

PRIVACY NOTICE AND CONSENT

Terrace 35, by Sri Aditya Homes

Data Fiduciary	Sri Aditya Homes Private Limited, CIN U45200TG1994PTC017517
Registered office	Road No. 3, Banjara Hills, Hyderabad 500034, Telangana, India
Project	Terrace 35, Survey No. 200/P, Manikonda, Hyderabad
TS RERA registration	P02400011009
Version	2.0, draft for legal review
Effective date	6 September 2026
Available in	English, Telugu, Hindi
Applies to	The Terrace 35 website, enquiry forms, WhatsApp channels, site visits, EOI and booking

1. Who processes your data

1.1 Sri Aditya Homes Private Limited is the Data Fiduciary for Terrace 35. We decide why and how your personal data is processed, and we are answerable to you for it under the Digital Personal Data Protection Act, 2023 and the Digital Personal Data Protection Rules, 2025.

1.2 House of Investors is our authorised sales and marketing partner for Terrace 35. It operates the enquiry forms, the WhatsApp business number, the site visit booking and the customer relationship system used for this project. It processes your data as a Data Processor, on our written instructions, under a data processing agreement as required by Section 8(2) of the Act.

1.3 If you contact our sales and marketing partner first, your data reaches us through that agreement. Your rights under this notice apply in full either way, and you may exercise them with either party. We remain responsible to you.

1.4 We are not a Significant Data Fiduciary.

2. What we collect, and at which stage

We collect only what the stage you are at actually requires. You are not asked for booking data to make an enquiry.

Stage	What we collect	Why
Enquiry	Full name, phone number, WhatsApp number, email address, city or country of residence, configuration and budget preference, how you found us	To answer you and to send the information you asked for
Site visit	Preferred date and time, number of visitors, entry register details recorded at the site gate	To confirm and host the visit, and for site safety and access control
Expression of Interest	PAN, current residential address, bank account and cheque details for the refund of your EOI amount, unit and floor preference, signature	To register your EOI, hold your price and unit, and refund your EOI amount when due

Stage	What we collect	Why
Booking, agreement and registration	Identity documents required by law for the sale agreement and registration, co-applicant details, loan requirement, nominee details	To execute the agreement, complete registration and meet statutory filing obligations
After booking	Payment records, demand and receipt history, correspondence, service requests	To administer your unit account and keep you updated

2.1 Aadhaar. We do not collect Aadhaar at enquiry or EOI stage. Where a government authority requires Aadhaar at the point of registration, it is provided at that point only, in masked form, and only to the extent that authority requires. [Confirm the statutory basis and the exact stage with counsel. Annexure A, point 1.]

2.2 Financial data. Bank and cheque details are collected only so that a refundable EOI amount can be returned to you and so that payments against your unit can be reconciled. We do not collect or hold your transaction history.

2.3 Age. Our forms are for adults. We do not knowingly collect personal data from anyone under 18. See Section 10.

3. Why we use your data, and on what legal basis

Each purpose below stands on its own. Where the basis is your consent, the consent item it maps to in Section 4 is named, so you can see exactly what each tick does.

Purpose	Legal basis	Consent item
Respond to your enquiry, arrange and confirm your site visit	Consent, Section 6	Item 1
Register your EOI, hold your price and unit, refund the EOI amount	Consent, Section 6	Item 1
Send you updates on your own unit: construction milestones, demand notices, account statements	Consent, and performance of your booking	Item 1
Execute the sale agreement and complete registration	Consent, and compliance with law	Item 1
TS RERA filings, statutory returns, tax reporting, statutory record keeping	Compliance with law, Section 7	Not consent-based
Marketing about Terrace 35 by WhatsApp, email, SMS and calls	Consent, Section 6	Item 2
Marketing about other Sri Aditya Homes projects	Consent, Section 6	Item 3
Online advertising audiences on Meta and Google, using a hashed identifier	Consent, Section 6	Item 4
Introducing you to an authorised channel partner, at your request	Consent, Section 6	Item 5
Introducing you to a bank or housing finance partner, at your request	Consent, Section 6	Item 6

We will not use your data for a purpose that is not listed here. If a new purpose arises, we will tell you and, where the law requires it, ask you again.

4. Your consent choices

Tick only what you want. Nothing here is ticked in advance.

Item 1 is what allows us to answer you at all. Items 2 to 6 are optional. If you leave them blank, it will not affect your enquiry, your site visit, your EOI, your price, your unit or your purchase. You can change any of these choices at any time. Section 9 tells you how.

- ☐ **Item 1. Contact me about Terrace 35.** *Needed to respond to you*
Calls, WhatsApp, SMS and email from Sri Aditya Homes and its authorised sales and marketing partner about my enquiry: pricing, unit availability, site visits, my EOI and, if I book, updates on my own unit.
- ☐ **Item 2. Send me marketing about Terrace 35.** *Optional*
Promotional messages by WhatsApp, email and SMS: offers, price change notices, launch and event invitations, project news and new inventory releases.
- ☐ **Item 3. Send me information about other Sri Aditya Homes projects.** *Optional*
Marketing about projects other than Terrace 35. Separate from Item 2 and can be given or withdrawn on its own.
- ☐ **Item 4. Use my contact details to show me relevant advertising online.** *Optional*
Share a secured, hashed version of my phone number or email address with Meta and Google so that I see Terrace 35 advertising, and so that similar audiences can be built. The hashed identifier is not readable as my phone number or email.
- ☐ **Item 5. Introduce me to an authorised channel partner if I ask for one.** *Optional*
Share my name and contact details with a named authorised channel partner, only when I have asked to be introduced.
- ☐ **Item 6. Introduce me to a home loan partner if I ask for one.** *Optional*
Share my name, contact details and the loan amount I am considering with a bank or housing finance company, only when I have asked to be introduced.
- ☐ **I confirm that I am 18 years of age or older.**
- ☐ **I have read this Privacy Notice and I give the consents I have ticked above, freely and for the purposes stated in it.**

Name		Date	
Signature		Language of the notice I read	

5. Who we share your data with

We do not sell your personal data, and we do not give it to anyone for their own marketing.

Who	What is shared	When
Government and statutory authorities	Whatever the law requires	TS RERA filings, sub-registrar and property registration, income tax and other statutory reporting
Our processors, under written contract	Only what the service needs	Our authorised sales and marketing partner, our customer relationship and WhatsApp business messaging provider, our cloud hosting and IT providers, our payment and reconciliation providers
Advertising platforms	A hashed identifier only	Only if you have given Item 4
Banks and housing finance companies	Name, contact, loan amount under consideration	Only if you have given Item 6 and asked for an introduction
Authorised channel partners	Name and contact details	Only if you have given Item 5 and asked for an introduction
Auditors, legal and professional advisers	What the engagement requires	Under confidentiality obligations

6. Transfers outside India

Some of our processors, including our messaging, advertising and cloud hosting providers, store or process personal data outside India. We transfer data only in line with Section 16 of the Act, and not to any country that the Central Government restricts by notification. Our processors are bound by contract to protect your data to the same standard wherever it is held. [Final list of providers and their processing locations to be inserted. Annexure A, point 7.]

7. How long we keep your data

Category	How long	Why
Enquiries that do not convert	[X] months from your last interaction with us, then erased	The purpose is exhausted
EOI that is withdrawn or refunded	[X] months from the date of refund	Refund reconciliation, audit and dispute window
Booked customers, agreement and registration records	[X] years from registration or handover, whichever is later	Registration Act, Income Tax Act, Companies Act and RERA record keeping
Consent records	For as long as the consent is live, plus [X] years	To prove what you agreed to and when
Consent withdrawal and erasure records	[X] years	To prove we acted on your request
Site visit register	[X] months	Site access and safety records

Where the Rules require advance intimation, we will tell you at least 48 hours before we erase your personal data. [Confirm whether this obligation applies to us. Annexure A, point 10.]

When a retention period ends, we erase the data or reduce it to a form that no longer identifies you.

8. Your rights as a Data Principal

Right	What it means	Where it comes from
Access	Ask us for a summary of the personal data we hold about you, what we are doing with it, and who we have shared it with	Section 11
Correction and completion	Have inaccurate or incomplete data corrected, completed or updated	Section 12
Erasure	Ask us to erase your personal data, except where a law requires us to keep it	Section 12
Nomination	Nominate another individual to exercise your rights on your behalf if you die or become unable to act. Ask us for the nomination form, or use the form at [link]	Section 14
Grievance redressal	Raise a complaint with us about how we have handled your data, and get a response	Section 13
Withdraw consent	Take back any consent you gave, at any time. See Section 9 below	Section 6(6)

How to exercise them. Write to our Grievance Officer at the address in Section 13, or use the request form at [\[link\]](#). We will verify who you are before we act, so that nobody else can make a request in your name. We respond within [30] days of a verified request. There is no charge.

9. Withdrawing your consent

Withdrawing consent is as easy as giving it. You can:

Reply STOP on WhatsApp to any message from us. Click the unsubscribe link in any email. Write to the Grievance Officer at the address in Section 13. Or ask us to change any single item from Section 4 without touching the others.

We act on it within [X] working days and we confirm when it is done.

What withdrawal does and does not do:

It takes effect going forward. It does not make our earlier processing unlawful, and it does not undo processing already completed. This is set out in Section 6(6) of the Act.

There is no charge and no penalty for withdrawing marketing consent, and it will not affect your price, your unit or your booking.

If you withdraw a consent that we need in order to service a live booking, we may not be able to continue with parts of that service. We will tell you exactly which parts before it takes effect, so you can decide.

We will still keep the records that a law requires us to keep, and we will still send you the notices that a law requires us to send.

10. Children

We do not knowingly process the personal data of anyone under 18 without the verifiable consent of a parent or lawful guardian, and we do not use a child's data for tracking or for behavioural advertising. This follows Section 9 of the Act. Our forms ask you to confirm that you are 18 or older. If you believe a child's data has reached us, tell the Grievance Officer and we will erase it.

11. How we protect your data

We apply reasonable security safeguards, including access control on our customer relationship system, encryption of data in transit, role based access for our sales team, and contractual security obligations on every processor we appoint.

If a personal data breach occurs, we will inform the affected Data Principals without delay, notify the Data Protection Board of India, and file the detailed report to the Board within 72 hours, as the Rules require.

12. Your duties as a Data Principal

Section 15 of the Act places some duties on you as well:

Do not impersonate another person when giving us your data. Do not suppress material information where the law requires it to be given, for example in registration documents. Do not raise a false or frivolous grievance. Give us information that is authentic and, where we ask you to correct something, verifiably correct.

The Act provides for a penalty of up to ten thousand rupees for breach of these duties.

13. Grievance redressal and escalation

If you have a question about this notice, or you want to exercise a right, or you are unhappy with how we have handled your data, contact our Grievance Officer:

Grievance Officer	Ms.Jannareddy Sravani
Email	hr@sriadityahomes.com
Phone	+91 98482 69639
Post	Sri Aditya Homes Private Limited, Road No. 3, Banjara Hills, Hyderabad 500034, Telangana
Hours	Monday to Saturday, 10:00 to 18:00 IST

We acknowledge every grievance within [3] working days and respond within [30] days.

If we do not respond within that period, or you are not satisfied with our response, you may complain to the Data Protection Board of India. Please complete our grievance process first, as the Act expects you to exhaust the Data Fiduciary's mechanism before approaching the Board.

14. Changes to this notice

Every version of this notice carries a version number and an effective date. If we change it in a way that affects what you have consented to, we will tell you, and where the law requires fresh consent we will ask you again rather than assume it. Earlier versions are available on request, so you can see what you agreed to on the day you agreed to it.

Annexure A. Open points for legal

Every square bracket in the notice traces back to one of these. Nothing should go live until each is closed.

#	Point	What needs to happen
1	Aadhaar	Version 1 stated that Aadhaar is collected for statutory booking and RERA compliance. We could not find that basis. Neither RERA nor the booking itself obliges a private developer to collect Aadhaar, and the Aadhaar Act restricts private entity use. Confirm whether any Aadhaar collection is required at all, at what stage, on what statutory basis, and whether masked Aadhaar is sufficient. Until confirmed, v2 removes it from the EOI stage.
2	Sales and marketing partner	Insert the correct legal entity name and CIN of the authorised sales and marketing partner at clause 1.2, and execute the data processing agreement under Section 8(2) before this notice is published. As things stand the partner operates the forms, the WhatsApp number and the customer relationship system, so it is a processor and the contract is not optional.
3	Retention periods	Fix the figures in Section 7 for each category. Statutory retention under the Registration Act, Income Tax Act, Companies Act and RERA should be confirmed rather than estimated, and the non converting enquiry period should be a business decision the sales team can live with.
4	Grievance response period	Confirm the maximum period prescribed under the Rules and whether the 30 day commitment in Sections 8 and 13 is the right number to publish. Publishing a shorter period than you can meet creates its own exposure.
5	Channel partners	Confirm that leads are shared with channel partners only on the buyer's request. If any list is ever shared with a channel partner in bulk, Item 5 in Section 4 and the sharing table in Section 5 both have to change, and the consent has to be captured before the sharing, not after.
6	Marketing consent and TRAI	Item 2 covers consent under the DPDP Act. Promotional messaging on WhatsApp and SMS also sits under the TRAI commercial communications regime, which has its own registration, template approval and opt out obligations. Confirm the messaging provider is compliant and that opt outs flow back into the customer relationship system automatically.
7	Cross border	Finalise the vendor list and the countries in which each processes data, then complete Section 6. Check the list against any restriction notified by the Central Government under Section 16.
8	Significant Data Fiduciary	Confirm that Sri Aditya Homes does not cross any notified threshold. If it does, a Data Protection Officer based in India, annual data protection impact assessment and audit obligations all follow, and clause 1.4 has to change.
9	Translations	The Telugu and Hindi versions must be legally reviewed, not machine translated, and must be served from the same page as the English version with the buyer choosing. Log which language the buyer actually read, per Annexure B.
10	Pre erasure intimation	Confirm whether the 48 hour advance intimation before erasure applies to this class of Data Fiduciary, and adjust Section 7 accordingly.
11	Financial data	Confirm bank and cheque details are captured only for the EOI refund and payment reconciliation. Version 1 also listed transaction history, which has been removed as unnecessary.
12	Grievance mailbox	Confirm the correct email domain and move data grievances off the engineering mailbox to a dedicated, monitored address with a named backup.

Annexure B. Build spec for the website and WhatsApp

A notice is only as good as what the system actually captures. This is what has to be built so the consent described in Section 4 is the consent that exists in the record.

B1. Terrace 35 enquiry form, on page copy

Placed directly above the submit button, with the notice linked and openable without leaving the page.

Before you send this, please read how we handle your data. Our Privacy Notice is here [link], available in English, Telugu and Hindi.

Then the tick items, in this order, none pre ticked:

Field	Exact text shown	Rule
Consent 1	Contact me about Terrace 35 by call, WhatsApp, SMS and email about my enquiry, site visit, pricing and unit availability.	Required. Form cannot submit without it.
Consent 2	Send me offers, price change notices and event invitations for Terrace 35.	Optional. Never pre ticked. Never bundled with Consent 1.
Consent 3	Send me information about other Sri Aditya Homes projects.	Optional and separate.
Consent 4	Use a secured version of my contact details to show me relevant advertising on Meta and Google.	Optional. Gates any audience upload.
Age	I am 18 years of age or older.	Required.
Notice	I have read the Privacy Notice.	Required. Link must be clicked or opened in place.

Items 5 and 6 from Section 4 are not on the public form. They are captured at the moment the buyer asks for the introduction, in the customer relationship system, with the same logging.

B2. Click to WhatsApp

A Meta Click to WhatsApp ad opens a chat, so the notice cannot be shown before the first message. The first automated reply carries it:

Thanks for reaching out about Terrace 35. We will use your number to answer your questions about this project. How we handle your data is here [link]. Reply STOP any time and we will stop messaging you. Would you also like offers, price change notices and event invitations for Terrace 35? Reply YES to receive them, or just carry on and we will only answer your questions.

Answering the buyer's question is service messaging under Consent 1. Promotional broadcasts require an explicit YES, logged as Consent 2. Do not treat an inbound Click to WhatsApp message as marketing consent.

B3. What to log with every consent

The record has to be able to prove, later, exactly what was shown and what was ticked:

Field	Why it matters
Consent ID and timestamp with timezone	Proof of when
Source: page URL, ad ID, or WhatsApp message ID	Proof of where
IP address and user agent	Proof of who, on a web form

Field	Why it matters
Notice version number and language served	Proof of what they read
The exact text of every item shown, stored verbatim	Wording changes over time. The record must hold the wording used on the day
State of each item, ticked or not	Proof of granularity
Method of capture: web form, WhatsApp reply, signed EOI form	Proof of how
Every later change, with timestamp and method	Proof of the withdrawal trail

B4. Withdrawal handling

STOP on WhatsApp, unsubscribe in email and a request to the Grievance Officer all have to reach the same place. The customer relationship system flags the contact within [24] hours, every broadcast list rebuilds off that flag rather than off a static export, and the buyer gets a confirmation. Any contact list already uploaded to Meta or Google is refreshed on the same cycle, because a withdrawal that only stops WhatsApp while the buyer keeps seeing the ads is not a withdrawal.

End of document. Version 2.0, draft for legal review, 6 September 2026.