

**Effective Date:1st September, 2018**

## **Privacy Policy: Introduction**

This privacy policy ("Privacy Policy") sets out how STONERAY TECHNOLOGIES PRIVATE LIMITED ("Company") collects, stores, uses, protects, communicates and discloses and make use of personal information. The Company is an online platform to facilitate real estate transactions, that allows / provides the online / registered customers' real estate related services.

It applies to this website and all related websites, applications, services and tools (together "[www.15bells.com](http://www.15bells.com)"). By visiting or using the Website you agree to the collection, storage, usage and disclosure of your personal information by the Company in the manner described in this Privacy Policy. From time to time we will review our Privacy Policy. We will notify you about any changes to our Privacy Policy at any time by posting an updated version of the Privacy Policy on the Website [ [www.15bells.com](http://www.15bells.com)].

We value your concerns about online privacy & security whilst browsing and availing our services on our Website. By visiting the Website you are accepting the terms of this privacy policy. For the purpose of this privacy policy, "**We**" or "**Us**" or "**Our**" shall include Stoneray Technologies Private Limited (the "**Company**" or "**15 Bells**") which owns, manages, runs, maintains and operates the Website. This document is an electronic record in terms of the Information Technology Act, 2000 and rules thereunder in force, and the provisions pertaining to electronic records in various applicable statutes as amended by the Information Technology Act, 2000 from time to time. This electronic record is generated by a computer system and does not require either physical or digital signatures.

Further, this document is published in accordance with the provisions of Rule 3(1) of the Information Technology (Intermediaries Guidelines) Rules, 2011 that requires publishing the rules and regulations, privacy policy and User agreement for access or usage of the internet resource [www.15bells.com](http://www.15bells.com).

We value your concerns about online privacy & security whilst browsing through the Website and availing the services available on the Website. We make every effort to guarantee that the information You provide will not be misused. This privacy policy ("**Privacy Policy**") would apply to all information We collect when You register with 15 Bells, or when You access or use Our Website, or avail any services and/or facilities on Our Website (collectively referred to as "**Services**").

This page informs You of Our Privacy Policies regarding the collection, use and disclosure of personal information We receive from users of the Website. We use your personal information only for enabling and facilitating the Services provided by the Website and for improvement thereof. By using the Site, You agree to the collection and use of information in accordance with this policy.

Our goal in this Privacy Policy is to be completely transparent about the data We collect, why We collect, use, share, store and protect personal information about Users. Any capitalized term used but not defined in this Privacy Policy shall have the meaning attributed to it in Our User Terms and Conditions [*hyperlink to User T&C webpage*]. We encourage You to familiarize yourself with Our policies and let Us know if you have any further questions or apprehensions, which We would be happy to address. We solicit and value your feedback and look forward to improve Our Services in order to endeavour to provide You with excellent and impeccable Services. By using this Website or its Services, you consent to the collection, storage, and use of personal information you provide (including any changes thereto as provided by you) for any of the Services that We offer.

### **To Whom Does This Policy Apply?**

This Policy applies to two specific types of users. Some parts of the policy are directed towards a particular group of users namely Real Estate Professionals.

Users: "**Users**" or "**You**" or "**Your**" or "**Yourself**" are everyone who uses Our Services.

Real Estate Professionals: These are the real estate professionals who have created their accounts with Us either free or premium model, to sell and/or rent and/or lease real estate, join in Our Services that includes advertising or other Services facilitating real estate transactions. These users shall include owners of the property, brokers, developers, property consultants, financial institutions etc.

### **When and what information does the Website collect?**

When You access/browse or use Our Website, to avail Our Services, You are required to create an account with the Website and provide certain personal information namely: Your name and email address as part of Our Customer Identification process. The information as supplied by You allows Us to provide You a safe, efficient, smooth and customised experience. Even if You do not create an account on [www.15bells.com](http://www.15bells.com), We have the ability to track the usage of Our Website when You simply browse [www.15bells.com](http://www.15bells.com) as a visitor. This information is not used to track information about individuals who visit the Website, but is used to an

aggregate level to customize Our Website, improve the online experience, improve the user interface (UI) and plan advertising and promotions. You agree to Our user Terms and Conditions and this Privacy Policy, governs how We treat Your information.

What information We collect: once You create an account with Us, whether as a buyer, lessee, lessor, landlord, broker, developer, property consultant, or subscriber You will have to furnish certain information like name (individual/company/firm etc.), contact number, email address, RERA registration number as provided under the Real Estate (Regulation and Development) Act, 2016, furthermore, We shall ask you any two self-attested copies of the following documents for customer identification process: (i) Aadhar Card; (ii) PAN Card; (iii) Passport; (iv) Voters ID Card; (v) Driving Licence; and/or (vi) 2 (two) Public Utility Bills of any last 6 months of a Government Agency. etc. A paid subscriber would have to furnish additional information including financial data like credit card information, billing addresses, and other billing related details which shall be asked by Us to facilitate Your transaction.

All the information the You shall provide Us is voluntary, including sensitive personal information. You understand that Our Website may use certain information of Yours, which has been designated as 'sensitive personal data or information' under the IT Rules for the purpose providing You the Services and for sharing the information only with affiliates who are subject to this Privacy Policy.

Further, when You use the Website You provide Us with Your IP address. We may use cookies or similar electronic tools to store this information. We may store a cookie on Your computer which in turn would store information about Your geographical location. This helps Us in providing Services and features that might cater to Your needs for browsing for Services of Your choice, and customize Our Website to make Your experience safer and easier.

### **Data Usage / Cookies**

We (or a third party providing services to the Company) may use cookies, pixel tags, "flash cookies", or other local storage provided by your browser or associated applications (each a "Cookie" and together "Cookies"). A Cookie is a small file that may be placed on your computer when you visit the Website. Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to Your browser from Our Website and stored to Your computer's hard drive. Use of cookies in Our Website is similar to other online marketplaces. It helps Us remember and understand and save User's preferences for future visits and

compile aggregate data about the Website traffic and their apparent interactions in order to offer You a better online experience and web tools in future.

Most browsers now recognise when a cookie is offered and permit you to refuse or accept it. If you are not sure whether your browser has this capability, you should check with the software manufacturer, your company's technology help desk or your internet service provider. If Cookies are disabled, the Company may not be able to provide you with the full range of our Services.

We may also use trusted third-party Services that track this information on Our behalf. Cookies also allow Us to collect non-personally identifiable information from You, like which pages You visited and what links You clicked on. Use of this information helps Us to create a more user-friendly experience for all visitors. In addition, We may use third-party advertising companies to display advertisements on Our Website. Most browsers automatically accept cookies, but You may be able to modify Your browser settings to decline cookies.

Cookies may collect and store your personal information. This Privacy Policy applies to personal information collected via Cookies. You consent and acknowledge that we collect your personal information through Cookies.

Cookies may be used to provide you with the Services, including to identify you as a user of the Website, remember your preferences, customise and measure the effectiveness of the Website and our promotions, advertising and marketing, analyse your usage of the Website, and for security purposes.

Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you choose to decline cookies, please note that you may not be able to sign in or use some of the interactive features offered on our \_\_\_\_\_ website.

[Client to confirm the above mentioned functioning of “cookies” from their IT department.]

## **Information Sharing**

We shall use the personal information provided by You for Our business purposes and this may include the viewing or advertising of residential or commercial real estate, rental properties or to use associated Services, for analytical purposes, for

improving Your experience with Our Website and providing targeted advertisements to You.

We do not sell, trade, or otherwise transfer to outside parties Your personally identifiable information unless We provide You with advance notice. This does not include Website hosting partners and other parties who assist Us in operating Our Website, conducting Our business, or servicing You, so long as those parties agree to keep this information confidential. We may also release Your information when We believe release is appropriate to comply with the law, enforce Our site policies, or protect Ours or others' rights, property, or safety.

We may provide non-personally identifiable visitor information to other parties for marketing, advertising, or other uses.

Users who supply Us with their telephone numbers online may receive communication from Us via telephone, text message or emails, pertaining exclusively to real estate properties and related Services. If You do not wish to be on Our mailing list, You can let Us know of Your updated preferences by either emailing Us at [•] or choosing the “unsubscribe” option. For those Users who have registered for the mailing list, their personal information is kept until they choose to delete their accounts provided they do not proceed and initiate any transaction with respect to any Property Listing. Moreover, in all cases wherein any User proceeds or initiates any transaction with respect to the aforementioned Property Listing, in such a case 15 Bells will retain all records both electronic and any physical forms thereof for its internal records.

We may share Your personally identifiable information that You share with Us and the information about Your use of Our Services with the party You want to contact, if You opt to contact or call Real Estate Professionals or any seller/buyer/promoter/developer/builder etc., via Our Website. This may include data You input such as home search criteria or Log Data that We collect as You use the Services. If a Real Estate Professional wants to contact You based on the anonymized profile of the Website pages You visited, We will contact You to see if We can make that connection. Sometimes, if We are working with a third-party to improve the leads We provide to Our Real Estate Professionals, We may provide that third-party with additional but limited personally identifiable information for the sole purpose of their carrying out their duty to Us.

### **Social Media Features and Widgets**

Our Website includes social media features, such as the Facebook ‘like’ button and widgets, such as the ‘share this’ button or interactive mini-programs that run on Our

site. These features may collect Your IP address and may set a cookie to enable the feature to function properly. These social media features and widgets are either hosted by a third-party or hosted directly on Our Website.

## **How do I update my Account information?**

### **General Matters**

The Accuracy and Confidentiality of Your Account Information is Your Responsibility: You are responsible for maintaining the secrecy and accuracy of Your password, email address, and other Account information at all times. We recommend a strong password that You do not use with other Services. We are not responsible for personal data transmitted to a third-party as a result of an incorrect email address provided by You. We make all User information accessible to Our employees, agents, or partners or third-parties only on a need-to-know basis, and bind all such employees to strict confidential obligations.

Third-Party Websites: This Privacy Policy only addresses the use and disclosure of information We collect from You. This Website may contain links to other Websites. When You click on one of these links, You are navigating to another Website. Other Websites that may be accessible through this Website have their own Privacy Policies and data collection, use and disclosure practices. If You link to any such Website, We urge You to review such Website's Privacy Policy. We do not take liability of misuse of any information by any of the Websites that We may link. We also do not have any responsibility of for the policies or practices of third-parties.

We will share Your personal information internally with those staff members who need it to carry out Your instructions regarding the receipt of marketing information. We will not disclose Your personal information to any third party without Your written consent unless required to do so by law and/or covered under this Privacy Policy.

Security: We use commercially reasonable security measures to protect the loss, misuse, and alteration of the information under Our control. However, We cannot absolutely guarantee the protection of any information shared with Us. Moreover, You understand and appreciate that no data transmission over the Internet can be guaranteed to be completely secure. We cannot ensure or warrant the security of any information that You transmit to Us and You do so at Your own risk. We strongly urge You to not share Your password with anyone. We encrypt certain sensitive information using Secure Socket Layer (SSL) technology to ensure that Your personal details are safe as it is transmitted to Us. We recommend that You do not share Your Password with anyone.

Furthermore, We shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond the reasonable control of 15 Bells including acts of government, computer hacking, unauthorised access to computer data and storage device, computer crashes, cyber security incident, cyber attack and/or a cyber security breach.

Policy Changes: We reserve the right to update or change Our Privacy Policy to reflect changes to Our information practices. If We make any change in how We use Your Personal Information, We will notify You by means of a notice on this Website prior to the change becoming effective. We encourage You to periodically review this page for the latest information on Our privacy practices.

We may disclose all or part of Your personal details in response to a request from the law enforcement authorities or in case of a bona fide requirement to prevent an imminent breach of any applicable law for the time being in force in India.

### **How to contact us**

If you have any questions about this Privacy Policy or our information-handling practices, or if you would like to request information about our disclosure of personal information to third parties for their direct marketing purposes, please contact us by e-mail or postal mail as follow:

Privacy Policy Inquiry \_\_\_\_\_

Following Address

21/22, 9th floor, Tower A,

Emaar Digital Greens, Sec-61,

Gurugram, Haryana(122102).

Your query will be handled by Our Grievance Redressal Officer at the earliest.

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