

# Privacy policy

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## Controller

Identification Number: 306464983

Registering Authority: LEPL National Agency of Public Registry

Legal Address: Georgia, Tbilisi, Samgori district, police lane I N5, floor 2, N4a

## Overview of the processing operations

The following overview summarizes the types of data processed and the purposes of their processing and refers to the data subjects.

### Types of data processed

- Contact data.
- Content data.
- Usage data.
- Meta, communication and process data.

### Categories of data subjects

- Communication partners.
- Users.

### Purposes of the processing

- Contact requests and communication.
- Security measures.
- Range measurement.
- Managing and responding to inquiries.
- Feedback.
- Marketing.
- Profiles with user-related information.

- Provision of our online services and user-friendliness.
- Information technology infrastructure.

## Relevant legal bases

### Security measures

We take appropriate technical and organizational measures in accordance with the legal requirements, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing as well as the different probabilities of occurrence and the extent of the threat to the rights and freedoms of natural persons, in order to ensure a level of protection appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access, input, disclosure, safeguarding availability and separation of the data. Furthermore, we have established procedures that ensure the exercise of data subject rights, the deletion of data and responses to data threats. Furthermore, we take the protection of personal data into account as early as the development and selection of hardware, software and processes in accordance with the principle of data protection, through technology design and data protection-friendly default settings.

TLS/SSL encryption (https): To protect user data transmitted via our online services, we use TLS/SSL encryption. Secure Sockets Layer (SSL) is the standard technology for securing Internet connections by encrypting the data transmitted between a website or app and a browser (or between two servers). Transport Layer Security (TLS) is an updated and more secure version of SSL. Hyper Text Transfer Protocol Secure (HTTPS) is displayed in the URL when a website is secured by an SSL/TLS certificate.

### Transfer of personal data

As part of our processing of personal data, data may be transferred to other bodies, companies, legally independent organizational units or persons or disclosed to them. The recipients of this data may include, for example, service providers commissioned with IT tasks or providers of services and content that are integrated into a website. In such cases, we observe the legal requirements and, in particular, conclude corresponding contracts or agreements with the recipients of your data that serve to protect your data.

### International data transfers

### Rights of the data subjects

### Use of cookies

Cookies are small text files or other storage notes that store information on end devices and read information from the end devices. For example, to store the login status in a user account, the contents of a shopping cart in an e-shop, the content accessed or the functions used in an online offering. Cookies can also be used for various purposes, e.g. to ensure the functionality, security and convenience of online services and to analyze visitor flows.

**Notes on consent:** We use cookies in accordance with the statutory provisions. We therefore obtain prior consent from users, unless this is not required by law. In particular, consent is not required if the storage and reading of information, including cookies, is absolutely necessary in order to provide the user with a telemedia service expressly requested by them (i.e. our online offer). Strictly necessary cookies generally include cookies with functions that serve the display and operability of the online service, load balancing, security, storage of user preferences and selection options or similar purposes related to the provision of the main and secondary functions of the online service requested by the user. The revocable consent is clearly communicated to the users and contains the information on the respective use of cookies.

**Information on legal bases under data protection law:** The legal basis under data protection law on which we process users' personal data with the help of cookies depends on whether we ask users for their consent. If users consent, the legal basis for processing their data is the consent they have given. Otherwise, the data processed using cookies will be processed on the basis of our legitimate interests (e.g. in the commercial operation of our online offering and improving its usability) or, if this is done in the context of fulfilling our contractual obligations, if the use of cookies is necessary to fulfill our contractual obligations. We explain the purposes for which we process cookies in the course of this privacy policy or as part of our consent and processing procedures.

**Storage duration:** With regard to the storage duration, a distinction is made between the following types of cookies:

- Temporary cookies (also: session cookies): Temporary cookies are deleted at the latest after a user has left an online service and closed their end device (e.g. browser or mobile application).
- Permanent cookies: Permanent cookies remain stored even after the end device is closed. For example, the login status can be saved or preferred content can be displayed directly when the user visits a website again. The user data collected with the help of cookies can also be used to measure reach. If we do not provide users with explicit information on the type and storage duration of cookies (e.g. when obtaining consent), users should assume that cookies are permanent and can be stored for up to two years.

## Provision of the online offer and web hosting

We process users' data in order to provide them with our online services. For this purpose, we process the user's IP address, which is necessary to transmit the content and functions of our online services to the user's browser or end device.

- Processed data types: Usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status); content data (e.g. .e.g. entries in online forms).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of processing: Provision of our online services and user-friendliness; information technology infrastructure (operation and provision of information systems and technical devices (computers, servers, etc.)). Security measures.
- Legal bases: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

## Further information on processing operations, procedures and services:

- Collection of access data and log files: Access to our online offering is logged in the form of so-called "server log files". The server log files may include the address and name of the websites and files accessed, date and time of access, data volumes transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a rule, IP addresses and the requesting provider. The server log files may be used for security purposes, e.g. to avoid overloading the servers (especially in the event of abusive attacks, so-called DDoS attacks) and to ensure the utilization of the servers and their stability; legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR). Deletion of data: Log file information is stored for a maximum of 30 days and then deleted or anonymized. Data whose further storage is required for evidentiary purposes is excluded from deletion until the respective incident has been finally clarified.
- WordPress.com: Hosting and software for the creation, provision and operation of websites, blogs and other online offers; Service provider: Aut O'Mattic A&C Ireland Ltd, Grand Canal Dock, 25 Herbert Pl, Dublin, D02 AY86, Ireland; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://wordpress.com>; Privacy Policy: <https://automattic.com/de/privacy/>; Data processing agreement: <https://wordpress.com/support/data-processing-agreements/>. Basis for transfer to third countries: EU-US Data Privacy Framework (DPF).

## Contact and inquiry management

When contacting us (e.g. by post, contact form, email, telephone or via social media) and as part of existing user and business relationships, the details of the inquiring persons are processed insofar as this is necessary to answer the contact inquiries and any requested measures.

- Processed data types: Contact data (e.g. email, telephone numbers); Content data (e.g. entries in online forms); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Communication partners.
- Purposes of Processing: Contact requests and communication; Managing and responding to inquiries; Feedback (e.g. collecting feedback via online form). Provision of our online services and user-friendliness.
- Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR). Contract fulfillment and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR).

### Further information on processing operations, procedures and services:

- Contact form: If users contact us via our contact form, e-mail or other communication channels, we process the data provided to us in this context to process the communicated request; legal basis: contract fulfillment and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR), legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

## Web analysis, monitoring and optimization

Web analysis (also referred to as "reach measurement") is used to evaluate the flow of visitors to our online offering and may include behavior, interests or demographic information about visitors, such as age or gender, as pseudonymous values. With the help of reach analysis, we can, for example, recognize at what time our online offer or its functions or content are most frequently used or invite reuse. We can also understand which areas require optimization.

In addition to web analysis, we can also use test procedures, e.g. to test and optimize different versions of our online offering or its components.

Unless otherwise stated below, profiles, i.e. data summarized for a usage process, can be created for these purposes and information can be stored in a browser or in an end device and read out from it. The information collected includes, in particular, websites visited and the elements used there as well as technical information such as the browser used, the computer system used and information on usage times. If users have consented to the collection of their location data from us or from the providers of the services we use, location data may also be processed.

The IP addresses of users are also stored. However, we use an IP masking procedure (i.e. pseudonymization by shortening the IP address) to protect users. In general, no clear user data (such as e-mail addresses or names) is stored in the context of web analysis, A/B testing and optimization, but pseudonyms. This means that neither we nor the providers of the software used know the actual identity of the users, but only the information stored in their profiles for the purposes of the respective processes.

- Processed data types: Usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. .e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of processing: Reach measurement (e.g. access statistics, recognition of returning visitors). Profiles with user-related information (creation of user profiles).
- Security measures: IP masking (pseudonymization of the IP address).

## Presence in social networks (social media)

We maintain online presences within social networks and process user data in this context in order to communicate with the users active there or to offer information about us.

We would like to point out that user data may be processed outside the European Union. This may result in risks for users because, for example, it could make it more difficult to enforce users' rights.

Furthermore, user data is generally processed within social networks for market research and advertising purposes. For example, user profiles can be created based on user behavior and the resulting interests of users. The user profiles can in turn be used, for example, to place advertisements within and outside the networks that presumably correspond to the interests of the users. For these purposes, cookies are generally stored on the user's computer, in which the user's usage behavior and interests are stored. Furthermore, data can also be stored in the user profiles independently of the devices used by the users (especially if the users are members of the respective platforms and are logged in to them).

For a detailed description of the respective forms of processing and the opt-out options, please refer to the data protection declarations and information provided by the operators of the respective networks.

In the case of requests for information and the assertion of data subject rights, we would also like to point out that these can be asserted most effectively with the providers. Only the providers have access to the users' data and can take appropriate measures and provide information directly. If you still need help, you can contact us.

- Processed data types: Contact data (e.g. e-mail, telephone numbers); Content data (e.g. entries in online forms); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of processing: Contact requests and communication; feedback (e.g. collecting feedback via online form). Marketing.
- Legal bases: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

### Further information on processing operations, procedures and services:

- Instagram: Social network; Service provider: Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://www.instagram.com>. Privacy Policy: <https://instagram.com/about/legal/privacy>.

## Plugins and embedded functions and content

We incorporate functional and content elements into our online offering that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These may be, for example, graphics, videos or city maps (hereinafter uniformly referred to as "content").

The integration always requires that the third-party providers of this content process the IP address of the user, as they would not be able to send the content to their browser without the IP address. The IP address is therefore required to display this content or function. We endeavor to only use content whose respective providers only use the IP address to deliver the content. Third-party providers may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. Pixel tags can be used to analyze information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may contain, among other things, technical information about the browser and operating system, referring websites, time of visit and other information about the use of our online offer, as well as being linked to such information from other sources.

- Processed data types: Usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. .e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of processing: Provision of our online services and user-friendliness.

- Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

### **Further information on processing operations, procedures and services:**

- Google Fonts (obtained from the Google server): Obtaining fonts (and symbols) for the purpose of a technically secure, maintenance-free and efficient use of fonts and symbols with regard to up-to-dateness and loading times, their uniform presentation and consideration of possible licensing restrictions. The provider of the fonts is informed of the user's IP address so that the fonts can be made available in the user's browser. In addition, technical data (language settings, screen resolution, operating system, hardware used) are transmitted that are necessary for the provision of the fonts depending on the devices used and the technical environment. This data may be processed on a server of the font provider in the USA- When visiting our online offer, users' browsers send their browser HTTP requests to the Google Fonts Web API (i.e. a software interface for retrieving fonts). The Google Fonts Web API provides users with the Google Fonts Cascading Style Sheets (CSS) and then the fonts specified in the CCS. These HTTP requests include (1) the IP address used by the respective user to access the Internet, (2) the requested URL on the Google server and (3) the HTTP headers, including the user agent, which describes the browser and operating system versions of the website visitors, as well as the referral URL (i.e. the web page on which the Google font is to be displayed). IP addresses are neither logged nor stored on Google servers and are not analyzed. The Google Fonts Web API logs details of HTTP requests (requested URL, user agent and referrer URL). Access to this data is restricted and strictly controlled. The requested URL identifies the font families for which the user wants to load fonts. This data is logged so that Google can determine how often a particular font family is requested. With the Google Fonts Web API, the user agent must adapt the font that is generated for the respective browser type. The user agent is primarily logged for debugging and used to generate aggregated usage statistics to measure the popularity of font families. These aggregated usage statistics are published on the Google Fonts "Analytics" page. Finally, the referral URL is logged so that the data can be used for production maintenance and to generate an aggregated report on the top integrations based on the number of font requests. According to its own information, Google does not use any of the information collected by Google Fonts to create profiles of end users or to place targeted ads; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://fonts.google.com/>; Privacy Policy: <https://policies.google.com/privacy>; Basis for third country transfer: EU-US Data Privacy Framework (DPF). Further information: <https://developers.google.com/fonts/faq/privacy?hl=de>.