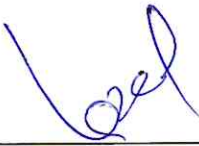
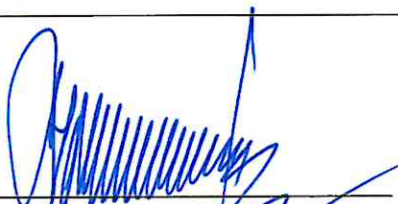


**CHL LIMITED**

New Friends Colony, New Delhi 110 025

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Company	CHL Limited (Including unit Hotel The Suryaa)	
Policy	Data Retention Policy	
Department	Information Technology	
Prepared by	 Ayush Verma IT Manager	
Reviewed by	 Mr. Gopal Prasad CFO	 Mr. Greesh Bindra EVP
Approved by	 Mr. Luv Malhotra Managing Director	





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1. PURPOSE

As a business requirement the CHL Limited (**inclusive of Unit Hotel the Suryaa**) (hereinafter referred as “**Company**”) deals with number of data information of the customers/guest, employees, contractors, vendors, suppliers and any third party, proper management of said data is an integral part and responsibility of the Company. Therefore, this policy has been adopted in order to set out the principles and manner of **retaining, reviewing and destroying data**.

This Data Retention policy is required to handle sensitive, personal and confidential data assets. This data must be collected, processed, stored and destroyed in a manner that makes business and economic sense and complies with legal requirements and contractual obligations.

This Data Retention Policy defines how long personal and business data is retained, processed, and securely deleted by the Company. **The policy aims to:**

- Protect the privacy of guests, employees, and business partners
- Ensure compliance with applicable Indian laws
- Minimize risks arising from excessive data retention

2. Scope

This policy applies to all personal and non-personal data collected, stored, or processed by the Company in electronic or physical form, including data relating to:

- Guests and visitors
- Employees and contractors
- Vendors, suppliers, and business partners

3. Legal & Regulatory Framework

This policy is framed in accordance with:

- Digital Personal Data Protection Act, 2023 (DPDP Act) & rules thereon for storage of personal data¹ and to the extend applicable;
- Information Technology Act, 2000.
- Companies Act 2013 and rules thereon
- Central Goods and Services Tax Act, 2017, Integrated Goods and Services Tax Act, 2017, State Goods and Services Tax Act, 2017 and Union Territory Goods and Services Tax Act, 2017
- Income Tax Act 1961
- Such other Applicable laws

Where multiple laws prescribe different retention periods, the longest legally required period shall apply.

¹ The Company have separate policy “Privacy Policy” for dealing with “Personal Data” of customers/guest of the Company.



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4. Data Retention Principles

The organization follows these principles:

- Purpose Limitation: Data is retained only for the purpose for which it was collected.
- Data Minimization: Only necessary data is retained.
- Limited Retention: Data is deleted once the purpose is fulfilled unless retention is required by law.
- Security & Confidentiality: Data is protected against unauthorized access, loss or misuse.
- All Data stored in India Data Centre

5. Retention Schedule

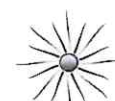
5.1 Guest Data

Data Category	Data bifurcation	Retention Period
Guest registration & booking records	Name, contact details, stay history	This data shall be retained till the discharge of purpose for which it was collected. But in any condition it shall not exceeds 5 years while in case of any critical conditions the data can be retained upto 8 years or till such time as may be authorized by any regulating authority, other documents as per the OPERA PMS like- guest invoice-90days, OPERA Batch logs- 30days, opera report history-30days, interface logs- 1826 days, guest profile with no activity- 365 days, Profile user logs- 365 days, guest confirmation letter- 180days, reservation attachments- 180days.
Guest communications	Emails, complaints, service requests	This data shall be retained till the discharge of purpose for which it was collected. But in any condition it shall not exceeds 3 years while in case of any critical conditions the data can be retained up to 8 years,
Identification documents of guest	Aadhaar, Passport, Driving Licence	This data shall be retained till the discharge of purpose for which it was collected. But in any condition it shall not exceeds 3 years whilse in case of any critical conditions the data can be retained upto 8 years or till such time as may be authorized by any regulating authority.
Loyalty & preference data	Membership profiles	This data shall be retained for the period upto 3 years from the date of account closure or withdrawal of consent, whichever is earlier.
Billing & payment records of guest	Invoices, GST data	This data shall be retained for the period upto 8 years as required under the Tax law.
Financial data and credit card information	Card details, payment codes etc	For as long as it is necessary to process the transaction, including any queries which may arise.

The Suryaa New Delhi
(A Unit of CHL Ltd.)ISO 22000:2018 CERTIFIED
www.thesuryaa.com

Email : chl@chl.co.in

CIN : L55101DL1979PLC009498

**THE SURYAA**
NEW DELHI
-SERVICE SO MEMORABLE-

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5.2 Employee Data

Data Category	Retention Period
Personnel & employment records	Employment duration + statutory period
Payroll, tax & statutory records	As required under Income Tax, PF, ESI, and labour laws
Recruitment records (unsuccessful candidates)	6–12 months

5.3 Business Information

Data Category	Retention Period
Emails	E-mails shall be kept for such period as may deemed fit or permitted under the statutory law. The important email shall be kept to the extend its possible.
System logs	The data shall be kept for such period as may deemed fit or permitted under the statutory law.

5.4 CCTV & Security Data

Data Category	Retention Period
CCTV footage	30–45 days unless required for investigation
Incident & security logs	Duration of investigation + statutory requirement

5.5 IT & Processing Logs

- Consent records, access logs, and processing activity logs are retained for a minimum of 1 year, or longer if required for compliance, audit, or legal purposes.

6. Consent & Data Principal Rights

- Personal data is processed only with valid consent, unless otherwise permitted by law.
- Individuals have the right to request access, correction, or deletion of their personal data.
- Upon withdrawal of consent, data shall be deleted unless retention is required by law.

7. Data Deletion & Anonymization

- Personal data is securely deleted or anonymized once the retention period expires or the purpose is fulfilled.
- Physical records are destroyed using secure methods (e.g., shredding).
- Digital records are permanently deleted and rendered irretrievable.
- Deletion actions are documented where required.

8. Data Security Measures

The organization implements reasonable security safeguards, including:

- Access controls and role-based permissions
- Encryption where appropriate





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- Regular audits and monitoring
- Contractual safeguards with third-party service providers

9. Exceptions

Data may be retained beyond stated periods if required:

- For compliance with legal, regulatory, or court orders
- For ongoing investigations, disputes, or litigation
- To protect the organization's legal rights

10. Responsibility & Governance

- The management shall designate a responsible officer/team to oversee data retention and deletion.
- All employees must comply with this policy and related procedures.

11. Policy Review

This policy shall be reviewed annually or earlier if required due to:

- Changes in law
- Regulatory updates
- Business or operational changes

