

# PRIVACY POLICY

Check In Georgia appreciates your visit to this web site (hereinafter - Website) and your interest in our services and products.

Your privacy is important to us and we want you to feel comfortable visiting our site. We take care to protect your personal data collected, processed and used during and after visits to the Website.

The terms for processing the personal data during your visit to the Website are defined by this Privacy Policy.

By accessing the Website you accept this Privacy Policy (hereinafter - Policy).

If you do not agree to this Policy, do not proceed to further web pages of the Website.

This Policy may be updated from time to time. We therefore ask you to consult it on a regular basis. The last line of this Policy below indicates when the Policy was last updated.

## **What are the purpose and the scope of this Policy?**

Check In Georgia, its subsidiaries and affiliates (hereinafter - Check In Georgia or We) are committed to safeguarding the personal information that we collect from individuals who use the Website. Accordingly, Check In Georgia has developed this Policy to describe how and what type of data will be collected from users of the Website and the purposes for which Check In Georgia may collect, share or disclose the data. Check In Georgia also outlines reasonable precautions which are taken to keep your data secure.

This Policy applies to any information obtained by Check In Georgia through your use of the Website. It is not applicable to any Internet websites controlled by third parties not affiliated with Check In Georgia that the Website may link to (hereinafter- Third Party Sites). Please review the privacy policies of Third Party Sites as Check In Georgia is not responsible for and has no influence on the content or the privacy practices of Third Party Sites.

## **What information do we collect from you and for what purpose?**

When you visit the Website, our web server automatically records details about your visit (for example, your IP address, the web site from which you visit us, the type of device and browser software used, the Website pages that you actually visit including the date and the duration of your visit and so forth)

In addition, we collect personal data which you provide through the Website, for example when you enter personal details (e.g. name, gender, address, e-mail address, phone/fax number and so forth) on a registration page or if you sign up for an email newsletter or when personal data is transferred to us by the third parties of which you are a customer/subscriber, for example when you pay your debt to such third parties and/or top up your mobile phone balance.

Check In Georgia will use your personal data:

- for the purposes of technical administration and research & development of the Website;
- for customer and client administration and marketing purposes;
- for the same exact purposes mentioned above with regards to other electronic channels of Check In Georgia;
- to inform you about our services and products;
- and for such purposes as otherwise specified;

Check In Georgia respects applicable laws and regulations in its use of personal data.

## **How do we collect and store information from you?**

Check In Georgia uses tracking technology such as cookies or tags (hereinafter – Tracking Technology) to gather information as outlined above (see: "What information do we collect from you and for what purpose?") to understand how visitors use the Website.

Tracking technology helps us manage and improve the usability of the Website, for example by detecting whether there has been any contact between your computer and us in the past and to identify the most popular sections of the Website.

Please ensure that you set your cookie settings by un-ticking certain types of cookies if you do not consent to their use by Check In Georgia.

When you save your cookie settings, they should also apply to your future visits to the Website. However, for technical reasons beyond Check In Georgia 's control, this cannot be guaranteed. For example, if you reset your browser, delete your cookies or access the Website from another browser or device your cookie settings may be lost.

In many cases you can also control tracking technologies using your browser. Please ensure that your browser setting reflects whether you wish to be warned about and/or accept tracking technologies (such as cookies) where possible. The specific capabilities of your browser and instructions on how to use them can usually be found in the manual or help file of your browser.

Refusing, disabling or deactivating of tracking technologies may result in a reduced availability of the services provided by the Website or parts of the Website may no longer function correctly.

#### **To whom do we disclose your information collected from the Website?**

Check In Georgia may disclose your information to its affiliates and its and their agents and third party providers inside or outside your country of residence to perform services for Check In Georgia and for the purposes stated above. Our affiliates, agents and third party providers who have access to personal data obtained through the Website are obliged to respect privacy.

When transferring personal data internationally we make sure that we comply with applicable laws and regulations, for example, by entering into agreements which will ensure that the recipients of your information maintain an adequate level of data protection.

We may also disclose your information to governmental agencies or entities, regulatory authorities, or other persons in line with any applicable law, regulations, court order or official request, or under any and for the purposes of any guidelines issued by regulatory or other authorities, or similar processes as either required or permitted by applicable law.

#### **What security measures have we implemented to protect your information collected through the Website?**

Check In Georgia has implemented reasonable technical and organisational security measures to protect your personal data collected by Check In Georgia via the Website against unauthorized access, misuse, loss or destruction.

#### **How do we treat electronic messages sent to and from Check In Georgia?**

All electronic messages (SMS, email and so forth) sent to and from Check In Georgia are automatically retained in a distinct journaling system which preserves the evidential weight of such messages. They are protected by reasonable technical and organisational measures and may only be accessed in justified cases in line with applicable laws and regulations (e.g. court order, suspicion of criminal conduct, violation of regulatory obligations, material breach of employment contract) to specific persons in defined functions (e.g. Legal, Compliance, Risk). Every step of the process, as well as the search criteria used, are logged in an audit trail. All messages are disposed of after the applicable retention period has expired.

#### **What should you consider when sending data over the Internet?**

The Internet is generally not regarded as a secure environment, and information sent via the Internet (such as to or from the Website or via electronic message) may be accessed by unauthorized third parties, potentially leading to disclosures, changes in content or technical failures. Even if both sender and receiver

are located in the same country, information sent via the Internet may be transmitted across international borders and be forwarded to a country with a lower data protection level than exists in your country of residence.

Please note that we accept no responsibility or liability for the security of your information whilst in transit over the Internet to Check In Georgia. In order to protect your privacy we would like to remind you that you may choose another means of communication with Check In Georgia, where you deem it appropriate.

#### **How do we deal with information from individuals under the age of 18?**

Check In Georgia does not offer its services to minors, correspondingly, the Website does not seek to collect personal data from individuals under the age of 18. Individuals under the age of 18 should receive permission from their parent or legal guardian before providing any personal data to Check In Georgia on the Website.

#### **How can you access or review your personal data?**

You may, where permitted by applicable law or regulation:

- check whether we hold your personal data,
- ask us to provide you with a copy of your personal data, or
- require us to correct any of your personal data that is inaccurate.

Should you have a request regarding the processing of your personal data please send a letter to the following email address:

Last Update in 30th of April 2018.