



Best Eastern Hotels Ltd.

CIN : L99999MH1943PLC040199

Regd. Office: 401, Chartered House, 293/299,

Dr. C.H. Street, Near Marine Lines Church, Mumbai - 400 002

Tel: + 91 22 69314400

Email: booking@ushaascot.com • Web: www.ushaascot.com

Privacy & Data Protection Policy

Best Eastern Hotels Limited ("the Company", "We", "Us") operates the resort property **Usha Ascot** (Matheran). This Privacy Policy details our protocols regarding the collection, processing, and safeguarding of personal data from our shareholders, investors, customers, and website users.

This policy is formulated in compliance with:

- **Regulation 46(2)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**, which mandates the maintenance of an updated, functional corporate website hosting official compliance policies.
- Section 43A of the **Information Technology Act, 2000** and the **Digital Personal Data Protection (DPDP) Act**.

1. Nature of Data Collected

The Company collects and processes data across distinct business verticals:

- **Investor & Shareholder Data:** Full name, PAN, Demat account details, Folio number, email address, physical address, and dividend payment bank details (facilitated securely through our Registrar and Share Transfer Agent, Link Intime India Private Limited).
- **Guest & Hospitality Data:** Contact details, proof of identity documents (Aadhaar, Passport, Voter ID as mandated by local tourism regulations), booking parameters, and secure transaction footprints.
- **Digital Telemetry:** IP addresses, cookies, and device identifiers capturing user engagement on our investor relations and reservation portals.
- **Marketing:** To send you promotional offers, newsletters, and updates, provided you have opted in to receive them.
- **Security & Compliance:** To prevent fraudulent transactions, protect our property, and comply with legal or regulatory obligations.

2. Purpose of Processing and Lawful Basis

We do not sell or rent your personal information to third parties. We only share your data with trusted partners under the following conditions:

- **Service Providers:** Third-party vendors who assist with website hosting, payment processing, analytics, marketing and email delivery.
- **Legal Authorities:** When required by law, court order, or government regulation (such as mandatory guest registration with local tourism authorities).



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- **Regulatory Compliance:** Serving notice of Annual General Meetings (AGMs), distributing financial performance reports, and updating corporate governance structures as dictated by the BSE Limited (Department of Corporate Services).
 - **Communications:** Distributing material info-disclosures, price-sensitive details under SEBI Insider Trading regulations, or customer updates.

3. Cookies and Tracking

Our website uses cookies to enhance your browsing experience, analyze site traffic, and remember your booking preferences. You can manage or disable cookies through your browser settings, though doing so may limit your ability to use certain features of our reservation system.

4. Controlled Information Sharing & Disclosures

Best Eastern Hotels Limited preserves data confidentiality. We do not sell or monetize personal information. Data transmissions are exclusively confined to:

- **Statutory Authorities:** Disclosures submitted to SEBI, the Bombay Stock Exchange (BSE), the Ministry of Corporate Affairs (MCA), and law enforcement mandates.
- **Corporate RTA Operations:** Certified data routing to our Registrar and Transfer Agent (Link Intime India Private Limited) to safely administer shareholder assets and structural updates.
- **Integrated Service Infrastructure:** Transaction gateways, secure banking partners, and booking management architectures utilizing rigid end-to-end data encryption protocols.

5. Corporate Governance & Investor Protection

Pursuant to SEBI regulations, the Company maintains structural boundaries to guard material information:

- All shareholding patterns, structural financials, and board determinations are cleanly separated from consumer marketing tracking tools.
- No investor relations data is cross-referenced or utilized for target-marketing programs without explicitly documented permission.

6. Data Security and Retention Standards

The Company deploys administrative, technical, and electronic safeguards (including SSL network encryption) to protect digital assets. Investor, corporate, and physical hospitality logs are preserved only for the duration dictated by Indian statutory periods, local tourism archiving regulations, and the Companies Act rules.



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7. Rights of Data Principals

Shareholders, investors, and guests retain full rights to inspect, update, correct, or request the erasure of their personal information—subject to statutory data preservation exceptions binding public listed entities.

8. Nodal Contact & Grievance Redressal

In alignment with corporate governance standards and SEBI LODR protocols, all investor data grievances, compliance inquiries, or privacy issues must be directed to our Nodal Officer:

Attn: Company Secretary & Compliance Officer

Best Eastern Hotels Limited

401, Chartered House, 293/297, Dr. C. H. Street,

Near Marine Lines Church, Mumbai - 400002, Maharashtra, India

Corporate Ph: 022-22074400

Dedicated Email: booking@ushaascot.com

Last Updated: July 29, 2026