

# Personal Data Protection Policy Document

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## 1. Introduction

This Personal Data Protection Policy document describes the process of personal data processing by "ELT BUILDING" LLC and the guarantees for protecting the rights of the data subject during this process. "ELT BUILDING" LLC respects Georgian legislation and international standards in the field of human rights protection. We consider the protection of the confidentiality of our guests, employees, and those with whom we have contractual relationships to be particularly important. Accordingly, we take all necessary organizational and technical security measures to protect your personal data. Your personal data is processed in accordance with the Law of Georgia "On Personal Data Protection." You have the right to request information from us about the processing of your personal data based on the regulations mentioned above. We are ready to provide you with the requested information as soon as possible and within the timeframes established by Georgian law.

## 2. The Person Responsible for Personal Data Processing

**Company Name:** "ELT BUILDING" LLC (hereinafter "the Company")

**Identification Number:** 445471285

**Address:** 18 Rejeb Nijaradze St., Commercial Space N1, Batumi

**Phone Number:** 0422 40 00 10

**Email:** [info@laquintabatumi.com](mailto:info@laquintabatumi.com)

## 3. Principles of Data Processing

3.1 In the process of data processing, the Company adheres to the following principles:

- a) Principle of Lawfulness and Fairness:** The company processes personal data only in accordance with the rules and on the grounds established by law. It ensures the proper protection of the rights of data subjects while adhering to the principle of equality (non-discrimination).
- b) Principle of Transparency:** The data processing process is transparent for the data subject. You can contact us at any time to receive information about the processing of your personal data in the manner and within the timeframes established by Georgian law.
- 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 the data volume.
- e) Principle of Data Accuracy:** The company ensures that the personal data it holds is accurate and truthful. Inaccurate data is immediately corrected or deleted, both at the request of the data subject and if the company discovers an error.
- f) Principle of Storage Limitation:** The company stores data only for the period necessary to achieve the purpose. The company predetermines a specific period for storing personal data or specifies a criterion for determining the period.
- g) Principle of Data Security:** To protect data security, the company takes technical and organizational measures during data processing that adequately

ensure data protection, including against unauthorized or illegal processing, accidental loss, destruction, and/or damage.

#### **4. The Purpose of Personal Data Processing**

**4.1** The purposes of personal data processing stem from the company's field of activity and are related to the provision of services/products, improving the quality of services/products, ensuring security measures, and the implementation of labor activities for people employed by the company.

Personal data is processed for the following specific purposes:

- a) To provide offered products and services.
- b) To conduct automatic payment procedures.
- c) To enter into a contract or transaction.
- d) For employment relations with people employed by the company.
- e) For special offers and marketing purposes for customers.
- f) To hold events on the hotel's premises.
- g) For analytical and statistical purposes to understand how customers interact with the company's website.
- h) To conduct various research to improve products and services; to study how customers use the company's products and services.
- i) To improve service quality and consider customer wishes.
- j) For security and property protection.
- k) To respond to violations of hotel rules.

#### **4. How Personal Data is Obtained**

##### **4.1 Obtaining personal information about hotel visitors:**

- a) From the data subject when booking hotel rooms online, via the communication center, or when purchasing a service on-site. Information about accompanying persons is also collected in the same way, with their consent.

- b) When paying for services online.
- c) From websites (e.g., Booking.com) through which hotel rooms are booked, based on contracts concluded with them.
- d) About members registered on the website.
- e) When registering on the hotel's website, we obtain data from the data subject, who enters the data themselves and, by checking the corresponding box, confirms their consent to personal data processing.

#### **4.2 About visitors to the company's website:**

- a) When you visit the website, the company does not collect "Cookies."

#### **4.3 Obtaining personal information about people in an employment relationship:**

- a) To make a decision on employment and to enter into an employment contract, personal data is obtained from the data subjects, as well as from the recommenders they specify.

#### **4.4 Personal information about participants in events held at the hotel:**

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

**4.5** For the purpose of security and property protection, video monitoring is carried out inside and on the outer perimeter of the company's building. A warning sign about the ongoing video monitoring is visibly placed. Employees are additionally notified in writing about the video monitoring.

**4.6** Information about restaurant customers/people using catering services/data subjects is obtained when they book a table (physically, by phone call, or using a booking application) and when they make a payment.

### **5. Personal Data Processing for Direct Marketing**

**5.1** The processing of personal data for direct marketing purposes is carried out only on the basis of the data subject's informed, written consent through a special form. Before giving consent, the data subject is provided with the following information: who is the person responsible for personal data processing; which personal data will be processed for direct marketing purposes if the data subject consents; the specific purposes of data processing; the form in which they will receive messages/information from the company; personal data protection guarantees; the rights of the personal data subject; the period of personal data

processing; withdrawal of consent and the mechanisms for withdrawal; the consequences of withdrawing consent.

**5.2** Direct marketing involves sending messages/offers of various natures to data subjects (according to the Law of Georgia "On Personal Data Protection" - any natural person about whom data is processed).

**5.3** If the data subjects consent, the company will send you personalized, tailored, unique offers and discounts that are of interest to you.

**5.4** The data subject has the right to request the data processor to stop using their data for direct marketing purposes at any time by sending a written notification to the email address: [info@laquintabatum.com](mailto:info@laquintabatum.com) . The person responsible for data processing is obliged to stop data processing in accordance with the rules defined in this section no later than 5 (five) working days from the date of receiving the data subject's request.

**5.5** Personal data processed for direct marketing purposes is stored for the duration of direct marketing from the moment the data subject gives consent until the consent is withdrawn.

## 6. Separate Data Categories, Processing Purposes, Legal Basis, and Retention Period

Personal Data	How Personal Data is Obtained	Legal Basis for Personal Data Processing	Retention Period
<b>Name, surname, phone number, email, address, personal number, citizenship, passport number of hotel and/or restaurant visitors</b>	Based on sharing by the data subject (when physically booking hotel or restaurant services, online, via a booking application, or through a communication center, or when making a payment, or when filling out a direct marketing consent document)	• Entering into a contract • Provision of offered products and services • Sending special offers (for direct marketing purposes) • Conducting research to improve service quality	Data shared by the parties to enter into a contract is stored for the duration of the contractual relationship and for 2 years after the end of the contractual relationship.  Data collected for direct marketing purposes is stored until consent is withdrawn.  Information collected to improve service

			quality (for conducting research) is stored until the purpose is exhausted, but for no longer than 2 years.
<b>Financial data (including payment card number, information about the owner, card expiration date)</b>	From the data subject (within the scope of the service)	During payment	2 years after the service is completed
<b>Information about a hotel visitor's use of a service and their evaluation of the service quality</b>	From the website with the subject's consent	• For statistical purposes • To improve service quality	Until consent is withdrawn
<b>Information related to website use; marketing and communication data</b>	Cookies	• For statistical purposes • To improve service quality	Until deleted by the user in the browser settings
<b>Information about hotel/restaurant bookings, visitor arrival and departure dates, and orders placed by them</b>	From data subjects	• To improve service quality • For payment settlement purposes • For analytical purposes	For analytical and payment settlement purposes, for a period of 2 years
<b>Personal information shared by employees (in accordance with the "Policy for Processing Personal Information of Employees")</b>	Information shared by the employee / recommender	Employment contract	The period of the employment relationship and 1 year after the termination of the employment contract
<b>Applicants (in accordance with the "Policy for Processing Personal Information of Employees")</b>	Information shared by the applicant / recommender	For the purpose of entering into an employment contract	1 year
<b>Audio/video image, recording of the data subject</b>	Video monitoring recordings	• To ensure security • To protect property	30 days

## 7. Data Subject's Rights

7.1 The company protects the rights of the personal data subject as guaranteed by the Law of Georgia "On Personal Data Protection." The data subject's rights are:

- a) Right to receive information about data processing:** The data subject has the right to request, and the company will provide, no later than 10 days, the following information: which data about them is being processed, the basis and purpose of data processing; the source of data collection/obtainment; and the data retention period.
- b) Right to access and receive a copy of the data:** The data subject can request copies of their personal data processed by the company free of charge.
- c) Right to correct, update, and supplement data:** The data subject has the right to request that we correct, update, and/or supplement inaccurate, imprecise, and/or incomplete data about them. The company will correct the error, both at the request of the data subject and if it discovers the error itself, and will inform the data subject about this, except in cases where the error is of a technical nature.
- d) Right to stop, delete, or destroy data processing:** The data subject has the right to request the person responsible for processing to stop, delete, or destroy data about them. The request must be fulfilled no later than 10 days. A data subject can be refused the deletion and destruction of data only in exceptional cases established by Georgian law.
- e) Right to block data:** The data subject has the right to request the person responsible for processing to block data if one of the following circumstances exists: the data subject disputes the truthfulness or accuracy of the data; the data processing is illegal, but the data subject objects to their deletion and requests the blocking of the data; the data is no longer needed to achieve the purpose of their processing, but the data subject needs them to file a complaint/claim; the data subject requests the termination, deletion, or destruction of data processing, and this request is being considered; there is a need to store the data for use as evidence. A data subject can be refused data blocking only in exceptional cases established by Georgian law.
- f) Right to withdraw consent:** The data subject has the right to withdraw their consent at any time, without any explanation or justification. If there is no other basis for data processing apart from the data subject's consent, in case of consent withdrawal, data processing must be terminated and/or the processed data must be deleted or destroyed no later than 10 working days from the request. The data subject has the right to withdraw consent in the same form in which they gave consent. The data subject is provided with information about the consequences of withdrawing consent.

## 8. Protection of Minors' Personal Data

**8.1** 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, and taking into account the best interests of the minor.

## **9. Processing of Data about a Deceased Person**

**9.1** Data about a deceased person is processed by the company for the purpose of fulfilling contractual obligations and realizing the company's contractual powers/interests, in accordance with the requirements of the Law of Georgia "On Personal Data Protection."

## **10. Data Security**

**10.1** The company ensures the secure protection of data subjects' data and takes all necessary technical and organizational measures for this purpose.

**10.2** The company protects personal data from unauthorized or illegal access, accidental loss, damage, disclosure, or destruction.

**10.3** 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.

## **11. Data Transfer to Third Parties**

**11.1** Personal data may be transferred to third parties if there is a legal basis for it. Third parties who may be shared with personal information may be:

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

## **12. Cookies Policy**

**12.1** Cookies are small text files that the website stores on your computer or mobile phone when you visit it. Cookies help the company to better manage and improve the effectiveness of the website. Cookie files store information related to your navigation on the website.

**12.2** The company does not store data about your address, passwords, credit and debit bank cards, and any other personal information in Cookie files.

**12.3** After visiting the company's website, you must agree to the Cookies policy for this information to be collected. Otherwise, the information outlined in section 12.1 will not be collected by the company.

### **13. Video and Audio Monitoring Rules**

**13.1** The company carries out video monitoring of the internal and external perimeter of the building, in accordance with the "Video Monitoring Rules" in effect at the company.

### **14. Incident Response Rules**

**14.1** The authorized person of the company is obliged to immediately - as soon as the incident is discovered - record the incident, the resulting outcome, the measures taken, and notify the Personal Data Protection Service in writing or electronically no later than 72 hours from the discovery of the incident, except in cases where it is unlikely that the incident will cause significant harm and/or pose a significant threat to a person's fundamental rights and freedoms.

### **15. International Transfer of Personal Data**

**15.1** Based on the purposes of the company's activities and taking into account the relevant grounds, processed data may be transferred to a person located/founded in another state, including private or public organizations.

**15.2** For the purpose provided for in this section, the company takes the following measures for international transfer:

- It assesses the risks associated with the international transfer of data;
- It concludes a corresponding contract with the recipient party, which, among other things, provides for the rights and obligations of the company and the recipient party, guarantees for the protection of the subject's rights, and appropriate transfer methods;
- If necessary, it agrees and obtains permission from the Personal Data Protection Service regarding the international transfer;
- If necessary, it controls the processing of the transferred personal data to ensure compliance with the legislation, including requesting information related to the processing process.
- The company records the facts of providing information to third parties, what data was provided, to whom, when, and on what legal basis.

## Contact Information

**Phone Number:** 0422 40 00 10

**Email:** [info@laquintabatum.com](mailto:info@laquintabatum.com)