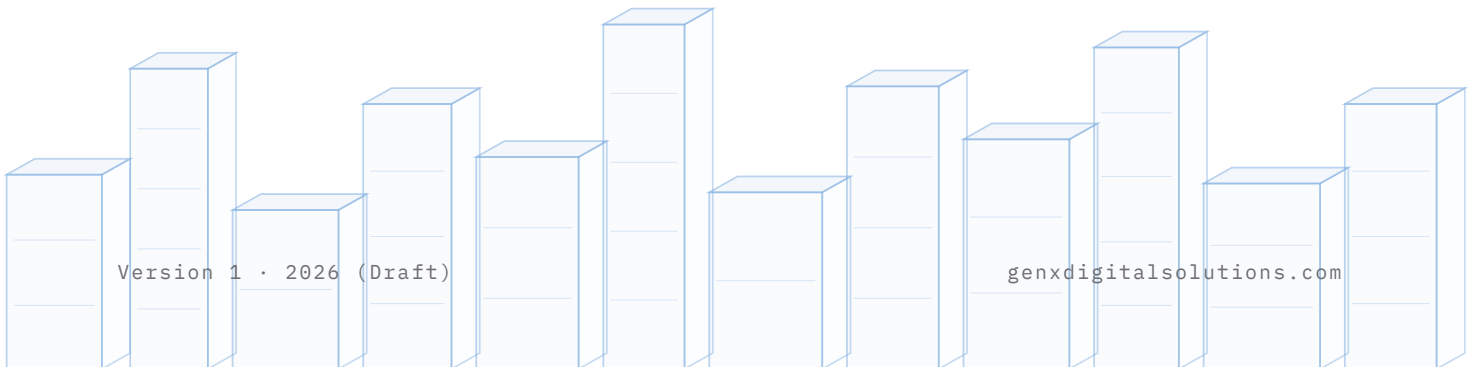




MADHYAMCONNECT · PRIVACY POLICY

How we handle your personal data.

A privacy policy for MadhyamConnect, written to the Digital Personal Data Protection Act, 2023. It explains what we collect, why, your rights, and how to reach our Grievance Officer.



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1 About this policy

This Privacy Policy explains how **GenX Digital Solutions** ("we", "us"; operating the MadhyamConnect platform) collects and handles personal data through its website, app and dashboard. **Effective date:** [effective date] · **Last updated:** [date] · **Version:** 1.0 (draft).

Legal standard. This policy is designed to comply with the **Digital Personal Data Protection Act, 2023 ("DPDP Act")** and the **Digital Personal Data Protection Rules, 2025** (notified 13 November 2025), whose substantive obligations take full effect from around **May 2027**, and with the **Information Technology Act, 2000** and its SPDI Rules, 2011 currently in force. We operate to DPDP standards ahead of the enforcement date.

Draft. This document is being finalised with legal counsel; the definitive version governs once the service is live. Items in [square brackets] will be completed before publication.

2 Definitions

- **Data Principal** — the individual the personal data is about (you).
- **Data Fiduciary** — the party that decides the purpose and means of processing.
- **Data Processor** — a party that processes personal data on behalf of a Data Fiduciary.
- **Personal data** — any data about an identifiable individual.
- **Processing** — any operation on personal data (collection, storage, use, sharing, erasure).

3 The personal data we collect

CATEGORY	EXAMPLES
Broker account data	Name, firm, phone, email, photo/logo, service areas, RERA registration number.
Billing data	Plan, GSTIN (if provided), payment details processed by a secure payment gateway. We do not store full card numbers.
Content you enter	Listings, and the contact details of your customers/leads (name, phone, email, property interest).
Usage & technical data	Device, IP address, and cookies/analytics needed to run and improve the service.

4 Why we process it, and our legal basis

We process personal data for specific, itemised purposes: creating and running your account; billing; hosting your listings; enabling broker-to-broker networking; supporting RERA display; providing support; preventing fraud; analytics; and meeting legal obligations.

Legal basis. We rely on your **consent** (DPDP s.6) and, where applicable, "certain legitimate uses" (s.7), such as data you voluntarily provide for a purpose. Consent is **free, specific, informed, unconditional and unambiguous**, given by clear affirmative action; you can **withdraw it at any time, as easily as you gave it**, and we will then stop the related processing unless another lawful basis applies.

5 Who is responsible — fiduciary & processor

Our roles differ by data type, and this matters:

- For your **broker account and usage data**, we are the **Data Fiduciary**.
- For the **customer/lead personal data you enter**, **you (the broker) are the Data Fiduciary** and we act as your **Data Processor** under a written data-processing agreement (DPDP s.8(2)).

Your undertaking. As the fiduciary for your customers' data, you confirm you have a lawful basis to enter it, will only enter data of adults, and will pass on your customers' rights requests to us.

6 Sharing & third parties

We share personal data only with processors who help us run the service — cloud hosting (in India), payment gateway, communication (email/SMS/WhatsApp) and analytics providers — each bound by contract to protect it. **We do not sell your personal data.** The broker controls the customer/lead data; we do not use it for our own purposes.

7 Retention & security

Retention. We keep personal data only while the purpose is served or as required by law, and erase or anonymise it on consent withdrawal, account closure, or when the purpose ends, subject to legal-hold exceptions (for example, tax records).

Security. Aligned to ISO/IEC 27001 "reasonable security practices": encryption in transit (TLS) and at rest, role-based access with multi-factor sign-in, tenant isolation so one broker cannot see another's data, logging and monitoring, and regular backups.

8 Data breaches

If a personal data breach occurs, we will notify affected individuals without undue delay with a plain-language description and mitigation steps, and report to the Data Protection Board of India, including a detailed report within **72 hours**, in line with the DPDP Rules (and any parallel CERT-In obligation).

9 Your rights

As a Data Principal you have the right to: **access** a summary of your data and who it has been shared with (s.11); **correction, completion, updating and erasure** (s.12); **grievance redressal** (s.13); and **nomination** of someone to exercise your rights (s.14). You may also **withdraw consent** at any time.

How to exercise them: from your account settings, or by emailing [privacy@genxdigitalsolutions.com]. We respond within the period prescribed by law; our target is **30 days**. From around November 2026, a Board-registered **Consent Manager** may also be used.

10 Children, cookies & cross-border

Children. MadhyamConnect is a business service intended for adults (18+). We do not knowingly process a child's data or direct tracking or targeted advertising at children; where a child's data is ever processed, verifiable parental consent is required.

Cookies. We use essential cookies to run the service and, with your consent, analytics cookies. See the separate **Cookie & Data-Handling Notice**.

Cross-border. Personal data is primarily stored and processed in India. Any transfer abroad is only to jurisdictions not restricted by the Central Government, with contractual safeguards, and subject to any sectoral localisation rules.

11 Grievance Officer

In accordance with the Information Technology Act, 2000 and the DPDP Act, 2023, our Grievance Officer is:

Name	[Grievance Officer name]
Designation	Grievance Officer, GenX Digital Solutions
Address	[Registered office address, India]
Email	[grievance@genxdigitalsolutions.com]

The Grievance Officer will **acknowledge your complaint within 24 hours** and **redress it within 15 days** of receipt. Data-protection grievances are resolved within the period prescribed under the applicable rules; if unresolved, you may approach the **Data Protection Board of India**.

12 Changes & contact

We may update this policy; we will publish the new version with a revised date and, where a change is material, seek fresh consent. Continued use after an update means you accept it. For any privacy question, contact us via genxdigitalsolutions.com or [\[privacy@genxdigitalsolutions.com\]](mailto:privacy@genxdigitalsolutions.com).

DISCLAIMER

Informational only. This Privacy Policy is provided for general information and is a draft; it is not legal advice. References to Indian law are summaries and may change. **Being finalised with legal counsel; the definitive version governs once the service is live.** © GenX Digital Solutions 2026. Queries via genxdigitalsolutions.com.



GenX Digital Solutions

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