

*Preamble:*

*This Personal Data Privacy Policy (hereinafter referred to as the Privacy Policy) is an integral part of the Public Offer posted on the website on the Internet at: <https://www.ertc.land> (hereinafter referred to as ERTC).*

*The ERTC team sincerely and responsibly assures that we are doing and will do everything possible to ensure that the confidentiality of our communications is at the highest level. We set as our most important goal and condition for the implementation of our activities the observance of the rights and freedoms of a person and a citizen in the processing of his personal data, including the protection of the rights to privacy, personal and family secrets. ERTC recognizes and shares the right of every individual to exercise control over their own personal data and the importance of protecting it. Providing the user with their personal data is an act of your trust in us, therefore, for our part, we will take all necessary measures to justify the trust placed in us. We perceive our communication as strictly confidential and such that under no circumstances, except as provided by the current legislation of Georgia, will become the property of third parties.*

*Our employees who have access to personal data do not cooperate with law enforcement agencies, undergo "lie detector" (polygraph) checks and sign material obligations upon hiring, which are imposed on them in the event of leakage of any information about our users. This Privacy Policy regarding the processing of personal data applies to all information that we can receive about visitors to the Website and personal account, which is located at: <https://www.ertc.land>, organized by a resident of Georgia - ERTC Platform LLC.*

**1. Definitions used in this Privacy Policy:**

*Web-platform "ERTC" (also referred to as "Website", "Service") - a legal entity ERTC Platform LLC, registered in accordance with the state law of Georgia, IDENTIFICATION NUMBER 400354086. OPERATING UNDER THE COMMERCIAL NAME (BRAND) "ERTC" (HEREINAFTER REFFERRED TO AS "PLATFORM" "ERTC" "Contractor").*

*Information - (messages, data) regardless of the form of their presentation.*

*Information and telecommunications network - a technological system designed to transmit information over communication lines, access to which is carried out using computer technology.*

*User - a person who has registered on the Website and gained access to a personal account.*

*Client - an individual who has acquired and / or intends to purchase the services of the Customer.*

*Notifications* - information posted through the Customer's Personal Account on the Website <https://www.ertc.land>.

*Services* - digital information and / or advertising services provided by the Contractor to the Customer under the Service Agreement.

*ERTC service* - a website, an online service organized by a resident of Georgia - ERTC Platform LLC at the web address: <https://www.ertc.land.ru>.

*Personal data in Georgia* - any information related to an identified or identifiable natural person. A person is identifiable when it is possible to identify him directly or indirectly, in particular, by an identification number or characteristic physical, physiological, psychological, economic, cultural or social characteristics.

*Data of a special category* - data related to race or ethnicity, political opinions, religious or philosophical beliefs, membership in trade unions, health status, sexual life, criminal record, administrative arrest, imposition of preventive measures on a person, imprisonment with a procedural agreements, with the elimination, recognition of a person as a victim of a crime or a victim, as well as biometric and genetic data that allows the identification of individuals by the above characteristics.

*Data processing* - any action performed on data using automatic, semi-automatic or non-automatic means, in particular the collection, recording, photographing, audio, video recording, organization, storage, replacement, restoration, recovery, use or disclosure for the purpose of transfer, distribution of data or providing access to them in any other way, grouping or combination, blocking, deletion or destruction of data

*Automatic data processing* - data processing using information technology.

*Semi-automatic data processing* - data processing using information technology or non-automatic means.

*Data subject* – any natural person whose data is being processed.

*Consent* - the voluntary consent of the data subject to the processing of data about him for certain purposes, expressed orally, by means of telecommunications or other appropriate means after receiving the appropriate information that allows you to clearly establish the will of the data subject.

*Written consent of the data subject* - expressed by the data subject after receiving the relevant information voluntary consent to the processing of data about him, signed or otherwise confirmed by him in writing or equivalent form;.

*Processor* - a public institution, natural person or legal entity, individually or together with other persons, determine the purposes and means of processing personal data, process data directly or with the help of an authorized person.

*Authorized person* - any natural or legal entity which processes data for or on behalf of the data processor. The authorized agency is the legal entity "Sumsub".

*The recipient of the data* - a private or public institution, a natural or legal entity, an employee of the private or public sector to whom the data was transferred, other than the data protection officer.

*Third party* - any natural person or legal entity, public institution, other than the data subject, the personal data protection officer, the data processor and the authorized person.

*A file system* - a structured set of data arranged and accessed according to specific criteria.

*The file system directory* - a detailed description of the structure and contents of the file system.

*Confidentiality of information* - a mandatory requirement for a person who has access to certain information not to transfer such information to third parties without the consent of its owner.

*The File System Directory Registry* - a registry that provides a detailed record of the available file systems.

*Data blocking* - temporary suspension of data processing.

*Data depersonalization* - the modification of data, as a result of which it is impossible to determine their connection with the data subject, or it requires disproportionate efforts, costs and time.

*Identification number* - a personal identification number or any other identification number associated with an individual, with the help of which it is possible to find data in the file system (in which the identification number is also processed) or disclose.

*The owner of a Website on the Internet* - a person who independently and at his own discretion determines the procedure for using a Website on the Internet, including the procedure for posting information on such a website.

*Identification (Verification)* - a set of measures to establish information about a person and verify it, carried out in accordance with federal laws and regulations adopted in accordance with them, and comparing this information with a unique designation (unique designations) of information about a person necessary to determine such person (hereinafter referred to as the identifier).

*Transfer of data to other states and international organizations (cross-border transfer)* - transfer to another state, international organization, regardless of the media or means used, of personal data that are the subject of processing or are going to be processed, and which is possible if there are grounds for processing data and appropriate data protection guarantees in the relevant state or international organization.

*Cookies* are small text files that contain small amounts of information and are downloaded to the User's computer or other device from the website's server.

*Web beacons* - electronic images that allow the Website to count the number of users who have visited a particular page and provide access to certain cookies.

*Tracking pixels* - tracking pixels used to count the number of Website visitors.

## **2. General provisions**

2.1 This ERTC Privacy Policy has been developed in accordance with the current legislation of Georgia and governs relationships with Website visitors and users of the Service. The interests of this Policy also take into account the rules of private international law.

2.2 This Privacy Policy applies to all information that the Administration can receive about the User while using the Website and the User's Personal Account. Using the Platform means the User's unconditional consent to this Policy and the conditions for processing his personal data specified therein. **In case of disagreement with these conditions, the User must refrain from using the Platform.**

2.3 This Privacy Policy applies only to the Website: <https://www.ertc.land>, and according to the personal account of the User-Participant of the project. Website: <https://www.ertc.land> does not control and is not responsible for third party websites to which the User can follow the links available on the Website.

2.4 The Administration ensures the confidentiality of users' personal data (including, but not exclusively, personal data of a special category) - which can be identified in any way when using the Website or the Personal Account.

2.5 The Administration reserves the right to change this Privacy Policy at any time without any special notice. Any changes to the terms of the Privacy Policy will be posted on this Website and will be valid from the moment of publication.

2.6 Further use of the Platform after making any changes to the Privacy Policy means the full, perpetual and unconditional acceptance by the User of such changes.

2.7 When processing personal data of Users, the Administration is guided by the current legislation of Georgia, including, but not exclusively, the Law of Georgia "On the Protection of Personal Data" No. 5669-C dated December 28, 2011 (as amended *and supplemented*). *Responsible for the storage and processing of personal data is Sumsub.*

2.8 In accordance with the provisions of the Law of Georgia on the Protection of Personal Data, the Administration collects personal data for certain, clear and legitimate purposes necessary to provide the services specified in the Rules of the Service and is guided by the following data processing principles:

2.9. The data must be processed fairly lawfully without degrading the dignity of the data subject;

2.9.2 Data may only be processed for specific, clearly defined, legitimate purposes. No subsequent processing of the data for other purposes incompatible with the original purpose is permitted;

2.9.3 Data may only be processed to the extent necessary to achieve the respective legitimate purposes. The data must be adequate and proportionate to the purposes for which they are processed;

2.9.4 Data must be valid and accurate and updated as necessary. Data collected without a legal basis and not corresponding to the purpose of processing must be blocked, deleted or destroyed;

2.9.5 The data may only be stored for the period necessary to achieve the purpose of the data processing. Upon reaching the purpose for which the data was processed, they must be blocked, deleted or destroyed or stored in a form that excludes the possibility of identifying the person, unless otherwise specified.

### **3. Personal information of Users that the Administration receives and processes, the purposes of processing the use of information**

3.1 The Administration collects only those personal data that are necessary for the provision of services within the Platform.

3.2 Categories of the User's personal data received by the Administration:

3.2.1 Surname, name, patronymic (if necessary);

3.2.2 Phone number;

3.2.3 Email address;

3.2.4 Other information (*if necessary*);

3.2.5. *Passport data for the identity verification procedure.*

3.2.6. *Documents confirming the ownership of the property.*

3.3 The Administration also has the right to send notifications to the User about new products and services, special offers and various events (direct marketing). The user can always refuse to receive informational messages by sending an email to the Administration at the email address specified in the "Contacts" section, marked "Refusal of notifications about new products and services and special offers".

3.4 Purpose of information processing: providing the User with access to the services, information and / or materials contained on the website. Identification of the User registered on the Website for the safe use of the Website and personal account in order to counteract the legalization and laundering of money obtained by criminal means.

3.5 Personal information (data) of the User may be used by the Administration for the following purposes:

3.5.1 Identification of the party within the framework of the services provided, incl. validation, purchase/sale of Tokens.

3.5.2 Providing the User with a personalized Service.

3.5.3 Communication with the User, including sending notifications, requests and information regarding the use of the Service, the provision of services, as well as processing requests and applications from the User.

3.5.4 Improving the quality of the Service, the convenience of its use, the development of new Services and services.

3.5.5 Targeting advertising and informational materials.

3.5.6 Conducting statistical and other research based on anonymized data.

### **4. Receipt, conditions for the processing of personal data and its transfer to third parties**

4.1 The Administration processes the personal data of the Users of the Service on the terms that are the subject of this Privacy Policy and the Rules of the Platform-Offer.

4.2 In the case of processing personal data of a special category, the Administration includes in the internal security policy of personal data and implements the requirements established for a certain level of security of personal data information systems, which is regulated by the local documents of the Administration.

4.3 The User fully accepts the terms of this Privacy Policy from the moment they start using the Platform.

4.4 Using the services of the Platform (by registering on the website, filling out an online application, for the exchange of Tokens, etc.), the User confirms that he provides the Administration with full written consent (permission) for the processing of his personal data (including data of a special category and, if necessary, , cross-border data transfer), by any means provided for by the provisions of the Law of Georgia on the Protection of Personal Data.

4.5 The User agrees that the Administration has the right to store and process, including automated (using registries / directories of the file system, file systems), any information related to his personal data, including the collection, systematization, accumulation, storage , clarification, use, distribution (including transmission over the Internet), depersonalization, blocking, destruction of personal data provided by the User. At the same time, the Administration undertakes to ensure confidentiality and appropriate security measures when processing personal data.

4.6 Personal data provided by the User when using the Platform is used to:

4.6.1 provision of the service chosen by the User;

4.6.2 providing the User with access to the Website and to improve the quality of the Service;

4.6.3 creating a User account on the Website, and using it to obtain access rights to the services of the User's Personal Account;

4.6.5 informing the User about changes or additions to the Service, as well as about the availability of any services provided by the Administration;

4.6.6 assessing the level of service, monitoring and optimizing various service options;

4.6.7 implementation of marketing activities and activities by the Administration (direct marketing purposes);

4.6.8 filing a claim and responding to submitted claims;

4.6.9 protect the rights and legitimate interests of users and third parties in accordance with the current legislation of Georgia.

4.7 The Administration undertakes not to transfer the User's personal data to third parties, except as expressly provided for by the [ERTC Service Rules](#) and the current legislation of Georgia.

4.8 The Administration has the right to use the User's Personal Data for electronic mailing of news and special offers, placing an order and providing services. The administration has the right to collect statistics on visiting the Website within the framework of the legislation of Georgia.

4.9 With regard to the User's personal data, their confidentiality is maintained, except in cases where the User voluntarily provides information about himself for general access to an unlimited number of persons.

4.10 The administration has the right to transfer personal information (data) of the user to third parties in the following cases:

4.10.1 The user has expressed his consent to such actions;

4.10.2 The transfer is necessary as part of the User's use of a particular Service or to provide a service to the User;

4.10.3 The transfer is provided for by Georgian or other applicable legislation within the framework of the procedure established by law;

4.10.4 Such a transfer occurs as part of the sale or other transfer of business (in whole or in part), while the acquirer transfers all obligations to comply with the terms of this Policy in relation to the personal information (personal data) received by him, and information about the acquirer (name, identification number, location, authorized person, etc.) of such data is published on the website of the Administration;

4.10.5 In order to ensure the possibility of protecting the rights and legitimate interests of the Administration and / or third parties in cases where the User violates the terms of use of the Website (Service Rules) and this Policy.

## **5. Setting, changing, clarifying personal information by the User**

5.1 The User can at any time change (update, supplement, delete) the personal information provided by him or part of it, as well as its confidentiality settings, using the personal data editing function in the "Personal Account" section or in the personal section of the Platform.

5.2 All personal information submitted by the User for registration on the Website can be changed or completely deleted from the database at any time upon request. The user can also delete the personal information provided by him under a specific account using the "Delete account" function. To do this, you need to contact the Administration in any convenient way using the contact information posted in a special section of our Website. At the same time, deleting your account may result in the inability to use some Services.

## **6. Consent to collection and use of information**

6.1 When using the services of the Website, the Administration asks to provide the User's personal data, which is used to activate the User's account on the Website, provide the User with services, interact with the User regarding the status of his account, and for other purposes set forth in this Privacy Policy.

6.2 Name, surname, phone number, email address and other information about the User may be required to provide access to the Service.

6.3 The User is also invited to create a password to access the Personal Account, which is also part of the User's account.

6.4 By providing personal information, the User voluntarily agrees to the collection, use and disclosure of such personal information and confirms that he has reached the age of majority and is a fully legal and capable citizen of Georgia.

6.5 The User, by putting the appropriate mark “acquainted or accepted” in the Privacy Policy, gives in electronic form a written unconditional, perpetual consent (permission) to the processing of his personal data (including, but not exclusively, personal data of a special category and, if necessary, - cross-border transfer of personal data) in accordance with the Law of the Republic of Georgia "On the Protection of Personal Data", and also gives consent to the provision, collection, storage, systematization, processing and / or transfer (including cross-border transfer) of personal data to third parties in the manner and on the grounds determined by the Law of Georgia on the Protection of Personal Data and internal documents of the Administration, and also confirms that he is familiar with the location of the personal data base (location of the Administration) containing his personal data, its purpose, name and procedure for anonymizing data .

6.6 The provision of personal data by Users is carried out only for the purpose and in cases limited by this Privacy Policy and the need to provide the services of this service, but, in any case, in accordance with and within the framework of the requirements of the Law of Georgia “On the Protection of Personal Data”. The User and/or the Client confirms that he/she is familiar with the Law of Georgia “On the Protection of Personal Data”, in particular, with their rights defined by this Law.

6.7 The User and/or the Client also consents to the provision, collection, storage and/or transfer of personal data to third parties for the purpose of systematization, distribution of advertising and/or other information (direct marketing purposes), and/or any other purposes that are not contradict the legislation of Georgia in the manner and on the grounds determined by the Law of Georgia on the Protection of Personal Data and internal documents of the Administration.

6.8 In the event of a change in the specific purpose of processing personal data, the User and / or the Client do not object to the processing of his personal data, if such a need is determined by the current legislation of Georgia and / or internal documents of the Contractor adopted in its execution. The personal data base is formed by collecting personal data necessary and sufficient to perform the tasks carried out by the Administration, as well as (if necessary) by a third party.

6.9 The procedure and principles for the collection, systematization of personal data are determined by the Administration independently. The storage of personal data is carried out in a form that allows the identification of the user to the extent required by the purposes previously stated when collecting personal data.

6.10 The period of storage of personal data is determined by the date of achievement of the objectives of their collection and processing.

6.11 The Administration guarantees the use of such data solely for the purpose of providing services and for the purposes described in this Privacy Policy, but, in any case, in accordance with and within the framework of the requirements of the Law of Georgia on the Protection of Personal Data. It is not allowed to use personal data without the consent of their owner to



distribute an offer and (or) advertising, including by mass mailing of electronic documents or electronic messages.

6.12 The consent of the data subject is the basis for the processing of his personal data.

## **7. Provision of information to the data subject**

7.1 If data is collected directly from the data subject, the data processor or authorized person (*Administration*) provides the data subject with the following information:

7.1.1 the identity and registered address of the person processing the information (*Administration*) and the authorized person (if any);

7.1.2 the purpose of data processing;

7.1.3 whether the provision of data is mandatory or voluntary, if mandatory, the legal consequences of refusing it;

7.1.4 the right of the data subject to receive information about the processed data about him, to demand their correction, updating, addition, blocking, deletion or destruction.

7.2 Providing the information referred to in clause 7.1. is not mandatory if the data subject already has it.

7.3 If the data is not collected directly from the data subject, the data processor or an authorized person (*Administration*) is obliged, if requested, to provide the data subject with the information specified in clause 7.1.

7.4 When collecting information for statistical, scientific and historical purposes, its provision is not mandatory if the provision of information to the data subject involves a disproportionate effort.

## **8. Right to access personal data, right to intervention and objection**

8.1 Any User of the Website has the right to receive from the Administration upon request without delay and free of charge:

8.1.1 confirming whether or not the data relating to it has been processed, as well as information about the purposes of processing, the categories of data used, the recipients or categories of recipients to whom the data is disclosed;

8.1.2 communication of personal data that is the subject of processing, as well as any available information about their origin, in an accessible form and in a manner that does not require additional equipment for understanding;

8.1.3 information about the principles of operation of the mechanism used in any automated processing of data relating to the User as the subject of personal data;

8.1.4 information about the legal consequences for the User resulting from data processing;

8.1.5 information on the procedure for exercising the right to intervene in relation to personal data.

8.2 The user of the Website, as the subject of personal data, has the right to object at any time and without any justification, free of charge, to the processing of personal data concerning him for the purposes of direct marketing. The administration of this Privacy Policy informs the User before disclosing personal data to third parties about the right to object to such use, and the User, when registering or placing an order on the Website, is considered to be familiar with the provisions of this Policy and such that he fully accepts them.

## **9. Disclosure**

9.1 The Administration has the right to disclose Users' Personal Data to third parties only for the provision of the Service or in cases provided for by the current legislation of Georgia.

9.2 This Website may contain links to other Websites, and the Administration is not responsible for the Privacy Policy or the content of other Websites

## **10. Safety and responsibility**

10.1 The Administration attaches great importance to the protection and security of all information of the Users of the Service, but Users must also take all possible measures to protect it.

10.2 The Administration strongly recommends that Users take all precautions while browsing the Internet, as The Administration cannot guarantee that its security measures will prevent illegal access to their data if the Users neglect the security measures. The Administration takes all possible measures to prevent unauthorized access to the personal data of the Website Users, but the Administration warns that no data transmission via the Internet, mobile device or wireless device can guarantee complete security.

10.3 The Administration is not responsible for the accuracy and completeness of the Personal Data or other information provided by the User or third parties, incl. in case of impossibility to use the Service or receive the service in case of providing inaccurate / incomplete Personal Data.

10.4 The user is responsible for the provision of false personal data or the use of personal data of third parties in accordance with the current legislation of Georgia.

10.5 The Administration strongly recommends not to disclose your User account password on the Website to third parties.

10.6 The Administration is not responsible for the use by third parties of information provided by the User to third parties.

10.7 Also, the Administration is not responsible for the content of personal information or other information that the User received from third parties.

10.8 The User undertakes not to post on the Website and not to send anywhere through / through the Website any materials of the following nature:

10.8.1 Data that is automatically transmitted to the Service during its use using the software installed on the User's device, including IP address, information from cookies, information about the User's browser (or other program that accesses the Services ), access time, address of the requested page.

10.8.2 Other information about the User, if its collection and/or provision is specified in the documents regulating individual Services.

10.9 To prevent unauthorized access to personal data, the Administration applies the following organizational and technical measures:

11.9.1 appointment of officials responsible for organizing the processing and protection of personal data - Data Protection Officer (DPO);

10.9.2 Data Protection Impact Assessment;

10.9.3 limiting the composition of persons having access to personal data;

10.9.4 Familiarize the subjects with the requirements of the legislation of Georgia and the regulatory documents of the Administration for the processing and protection of personal data;

10.9.5 Organization of accounting, storage and circulation of information carriers;

10.9.6 Placement of technical means for processing personal data within the protected area;

10.9.7 Identification of threats to the security of personal data during their processing, formation of threat models based on them;

10.9.8 Differentiation of user access to information Websites and software and hardware for information processing;

10.9.9 Registration and accounting of actions of users of personal data information systems;

10.9.10 Use of licensed anti-virus tools and recovery tools for the personal data protection system;

10.9.11 Use, if necessary, firewalls, intrusion detection, security analysis and cryptographic information protection;

10.9.12 A number of other measures provided for by the legislation of Georgia.

## **11. Transfer of personal data to third parties. Measures taken to protect the personal information of Users**

11.1 The User gives his full consent to the processing of his personal data provided when using the Website, including the collection, storage and transfer of his personal data to third parties.

11.2 The Administration has the right to entrust the processing of personal data of Users to third parties, on the basis of an agreement concluded with these persons.

11.3 Persons processing personal data on behalf of the Administration undertake to comply with the principles and rules for the processing and protection of personal data provided for by the legislation of Georgia, in particular, but not exclusively, by the Law on the Protection of Personal Data. For each person, a list of actions (operations) with personal data that will be performed by the person processing personal data, the purposes of processing, the obligation of such a person to maintain confidentiality and ensure the security of personal data during their processing, as well as the requirements for protecting the processed personal data.

11.4 The Administration takes all possible, necessary and sufficient organizational and technical measures to protect the User's personal information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties with it.

## **12. Social services**

12.1 The Website may contain links to various blogs, forums, Wiki websites and other social networks or services ( *social applications* ) that allow the User to exchange information with other users.

12.2 Any personal data or other information that the User provides in social applications can be read, stored and used by other users of social applications that are practically or completely not controlled by the Administration. In this regard, the Administration is not responsible for the use, misuse and misappropriation of any personal or other information that the User has provided in any social application by any other user.

12.3 Social media buttons are used to enable Website Users to share a link to a web page or make an electronic bookmark. These buttons are links to social networking websites owned by third parties, which, in turn, can capture information about the activity of Users on the Internet, including on the site. The Administration recommends that you read the relevant terms of use and the Privacy Policy of such sites to understand how they use Users' data, and how you can refuse to use their data or delete it.

12.4 The Administration has the right to use third-party web services on the Website to display images, watch videos or organize polls / polls. At the same time, the Administration cannot prevent the collection by these sites or external domains of information about how the User uses the content of the site.

12.5 The Administration may also use technologies that allow tracking whether the User has read, opened or forwarded certain messages sent to email. The purpose of using these technologies is to make the means of communication more useful and attractive to the User. If the User does not want the Administration to receive information about whether he read, opened or forwarded certain email messages, the User should write to the Administration at the email address of the Service specified in the "Contacts" section.

## **13. Journal, "cookies", "web beacons", "tracking pixels", their use.**

13.1 By doing this, the Administration informs Users that the Website collects and processes impersonal data about Visitors using Internet statistics services (Yandex Metrika, Google Analytics and others). Impersonal data of Users collected using Internet statistics services are used to collect information about the actions of Users on the Website, improve the quality of the Website and its content.

13.2 In order to provide quality services that best meet the needs of Users, the Administration needs to store and accumulate information about how Users use the website. To do this, small text files - "cookies" are used.

13.3 Cookies contain small amounts of information and are downloaded to the User's computer or other device from the website's server. On each subsequent visit to the website, the User's

browser sends cookies back to the server in order to be able to identify the User and remember user preferences.

13.4 Detailed information about cookies and how they work can be found on: <http://www.aboutcookies.org/>.

13.5 When the User visits the website, information may be collected both through cookies and other technologies. By using this website, the User agrees to the use of cookies by the Administration in accordance with this Privacy Policy.

13.6 The Administration informs the Users that the Website also uses cookies of a functional type, which store information about the User's actions during the use of the website, so that the Administration can adjust its work to the preferences of the Users. Such information is usually anonymized and not used for other purposes. Our Website collects typical session log information, including IP address, browser type and language, as well as data on the time of visit and the address of the websites from which the links were clicked.

13.7 In order to ensure effective management of the Website and simplify navigation, the Administration may also use web beacons (web beacons - electronic images that allow the Website to count the number of users who have visited a particular page and provide access to certain cookies) and "tracking pixels " ("tracking pixels") for counting the number of visitors, as well as cookies that record the number of visitors to the Website and the frequency of visits.

13.8 This information is used solely for statistical purposes. The Administration does not use personal data for the purpose of personal identification of any of the Users. However, when authorizing registered users on the website, the Administration may use this information in combination with information obtained using data analysis tools and cookies in order to analyze how Visitors use the website.

13.9 The user has the ability to manage cookies. The Administration informs the User that deleting or blocking cookies may affect the user interface, and some components of the Website may become inaccessible.

#### **14. Browser controls**

14.1 Most browsers allow you to see the cookies stored on the User's device and individually delete or block cookies from certain or all websites.

14.2 The Administration informs that when deleting all cookies, all data about the User's preferences will be lost, including the preference to refuse the use of cookies, since this implies the installation of a cookie that provides for such refusal.

#### **15. Changes to the Privacy Policy**

15.1 The Administration has the right to make changes to this Privacy Policy. When making changes in the current version, the date of the last update is indicated. The new version of the Policy comes into force from the moment it is published on the Website.

#### **16. Right of the data subject to request rectification, updating, supplementation, blocking, deletion and destruction of data**

16.1 At the request of the data subject, the data processor is obliged to correct, update, supplement, block, delete or destroy the data if they are incomplete, inaccurate, not updated or collected and processed illegally.

16.2 The processor must notify all recipients of the correction, update, addition, blocking, deletion or destruction of the data, unless the provision of such information is not possible due to multiple recipients and disproportionate costs. The latter circumstance must be notified to the personal data protection inspector.

16.3 If information is received, the recipient is obliged to correct, update, supplement, block, delete or destroy the data accordingly.

## **17. Procedure for correcting, updating, supplementing, blocking, deleting and destroying data**

17.1 Within 15 days after receiving the data subject's request, the data processor is obliged to correct, update, supplement, block, delete or destroy the data or inform the data subject of the reason for the refusal.

17.2 If a data processor, without having received a request from the data subject, considers that the data held by him is incomplete, inaccurate or not updated, he must correct or update them accordingly and inform the data subject thereof.

17.3 After the data subject submits such a request, the data processor (Administration) is entitled to block the data based on the request of the applicant.

17.4 The decision to block data is made within 3 days after the submission of the relevant request and is valid until the data processor makes a decision to correct, update, supplement, delete or destroy the data.

17.5 A decision to block data for the duration of the reason for blocking must be attached to the relevant data.

## **18. Anonymization of personal data**

18.1 For statistical purposes, for historical, scientific, sociological, medical research, legal documentation, the Administration depersonalizes personal data by removing from them a part that allows you to identify an individual, converting them into anonymous information that cannot be linked to identified information or an identifiable person .

18.2 Upon depersonalization, the confidentiality regime established for the relevant personal data is removed.

## **19. Cross-border transfer of personal data**

19.1 Before the start of the cross-border transfer of personal data, the Administration is obliged to make sure that the foreign state to whose territory it is planned to transfer personal data provides reliable protection of the rights of personal data subjects.

19.2 The transfer of data to other states and international organizations is possible if there are grounds for data processing provided for by the Law of Georgia on the Protection of Personal Data and there are adequate data protection guarantees in the relevant state or international organization.

19.3 The transfer of data to another state or international organization, except for clause 22.2., is also possible if:

19.3.1 The transfer of data is provided for by an international treaty and an agreement of Georgia;

19.3.2 The data processor ensures adequate guarantees of data protection and fundamental rights of the data subject on the basis of an agreement concluded by the data processor and the relevant state, legal or natural person of such state or international organization.

19.4 Communication of data based on clause 22.3.2. possible only after permission is given by the inspector.

19.5 The presence of adequate data protection guarantees in another state and/or international organization is assessed and the decision is made by the inspector based on an analysis of the legislation governing data processing and practice.

## **20. Applicable law**

20.1 This Policy and relations between the User and the Administration arising in connection with the application of the Privacy Policy are subject to the substantive and procedural law of Georgia.

## **21. Feedback**

21.1 All suggestions or questions regarding this Policy should be reported to the Administration at the address specified in the "Contacts" section. online (cookies) for direct marketing purposes, the consent procedure in such cases; as well as the right to refuse the collection of personal data and the method of withdrawing consent by contacting the Administration using the email specified in the "Contacts" section.

21.2 The contact point for requests from Users regarding their personal data is also the location of the Administration specified in clause 1.1. Privacy Policy.

## **22. Final provisions, other conditions**

22.1 This Privacy Policy is valid indefinitely, during the entire period of use of the Website by the User, until it is replaced by a new version.

25.2 The Administration has the right to change the terms of this Policy at any time by publishing their new version on the Website. The User undertakes to regularly review the text of the Privacy Policy published on the Website in order to familiarize himself with the changes.

25.3 The User undertakes not to use the Website for commercial purposes without the prior written consent of the Administration.

25.4 The User undertakes not to use the results of intellectual activity posted on the Website (including, but not limited to: images, texts, program code) without the prior written consent of the Administration.

25.5 The Administration makes all reasonable efforts to prevent failures and malfunctions in the operation of the Website, but does not guarantee its uninterrupted operation if this is caused by external factors beyond its control (DDoS attacks, etc.), is not responsible for it and is not

obliged to notify Users about such interruptions, unless such interruptions last more than 48 hours, and the Administration has the technical possibility of such notification on the Website.

25.6 The Administration has the right to remove any information from the Website at any time on its own initiative.

25.7 The administration guarantees compliance with the confidentiality of personal data, taking all possible organizational and technical measures necessary to protect personal data from illegal or accidental access to them, deletion, modification, blocking, copying, illegal or unauthorized distribution, as well as from other illegal actions.

25.8 All issues not regulated by this Privacy Policy are regulated in accordance with the current legislation of Georgia and local documents of the Administration.