

Privacy Policy

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Privacy Policy

1. Kettari – WHO ARE WE, AND HOW TO CONTACT US?

1.1. Kettari GE LLC (hitherto and hereinafter referred to as "**Kettari**" or "**We**", "**Us**", "**Our**") is an organization incorporated in the territory and under the laws of Georgia (registration number 404637915), providing services for uploading (and downloading) and depositing any types of intellectual property objects (items) – items of copyright, items of neighbouring rights, trademarks, patents, etc. (the "**IP items**") – through the developed online service (the "**Service**" or "**Services**"), posted on the Internet site – <https://www.kettari.com> (the "**Site**"), and registered at: Georgia, Tbilisi, Mtatsminda district, Kiacheli street, #2, area #5.

1.2. When You use Our Site and (or) Services, or interact with Us in any digital means available to You (for example, visiting and viewing pages of Our Site; using the functionality presented on the Site; uploading (downloading), installing and using Our official applications (the "**Application**" or "**Applications**"); sending electronic messages, etc.) and non-digital means (for example, sending physical letters to Our postal address; contacting Our specialists by telephone, etc.), You share with Us with Your personal data.

We collect; store and process (use) such personal data only in the ways and only for the purposes outlined in this Privacy Policy.

In this regard, in relation to You and Your personal data, We are the controller of personal data. This means that We, alone or jointly with others:

1.2.1. Collect (receive), store and process (use) Your personal data;

1.2.2. Determine the list of:

1.2.2.1. Your personal data that We will collect (receive), store and process (use);

1.2.2.2. Purposes of collecting (receiving), storing and processing (using) Your personal data;

1.2.2.3. Methods and means of collecting (receiving), storing and processing (using) Your personal data;

1.2.2.4. Material, technical and legal measures aimed to protect Your personal data.

1.3. You can question Our Data Protection Officer about how We collect (receive), store, process (use) and protect Your personal data as well as, when You wish to exercise any of Your data subject's rights or when You have questions about the content or Your data subject's rights exercising procedure, You can contact Our Data Protection Officer in the following way:

DATA PROTECTION OFFICER'S CONTACTS	
Postal address:	Georgia, Tbilisi, Mtatsminda district, Kiacheli street, #2, area #5
Email address:	info@kettari.com
Phone number:	995 32 231 88 88

2. WHY DID WE DEVELOP THIS PRIVACY POLICY?

We value the trust You place in Us when You share Your personal data. We recognize that the right to privacy is one of the fundamental rights of every person, and We also recognize the value of Your personal data to You and understand the importance and necessity of maintaining confidentiality and ensuring the security and protection of Your personal data.

This Privacy Policy complies with the LAW OF GEORGIA ON PERSONAL DATA PROTECTION consolidated version (01/12/2016 - 22/03/2017).

The aim of this Privacy Policy is to tell You, in a plain and understandable manner, how We collect (receive), store, process (use) and protect Your personal data; as well as what rights You have in relation to Your personal data and how You can exercise them.

In this regard, We strongly recommend You to read this Privacy Policy properly and, in future, to examine, on Your own initiative, any Our further notifications related to the collection

(receiving), storage, processing (use) and protection of Your personal data, so that You are always fully aware of how and why We collect (receive), store, process (use) and protect Your personal data.

3. SCOPE OF THIS PRIVACY POLICY

3.1. This Policy is developed and applied to Your personal data collecting (receiving) and processing (using) by Us when You:

3.1.1. Use Our Services; and (or)

3.1.2. Interact with Us in any digital means available to You on Our Site (for example, visiting and viewing pages of Our Site; using the functionality presented on the Site; uploading (downloading), installing and using Our official Applications; sending electronic messages, etc.) and in non-digital means (for example, sending physical letters to Our postal address; contacting Our specialists by telephone, etc.).

3.2. Moreover, this Privacy Policy applies to Your personal data that, in certain cases, We may receive from open and public sources and (or) from third parties; as well as this Privacy Policy applies to Your personal data that, in certain cases, We may receive just using Your personal data that has already been provided to Us by You.

3.3. This Privacy Policy applies to all websites, domains and subdomains, applications, services, products and subscriptions, etc. owned by Our subsidiaries and Us.

4. CHANGES TO THIS PRIVACY POLICY. CURRENT AND PREVIOUS EDITIONS

4.1. We are constantly monitoring the compliance of the provisions of this Privacy Policy with provisions of national and European data protection legislation. In this regard, We reserve the right to change this Privacy Policy at any time. However, We guarantee that We will take reasonable and necessary measures to bring to Your attention the complete and clearly stated information about the changes and additions made by Us to this Privacy Policy (including by sending You appropriate notifications in the interface of Your Personal Account, to Your email address, etc.).

4.2. The current version of this Privacy Policy is always available for reading online, printing or downloading to Your technical devices from the Privacy Policy section of Our Site. In addition, at any time, You can write to Us by the following email address and request the latest version of this Policy: info@kettari.com.

4.3. If You want to receive the previously valid versions of this Privacy Policy, You can also write to Us about this at the above-mentioned email address. We will gladly send You copies of previous versions (provided that other editions of this Policy previously existed).

5. TERMINOLOGY AND INTERPRETATION

5.1. The words “**We**”, “**Us**”, “**Our**”, and their derivatives mean **THE NAME OF ORGANIZATION** and **Kettari**.

5.2. The words “**You**”, “**Your**”, “**Yours**”, and their derivatives mean **natural persons who share their personal data with Us (data subjects)**.

5.3. This Privacy Policy contains basic terms related to personal data. We use such terms in this Privacy Policy in those meanings that they have in data protection laws applicable to this Privacy Policy. For ease and accessibility of Your understanding of such terms and Your interpretation of their meanings, We provide the relevant terms and their interpretation directly throughout the text of the appropriate Privacy Policy’s sections.

6. PRINCIPLES UNDER WHICH WE PROCESS (USE) YOUR PERSONAL DATA

Processing Your personal data, We are guided by the following fundamental data processing principles:

№	Principle	Requirements	What are We doing to comply?
1.	Lawfulness processing of	The processing (using) of Your personal data must be carried out under the law	<p>We make sure that at each specific instance when We process (use) Your personal data, We have at least one basis for this outlined in the legislation. Processing (using) Your personal data, We rely mainly on the following legal grounds for their processing (use):</p> <ul style="list-style-type: none"> ✓ Your consent to the processing (use) of Your personal data; and (or) ✓ Fulfilment of Our contractual obligations to You; and (or) ✓ Compliance with mandatory legal requirements; and (or) ✓ Having a legitimate interest.
2.	Fairness processing of	The processing (using) of Your personal data should be carried out taking into account the reasonable expectations that You had at the time of making the decision to provide Us with Your personal data.	We have developed and are using technical solutions that allow Us to inform You, timely and in a simple and accessible manner, about all changes We make to this Privacy Policy.
3.	Transparency processing of	The processing (using) of Your personal data should be carried out with the use of organizational and technical measures that allow, before the collection and processing (use) of Your personal data, to convey to You in the most simple and accessible form information that reveals to You the entire process of collection, processing (use) and protection of your personal data, so that You are always fully aware of who We are, as well as how and why We collect, store, process (use) and protect Your personal data.	<p>We have developed and published the text of this Privacy Policy in the public domain on the Internet.</p> <p>We have developed and are using special technical solutions that allow Us, when necessary, to send You additional notifications related to the collection, storage, processing (use) and protection of Your personal data.</p> <p>We have appointed of the Data Protection Officer and published his contact information in the public domain so that You can contact him at any time and get the advice You need on any questions you have about how We collect, store, process (use) and protect Your personal data.</p> <p>We have developed and are using special technical solutions that allow you to exercise Your rights in relation to Your personal data in the fastest and most efficient way.</p>

4.	Purpose limitation	<p>The purposes of processing (using) Your personal data should:</p> <ul style="list-style-type: none"> ✓ Not contradict legislation; and ✓ Be specifically identified and communicated to You prior to the collection and processing (use) of Your personal data by Us. 	<p>We made sure that:</p> <ul style="list-style-type: none"> ✓ Our purposes of processing (using) Your personal data were formulated and set out in this Privacy Policy in simple and understandable language; ✓ You had the opportunity to familiarize yourself with the text of this Privacy Policy until the moment when You decided to share Your personal data with Us; ✓ The collection, storage and processing (use) of Your personal data were carried out only for purposes compatible with the provisions of this Privacy Policy and the provisions of Our other notifications that We, in certain cases, related to the collection, storage, processing (use) and protection of Your personal data, have the right to send You.
5.	Data minimization	<p>Only that personal data should be collected and processed by Us that is adequate and relevant to achieve the stated purposes of processing (use).</p>	<p>We do not collect or process (use) Your personal data, which is redundant in relation to the stated purposes of processing (use) of Your personal data.</p> <p>In addition, when the stated purposes of processing can be achieved by Us without collecting and processing (using) Your personal data, We do not collect or process (use) Your personal data.</p>
6.	Accuracy of personal data	<p>When processing (using) Your personal data, all reasonable measures should be taken to ensure the accuracy and relevance of Your personal data.</p>	<p>We provide You with reasonable access to Your personal data.</p> <p>We have developed and are using special technical solutions that allow You to view the personal data that You previously provided, update (clarify, change) and delete it if such personal data is found to be inaccurate or outdated.</p>
7.	Storage limitation	<p>Indefinite storage of Your personal data in a form that allows identifying You is prohibited.</p>	<p>We maintain strict control over the observance of the terms of storage of Your personal data and do not store Your personal data for longer than the period that is necessary for Us to achieve the purposes of collection and processing (use) of Your personal data stated by Us, or to comply with certain legal requirements for certain categories of Your</p>

			<p>personal data for a longer storage period.</p> <p>In addition, We have provided a system for limiting the storage time of all backup copies of Your personal data. The storage period for backups of Your personal data is 25 (twenty-five) calendar days.</p>
8.	Confidentiality	<p>When processing (using) Your personal data, such legal and organizational and technical measures should be taken to protect Your personal data, which prevent any attempts of unauthorized access to Your personal data, their unauthorized or illegal processing (use); as well as prevent any situations that may lead to accidental deletion (destruction) of Your personal data.</p>	<p>The information architecture of Our website has been designed and developed per the principles of confidentiality by default, which are internationally recognized as one of the leading standards in the field of information security.</p> <p>In addition, as additional security measures for Your personal data, We use some of the most powerful and market-leading technical tools, solutions and products that provide the highest level of security and protection of Your personal data.</p>
9.	Accountability	<p>All operations on processing (use) of Your personal data should be carried out in such a way that, if necessary, We could prove that they were carried out exclusively in accordance with the abovementioned principles of processing (use) of Your personal data</p>	<p>We maintain special registers for recording information about all actions performed by Us with Your personal data.</p>

7. WHOSE PERSONAL DATA DO WE COLLECT?

7.1. Personal data can be any information that points to You personally, or with the help of which We can directly or indirectly determine Your identity. So, We can collect, store and process (use) Your personal data if:

7.1.1. You are an unregistered visitor of Our Site; and (or)

7.1.2. You are a registered User of Our Site and Services; and (or)

7.1.3. Your personal data have been provided to Us by a registered User of Our Site and Services.

7.2. We do not purposefully and knowingly collect (receive) or request personal data from the individuals under the age of 18 (eighteen) years. This is the age of consent (the “**Consent Age**”). That is, until You reach a certain age, You will need to have the consent of Your parents or other legal representatives (the “**Legal Representatives**”).

7.3. If you are a Legal Representative of an individual who has not reached the appropriate age of consent and you have reason to believe that they provided Us with their personal data without your consent, please contact Our Data Protection Officer in any of the following ways:

DATA PROTECTION OFFICER’S CONTACTS	
Postal address:	Georgia, Tbilisi, Mtatsminda district, Kiacheli street, #2, area #5

Email address:	info@kettari.com
Phone number:	995 32 231 88 88

8. HOW AND WHAT PERSONAL DATA DO WE COLLECT (RECEIVE) AND ON WHAT BASIS?

Personal data can be any information that points to You personally, or with the help of which We can directly or indirectly determine Your identity. Depending on the nature of Your interaction with Us, at any given moment, the content of the categories of Your personal data that We collect (receive) may change.

In any case, We do not collect (receive) any of Your personal data that belongs to special categories of personal data (in particular, information about Your race or ethnicity; information about Your religious or philosophical beliefs; information about Your sex life and (or) sexual orientation; information about Your political views; information about Your membership in trade unions; information about Your health; as well as Your genetic or biometric data). In addition, We also do not collect (receive) any information about Your criminal charges or convictions.

To illustrate, as clearly as possible, to You the process of collecting (receiving) Your personal data and their processing (use) and disclosure to third parties to achieve the purposes stated in this Privacy Policy, We have formed the following table (which will tell You what categories of Your personal data We collect (receive), process (use) and disclose to third parties and at what stage; for what specific purposes We collect (receive), process (use) and disclose Your personal data and on what legal basis):

№	Categories of personal data & their content	Collection (receiving) stage	Sources of Collection	Purposes of collection & processing	Collection & processing bases	Transfer & its purposes
I. IDENTITY DATA						
1.	Your full name (first name, last name, middle name)	✓ Filling information of yourself in Your Personal Account.	✓ Registration form on the Site; and (or)	✓ Identification of You as a user for depositing IP items;	<ul style="list-style-type: none"> ✓ Your consent to processing of Your personal data; and (or) ✓ Fulfilment of Our obligations under the contract. 	GeChain, Non-Entrepreneurial Legal Entity, registration number 402233864 – for Your identification (authentication) as a user.
2.	Age (birth date)	✓ Filling information of yourself in Your Personal Account.	✓ Form in Your Personal Account.	<ul style="list-style-type: none"> ✓ Prevention of the facts of registration on the Site of persons who have not reached the required age for concluding transactions and for providing their personal data in the absence of the consent of an adult, the age of consent. 	<ul style="list-style-type: none"> ✓ Your consent to the processing of your data; and (or) ✓ Fulfilment of Our obligations under the contract; and (or) ✓ Our compliance with the obligations that are imposed on Us as the controller by law; and (or) ✓ Our legitimate interest in processing of such Your personal data. 	Not transferred to third parties.
3.	ID number (Personal ID number, Authority, Issue Date, Validity), Bank details (Bank Name,	✓ Filling information of yourself in Your Personal Account.	✓ Form in Your Personal Account.	<ul style="list-style-type: none"> ✓ Prevention of the facts of registration on the Site of persons who have not reached the required age for concluding transactions and for providing their personal 	<ul style="list-style-type: none"> ✓ Your consent to the processing of your data; and (or) ✓ Fulfilment of Our obligations under the contract; and (or) 	Not transferred to third parties.

	Account, IBAN, SWIFT or Card number, Validity, CVC-code)			data in the absence of the consent of an adult, the age of consent.	<ul style="list-style-type: none"> ✓ Our compliance with the obligations that are imposed on Us as the controller by law; and (or) Our legitimate interest in processing of such Your personal data. 	
II. CONTACT DETAILS						
4.	E-mail address (e-mail)	<ul style="list-style-type: none"> ✓ Registration on the Site. ✓ Filling information of yourself in Your Personal Account. 	<ul style="list-style-type: none"> ✓ Registration form on the Site; and (or) ✓ Form in Your Personal Account. ✓ GeChain ID service. 	<ul style="list-style-type: none"> ✓ Interaction with You as a user of the Site and the Services presented on it. ✓ Sending You as a user of the Site and its Services of various kinds of notifications. ✓ Providing You with the opportunity to reset and (or) recover Your password to log into Your account. 	<ul style="list-style-type: none"> ✓ Your consent to the processing of your data; and / (or) ✓ Fulfillment by Us to You of Our obligations under the contract; and (or) ✓ Our legitimate interest in the processing of such personal data of You. 	GeChain, Non-Entrepreneurial Legal Entity, registration number 402233864, for identification (authentication) of You as a user.
III. INFORMATION OF THE SERVICES YOU RECEIVE						
5.	Information of services (ordered, canceled, unpaid, as well as paid, etc.)	<ul style="list-style-type: none"> ✓ "Invoices" section formed in Your account. 	<ul style="list-style-type: none"> ✓ Full name of the User ✓ Service details ✓ E-mail. 	<ul style="list-style-type: none"> ✓ Activation by Us of the services requested and issued by You on Our Site through its Services. 	<ul style="list-style-type: none"> ✓ Your consent to the processing of your data; and (or) ✓ Fulfillment by Us to You of Our obligations under the contract; and (or) ✓ Our legitimate interest in the processing of such personal data of You. 	Not transferred to third parties.

6.	Information about payments made by you for services that you have issued on Our Site and using its Services (amount, method, date, currency of payment; information on failed payments; information on full or partial refunds of the amounts paid; information on the refund procedure, etc.)	<ul style="list-style-type: none"> ✓ Purchases” section formed in Your account. 	<ul style="list-style-type: none"> ✓ Card number, ✓ Full name of the User ✓ Validity date of the card ✓ CVC code. 	<ul style="list-style-type: none"> ✓ Providing You, as a user of Our Site and its Services, with statistical data regarding the financial relationship You have with Us. 	<ul style="list-style-type: none"> ✓ Your consent to the processing of your data; and (or) ✓ Fulfillment by Us to You of Our obligations under the contract; and (or) ✓ Our legitimate interest in the processing of such personal data of You 	<p>Not transferred to third parties.</p>
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IV. CREDENTIALS

7.	Login email (Your)	<ul style="list-style-type: none"> ✓ Registration on the Site; and (or) ✓ Filling in information about yourself in Your account. 	<ul style="list-style-type: none"> ✓ Registration form on the Site; and (or) ✓ Form in Your user account. 	<ul style="list-style-type: none"> ✓ For internal work with the user base. 	<ul style="list-style-type: none"> ✓ Your consent to the processing of your data; and (or) ✓ Fulfillment by Us to You of Our obligations under the contract; and (or) ✓ Our legitimate interest in the processing of such personal data of You. 	<p>Not transferred to third parties.</p>
8.	Password	<ul style="list-style-type: none"> ✓ Registration on the Site; and (or) 	<ul style="list-style-type: none"> ✓ Registration form on the Site; and (or) 	<ul style="list-style-type: none"> ✓ For internal work with the user base. 	<ul style="list-style-type: none"> ✓ Your consent to the processing of your data; and (or) 	<p>Not transferred to third parties.</p>

		<ul style="list-style-type: none"> ✓ Filling information about yourself in Your account. 	<ul style="list-style-type: none"> ✓ Form in Your user account. 		<ul style="list-style-type: none"> ✓ Fulfillment by Us to You of Our obligations under the contract; and (or) ✓ Our legitimate interest in the processing of such personal data of You. 	
9.	Date and time You created Your account	<ul style="list-style-type: none"> ✓ Registration on the Site. 	<ul style="list-style-type: none"> ✓ Registration form on the Site. 	<ul style="list-style-type: none"> ✓ For internal work with the user base. 	<ul style="list-style-type: none"> ✓ Your consent to the processing of your data; and (or) ✓ Fulfillment by Us to You of Our obligations under the contract; and (or) Our legitimate interest in the processing of such personal data of You. 	Not transferred to third parties.
V. TECHNICAL DETAILS						
10.	Information about your use of Our Site (time of visit; link from which the transition to the Site was made; time of stay on it; history and map of visits to the pages of the Site; information about actions performed on the Site and the time of their	<ul style="list-style-type: none"> ✓ Each time you interact with Our Site and its Services. 	<ul style="list-style-type: none"> ✓ Google Analytics service. 	<ul style="list-style-type: none"> ✓ Analytical and statistical purposes. ✓ Internal (including technical and legal) goals. ✓ Marketing and advertising purposes. 	<ul style="list-style-type: none"> ✓ Your consent to the processing of Your data; and (or) ✓ Fulfillment by Us to You of Our obligations under the contract; and (or) ✓ Our legitimate interest in the processing of such personal data of You. 	Not transferred to third parties.

	commission, etc.)					
11.	IP address	<ul style="list-style-type: none"> ✓ Each time you interact with Our Site and its Services. 	<ul style="list-style-type: none"> ✓ Technical means and technologies used to determine your IP address. The IP address is basic network information, the data about which We receive from the server. 	<ul style="list-style-type: none"> ✓ Internal (including technical and legal) goals. ✓ Marketing and advertising purposes. ✓ Ensuring your safety as a user of Our Site and its Services (preventing the facts of unauthorized access to your account). 	<ul style="list-style-type: none"> ✓ Your consent to the processing of your data; and (or) ✓ Fulfillment by Us to You of Our obligations under the contract; and (or) ✓ Our compliance with the obligations that are imposed on Us as an operator by law; and (or) ✓ Our legitimate interest in the processing of such personal data of you. 	Not transferred to third parties.
12.	Information about the time of entry into the account, the time of stay in it and the time of exit from it.	<ul style="list-style-type: none"> ✓ Each time you interact with Our Site and its Services. 	<ul style="list-style-type: none"> ✓ The technical means and solutions used to track your data. 	<ul style="list-style-type: none"> ✓ Internal (including technical and legal) goals. ✓ Marketing and advertising purposes. ✓ Ensuring your safety as a user of Our Site and its Services (preventing the facts of unauthorized access to your account). 	<ul style="list-style-type: none"> ✓ Your consent to the processing of your data; and (or) ✓ Fulfillment by Us to You of Our obligations under the contract; and (or) ✓ Our compliance with the obligations that are imposed on Us as an operator by law; and (or) ✓ Our legitimate interest in the 	Not transferred to third parties.

					processing of such personal data of you.	
13.	Information about the device from which the Website was logged in (including the account data): information about the operating system and platform.	<ul style="list-style-type: none"> ✓ Each time you interact with Our Site and its Services. 	<ul style="list-style-type: none"> ✓ The technical means and solutions used to track such your data (including Google Analytics, standard network stack). 	<ul style="list-style-type: none"> ✓ Internal (including technical and legal) goals. Marketing and advertising purposes. ✓ Ensuring your safety as a user of Our Site and its Services (preventing the facts of unauthorized access to your account). 	<ul style="list-style-type: none"> ✓ Your consent to the processing of your data; and (or) ✓ Fulfillment by Us to You of Our obligations under the contract; and (or) ✓ Our compliance with the obligations that are imposed on Us as an operator by law; and (or) ✓ Our legitimate interest in the processing of such personal data of you. 	Not transferred to third parties.
14.	Information about the browser through which the Site was logged in (including the account)	<ul style="list-style-type: none"> ✓ Each time you interact with Our Site and its Services. 	<ul style="list-style-type: none"> ✓ The technical means and solutions used to track such your data (including Google Analytics, standard network stack). 	<ul style="list-style-type: none"> ✓ Internal (in particular technical) goals. ✓ Marketing and advertising purposes. 	<ul style="list-style-type: none"> ✓ Your consent to the processing of your data; and (or) ✓ Fulfillment by Us to You of Our obligations under the contract; and (or) ✓ Our legitimate interest in the processing of such personal data of you. 	Not transferred to third parties.
15.	Cookies	<ul style="list-style-type: none"> ✓ Each time you interact with Our Site and its Services. 	<ul style="list-style-type: none"> ✓ The technical means and solutions used to track such your data; and (or) 	<ul style="list-style-type: none"> ✓ Providing by Us the mechanism of user sessions. ✓ Marketing and advertising purposes. 	<ul style="list-style-type: none"> ✓ Your consent to the processing of your data; and (or) ✓ Our legitimate interest in the 	Not transferred to third parties.

			✓ Your browser.		processing of such personal data of you.	
CREATIVE ACTIVITY DATA						
16.	Information about uploaded works and their data (title; date of creation; scope of application; co-authors; contact information of co-authors, etc.)	✓ Deposit of intellectual property item (IPI)	✓ The form for depositing the IPI that you fill out in your account; and (or) ✓ Plugin from JetBrains Platform.	✓ Registration of authorship and the fact of deposit.	✓ Your consent to the processing of your data; and (or) ✓ Fulfillment by Us to You of Our obligations under the contract; and (or) ✓ Our legitimate interest in the processing of such personal data of you.	GeChain, Non-Entrepreneurial Legal Entity, registration number 402233864.

9. HOW DO WE PROCESS AND DISCLOSE YOUR PERSONAL DATA?

9.1. The processing (use) of Your personal data is any action performed with Your personal data. Such actions, among others, may include actions for collection (receipt); recording; organizations; structuring; storage; adaptation or change (processing, modification); search or selection; use; disclosure by transfer, distribution, provision of access or in any other way: grouping or combination; restriction (blocking) or destruction (deletion) of your personal data.

At the same time, We do not process (use) Your personal data for commercial purposes. This literally means the following: We do not sell, rent or lease Your personal data to other organizations or third parties for cash or other equivalent counter provision.

9.2. In some cases outlined in this Privacy Policy, We may provide Your personal data to third parties for the following purposes:

9.2.1. To assist in providing the Services and providing You with the Services You have requested and the subscriptions You make (see, for example, Section 8 of this Privacy Policy);

9.2.2. To carry out direct business activities by Us (for example, when transferring Your data to Our related companies in the general business interests);

9.2.3. For exercising Our rights and legitimate interests related to the development of Our business (for example, We may sell, buy, merge and enter into partnerships with other companies and enterprises, or partially or completely sell our assets. In the framework of such transactions, information about You as a User of Our Site and its Services may be included in the number of transferred assets);

9.2.4. For complying with the requirements of the law or the orders of the relevant regulatory, supervisory, law enforcement and (or) judicial authorities (for example, when the disclosure of Your personal data is necessary to investigate, prevent or take action against potential illegal actions; suspicion of fraud; situations that suggest a potential threat to violate the rights of third and (or) Our rights, legitimate interests and Our property as an organization, the rights and legitimate interests of Our employees, as well as the rights and legitimate interests of other Users of Our Site and its Services; situations involving a potential threat to the physical safety of a person, violations of this Privacy Policy and the Rules for using Our Site and its Services);

9.2.5. For other purposes and in other cases when We have Your consent for this and (or) other legal grounds that allow and (or) require Us to disclose Your personal data in the absence of Your consent.

10. HOW AND WHERE DO WE STORE YOUR PERSONAL DATA?

10.1. We are an organization incorporated in the territory and under the laws of Georgia (registration number (registration number)). Therefore, Our main offices are located in Georgia.

10.2. We will store Your personal data in data centers located on the territories of the following states: Republic of Georgia.

11. HOW LONG DO WE STORE YOUR PERSONAL DATA?

11.1. We will only store Your personal data for as long as it is necessary to fulfill the purposes for which We collected it; as well as for the purpose of meeting any regulatory, accounting and reporting requirements; performing legal work or legal defense.

11.2. To determine the appropriate storage period for personal data, We take into account the volume, nature and sensitivity of personal data, the potential risk of harm as a result of their unauthorized use or disclosure; as well as the purposes for which We process (use) Your personal data.

In addition, We also take into account that We have the ability to achieve the relevant purposes of collection and processing (use) of Your personal data by other means that do not require the collection and processing (use) of such Your personal data; as well as applicable legal requirements.

11.3. . For more information on the storage period for cookies, see Section 13 of this Privacy Policy.

11.4. If You would like to know more about the retention periods that We apply to Your personal data, please contact Our Data Protection Officer in any of the following ways:

DATA PROTECTION OFFICER'S CONTACTS	
Postal address:	Georgia, Tbilisi, Mtatsminda district, Kiacheli street, #2, area #5
Email address:	info@kettari.com
Phone number:	995 32 231 88 88

11.5. In some cases, We may anonymize Your personal data (so that they can no longer be associated with You) for research or statistical purposes. In this case, We can use such data indefinitely without Your further notice.

12. WHAT RIGHTS DO YOU HAVE REGARDING YOUR PERSONAL DATA?

Per data protection legislation, You have several rights related to Your personal data, which We are obliged to communicate to You. We respect Your rights and guarantee their strict observance. Depending on the basis for processing (use) of Your personal data, the following rights may be available to You:

№	You have the right to:	Content of the right
1.	Be informed of processing (use) of Your personal data	<p>Until the moment You provide any of Your personal data to Us, You have the right to receive timely information from Us about:</p> <ul style="list-style-type: none"> ✓ Who We are; ✓ How We collect, store, process (use), transfer and protect Your personal data. <p>Relevant information about this should be provided in an easily accessible format and presented in a concise and understandable form in a simple and understandable language.</p>
2.	Access Your personal data	<p>You have the right to contact Us with a demand to provide You with:</p> <ul style="list-style-type: none"> ✓ Confirmation that We do or do not collect, process (use) or store Your personal data; and (or) ✓ A copy of all personal data that We have and the processing (use) and storage of which We carry out; and (or) ✓ Information about: <ul style="list-style-type: none"> ▪ What kind of Your personal data We have; ▪ Where did We receive Your personal data from; ▪ How and why We process (use) Your personal data;

		<ul style="list-style-type: none"> ▪ To whom and why We transfer Your personal data.
3.	Correct Your inaccurate personal data	<p>You have the right to contact Us with a request:</p> <ul style="list-style-type: none"> ✓ Correct (change, replace) or delete the information about You that You consider inaccurate or irrelevant; ✓ Supplement the information We have about You with information, in the absence of which such information about you appears to You incomplete.
4.	Delete (destroy) Your personal data	<p>You have the right to contact Us with a request to delete (destroy) Your personal data in the following cases:</p> <ul style="list-style-type: none"> ✓ We no longer need Your personal data to achieve the purposes for which they were originally collected by Us or processed (used) by Us; and (or) ✓ You have revoked Your earlier consent to the processing (use) of Your personal data; and (or) ✓ You object to the processing (use) of Your personal data, and Your legitimate interests outweigh Our legitimate interests, on the basis of which We process (use) Your personal data; and (or) ✓ You object to the processing (use) of Your personal data for the purpose of making direct contacts with You. ✓ We process (use) Your personal data unlawfully; and (or) ✓ We have a statutory obligation to delete (destroy) Your personal data; and (or) ✓ Your personal data was collected from You when You were a child for the purpose of providing You with online services.
5.	Restrict (block) Your personal data	<p>You have the right to contact Us with a request:</p> <ul style="list-style-type: none"> ✓ Temporarily restrict the processing (use) of Your personal data when: <ul style="list-style-type: none"> ▪ You consider Your personal data processed by Us inaccurate or ▪ You object to the processing (use) of your personal data by Us; ✓ Suspend the process of deleting Your personal data when: <ul style="list-style-type: none"> ▪ You believe that We are processing (using) Your personal data unlawfully, but do not want such data to be deleted; or <input type="checkbox"/> ▪ You believe that We no longer need to process (use) Your personal data, but You want Us to store it for the purposes of creating, exercising or defending legal claims.
6.	Object to the processing (using) of Your personal data	<p>In certain cases, You have the right to send Us Your objection to the use of Your personal data. This literally means that You have the</p>

		<p>right to demand from Us to stop processing (use) your personal data for one or more of the following purposes:</p> <ul style="list-style-type: none"> ✓ To achieve socially significant goals; <p>and (or)</p> <ul style="list-style-type: none"> ✓ To exercise the official powers assigned to Us; and (or) <p>and (or)</p> <ul style="list-style-type: none"> ✓ To pursue Our legitimate interests; <p>and (or)</p> <ul style="list-style-type: none"> ✓ For scientific or historical research or for statistical purposes; and (or) ✓ To have direct contact with You.
7.	Transfer Your personal data	<p>You have the right to contact Us with a request:</p> <ul style="list-style-type: none"> ✓ Provide You in an accessible and machine-readable format (for example, in the form of a CSV file) Your personal data that You personally provided to Us or that were collected by Us in the process of monitoring your activity when using Our website; and (or) ✓ Transfer Your personal data that You personally provided to Us or that was collected by Us in the process of monitoring Your activity while using Our website to another company specified by You, provided that such transfer is technically possible.

To exercise any of Your rights mentioned above, You can apply with a corresponding request to Our Data Protection Officer in one of the following ways:

DATA PROTECTION OFFICER'S CONTACTS	
Postal address:	Georgia, Tbilisi, Mtatsminda district, Kiacheli street, #2, area #5
Email address:	info@kettari.com
Phone number:	995 32 231 88 88

We do not charge You any fee for providing You with access to Your personal data (or for exercising any of Your rights). If your request turns out to be unfounded, repetitive or redundant, We will be entitled to:

- ✓ Demand from You the payment of administrative costs associated with the execution of such Your request; or

- ✓ To deny You the satisfaction of the requirements stated by You in such a request.

To ensure the exercise of Your right to access Your personal data (or the exercise of any of Your other rights), We may need additional information from You that will allow Us to identify You. This action on Our part is one of the security measures that We take, which allows Us to make sure that We do not disclose Your personal data to anyone who is not entitled to receive it. In addition, We may also contact You and ask You to provide Us with additional information regarding Your request in order to expedite the process of responding to it.

We will do Our best to respond to all Your legitimate requests within 1 (one) calendar month from the date of the request and Your identification. If Your request turns out to be particularly difficult or You make several requests, We may need more than 1 (one) calendar month to give You an answer. If this happens, We will definitely notify You about this, indicating the reason and the amount of the additional period that We need.

13. WHAT ARE COOKIES, AND HOW DO WE COLLECT AND PROCESS (USE) THEM?

Cookies are small text files containing a small amount of information and downloaded to the device You are using when You visit Our Site. Once downloaded to Your technical device, the Cookies are sent back to Our Site each time You visit it, or to another site, if such a site recognizes such Cookies. Usually, Cookies are widely used to ensure the operation of the Sites or to improve the performance of the Site; as well as to provide Us, as owners of the Site, with relevant information.

In the table below, We explain exactly what types of Cookies We collect and why:

№	The name of the cookie or the name of the resource to which the cookie belongs	Cookie type	Purpose of collecting the cookie	Cookie retention period
1.	Google Analytics	Permanent, can be disabled	Analysis of visits and user behavior	According to Google regulations
2.	GeChain, Non-Entrepreneurial Legal Entity, registration number 402233864	Session	For authentication	For authentication According to GEChain regulations

14. LEGAL CONSEQUENCES OF PROVISION OR NON-PROVISION BY YOU YOUR PERSONAL DATA TO US

14.1. By registering on Our Site and (or) using it and (or) the Services, You are aware of the fact that You provide Us with Your personal data (included in one or another category specified in Section 8 of this Privacy Policy).

In addition, You acknowledge and confirm for Us the legality of processing (use) of this kind of Your personal data (including without obtaining your consent), due to other legal grounds for their processing (in particular, the fulfillment by Us of Our contractual obligations to You; compliance by Us obligations that are assigned to Us as the controller by law; Our legitimate interest in the processing of Your personal data), for the purposes specified in this Privacy Policy.

14.2. If We need to use Your personal data for other purposes not related to the purposes presented in this Privacy Policy, We guarantee You that such processing (use) will be carried out only with Your explicit consent or if We have other legal grounds for their processing, and solely in accordance with the provisions of this Privacy Policy.

14.3. If You, for any reason and at any stage of interaction with Us, visit and (or) use Our Site and the Services, refuse to provide Us with any of Your personal data (included in one or another category specified in Section 8 of this Privacy Policy), a situation may arise in which We will not be able to provide You with the opportunity to use Our Site and (or) the Services in full due to the lack of necessary and sufficient information about You from Us.

14.4. If, after reading this Privacy Policy:

14.3.1. You do not understand some of its provisions, You can contact Us in any convenient way:

DATA PROTECTION OFFICER'S CONTACTS	
Postal address:	Georgia, Tbilisi, Mtatsminda district, Kiacheli street, #2, area #5
Email address:	info@kettari.com
Phone number:	995 32 231 88 88

14.3.2. You disagree in part or in full with this Privacy Policy, as well as You do not want to provide any of Your personal data, thereby not only expressing Your refusal to provide Us with Your consent to the processing of personal data, but also Your unwillingness for Us to process any of Your personal data on grounds that do not require Your consent, You need to

leave Our Site without performing any actions on it (including actions to register on the Site, using the Services, etc.).

14.5. If, after reading this Privacy Policy, You continue to visit Our Site and (or) use it and the Services, based on the principle of good faith, We have the right to consider such Your actions (and in the absence of any other actions on Your part indicating the opposite) as Your confirmation of the fact that:

14.5.1. You have read this Privacy Policy in good faith and in a timely manner (that is, before using Our Site and the Services); and

14.5.2. All provisions of this Privacy Policy are clear to You and are not disputed by You in whole or in part; and

14.5.3. You acknowledge all provisions of this Privacy Policy to be legally binding for You.

15. TO WHOM CAN YOU CONTACT IF YOU HAVE A COMPLAIN?

15.1. We sincerely hope that if You have any problems or complaints related to the processing (use) of Your personal data by Us, You will first contact Us, since We are aimed at prompt, effective and safe resolution of any with the processing (use) of Your personal data of problems and complaints. We kindly remind You that You can contact Our Data Protection Officer in any convenient way:

DATA PROTECTION OFFICER'S CONTACTS	
Postal address:	Georgia, Tbilisi, Mtatsminda district, Kiacheli street, #2, area #5
Email address:	info@kettari.com
Phone number:	995 32 231 88 88

15.2. If, for some reason, You do not want to contact Us, or You have contacted, but were not satisfied with the solution proposed by Us, You can contact Your national data protection authority directly with the relevant problem or complaint.

In Georgia, this body is the **PERSONAL DATA PROTECTION OFFICE**. You can send Your problem or complaint to the **Officer** Teimuraz Japaridze by clicking on the following link: <https://personaldata.ge/ka>

In addition, You can contact the at the following contacts.

Address:

Georgia, Tbilisi, Mtatsminda district, Kiacheli street, #2, area #5

Phone number:

995 32 231 88 88

15.3. This Privacy Policy could be drawn up in another language. Each copies of this Policy equally authentic. The Georgian language version prevails in the event of conflict between other versions.