



MASTER PRIVACY POLICY

Cosmion Community Clubhouse

Effective Date: June 28, 2026

Version: 3.2

Last Updated: June 28, 2026

This Privacy Policy explains how **Cosmion Family Resort and Community Club LLP**, doing business as **Cosmion Community Clubhouse** and **Cosmion Family Resort**, collects, uses, stores, shares, protects, retains and manages personal data.

For the purposes of the **Digital Personal Data Protection Act, 2023** and rules made under it, Cosmion Family Resort and Community Club LLP acts as the **Data Fiduciary** in relation to personal data processed by it.

This Privacy Policy applies to personal data processed in connection with the Cosmion campus, facilities, website, enquiry channels, booking systems, guest interactions, memberships, events, sports facilities, hospitality services, CCTV, marketing, recruitment and related operations.

This Privacy Policy is intended to be read along with applicable terms and conditions, booking terms, membership rules, event agreements, sports facility rules, safety instructions, guest conduct rules, recruitment terms and facility-specific notices issued by Cosmion.

1. Data Fiduciary Details

Legal Entity: Cosmion Family Resort and Community Club LLP

LLPIN: ACX-3932

Doing Business As: Cosmion Community Clubhouse and Cosmion Family Resort

Registered / Operating Address: Survey #19, Bagalur Main Rd, Yelahanka, Sathanur, Bengaluru, Karnataka 562149, India

Email: hello@cosmion.in

Phone: +91 96062 21724

If Cosmion operates, manages or controls additional adjoining areas, facilities, survey numbers, access roads, parking areas, lawns, sports areas, restaurants, event areas or campus facilities, this Privacy Policy applies to all such areas and operations forming part of the Cosmion campus.

2. Brand Scope and Consistent Usage

For consistency across this Privacy Policy, website, signage, Google Business Profile listings, brochures, invoices, contracts and trademark filings, the following brand names are used:

- **Cosmion Community Clubhouse**
- **Cosmion Family Resort**
- **Haritachala Weddings**
- **Nakshatra Multi-Cuisine Family Restaurant**
- **Nézo Café & Lounge**
- **Suráhi Bar & Grill**
- **DCUBE Sports Club**

Any change in spelling, accent, capitalisation or brand presentation should be approved for brand, legal and trademark consistency.

3. Privacy and Grievance Officer

For privacy queries, consent withdrawal, correction requests, deletion requests, nomination requests, CCTV-related requests, marketing opt-outs or grievances, please contact:

Privacy & Grievance Officer: Madhusudhan Chandrasekhar

Email: hello@cosmion.in

Phone: +91 96062 21724

Address: Survey #19, Bagalur Main Rd, Yelahanka, Sathanur, Bengaluru, Karnataka 562149, India

Cosmion will make reasonable efforts to respond to privacy requests and grievances within a reasonable period, generally within **30 days**, unless a longer period is required due to the nature of the request, identity verification, legal requirements, operational constraints, ongoing investigation or other lawful reasons.

If a Data Principal is not satisfied with Cosmion's response, they may have the right to approach the **Data Protection Board of India** in accordance with applicable law.

4. Language Availability

This Privacy Policy will be made available in English.

Cosmion may also make this Privacy Policy, consent notices or key privacy notices available in Kannada or any other language specified in the Eighth Schedule to the Constitution of India, where appropriate.

In case of any inconsistency between translations, the English version will prevail unless otherwise required by applicable law.

5. Definitions

For this Privacy Policy:

Data Fiduciary means the person or entity that determines the purpose and means of processing personal data. In this Privacy Policy, the Data Fiduciary is Cosmion Family Resort and Community Club LLP.

Data Principal means the individual to whom the personal data relates. This may include guests, members, visitors, customers, event organisers, wedding families, sports users, restaurant guests, bar guests, website users, job applicants, vendors, drivers, invitees and other individuals interacting with Cosmion.

Personal Data means any data about an individual who is identifiable by or in relation to such data.

Processing includes collection, recording, storage, organisation, structuring, use, sharing, disclosure, transmission, restriction, erasure, deletion, destruction or any other operation performed on personal data.

Data Processor means any person, vendor, service provider or entity that processes personal data on behalf of Cosmion.

Consent means free, specific, informed, unconditional and unambiguous consent given through a clear affirmative action for a specified purpose.

Child means an individual who has not completed 18 years of age.

Personal Data Breach means any unauthorised processing of personal data, or accidental disclosure, acquisition, sharing, use, alteration, destruction, loss of access to, or compromise of personal data, that affects the confidentiality, integrity or availability of such personal data.

6. Scope of this Privacy Policy

This Privacy Policy applies to personal data collected or processed in connection with:

- Cosmion Community Clubhouse
- Cosmion Family Resort
- Haritachala Weddings
- Nakshatra Multi-Cuisine Family Restaurant
- Nézo Café & Lounge
- Suráhi Bar & Grill
- DCUBE Sports Club
- Tennis, badminton, cricket, football, swimming and other sports or recreational facilities
- Weddings, events, banquets, lawns, conference spaces and corporate bookings
- Room stays, resort bookings, guest registration and visitor access
- Memberships, day passes, club access and family usage
- Restaurants, café, bar and food and beverage services
- Website, online forms, phone calls, email, WhatsApp, social media, advertisements and customer enquiries
- CCTV, campus access, parking, security and incident management
- Recruitment, hiring, job applications and applicant communications
- Vendors, contractors, coaches, trainers, event partners, photographers, service providers and professional advisers

This Privacy Policy applies whether personal data is collected directly from the Data Principal, through an authorised representative, through a parent or guardian, through a booking platform,

through a corporate or event organiser, through a vendor, through CCTV or security systems, or through digital channels.

7. Personal Data We Collect

Cosmion may collect the following categories of personal data, depending on the nature of your interaction with us.

Category	Examples
Identity data	Name, age, date of birth, gender, nationality, photograph, signature, identity document details
Contact data	Phone number, WhatsApp number, email address, postal address, emergency contact details
Guest and booking data	Room booking, stay dates, guest count, check-in/check-out details, package details, preferences
Membership data	Member name, family member details, membership type, access details, renewal status, member communications
Event and wedding data	Enquiry details, organiser details, family contacts, event date, guest count, menu choices, vendor coordination details
Sports and recreational data	Sports booking, coaching registration, age group, parent/guardian details, emergency contact, facility usage records
Food and beverage data	Table reservations, menu preferences, allergy information voluntarily provided, feedback, complaints
Payment and billing data	Invoice details, GST details, payment references, deposit records, refund details, outstanding dues
Foreign guest data	Passport, visa, OCI details, nationality, arrival/departure details and information required for legal reporting
CCTV and security data	CCTV footage, vehicle details, entry/exit records, visitor logs, access records, incident-related records
Health, safety and incident data	Injury reports, first-aid notes, emergency assistance details, medical information voluntarily provided, witness information and incident records
Digital data	IP address, device data, website usage, cookies, enquiry source, analytics data, advertising interaction data
Communication data	Emails, WhatsApp messages, phone enquiry notes, social media messages, complaints, feedback and support records
Recruitment and applicant data	CV/resume, job application details, phone number, email address, work history, education details, references, interview notes, assessment details, salary expectations, hiring status and applicant communications

Cosmion does not intentionally collect more personal data than is reasonably required for the relevant purpose.

8. Purposes for Which We Process Personal Data

Cosmion may process personal data for the following purposes.

Purpose	Examples
Enquiries and customer support	Responding to website, phone, WhatsApp, email, social media and walk-in enquiries
Bookings and reservations	Managing rooms, events, weddings, restaurant bookings, sports bookings and club services
Guest registration and legal compliance	Identity verification, check-in formalities, visitor registration and statutory record keeping
Foreign guest reporting	Collecting and submitting foreign guest information to FRRO, police, immigration or other lawful authorities where required
Membership management	Creating, managing, renewing and servicing memberships and family memberships
Event and wedding management	Planning, coordinating and delivering weddings, banquets, corporate events and private functions
Sports and safety	Managing sports bookings, coaching, swimming access, emergency contacts, incident reports and safety records
Payments and accounting	Billing, GST invoices, deposits, refunds, dues recovery, accounting, audit and taxation
Food and beverage service	Managing restaurant, café, bar, catering, allergy requests, feedback and service issues
CCTV and campus security	Safety, access control, incident investigation, property protection and dispute handling
Emergency assistance	Contacting emergency contacts, doctors, hospitals, ambulance providers or lawful authorities where necessary
Marketing and promotions	Sending offers, updates, event information, membership communications and promotional messages where permitted
Website and advertising	Website functionality, analytics, digital advertising, campaign measurement and retargeting, subject to applicable consent choices
Recruitment and hiring	Receiving and evaluating job applications, communicating with applicants, conducting interviews, verifying references where appropriate, assessing suitability, making hiring decisions, maintaining hiring records and managing onboarding where selected
Legal and dispute management	Enforcing terms, investigating violations, handling claims, insurance matters and legal proceedings
Service improvement	Improving guest experience, staff training, quality control, operations and business planning

Where Cosmion conducts background verification, reference checks or similar pre-employment checks for job applicants, such checks will be disclosed to the applicant in advance and carried out based on consent or another lawful basis available under applicable law. Background verification may involve sharing relevant applicant data with authorised recruitment, verification or professional service providers only for the stated verification purpose.

9. Consent and Permitted Processing under DPDP

Cosmion processes personal data only for lawful purposes in accordance with applicable Indian law, including the Digital Personal Data Protection Act, 2023 and rules made under it.

Cosmion may process personal data where:

1. The Data Principal has given free, specific, informed, unconditional and unambiguous consent through a clear affirmative action.
2. The Data Principal voluntarily provides personal data to Cosmion for a specified purpose, such as making an enquiry, requesting a booking, registering for a service, using a facility, making a payment, submitting a form, communicating with Cosmion, applying for a job, or asking Cosmion to perform a requested action, and has not indicated that they do not consent to such use.
3. Processing is necessary for compliance with applicable law, including hotel registration, foreign guest reporting, GST, accounting, tax, police, court, regulatory, statutory or government requirements.
4. Processing is necessary for responding to a medical emergency involving a threat to life or immediate threat to health.
5. Processing is necessary for taking measures to provide medical treatment, health services, safety assistance, emergency support or disaster-related assistance where permitted by law.
6. Processing is necessary for employment-related purposes or safeguarding Cosmion from loss or liability in relation to employees, staff, consultants or authorised personnel, where permitted by law.
7. Processing is otherwise authorised under the DPDP Act, rules made under it, or any other applicable law in force in India.

Cosmion does not rely on *performance of contract* as an independent ground for processing personal data. Where a person provides data for a booking, membership, enquiry, stay, event, dining reservation, sports registration, job application, payment or service request, Cosmion treats such processing as processing for the specified purpose for which the Data Principal voluntarily provided the personal data, subject to applicable consent, notice and legal requirements.

Where processing is based on consent, the Data Principal may withdraw consent. Withdrawal of consent will not affect the legality of processing done before withdrawal. Withdrawal may affect Cosmion's ability to provide certain services, bookings, memberships, access, communications, event arrangements, recruitment consideration or support.

Where consent is given through a digital or communication channel, such as a website form, checkbox, WhatsApp opt-in, email confirmation, SMS, digital form or similar method, Cosmion will provide a withdrawal method through the same channel or another method that is comparably simple and accessible. Data Principals may also contact the Privacy & Grievance Officer for consent withdrawal.

10. Legacy and Pre-Existing Data

Cosmion may have collected personal data before the effective date of this Privacy Policy through previous enquiries, WhatsApp interactions, phone calls, walk-ins, event enquiries, room bookings,

membership enquiries, restaurant reservations, sports bookings, social media leads, paper forms, spreadsheets, CRM tools, booking systems, POS systems or other business records.

Cosmion will provide notice of this Privacy Policy to existing Data Principals as soon as reasonably practicable through appropriate methods such as email, WhatsApp, SMS, website notice, booking communication, customer follow-up, front-desk notice or other effective communication channels.

Data Principals may contact Cosmion to exercise their rights, withdraw consent where applicable, update their information, request deletion where legally permissible, or opt out of promotional communications.

11. Data Principal Rights

Subject to applicable law, Data Principals may exercise the following rights.

Right	What it means	How to exercise
Right to access information	You may ask for information about personal data processed by Cosmion and the processing activities related to it.	Email hello@cosmion.in
Right to correction	You may request correction of inaccurate or misleading personal data.	Email hello@cosmion.in with details
Right to completion/update	You may request completion or updating of incomplete or outdated personal data.	Email hello@cosmion.in
Right to erasure	You may request deletion of personal data where retention is no longer necessary or legally required.	Email hello@cosmion.in
Right to withdraw consent	You may withdraw consent where processing is based on consent.	Use the same or similarly simple channel where available, or email hello@cosmion.in
Right of grievance redressal	You may raise a grievance about Cosmion's processing of your personal data.	Contact the Privacy & Grievance Officer
Right to nominate	You may nominate another individual to exercise your rights in the event of death or incapacity, where applicable.	Email hello@cosmion.in

Cosmion may verify your identity before acting on a request. Requests may be refused or limited where retention or processing is required for legal compliance, tax, accounting, safety, security, employment, recruitment, dispute resolution, fraud prevention, insurance, law enforcement or other lawful reasons.

12. Duties of Data Principals

When interacting with Cosmion, Data Principals are expected to:

- Provide accurate and authentic information.
- Not impersonate another person.
- Not suppress material information where legally required.

- Update information when necessary.
- Not submit false, frivolous or misleading grievances or requests.
- Ensure they have authority to provide information about family members, guests, children, invitees, employees, applicants, vendors, drivers or other persons.

13. Children and Minors

Cosmion is a family-oriented campus and may process children's personal data in connection with family memberships, room stays, sports coaching, swimming access, birthday parties, school programs, events, safety and emergency contact purposes.

Cosmion will process personal data of children only with verifiable consent of a parent or lawful guardian where required by applicable law.

For sports, swimming, coaching, recreational programs, school programs, children's events and any other service involving minors, Cosmion may require an identity-verified parent or lawful guardian declaration before processing the child's personal data. Such consent may be obtained through a signed consent form, digital consent form, ID-linked declaration, verified parent/guardian declaration, or another method that enables Cosmion to reasonably verify that the person giving consent is an identifiable adult parent or lawful guardian.

A booking confirmation or generic registration form alone will not be treated as verifiable parental consent unless it includes an appropriate parent or guardian declaration and verification mechanism.

Cosmion does not knowingly:

- Track children.
- Undertake behavioural monitoring of children.
- Direct targeted advertising at children.
- Process children's personal data in a manner likely to cause any detrimental effect on their wellbeing.
- Publish identifiable images or videos of children for promotional purposes without appropriate parent or guardian consent.

For clarity, Cosmion's use of CCTV in public and common areas for safety, security, access control, incident investigation and protection of guests, children, staff, visitors and property is not intended to constitute behavioural tracking, profiling or targeted monitoring of children. CCTV footage involving children is processed only for safety, security, legal, operational or incident-related purposes and not for advertising, profiling or behavioural analysis.

Parents and guardians remain responsible for supervising children on campus and for ensuring that information provided on behalf of children is accurate and authorised.

14. Foreign Guests and Legal Reporting

Foreign nationals, including OCI cardholders where applicable under current law, may be required to provide passport, visa, nationality, arrival, departure, stay and related information at the time of booking or check-in.

Cosmion may collect, record, retain and submit such information to the Foreigners Regional Registration Office, police, immigration authorities or other lawful authorities through Form C or other legally required reporting mechanisms.

This processing is carried out for legal compliance and may be mandatory for providing accommodation or permitting stay.

15. Sensitive and Higher-Risk Categories of Information

Cosmion may process certain categories of information that require additional care, including:

- Health, medical, allergy, injury, emergency or safety-related information voluntarily provided or generated during incidents.
- Payment, billing and financial information.
- Government identity documents.
- Biometric information, only if Cosmion introduces biometric access, attendance or identity systems in the future.
- Children's information.
- CCTV footage and security records.
- Recruitment records and employee-related information.

Cosmion will use such information only for specific purposes such as service delivery, safety, legal compliance, emergency assistance, payments, incident investigation, access control, recruitment, employment, dispute handling, insurance, accounting or statutory requirements.

Cosmion will apply additional safeguards such as restricted access, purpose limitation, confidentiality, retention controls, access logs where appropriate and vendor obligations where such information is processed.

16. Marketing, WhatsApp, SMS, Email and Advertising

Cosmion separates service communications from promotional communications.

16.1 Service and Transactional Communications

Cosmion may send service-related communications such as booking confirmations, payment reminders, event coordination messages, membership updates, safety notices, check-in details, policy updates, invoices, recruitment communications, operational updates and customer support responses.

These communications are necessary for providing services, responding to requests or managing operational matters and may continue even if you opt out of promotional messages.

16.2 Promotional Communications

Cosmion may send promotional messages, offers, membership updates, event announcements, dining offers, wedding promotions, sports promotions or marketing communications through WhatsApp, SMS, phone, email, social media or other channels where permitted by law and based on applicable consent or customer preferences.

Promotional consent may be collected through enquiry forms, booking forms, website checkboxes, WhatsApp opt-ins, membership forms, event forms, customer interactions or other recorded methods.

Where channel-specific consent is required, Cosmion may maintain records of consent for WhatsApp, SMS, email, phone or other marketing channels separately.

16.3 Opt-Out

You may opt out of promotional communications by:

- Replying STOP where available.
- Using unsubscribe options where provided.
- Contacting hello@cosmion.in.
- Informing Cosmion staff that you do not wish to receive promotional communications.

Cosmion may retain opt-out records to ensure your preference is respected.

17. Cookies, Website Tracking and Digital Advertising

Cosmion's website may use cookies, pixels, tags, analytics tools or similar technologies.

These may include:

Cookie / Tracking Type	Purpose
Strictly necessary cookies	Website operation, form submission, security and basic functionality
Analytics cookies	Understanding website traffic, page visits, user behaviour and performance
Marketing cookies / pixels	Advertising, retargeting, campaign measurement and lead attribution
Preference cookies	Remembering user choices where applicable

Where required, Cosmion may provide cookie notices, consent banners, reject/manage choices or preference tools on its website.

You may control cookies through browser settings. Disabling certain cookies may affect website functionality.

18. CCTV and Campus Surveillance

Cosmion uses CCTV and security systems in public and common areas for safety, security, access control, incident investigation, property protection, dispute handling and legal compliance.

CCTV may operate in areas such as entry gates, exits, parking areas, reception, corridors, building exteriors, restaurants, cafés, bars, event areas, lawns, sports areas, circulation areas and other public or operational areas.

Where children are incidentally captured by CCTV in public or common areas, such CCTV processing is carried out for safety, security, access control, incident investigation and protection purposes, and not for behavioural tracking, profiling or targeted advertising directed at children.

CCTV will not be intentionally placed in private guest rooms, toilets, changing rooms, locker rooms or areas where individuals have a reasonable expectation of privacy.

Unless specifically notified, Cosmion does not use audio recording in CCTV systems.

CCTV footage is generally retained for up to **90 days**, unless longer retention is necessary for an incident, investigation, police request, legal claim, insurance matter, safety review, dispute, audit or compliance requirement.

CCTV footage access is restricted to authorised personnel. The Privacy & Grievance Officer or authorised management/security personnel may control or approve access to footage.

CCTV footage will not be used for social media, advertising or promotional purposes.

A Data Principal may request access to CCTV footage relating to them by contacting hello@cosmion.in. Cosmion may refuse, limit, redact or provide controlled access where disclosure would affect the privacy of others, security, investigation, legal privilege, confidentiality, operational integrity or applicable law.

CCTV signage may be placed at monitored entry points and relevant public areas.

19. Photos, Videos and Event Media

Cosmion may capture or process photos and videos in connection with events, weddings, sports, dining, campus activities, promotional shoots, guest experiences and operational documentation.

For weddings and private events, Cosmion's use of identifiable photos or videos for marketing, website, social media, brochures, advertisements or promotional material should be governed by the event agreement or written consent.

For club activities, sports programs, public events or campus ambience, Cosmion may use general photographs or videos where reasonable notice has been provided and individuals are not the primary focus, subject to applicable law and opt-out requests where feasible.

Identifiable images or videos of children will not be used for promotional purposes without appropriate parent or guardian consent.

CCTV footage is not treated as promotional media and will not be used for marketing or social media.

20. Sharing of Personal Data

Cosmion may share personal data with the following categories of recipients where necessary and lawful.

Recipient Category	Examples / Purpose
Internal teams	Front office, sales, events, memberships, accounts, sports, food and beverage, security, management, HR and customer support
Technology and operations service providers	Website, hosting, cloud storage, email, CRM, hotel software, POS, booking systems, communication platforms, analytics and IT support
Payment and finance providers	Payment gateways, banks, accounting systems, auditors, tax consultants and billing service providers
Marketing and communication providers	Advertising platforms, campaign tools, SMS/WhatsApp/email service providers, analytics and lead management systems
Event and wedding partners	Planners, decorators, photographers, videographers, caterers, entertainers, logistics partners and event vendors
Sports and coaching partners	Coaches, trainers, academy partners, facility operators, referees, equipment providers and program partners
Recruitment and HR service providers	Recruitment platforms, background verification providers, consultants and HR support providers
Safety and security providers	Security agencies, CCTV vendors, access-control providers and emergency support providers
Professional advisers	Lawyers, accountants, auditors, insurers, consultants and compliance advisers
Emergency recipients	Doctors, ambulance services, hospitals, emergency contacts and authorities where necessary
Legal and regulatory recipients	Police, FRRO, immigration authorities, courts, regulators, tax authorities, government departments and law enforcement authorities

Cosmion does not sell personal data as a business practice.

Where third-party service providers process personal data on Cosmion's behalf, Cosmion engages such Data Processors only under binding contracts or legally enforceable arrangements that require them to process personal data only for authorised purposes, maintain confidentiality, apply appropriate security safeguards, restrict further sharing, assist with data rights and breach response where applicable, and delete or return personal data when no longer required, subject to applicable law.

Cosmion remains responsible under applicable law for personal data processed by Data Processors on its behalf.

21. Cross-Border Transfers

Cosmion may use Indian and international technology, communication, cloud, hosting, analytics, advertising, booking, CRM, payment, software, recruitment and support service providers.

As a result, personal data may be stored, processed or accessed in India or outside India, depending on the location of service providers, servers, support teams, cloud infrastructure or business systems.

Where personal data is transferred outside India, Cosmion will take reasonable steps to ensure that such transfer is carried out in accordance with applicable Indian law, including any restrictions notified by the Central Government, and through appropriate contractual, technical and organisational safeguards.

22. Security Safeguards

Cosmion takes reasonable technical and organisational measures to protect personal data against unauthorised access, misuse, loss, disclosure, alteration or destruction.

These safeguards may include:

- Access controls and role-based permissions.
- Password protection and account controls.
- Restricted access to ID documents, payment records, CCTV, applicant records and incident files.
- Staff confidentiality instructions.
- Vendor confidentiality and data protection obligations.
- Secure storage of physical and digital records.
- CCTV access restrictions.
- Backup and recovery practices where appropriate.
- Review of access to sensitive or high-risk records.
- Internal escalation for suspected data incidents.

No physical or digital system can be guaranteed to be completely secure. Cosmion will continue to improve safeguards as systems, laws and operational needs evolve.

23. Personal Data Breach

If Cosmion becomes aware of a Personal Data Breach, Cosmion will take reasonable steps to assess, contain, investigate, mitigate and respond to the breach.

Where required by applicable law, Cosmion will notify affected Data Principals and the Data Protection Board of India without undue delay and within timelines prescribed under the DPDP Act and rules made under it.

Breach notices may include, as required by law and to the best of Cosmion's knowledge, the nature of the breach, categories of personal data affected, likely consequences, mitigation steps taken or proposed, safety measures recommended to affected Data Principals, and the contact details of the person who can respond to questions on behalf of Cosmion.

Cosmion may also notify law enforcement, insurers, vendors, advisers, emergency responders or other relevant persons where necessary to contain the breach, reduce harm, comply with law, investigate the incident or protect legal rights.

Cosmion will maintain internal breach records and escalation procedures to support timely investigation, mitigation and notification.

24. Data Retention

Cosmion retains personal data only for as long as necessary for the purposes for which it was collected, unless a longer retention period is required or permitted by law, tax, audit, safety, security, insurance, dispute resolution or legal requirements.

Data Category	Indicative Retention
CCTV footage	Generally up to 90 days unless needed for incident, legal, insurance, police, audit or compliance purposes
Enquiry and lead data	Active enquiries may be retained while follow-up is ongoing. Inactive enquiry and lead data will generally be deleted or anonymised within 24 months from the last meaningful interaction, unless the person becomes a customer, member, guest, vendor, applicant or event client, or a longer retention period is required for legal, tax, accounting, dispute, audit, consent, opt-out or business record purposes
Booking and membership records	For the active service period and thereafter as required for legal, tax, audit, dispute or business records
Room guest records and ID-related data	As required for hotel, police, immigration, tax, legal and compliance purposes
Foreign guest records	As required for FRRO, police, immigration and legal compliance
Payment, invoice and GST records	As required for accounting, GST, tax, audit and legal purposes
Sports, swimming and coaching records	As required for service delivery, safety, consent records, incident handling and legal purposes
Injury, incident and emergency records	For a longer period where necessary for safety, insurance, claims, legal defence, investigation or compliance
Recruitment and applicant data	Selected candidate records may be retained as part of employment records. Unsuccessful candidate records are generally retained for 6 to 12 months unless a longer period is required for legal, audit, dispute, future hiring consideration or consent-based talent pool purposes
Marketing consent and opt-out records	As long as necessary to demonstrate consent and respect opt-out preferences
Vendor and event records	As required for coordination, billing, tax, legal, audit and dispute purposes

When personal data is no longer required, Cosmion may delete, anonymise, archive or securely dispose of it in accordance with internal procedures and applicable law.

25. Third-Party Platforms and Links

Cosmion may use third-party websites, platforms, payment systems, booking platforms, communication tools, advertising networks, review platforms, recruitment platforms and social media platforms.

These third parties may process personal data under their own privacy policies and terms. Cosmion is not responsible for the privacy practices of third-party platforms that are not under its control.

Data Principals are encouraged to review the privacy policies of third-party platforms they use to interact with Cosmion.

26. Accuracy and Authority to Share Information

You are responsible for ensuring that personal data provided to Cosmion is accurate, complete and updated.

If you provide personal data relating to family members, children, guests, employees, applicants, invitees, drivers, vendors or any other person, you confirm that you have the authority to provide such data and that you have informed them where required.

27. Legal Compliance and Protection of Rights

Cosmion may process or disclose personal data where necessary to:

- Comply with applicable law, court orders, government directions, police requests or regulatory requirements.
- Verify identity and maintain guest, visitor, applicant or foreign national records.
- Protect the safety of guests, members, visitors, staff, vendors, children or the public.
- Investigate accidents, injuries, damage, theft, fraud, misconduct, nuisance or policy violations.
- Enforce booking terms, membership rules, event agreements, guest terms, sports rules, recruitment rules or other policies.
- Recover dues, charges, damages or penalties.
- Defend, pursue or settle legal claims.
- Protect Cosmion's property, rights, reputation, brand standards, business interests and operational integrity.

28. Relationship with Other Terms

This Privacy Policy deals only with personal data and data processing.

It does not replace Cosmion's terms and conditions, booking terms, membership rules, event agreements, sports facility terms, swimming pool rules, guest conduct rules, safety instructions, pricing terms, cancellation policies, liability provisions, recruitment terms or facility-specific conditions.

Use of Cosmion facilities remains subject to applicable terms, safety rules and management instructions.

29. Updates to this Privacy Policy

Cosmion may update this Privacy Policy from time to time due to changes in law, business operations, technology, facilities, services, vendors, safety practices or internal processes.

The latest version may be published on Cosmion's website, made available at the front desk or shared through appropriate channels.

Minor updates, clarifications, formatting corrections or administrative changes may be effective when published.

Where a material change expands the purposes of processing, introduces materially different uses of personal data, or requires fresh consent under applicable law, Cosmion will provide appropriate notice and, where required, seek fresh consent before such new processing begins.

30. Governing Law and Jurisdiction

This Privacy Policy shall be governed by and interpreted in accordance with the laws of India, including the Digital Personal Data Protection Act, 2023 and rules made under it.

Subject to the authority and jurisdiction of the Data Protection Board of India and any other competent regulatory or statutory authority, any dispute relating to this Privacy Policy shall be subject to the jurisdiction of the competent courts in Bengaluru, Karnataka, unless otherwise required by applicable law.

31. Contact

For privacy requests, grievances, consent withdrawal, correction requests, deletion requests, nomination requests, CCTV-related requests or marketing opt-outs, please contact:

Madhusudhan Chandrasekhar

Privacy & Grievance Officer

Cosmion Family Resort and Community Club LLP

Survey #19, Bagalur Main Rd, Yelahanka, Sathanur, Bengaluru, Karnataka 562149, India

Email: hello@cosmion.in

Phone: +91 96062 21724

32. Changelog

Version	Date	Description
3.2	June 28, 2026	Revised to clarify CCTV treatment of children, applicant processing basis, children's data consent, consent withdrawal, lead retention, language availability and recruitment background verification consent. Published version.