

Privacy Policy

BXELL (www.bxell.com) – an online marketplace owned and operated by **HEXEL VENTURES PRIVATE LIMITED**

Effective date: 5 October 2026 | Version 2.0 (replaces the policy dated 24 November 2024)

HEXEL VENTURES PRIVATE LIMITED respects your privacy. This Privacy Policy explains what personal data we collect when you use BXELL, why we collect it, who we share it with, how long we keep it, and the rights you have. By using the Platform you agree to this Policy. If you do not agree, please do not use the Platform.

1. Who we are

1.1 The website www.bxell.com and its associated WhatsApp and SMS services (the "**Platform**" or "**BXELL**") are owned and operated by **HEXEL VENTURES PRIVATE LIMITED**, a company incorporated under the Companies Act, 2013 (CIN: **U47912TN2025PTC177620**), having its registered office at Door No. 37-240/8, Neerodi, Kollemcode, Kollangodu, Vilavancode, Kanyakumari – 629160, Tamil Nadu, India ("**Hexel Ventures**", "**we**", "**us**" or "**our**"). BXELL is a brand of Hexel Ventures and not a separate legal entity.

1.2 Hexel Ventures decides why and how your personal data is processed on the Platform and is the "body corporate" and "Data Fiduciary" responsible for it under Indian law.

1.3 This Policy is published under the Information Technology Act, 2000, the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, and the Digital Personal Data Protection Act, 2023 read with the Digital Personal Data Protection Rules, 2025, to the extent and from the dates their provisions are in force.

2. Personal data we collect

2.1 Information you give us

- **Account details:** your mobile number (verified by OTP), and your name, email address and city or area where you provide them.
- **Listing details:** information about the business, franchise, investment opportunity or property you list, including name, location, asking price, turnover or other financial information you choose to disclose, descriptions and photographs.
- **Verification documents:** documents you upload for the verification badge, such as a GST registration certificate, Udyam (MSME) registration, Shop and Establishment licence, certificate of incorporation or LLP certificate, current-account bank statement or PAN; and for property, patta, chitta, sale deed or encumbrance certificate.
- **Enquiry details:** when you unlock a Seller's contact, the name, area and mobile number you agree to share with that Seller.
- **Responses and communications:** your replies to our WhatsApp or SMS questions (for example, engagement questions and freshness confirmations), and any complaint, feedback or support request you send us.

2.2 Information collected automatically

- device type, operating system, browser type, IP address and approximate location derived from it;
- pages and Listings viewed, searches and filters used, links clicked, the date and time of visits, and the advertisement or link that brought you to the Platform;
- cookies and similar identifiers (see Section 6); and
- server and security logs.

2.3 Information from third parties

- **Payment gateway:** when you pay for a service, Razorpay tells us whether the payment succeeded, the amount, the transaction reference and the payment method type. **We do not receive or store your card number, CVV, net-banking password or UPI PIN.**
- **Verification sources:** the result of checks against government or third-party databases, such as the status and legal name linked to a GSTIN.

2.4 What we do not collect

- **Aadhaar:** we do not ask for or accept Aadhaar cards or Aadhaar numbers. Please do not upload them. Any such upload may be deleted without being processed.
- We do not knowingly collect biometric data, health data, or data about caste, religion or political opinion. Please do not include such information in a Listing.

3. Why we use your data

We use personal data only for the following purposes:

- to create and manage your account and verify your mobile number;
- to publish, display, rank and promote your Listings;
- to verify documents and grant or refuse a verification badge;
- to deliver Buyer enquiries to Sellers and share contact details as described in Section 4;
- to process payments, issue invoices and maintain accounts and tax records;
- to send OTPs, transaction alerts, enquiry notifications, freshness confirmations and other service messages;
- to send promotional messages, only where you have opted in;
- to detect and prevent fraud, spam, duplicate accounts and misuse, and to keep the Platform secure;
- to analyse usage and improve the Platform, its content and its advertising;
- to handle complaints and grievances; and
- to comply with law and respond to lawful requests from courts and authorities.

We process your data on the basis of your consent, which you give when you register, post a Listing, upload a document or confirm an enquiry, and for other uses permitted by law, such as compliance with legal obligations.

4. Who we share your data with

We do not sell or rent your personal data. We share it only as follows:

4.1 The public. Listing content that you publish — such as the business description, category, location, asking price and photographs — is visible to anyone who visits the Platform and may be indexed by search engines. Your mobile number is not displayed publicly in a Listing. Verification documents are never shown to other Users.

4.2 Other Users. When a Buyer unlocks a Seller's contact and confirms the enquiry, we share the Buyer's name, area and mobile number with that Seller by WhatsApp and/or SMS, and the Seller's contact becomes available to that Buyer. After that, each party handles the other's details independently and is responsible for using them lawfully.

4.3 Service providers who process data on our behalf and under confidentiality obligations, including:

- Razorpay, for payment processing;
- SMS and OTP delivery providers;
- WhatsApp Business service providers and Meta Platforms, for WhatsApp messages;
- GSTIN and other document-verification service providers;
- cloud hosting, storage and email providers; and
- analytics and advertising-measurement providers such as Google.

4.4 Professional advisers such as our auditors, chartered accountants and lawyers, where necessary.

4.5 Government and law enforcement. We will disclose information where required by law, court order or a lawful written request from an authorised government agency, including for verification of identity or for the prevention, detection, investigation or prosecution of offences or cyber-security incidents.

4.6 Business transfer. If Hexel Ventures or the BXELL business is merged, acquired or restructured, your data may be transferred to the successor, which will be bound by this Policy.

4.7 To protect rights and safety of Hexel Ventures, our Users or the public, including to investigate fraud or breaches of our Terms and Conditions.

5. Third-party advertisers and professionals

The Platform may display advertisements or contact panels of third parties such as chartered accountants, lawyers and lenders. We do not pass your personal data to them unless you choose to — for example, by opting in to a referral or by contacting them yourself. Once you do, their own privacy practices apply.

6. Cookies and analytics

6.1 We use cookies and similar technologies to keep you signed in, remember your preferences, secure the Platform, measure traffic and understand which Listings, pages and advertisements perform well.

6.2 We use third-party analytics and advertising-measurement tools, such as Google Analytics, Google Search Console and campaign tracking tags, and may use the Meta Pixel. These providers may set their own cookies and collect usage information in line with their own privacy policies.

6.3 You can block or delete cookies through your browser settings. Some features of the Platform may not work properly if you do so.

7. Where your data is stored

We store Platform data on secure servers and aim to keep it within India. Some of our service providers (for example, messaging, analytics and email providers) may process limited data on servers outside India. Any such transfer is made only as permitted under the Digital Personal Data Protection Act, 2023 and other applicable law, and not to any country to which the Central Government has restricted transfers.

8. How long we keep your data

- **Account and Listing data:** for as long as your account is active and as needed to provide the service.
- **After account deletion or cancellation:** registration information is retained for 180 days, as required by the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, and then deleted or anonymised unless a longer period is required by law.
- **Verification documents:** for as long as the related Listing or badge is active, and for a limited period afterwards for audit and dispute purposes, after which they are deleted.
- **Payment, invoice and tax records:** for the period required under tax, accounting and company law.
- **Logs and traffic data:** for at least one year, or longer where required by law or for security investigations.
- **Grievance records:** for the period needed to resolve the grievance and to demonstrate compliance.

Data that is no longer required is deleted or irreversibly anonymised.

9. How we protect your data

9.1 We follow reasonable security practices and procedures, including encryption of data in transit (HTTPS/TLS), encrypted storage of verification documents, OTP-based authentication, role-based access controls, access logging and regular review of our systems.

9.2 Access to personal data is limited to authorised personnel and service providers who need it to perform their duties and who are bound by confidentiality.

9.3 No system is completely secure. You are responsible for keeping your device and OTPs safe and should never share an OTP with anyone. We will never ask you for an OTP by phone call.

9.4 If a personal data breach occurs that affects you, we will inform you and the competent authorities, including the Data Protection Board of India and CERT-In, in the manner and within the time required by law.

10. Your rights

Subject to applicable law, you have the right to:

- **Access** — obtain a summary of the personal data we hold about you and how it is processed;
- **Correction and updating** — have inaccurate or incomplete data corrected or updated;
- **Erasure** — ask us to delete your account and personal data, except data we must keep by law;
- **Withdraw consent** — withdraw consent to processing at any time. Withdrawal does not affect processing already carried out, and may mean we can no longer provide some or all services;
- **Opt out** of promotional and WhatsApp messages at any time;
- **Grievance redressal** — have your complaint addressed by our Grievance Officer; and
- **Nominate** another person to exercise your rights in the event of your death or incapacity.

To exercise any right, write to thebxell@gmail.com from your registered contact details, or use the account settings where available. We may need to verify your identity through your registered mobile number before acting. We will respond within 15 days and in any case within the period permitted by law.

11. Your responsibilities

- Give us only information that is accurate and that you are entitled to share.
- Do not upload another person's personal data or documents without their authority.
- Use contact details obtained through the Platform only for the Listing concerned, and never for spam, marketing or resale.

12. Children

The Platform is meant only for persons aged 18 or above. We do not knowingly collect personal data from anyone under 18. If we learn that we have, we will delete it. A parent or guardian who believes a child has given us data may contact the Grievance Officer.

13. Links to other websites

The Platform may contain links to third-party websites and services, including news sources and payment pages. This Policy does not apply to them, and we are not responsible for their content or privacy practices.

14. Grievance Officer

If you have any question, concern or complaint about your personal data or this Policy, please contact our Grievance Officer:

Name	Mr. Hillu Micheal I S
Designation	Founder and Grievance Officer, Hexel Ventures Private Limited
Address	Door No. 37-240/8, Neerodi, Kollemcode, Kollangodu, Vilavancode, Kanyakumari – 629160, Tamil Nadu, India
Email	thebxell@gmail.com
Phone	+91 80506 74095

Complaints are acknowledged within 24 hours and resolved within 15 days of receipt, and in any case within one month. If you are not satisfied with our response to a data-protection grievance, you may approach the Data Protection Board of India in the manner provided by law. The full procedure is in our Grievance Redressal Policy.

15. Changes to this Policy

We may update this Policy to reflect changes in our practices or in the law. The updated version will be published on the Platform with a revised effective date, and significant changes will be notified through the Platform or by message. Where the law requires fresh consent, we will ask for it.

16. Company information

Legal name	HEXEL VENTURES PRIVATE LIMITED
Platform	BXELL — www.bxell.com
CIN	U47912TN2025PTC177620
Registered office	Door No. 37-240/8, Neerodi, Kollemcode, Kollangodu, Vilavancode, Kanyakumari – 629160, Tamil Nadu, India
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