

## HOTEL PRIVACY POLICY

### **Heritage Village Resort and Spa, Manesar — Privacy Policy (DPDP Act, 2023 Compliant)**

**Effective Date:** 1<sup>st</sup> December 2025

---

#### **1. Introduction**

The Heritage Village Resort and Spa, Manesar (“we”, “our”, “us”) is committed to protecting the privacy of all guests whose personal data we collect and process.

This Privacy Policy explains **what data we collect, why we collect it, how long we keep it, how we process it, and your rights** under the **Digital Personal Data Protection Act, 2023** (“DPDP Act”).

---

#### **2. Types of Personal Data We Collect**

We may collect the following categories of personal data:

##### **2.1 Identification & Contact Information**

- Full name
- Address
- Phone number
- Email ID
- Government ID (Passport / Voter ID / Driving Licence / Aadhaar\*)  
\*Aadhaar is collected only in compliance with UIDAI guidelines and only when required for lawful verification.

##### **2.2 Financial Information**

- Payment card details (processed by secure payment gateways)
- Billing details and transaction records

## 2.3 Reservation & Stay Information

- Check-in and check-out dates
- Room type and preferences
- Special requests
- Vehicle details

## 2.4 Sensitive or Special Data (Only if required)

- Health or accessibility requirements voluntarily shared by the guest
- CCTV video recordings in common and guest areas for safety & security.

## 2.5 Data of Minors

Guests below 18 require **verifiable parental or guardian consent**.

---

## 3. Purposes of Processing

We process personal data strictly for lawful and specific purposes, including:

1. Managing reservations
2. Guest registration and verification
3. Providing hotel services (stay, dining, facilities, amenities)
4. Payment processing
5. Legal and regulatory compliance (including police verification, taxation, audits)
6. Ensuring safety and security of guests
7. Customer support and grievance redressal

We **do not** use your data for marketing unless you provide **separate explicit consent**.

---

#### 4. Legal Basis for Processing

Under the DPDP Act, processing is based on:

- **Guest consent** (free, specific, informed, unambiguous)
  - **Performance of service** (reservation and stay)
  - **Compliance with legal obligations**
- 

#### 5. Sharing of Personal Data

We may share your data only with:

- Payment processors
  - IT and cloud service providers supporting hotel operations
  - Government authorities, if legally required
- 

#### 6. Data Retention

We retain personal data only for the duration required to fulfil the purpose and as mandated by applicable laws.

(See **Data Retention Policy** below.)

---

#### 7. Your Rights

Under the DPDP Act, you may request:

- Access to your data
- Correction of inaccurate data
- Deletion of data
- Withdrawal of consent
- Lodging a complaint

Requests can be made to the Data Protection Officer.

---

## 8. Security Measures

We implement:

- Encryption of stored and transmitted data
  - Access control and role-based access
  - Staff confidentiality agreements
  - Regular audits
  - Secure deletion procedures
  - CCTV monitoring for safety
- 

## 9. Grievance / Data Protection Officer

**Name:** Mr. Pramod Singh

**Email:** pramod@heritagevillageresorts.com

**Phone:** 0124 611 1234

**Address:** Heritage Village Resort and Spa, NH-8, Naharpur Kasan Road, IMT Manesar 122050.

---

## 10. Updates to the Policy

We may update this Policy periodically. Changes will be communicated through our website or at check-in.

---

---

## ✓ 2. DATA RETENTION POLICY

### Purpose

To specify how long guest data is stored and when it is securely deleted.

### Retention Rules

Data Type	Retention Duration	Reason
Guest registration card	7 year (for local police requirement)	Legal/statutory
Reservation records	2 years	Accounting & audit
Payment records	7 years	Tax compliance
CCTV footage	30–90 days	Security purposes
Marketing opt-in records	Until withdrawal of consent	Proof of consent
Scanned IDs	Permanent, (for police requirement) – kept under server security protocols.	Data minimisation
Email/SMS communication	1 year	Operational needs

### Secure Disposal Methods

- Digital deletion from servers and backups
- Physical shredding of paper forms
- Vendor compliance for deletion certificates

---

## ✓ 3. HOTEL PERSONAL DATA FLOW MAP

### 1. Data Collection Points

- Booking engine (Website / OTA)
- Front desk check-in (ID card, registration)
- Payment gateway
- CCTV cameras in Public and Guest areas
- Wi-Fi login details (if collected)

## **2. Data Movement**

Guest → Hotel PMS (Property Management System) →

- Finance system → bank/payment processors
- Housekeeping & operations system
- Police portal (where mandatory)
- Third-party vendors (only when required)

## **3. Data Storage**

- PMS
- Encrypted servers or cloud storage
- Physical copies in secure cabinets (as required).

## **4. Data Exit Points**

- Secure deletion after retention period
- Transmission to authorities only when legally required
- Guest-requested deletion