

# PRIVACY POLICY

## 1. What does this Privacy Policy cover?

This is ShopyGeo's primary Privacy Policy, outlining how we ("**ShopyGeo**", "**we**", or "**us**") collect and use Personal Data about individuals. "Personal Data" refers to any information relating to an identifiable living person—someone who can be identified directly or indirectly through details such as name, location, or other identifiers, as defined by the GDPR.

Throughout this policy, "Personal Data" refers to any information we hold about you or other individuals that enables identification. We are committed to handling Personal Data responsibly. This Privacy Policy explains how we manage and use the Personal Data we collect in the course of our operations, including information gathered from various sources listed in section 3 below.

This Privacy Policy may be supplemented by additional notices specific to certain activities to ensure you fully understand how we collect and use your data.

If you provide us with someone else's data, you must:

- (a) inform them about this Privacy Policy and any other relevant privacy notices;
- (b) obtain their permission to share their data with us in line with those policies; and
- (c) Secure any legally required consent, if applicable.

## 2. Personal Data we hold

The Personal Data we collect and process varies based on the nature of our relationship, including the type of communication and services provided. This may include:

- Contact details
- Marketing preferences and activities
- Customer feedback

## 3. Sources of Personal Data

3.1 We may collect Personal Data from the following sources:

- Our website <https://shopygeo.shopylyst.com/> (the "Website");
- Email communications;
- Telephone calls and surveys, either directly or via third parties acting on our behalf, to maintain and update our databases;
- Businesses, specifically regarding the contact details of individuals within those organizations.

#### **4. How do we use Personal Data?**

We use Personal Data to support our business operations, as outlined in more detail on our websites. The specific purposes for which we process your Personal Data may vary depending on the services we offer.

Our primary uses of Personal Data include:

- Supporting advertising, marketing, direct marketing, and public relations activities for ourselves and our clients;
- Managing accounting and other administrative record-keeping functions;
- Delivering personnel, payroll, and pension administration services; and
- Conducting identity verification to support anti-fraud and anti-money laundering efforts.

#### **5. Responsibility for Personal Data**

ShopyGeo is committed to protecting your Personal Data in line with this Privacy Policy, our internal policies and procedures, and the requirements of Indian data protection law.

When we share Personal Data with third-party service providers or engage them to collect data on our behalf, we carefully select these providers and require them to implement appropriate safeguards to ensure the confidentiality and security of the data. These third parties (acting as data processors) also take on specific responsibilities under data protection law to protect any Personal Data they receive from us.

#### **6. Processing of Personal Data**

To achieve the purposes outlined above, we may transfer Personal Data to clients and service providers in other countries. If such transfers are made to countries outside India with data protection laws that differ from those in India, we take appropriate measures to ensure your Personal Data remains protected and is transferred in compliance with applicable data protection laws.

These measures may include data transfer agreements using Indian Commission-approved formats or other legally recognized mechanisms, such as standard contractual clauses.

If you would like more information about these transfers or the safeguards we use, please contact us using the details provided below.

#### **7. Security of Personal Data**

ShopyGeo implements a range of technical, physical, legal, and organisational measures to ensure the security of Personal Data under data protection laws.

As most of the Personal Data we manage is stored electronically, we have adopted robust IT security measures, including firewalls, anti-virus software, and encryption technologies. To safeguard physical records, we have on-site procedures and controls, such as secure storage and restricted access. Entry to our premises is managed using electronic access cards and confidential PIN codes. Additionally, our staff receive regular training on data protection and information security practices.

While we take extensive precautions, no method of data transmission over the Internet or electronic storage is completely secure. If you suspect any compromise in your interaction with us, such as concerns about the security of Personal Data you have shared, please contact us immediately.

## **8. Legal justification for our use of Personal Data**

By the GDPR and Indian data protection laws, we are required to inform you of the legal basis we rely on to process your Data.

This section outlines the primary legal justifications relevant to our use of Personal Data.

### **8.1 Justification for processing Personal Data:**

- When it is necessary to fulfill a contract you are a party to, or to take steps at your request before entering into such a contract.
- With your consent, when you voluntarily agree to provide us or a third party with your data, and
- When it is necessary for our legitimate interests or those of a relevant third party.

**8.2** When we rely on our legitimate business interests, or those of a third party, to justify the use of your Personal Data, these interests typically include:

- Advancing our commercial goals or those of a third party (such as through direct marketing or market research);
- complying with legal and regulatory requirements;
- developing internal guidelines and enhancing our business operations and services;
- Performing analytics, statistical research, and profiling.

## **9. Monitoring communication**

We monitor electronic communications between you and us (such as emails) to protect you, our business, our IT infrastructure, and third parties. This includes:

- Detecting and addressing inappropriate or unauthorized communications
- Identifying and removing viruses, malware, and other cybersecurity threats

## **10. Retention of Personal Data**

We retain Personal Data only for as long as necessary to fulfill the purposes for which it was collected.

If we are required to retain Personal Data to meet legal or regulatory obligations, we will do so for at least the duration required by those obligations.

When we hold Personal Data to provide you with a product or service, we will retain it for the duration of our relationship and an additional seven years afterward.

For more information about our data retention periods, please contact us using the details provided

below.

## 11. Personal Data Rights

Individuals in the Digital Personal Data Protection (DPDP) Act, 2023, have certain rights regarding their data. These rights may apply only in specific situations and may be subject to legal exceptions.

Your Data Protection Rights Include:

- **Right to Be Informed:** You have the right to receive clear and transparent information about how your data is used.
- **Right of Access:** You can request a copy of the personal data we hold about you by contacting us using the details below. We may ask for proof of identity before fulfilling your request. We aim to respond within 30 days, though complex or high-volume requests may take longer.
- **Right to Withdraw Consent:** Where processing is based on your consent, you have the right to withdraw it at any time.
- **Right to Rectification:** You can ask us to correct or complete any inaccurate or incomplete personal data we hold about you.
- **Right to Erasure ("Right to be Forgotten"):** You may request deletion of your data in certain circumstances, such as:
  - If it has been processed unlawfully;
  - If you withdraw your consent;
  - If you object to our processing and there are no overriding legitimate grounds for continuing it.
- **Right to Restrict Processing:** You can request a restriction on how we process your data in certain cases, such as when contesting its accuracy or when objecting to processing.
- **Right to Data Portability:** Where processing is based on consent and carried out by automated means, you can request a copy of your data in a structured, commonly used, and machine-readable format.
- **Right to Object:** You may object to processing based on our legitimate interests if your situation warrants it. We may continue processing if we have compelling legitimate grounds or if it's necessary for legal claims or other lawful reasons.
- **Rights Related to Automated Decision-Making and Profiling:** We do not engage in automated decision-making or profiling that has legal or similarly significant effects on individuals, so these rights do not apply.

If you wish to exercise any of these rights, please contact us using the details provided below.

## **12. Who to contact about your Personal Data**

If you have any questions or concerns about how we use your Personal Data, please feel free to contact us by email at [office@codebeans.net](mailto:office@codebeans.net) or by writing to:

**Data Protection Coordinator**

ShopyGeo  
Shanti Nagar, Durgapura,  
Jaipur, Rajasthan, 302018

We regularly review this Privacy Policy and reserve the right to update it at any time to reflect changes in our business operations, legal obligations, or data processing practices.

**Last updated in May 2025.**