasonable steps to verify your identity before granting access to your personal data.

- B. If you have any questions, comments or concerns about how we handle your personal data, then you may contact us—at [gdpr@godrej.com](mailto:gdpr@godrej.com).
- C. You have the right to tell us if you:
  - i. don't want to be contacted in the future by us
  - ii. would like a copy of the personal data which we hold about you
  - iii. would like to delete your personal data in our records
  - iv. wish to report any misuse or unauthorized use of your personal data including but not limited to any illegal action or omission done by any third party
  - v. would like to correct or update your personal data
- D. To exercise any of the above listed rights you may contact us to assist us in dealing with your request, please provide your full name, address, date of birth and email address.
- E. If you have subscribed to receive marketing communications, you can unsubscribe by contacting our Privacy Officer.

### **13. CHANGES TO OUR PRIVACY NOTICE**

- A. We may change our Privacy Notice from time to time and post the updated version of the same. We encourage you to visit frequently to stay informed about how we use your personal data.

### **14. HANDLING PRIVACY CONCERNS**

- A. If you have any questions about this Privacy Notice or if you believe that your personal data is not handled in accordance with the applicable law or this notice, then you may contact us at [gdpr@godrej.com](mailto:gdpr@godrej.com).

**Effective on-24-10-2024**