

Personal Data Protection Policy

Company Name: "Elt Building" LLC (hereinafter the "Company")

Identification Number: 445471285

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1. Personal Data Protection

1.1. The Personal Data Protection Policy of "Elt Building" LLC (hereinafter - the "Policy") establishes the purposes, basic principles, and rules for processing personal data, and defines the basic measures implemented to ensure data security.

1.2. "Elt Building" LLC respects Georgian legislation and international standards in the field of human rights protection. Protecting the privacy of our guests, employees, and persons in a contractual relationship with us is especially important to us. Accordingly, we apply all necessary organizational and technical security measures to protect your personal data.

1.3. Your personal data is processed in accordance with the Law of Georgia on Personal Data Protection.

2. Purpose and Scope of the Policy

2.1. This Policy establishes the general rules for the processing of personal data by the Company. This Policy applies to the Company's customers, employees, contractors, and all persons whose data is processed by the Company. It also applies to persons who process personal data on behalf of and/or for the Company.

2.2. The purpose of the Policy is to implement a high standard of personal data protection, taking into account the Law of Georgia on Personal Data Protection and European Union data protection regulations.

2.3. This Policy aims to:

- Establish general principles for personal data processing, including the principles of integrity, legality, accuracy, and accountability.
- Establish mandatory requirements for personal data protection by ensuring the Company's compliance with these requirements.
- Create a secure and lawful management system for data protection and privacy that complies with the requirements set by data protection laws.
- Ensure a unified and systematic approach to resolving issues in the field of personal data processing.

3. Definition of Terms Used in the Policy

The terms used in this document are purely descriptive and are defined based on the specific nature of the Company's work. The definitions are in accordance with the Law of Georgia on Personal Data Protection, and interpreting them contrary to the law is unacceptable.

Personal data (hereinafter - "data"): any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, including by his/her name, surname, identification number, location data and electronic communication identifiers, or by physical, physiological, mental, psychological, genetic, economic, cultural or social characteristics;

Special categories of data: data connected to a person's racial or ethnic origin, political views, religious, philosophical, or other beliefs, membership of professional unions, health, sexual life, status of an accused, convicted or acquitted person or a victim in criminal proceedings, conviction, criminal record, diversion, recognition as a victim of trafficking in human beings or of a crime under the Law of Georgia on the Elimination of Violence against Women and/or Domestic Violence, and the Protection and Support of Victims of Such Violence, detention and enforcement of his/her sentence, or his/her biometric and genetic data that are processed to allow for the unique identification of a natural person;

Data processing: Any operation performed on data, including its collecting, obtaining, accessing, photographing, video monitoring and/or audio monitoring, organising, grouping, interconnecting, storing, altering, retrieving, requesting for access, using, blocking, erasing or destroying, and disclosing by transmission, publication, dissemination or otherwise making available;

Data subject: Any natural person whose data are being processed.

Consent of the data subject: Consent freely and unambiguously expressed by a data subject after the receipt of the respective information, by an active action, in writing (including in electronic form) or verbally, to the processing of data concerning him/her for specific purposes;

Data Controller: A natural person, legal entity, or public institution that, individually or together with others, determines the purposes and means of data processing, and carries out data processing directly or through a person authorized for processing.

Data Processor: A natural person, legal entity, or public institution that processes data for or on behalf of the person responsible for processing.

Company: For the purposes of this Policy, "Elt Building" LLC, which processes data, determines the purposes and means, methods, forms, organizational and technical security measures of data processing, as well as the ways to realize the rights of the data subject.

Incident: A breach of data security leading to the unlawful or accidental damage, loss, as well as unauthorized disclosure, destruction, alteration, access, collection/acquisition, or other unauthorized processing of data.

4. Grounds for Processing Personal Data

4.1. Processing of personal data is permissible only on one of the grounds provided by the Law of Georgia on Personal Data Protection:

- The data subject has given consent to the processing of data concerning him/her for one or more specific purposes;
- Data processing is necessary for the performance of a contract entered into with the data subject or to enter into a contract at the request of the data subject;
- Data processing is provided for by law;
- Data processing is necessary for the person responsible for processing to fulfill obligations assumed under Georgian legislation;

- Data processing is necessary to protect legitimate interests, except when there is an overriding interest in protecting the rights of the data subject.

5. Principles of Personal Data Processing

5.1. During the data processing process, the Company observes the following principles:

a) Principle of legality and fairness: The Company processes personal data only under the rules and grounds established by law. It ensures appropriate protection of the rights of data subjects while observing the principle of equality (exclusion of discrimination).

b) Principle of transparency: The data processing process is transparent to the data subject. You can request and receive information about the processing of your personal data at any time in the manner and terms established by the legislation of Georgia.

c) Principle of purpose limitation: The Company processes personal data only for the specific purpose for which it was obtained.

d) Principle of data minimization: Data is processed only to the extent necessary to achieve the purpose, considering the proportionality of the purpose and data volume.

e) Principle of data accuracy: The Company ensures that the personal data protected by it is accurate and valid. Inaccurate data is immediately corrected or deleted, both based on the data subject's request and if an error is discovered by the Company.

f) Principle of storage limitation: The Company stores data only for the period necessary to achieve the purpose. For storing personal data, the Company pre-determines a specific period or indicates a criterion for determining the period.

g) Principle of data security: In order to protect data security, the Company takes technical and organizational measures during data processing that adequately ensure data protection, including protection from unauthorized or illegal processing, accidental loss, destruction, and/or damage.

6. Purpose of Personal Data Processing

6.1. The purposes of processing personal data derive from the Company's field of activity and are related to the delivery of services/products, improvement of the quality of services/products and delivery, observance of security measures, and implementation of the labor activities of persons employed in the Company.

6.2. Personal data is processed for the following specific purposes:

- To supply offered products and services;
- To conduct automatic payment procedures;
- To conclude a contract or transaction;
- For labor relations with persons employed in the Company;
- For special offers and marketing purposes for customers;
- To hold events on the hotel premises;
- For analytical and statistical purposes, to understand how users interact with the Company's website;
- To conduct various research to improve products and services; to study how users use the Company's products and services;

- i) To improve the quality of service and take customer wishes into account;
- k) For safety and property protection;
- l) To respond to violations of hotel rules.

7. Individual Categories of Data, Processing Purposes, Grounds, and Terms

Personal Data	Ways of Obtaining Personal Data	Basis for Personal Data Processing	Retention Period of Personal Data
Name, surname, phone number, e-mail, address, personal number, citizenship, passport number of hotel and/or restaurant visitors	Based on sharing by the data subject (when booking a hotel or restaurant physically, online, via a booking app or communication center, making a payment, filling out a direct marketing implementation document). Based on the contract concluded during online hotel booking (e.g., booking.com).	Conclusion of a contract. Delivery of offered products and services. For sending special offers (for the purpose of implementing direct marketing). For conducting research to improve service quality.	Data shared by the parties to conclude a contract is stored for the term of the contractual relationship and for a period of 2 years after the end of the contractual relationship. Data collected for direct marketing purposes is kept until consent is withdrawn. Information collected for the purpose of improving service quality (for conducting research) is stored until this purpose is exhausted, but for no more than 2 years.

Financial data (includes payment card number, cardholder information, card expiration date)	From the data subject (within the framework of the service)	When making a payment	For a period of 2 years after the completion of the service
Information regarding the use of the service by the hotel visitor and their evaluation of the service quality	From the website with the subject's consent	Producing statistics, improving service quality	Until consent is withdrawn
Information related to website use; marketing and communication data	Cookies	Producing statistics, improving service quality	Until deleted by the user in the browser settings.
Information about reservations in hotels/restaurants, dates of arrival and departure of visitors, and orders placed by them	By data subjects	For improving service quality, for payment settlement purposes	For analytical purposes and payment settlement purposes for a period of 2 years
Personal information shared by employees in accordance with the "Policy on Processing Personal Information of Employed Persons"	Information shared by the employee/recommender	Labor contract	The period of the labor relationship and 1 year after the termination of the labor contract

Applicants - in accordance with the "Policy on Processing Personal Information of Employed Persons"	Information shared by the applicant/recommender	For the purpose of concluding a labor contract	1 year
Audio/video image, recording of the data subject	Video monitoring recordings	Ensuring safety, protecting property	30 days

8. How Personal Data is Obtained

8.1. Obtaining personal information about hotel visitors:

- From the data subject when booking hotel rooms online, via the communication center, or when purchasing services on-site. Information about accompanying persons is also collected in this way, with their consent.
- During online payment of service fees.
- From websites (e.g., Booking.com) through which hotel rooms are booked, based on contracts concluded with them.
- About members registered on the website;
- When registering on the hotel website, we obtain data from the data subject, who enters the data themselves and confirms consent to personal data processing by checking the relevant box.

8.2. About Company website visitors:

- The Company does not collect "cookie" information when visiting the website.

8.3. Obtaining personal information about persons in a labor relationship is done:

- To make a decision on employment and also to conclude an employment contract, personal data is obtained from data subjects, as well as from recommenders indicated by them.

8.4. Personal information about persons participating in events held at the hotel:

- In the case of using the hotel's conference space within the framework of a contract, the participating party in the contract may provide us with information about the persons participating in the event (names and surnames) for the purpose of admitting them to the building.

8.5. For the purpose of security and property protection, video monitoring is carried out in the Company's building and on its outer perimeter. A warning sign about the ongoing video monitoring is visibly placed. Employed persons are additionally warned in writing about the implementation of video monitoring.

8.6. Information about restaurant users/persons using food facilities/data subjects is obtained during space reservation (physically, via phone calls, or using a reservation app) and when a payment is made.

9. Processing of Personal Data for Direct Marketing

9.1. Data processing for direct marketing purposes may be carried out only with the data subject's consent.

9.2. In addition to the data subject's name, surname, address, phone number, and e-mail address, the processing of other data for direct marketing purposes requires the written consent of the data subject.

9.3. Before consent is given, the data subject is provided with the following information: who is the person responsible for processing personal data; which personal data is processed for direct marketing purposes if the data subject consents; specific purposes of data processing; in what form they will receive notifications/information from the Company; personal data protection guarantees; rights of the personal data subject; term of personal data processing; withdrawal of consent and withdrawal mechanisms; consequences of consent withdrawal.

9.4. The data subject has the right to demand the cessation of the use of their data for direct marketing purposes at any time by sending a written notification to the e-mail: info@laquintabatumi.com. The person responsible for data processing is obliged to stop processing data in accordance with the rule defined in this clause - no later than 5 (five) working days from the receipt of the data subject's request.

9.5. Personal data processed for direct marketing purposes is stored from the moment the data subject gives consent for direct marketing until the consent is withdrawn, during the term of implementing direct marketing.

10. Rights of the Data Subject

10.1. The data subject enjoys the rights provided for in Chapter 3 of the Law of Georgia "On Personal Data Protection", which include, but are not limited to, the following:

- **Right of access:** To receive information on what personal data is being processed and for what purpose, including information about the person conducting video monitoring, the purpose, and the legal basis for the monitoring.
- **Right to rectification/update:** To request the correction or update of inaccurate or incomplete data.
- **Right to erasure ("right to be forgotten"):** To request the deletion of data if its processing is no longer necessary to achieve the purpose or if consent has been withdrawn, except for exceptions established by law.
- **Right to restriction of processing:** To request the restriction of data processing in cases specified by law.

- **Right to withdraw consent (refusal):** To withdraw the given consent.
- In case of a violation of rights, apply to the State Audit Office or the court.

11. Protection of Minors' Personal Data

11.1. The Company processes the personal data of minors in accordance with the Law on Personal Data Protection, based on the consent of a parent or legal representative, taking into account the best interests of the minor.

12. Processing of Data about a Deceased Person

12.1. Data concerning a deceased person is processed by the Company to fulfill contractual obligations and to realize the Company's contractual authorizations/interests, in accordance with the requirements of the Law of Georgia on Personal Data Protection.

13. Data Security

13.1. The Company ensures the secure protection of data subjects' data and, for this purpose, applies all necessary technical and organizational measures.

13.2. The Company protects personal data from unauthorized or illegal access, accidental loss, damage, disclosure, or destruction.

13.3. After the purpose of personal data processing is exhausted, the Company regularly deletes and destroys personal data or stores it in a depersonalized form for analytical and statistical purposes.

14. Data Transfer to a Third Party

14.1. Personal data may be transferred to third parties when there is a ground provided for by law. Third parties with whom personal information may be shared could be:

- Persons in a contractual relationship with the Company;
- Service providers who assist the Company in fulfilling contractual relationships;
- Tax service providers and financial institutions, for the purpose of preventing and detecting fraud and financial crime or for other purposes established by law;
- Companies that provide customer experience analysis and feedback;
- Investigative, regulatory, or other state/administrative bodies that are authorized to request the sharing of information related to the subject;
- The legal successor of the Company;
- External auditors.

15. "Cookies" Policy

15.1. "Cookies" are small text files that a website stores on your computer or mobile phone during your visit. "Cookies" help the Company better manage and improve the effectiveness of the website. "Cookie" files store information related to your navigation on the website.

15.2. The Company does not store data about your address, passwords, credit and debit bank cards, or any other personal information in Cookie files.

15.3. Upon visiting the Company's website, you must agree to the "Cookies" policy for this information to be collected; otherwise, the information specified in clause 12.1 will not be collected by the Company.

16. Video Monitoring Rules

16.1. The Company conducts video monitoring of the internal and external perimeter of the building in accordance with the "Video Monitoring Rules" operating in the Company.

17. Incident Response Rules

17.1. An authorized person of the Company is obliged immediately - as soon as the incident is discovered - to record the incident, the result, the measures taken, and no later than 72 hours after discovering the incident, report it in writing or electronically to the State Audit Office, unless the incident is unlikely to cause significant harm and/or pose a significant threat to basic human rights and freedoms.

18. International Transfer of Personal Data

18.1. The Company carries out the international transfer of personal data in accordance with the Law of Georgia "On Personal Data Protection".

18.2. Based on the purposes of the Company's activities and considering the relevant grounds, processed data may be transferred to a person located/established in another state, including private or public organizations.

18.3. For the purpose stipulated in this clause, the Company takes the following measures for international transfer:

- Assesses the risks associated with the international data transfer;
- Signs an appropriate contract with the receiving party, which, among other things, provides for the rights and obligations of the Company and the receiving party, guarantees for the protection of the subject's rights, and relevant transfer methods;
- If necessary, controls the processing of transferred personal data for compatibility with the legislation, including requesting information regarding the processing process.
- The Company records facts of information issuance to third parties, specifying what data was issued, to whom, when, and on what legal basis.

19. Personal Data Protection Officer

The Company has a Personal Data Protection Officer who ensures compliance of personal data processing processes with personal data protection legislation. They are independent in their activities and are subordinate to the highest level of management.

- **Personal Data Protection Officer:** Safe Data Solutions LLC
- **E-mail:** anatavkhelidze@safedata.ge

20. Final Provisions

20.1. Rules and conditions that are not defined by this document are regulated in accordance with the legislation of Georgia.

20.2. The policy document is reviewed as needed or during significant changes to the legislation regulating the processing of personal data.