

PRIVACY POLICY

Effective Date: 15 August 2026

Last Updated: 15 August 2026

1. Introduction and Scope

This Privacy Policy ("Policy") is issued by **Ridgeline / Pvt. Ltd.**, having its registered office at **Plot No 13, Sa Ra Ga Ma Bunglow, Pratap Colony, MIDC, Rahimatpur Road, Satara 415004**

, and governs the collection, use, storage, disclosure, and protection of personal data of participants, website visitors, volunteers, and other individuals ("you," "your," "Data Principal") in connection with the Sahyadri Classic cycling race, its website at <https://sahyadriclassic.com/> and related registration, communication, and event-management activities.

This Policy is framed with reference to the **Digital Personal Data Protection Act, 2023** and applicable rules made thereunder, the **Information Technology Act, 2000** and the **Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011**, to the extent applicable. Where international participants register from jurisdictions with their own data protection laws (e.g. the EU/UK GDPR), we process such data in a manner consistent with recognized international principles, as further described in Section 11.

By registering for the event, using our website, or otherwise providing us with personal data, you consent to the practices described in this Policy. If you do not agree with this Policy, please do not use our website or register for the event.

2. Definitions

- **"Personal Data"** means any data about an individual who is identifiable by or in relation to such data.
- **"Sensitive Personal Data"** includes, without limitation, health/medical information, biometric-adjacent data (where applicable), and government-issued identity document numbers.
- **"Processing"** means any operation performed on personal data, including collection, recording, storage, use, disclosure, and erasure.
- **"Data Principal"** means the individual to whom the personal data relates (i.e., you).
- **"Data Fiduciary"** means Sahyadri Classic, as the entity determining the purpose and means of processing your personal data.

3. Categories of Personal Data We Collect

3.1 Identity and Contact Information Full name, date of birth/age, gender, phone number, email address, residential address, city/state, emergency contact name and phone number.

3.2 Government-Issued Identification Aadhaar Card, Driving License, or Passport details (passport mandatory for non-Indian participants), collected and physically verified at pre-race inspection, as required under Section 6.3 of the Rules & Regulations.

3.3 Health and Medical Information Self-declared fitness status, medical fitness certificates (mandatory for participants under 18), and any medical conditions or allergies voluntarily disclosed

for safety and emergency-response purposes. This constitutes **Sensitive Personal Data** and is processed under heightened safeguards described in Section 6.

3.4 Minors' Data Where a participant is aged 15–17 (eligible only under the 1 Ghat "U-18" category), we additionally collect the name, contact details, and signature of a parent/legal guardian, along with the written consent form required under Section 1.1(F) of the Rules & Regulations. Processing of a minor's personal data is undertaken strictly with verifiable parental/guardian consent, in accordance with Section 9 of the DPDP Act, 2023.

3.5 Payment and Transaction Information Registration fee payment is processed through our third-party payment gateway, [e.g. **Razorpay / Instamojo / PayU**]. We do not collect or store your full card number, CVV, or UPI PIN on our own servers; such data is processed directly by the payment gateway under its own privacy and PCI-DSS compliance framework.

3.6 Waiver, Indemnity, and Legal Documentation Signed Waiver/Indemnity/Discharge Forms and, where applicable, parental consent forms, as required under Section 6.3 of the Rules & Regulations.

3.7 Race Tracking and Timing Data Real-time location data via RFID timing chips/bibs and, where used, GPS tracking devices or mobile applications, collected during the event for the purposes of timing, safety monitoring, cut-off enforcement, and results computation.

3.8 Communications Records of communications with Race Headquarters (RHQ) and Race Officials via email, phone, SMS, or WhatsApp, including for the purposes of protest/appeal handling under Section 3.7 of the Rules & Regulations.

3.9 Photographs, Video, and Media Images and video footage of participants captured before, during, and after the race, at start/finish venues, and along the race route.

3.10 Website and Technical Data IP address, browser type and version, device information, pages visited, referring URLs, and cookie data collected through standard website analytics.

4. Purposes and Legal Basis for Processing

We process your personal data for the following purposes, on the legal bases indicated, in accordance with Section 4 read with Section 6 of the DPDP Act, 2023:

Purpose	Legal Basis
Processing event registration and entry	Your consent, provided at registration
Pre-race inspection and eligibility verification	Consent; legitimate interest in race integrity and safety
Payment processing	Consent; performance of a contractual obligation
Race-day safety, medical response, and emergency coordination	Consent; legitimate interest in protecting your vital interests and those of others
Timing, tracking, and results computation	Consent
Enforcement of Rules & Regulations, including protests/appeals	Consent; legitimate interest in race integrity

Purpose	Legal Basis
Communication of race updates, route changes, safety instructions	Consent; performance of contractual obligation
Publication of results, provisional standings, and finisher certificates	Consent; legitimate interest
Use of photographs/video for promotional purposes	Consent, as described in Section 8
Compliance with legal, regulatory, or law enforcement requirements	Legal obligation
Website analytics and functionality	Consent (cookies), legitimate interest

Where we rely on your consent, you may withdraw it at any time in accordance with Section 10, subject to the limitations described therein (for example, withdrawal after race participation cannot retroactively undo processing already lawfully carried out, such as safety-related record-keeping).

5. Disclosure of Personal Data to Third Parties

We disclose personal data only as reasonably necessary for the purposes set out in this Policy, and only to the following categories of recipients:

- **Payment gateway providers**, to process registration fee transactions.
- **Timing and RFID technology partners**, to operate live tracking, timing, and results systems.
- **Medical and emergency response personnel/services**, where necessary to respond to a safety incident.
- **Race Officials, marshals, and volunteers**, on a need-to-know basis, for race operations and safety.
- **Government and law enforcement authorities**, where required by applicable law, court order, or to protect the rights, safety, or property of Sahyadri Classic, participants, or the public.
- **Professional advisors** (legal, insurance, accounting), where necessary in connection with the event's operation, an insurance claim, or a legal proceeding.

We do not sell, rent, or trade your personal data to third parties for their independent marketing purposes. We do not share Sensitive Personal Data (including medical information) with any party beyond what is strictly necessary for safety and emergency response.

6. Sensitive Personal Data — Additional Safeguards

Medical and health-related information is:

- Collected only to the extent necessary for participant safety;
- Accessible only to designated Race Officials, medical personnel, and RHQ staff on a need-to-know basis;

- Not used for any purpose other than safety, emergency response, and eligibility verification;
- Retained separately from general registration records where operationally feasible, and deleted or anonymized following the retention period specified in Section 9.

7. Children's and Minors' Data

Where a participant is a minor (aged 15–17, eligible solely under the 1 Ghat U-18 category per our Rules & Regulations), we process their personal data, including any Sensitive Personal Data, only upon verifiable consent of a parent or lawful guardian, obtained through the signed consent form referenced in Section 1.1(F) of the Rules & Regulations. We do not knowingly collect personal data from any individual under the minimum eligible age for participation for any purpose other than the limited U-18 category process described above. A parent or guardian may contact us at any time to review, correct, or request deletion of their child's data, subject to Section 10.

8. Photography, Video, and Media Consent

By registering for and/or participating in the event, you acknowledge and consent that:

- Photographs and video footage may be captured of you at any point before, during, or after the race, at official venues and along the race route;
- Such images and footage are the property of Sahyadri Classic and may be used, reproduced, and published on our website, official social media accounts, and other print or digital promotional materials, without further notice or compensation to you;
- If you do not wish to be featured in promotional media, you must notify us in writing at **sahyadriclassic@gmail.com** prior to race day; we will make reasonable efforts to honor such requests, but cannot guarantee exclusion from group/crowd photography or live broadcast footage where individual identification/removal is not reasonably practicable.

9. Data Retention

We retain personal data only for as long as reasonably necessary for the purposes described in this Policy, and thereafter delete or anonymize it, except where retention is required to comply with a legal obligation, resolve a dispute, or enforce our agreements. Specific retention periods:

Data Category	Retention Period
Registration and contact details	[e.g. 3 years] from the event date
Identity documents (Aadhaar/DL/Passport)	Verified at inspection; not retained beyond [e.g. 90 days] post-event unless required for a pending dispute or legal obligation
Medical fitness information	[e.g. 1 year] post-event, or as required for insurance/legal purposes
Waiver/Indemnity forms	[e.g. 7 years] , consistent with applicable limitation periods for civil claims
Payment transaction records	As required under applicable tax and financial regulations (typically [e.g. 8 years])

Data Category	Retention Period
Race results and finisher records	Retained indefinitely as part of official race history, unless deletion is requested and does not compromise result integrity
Photographs/video used for promotion	Retained per Section 8, until a valid opt-out request is received
Website analytics/cookies	Per Section 12

10. Your Rights as a Data Principal

Under the DPDP Act, 2023, you have the right to:

1. **Right to Access** — obtain a summary of the personal data we hold about you and the processing activities undertaken.
2. **Right to Correction and Completion** — request correction of inaccurate or incomplete personal data.
3. **Right to Erasure** — request deletion of personal data that is no longer necessary for the purpose it was collected, subject to our legal retention obligations described in Section 9.
4. **Right to Grievance Redressal** — lodge a complaint regarding our processing of your personal data (see Section 15).
5. **Right to Nominate** — nominate another individual to exercise these rights on your behalf in the event of death or incapacity.
6. **Right to Withdraw Consent** — withdraw previously given consent at any time, with effect from the date of withdrawal, and without affecting the lawfulness of processing carried out prior to withdrawal.

To exercise any of these rights, contact us at sahyadriclassic@gmail.com. We will respond within **30 days**, or such period as prescribed under applicable law.

11. Cross-Border Participants and Data Transfers

Where non-Indian participants register for the event, their personal data is collected and primarily processed within India. Where any processing involves transfer to a service provider located outside India (for example, a cloud hosting or analytics provider), we take reasonable steps to ensure such transfers are consistent with the DPDP Act, 2023 and any applicable government notifications restricting transfer to specific countries.

12. Cookies and Website Analytics

Our website uses cookies and similar tracking technologies to operate core functionality, remember preferences, and analyze traffic patterns. You may disable cookies through your browser settings; doing so may limit certain website functionality, such as saved registration progress. We do not use cookies to track you across unrelated third-party websites for advertising purposes.

13. Data Security

We implement reasonable security practices and procedures, consistent with Section 8(5) of the DPDP Act, 2023 and the IT (Reasonable Security Practices) Rules, 2011, including access controls,

restricted staff access to Sensitive Personal Data, and secure storage of physical documents collected at inspection. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security of your data.

In the event of a personal data breach that is likely to affect you, we will notify you and the Data Protection Board of India, as applicable, in accordance with Section 8(6) of the DPDP Act, 2023.

14. Third-Party Links

Our website may contain links to third-party websites (e.g. payment gateways, social media platforms, vendor/accommodation partners). This Policy does not apply to such third-party websites, and we encourage you to review their respective privacy policies.

15. Grievance Officer

In accordance with applicable law, we have designated the following Grievance Officer to address any concerns regarding this Policy or our processing of your personal data:

Name: Mr. Mayur Pawar, **Designation:** Grievance Officer **Email:** pawarmayur12@gmail.com **Phone:** +91 7558550353 **Address:** Amarlakshmi Stop, Satara, 415004

We aim to acknowledge grievances within **48 hours** and resolve them within **30 days**.

16. Changes to This Policy

We may update this Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. The "Last Updated" date at the top of this Policy indicates when it was last revised. Material changes will be notified to registered participants via email or a prominent notice on our website prior to taking effect.

17. Governing Law and Jurisdiction

This Policy is governed by the laws of India. Any disputes arising out of or in connection with this Policy shall be subject to the exclusive jurisdiction of the courts at **Satara, Maharashtra**.

18. Contact Us

For any questions regarding this Privacy Policy or our data practices, contact:

Ridgeline pvt/ltd, Email: sahyadriclassic@gmail.com Phone: **+91 7057484681** Address: **Plot No 13, Sa Ra Ga Ma Bunglow, Pratap Colony, MIDC, Rahimatpur Road, Satara 415004**
