

## 1. Introduction

We, Simon India Limited, are committed for safeguarding the privacy of our website visitors. With this policy in place, we will explain how we treat your personal information in accordance to the Information Technology Act, 2000 and Rule 4(1) of Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011.

By using our website ([www.simonindia.com](http://www.simonindia.com)) and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

## 2. Collecting Personal Information

- We may collect, store and use the following kinds of personal information:
  - Information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, etc.);
  - Information that you provide to us when registering with our website including your email address;
  - Information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including [your name and email address]);
  - Information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use);
  - Information contained in or relating to any communications that you send to us or send through enquiry forms or otherwise on our website (including the communication content and meta data associated with the communication);
  - Any other personal information that you choose to send to us.
- Before you disclose to us any personal information of another person, it would be your responsibility to obtain that person's consent both for disclosure as well as processing of that personal information in accordance with this policy.

## 3. Using Your Personal Information

- Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.
- We may use your personal information to:
  - Administer our website and business;
  - Personalise browsing experience of our website for you;
  - Enable your use of the services available on our website;
  - Send you email notifications that you have specifically requested;
  - Send you our email newsletter, if you have requested for it;
  - Deal with enquiries and complaints made by or about you relating to our website;
  - Keep our website secure and prevent fraud.
- If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the licence/ consent you grant to us.

#### 4. Disclosing Personal Information

- We may disclose your personal information to any of our employees, officers, advisers, agents, insofar as reasonably necessary for the purposes set out in this policy.
- We may disclose your personal information to any member of our group of companies (this means our affiliates and subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.
- We may disclose your personal information:
  - To the extent that we are required to do so by law;
  - In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
  - To the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
  - To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- Except as provided in this policy, we will not provide your personal information to third parties.

#### 5. International Data Transfers

- Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
- Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.
- You expressly agree to the transfers of personal information described in this Section.

#### 6. Retaining Personal Information

- This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Notwithstanding the other provisions of this Section 6, we will retain documents (including electronic documents) containing personal data:
  - To the extent that we are required to do so by law;
  - If we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
  - In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## 7. Security of your Personal Information

- We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
- You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

## 8. Third Party Websites

- Our website may include hyperlinks to, and details of, third party websites.
- We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## 9. Cookies

- Our website uses cookies. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- This Privacy Policy may be amended and updated periodically and without prior notice to you to reflect changes in our online information practices. When changes are made to this Policy it will be posted to the website and the "last updated" date at the top of this policy will be revised. We also encourage users to periodically check this Policy to understand how we protect and use your information.

## 10. Grievance Redressal

Simon India Ltd. strongly believes in a sincere and transparent approach to its users. Our policy on grievance redressal follows the under noted principles.

- Our users are to be treated fairly at all times.
- Complaints or concerns raised by users are dealt with an open mind, with courtesy and in a timely manner.
- All employees at Simon India must work in good faith and without prejudice to the interests of the users.

We understand that customer grievances can happen due to multiple reasons. Since we are dealing with humans, grievances can arise due to the attitudinal and the way communication gets done. It can also happen due to the actual errors across the system.

Users have complete authority to file a complaint/ share feedback if they are disappointed by services rendered by us. They can give their complaint/ feedback. If user's dilemma is not resolved within the given time or if they are not satisfied with the solution provided by us, they can approach our tiered redressal system.

Users can send email to [system.admin@adventz.simonindia.com](mailto:system.admin@adventz.simonindia.com) mail ID covering brief description of grievance and contact details. We, at Simon, will revert within reasonable time-frame and try to resolve the issue.

If you are still not satisfied at this level, you may please write to or call on:

**Head – IT, Simon India Ltd.**

Mehtab House, Ground Floor,  
A-36, Mohan Cooperative Industrial Estate,  
Near Mohan Estate Metro Station,  
New Delhi - 110044  
Phone: 011-42602222, 26943004 / 05