

## PERSONAL DATA PROTECTION POLICY

Present document explains the principles, purpose and rules of processing and using user's personal data by Global Assistance Georgia LLC (identification code: 405488887, legal address: 67 Kostava St., Tbilisi 0171, Georgia).

By electronically marking/acknowledging the consent to the Terms and Conditions on the "Voovly" website/application and/or by disclosing the code received by SMS message to "Voovly" contact center, the user confirms that at the same time he/she agrees to the Personal Data Protection Policy, the information provided by the user is accurate and reliable. The information was provided at the user's own request and for this he/she has all the rights and permissions provided by the law.

By electronically marking/acknowledging the consent to the Terms and Conditions of the website/application and/or by disclosing the code received by SMS message to "Voovly" contact center, the user declares his/her consent that he/she authorizes "Voovly" and declares his/her consent that "Voovly" at its own discretion and within the framework of the applicable legislation, at any time and in any amount, from any source, request and receive information about him/her, including personal data, for the purposes of identification, verification, comparison, analysis, storage and fulfillment of legal and/or contractual obligation(s).

### Definitions

**Application** – a mobile app/software application „Voovly” developed and owned by the Company, specifically for use on small, wireless computing devices, such as smartphones and tablets.

**Data Subject** - any natural person about whom data is processed;

**Personal Data** - any information related to an identified or identifiable natural person. A person is identifiable when it is possible to identify him/her directly or indirectly, namely by an identification number or by physical, physiological, psychological, economic, cultural or social characteristics of a person.

**The User** – refers to any person who enters the website/application and uses it to receive information or services;

**Voovly/the Company/the Data Processor** - limited liability company "Global Assistance Georgia" established in accordance with the legislation of Georgia (identification code: 405488887, legal address: 67 Kostava St., Tbilisi 0171, Georgia), which determines the purposes and means of personal data processing , directly or through an authorized person performs data processing;

**Website** - a set of websites with the domain <http://www.voovly.ge>.

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## 1. Personal Data Protection Policy and Purpose

- 1.1. The Company focuses on personal data protection and information confidentiality in full compliance with both international data protection standards and on Law of Georgia “On Personal Data Protection”.
- 1.2. Ensuring data protection is an important basis for reliable and honest business relations, the reputation of an attractive partner.
- 1.3. The basis of data processing is the user's request for the provision of specific services by the company. The processing of the user's data is necessary for the company to process its application.

## 2. Scope of Data Protection Policy

- 2.1. This policy fully applies to the processing of personal data by "Voovly" by automatic, semi-automatic or non-automatic means and is used in the process of personal data protection.
- 2.2. This policy applies to "Voovly" users, employees of the company, contractors, all persons whose data is processed by the Company, as well as to data recipients and authorized persons who process personal data on behalf of or for the Company.

## 3. Basics and Principles of Personal Data Processing

- 3.1. "Voovly" processes personal data only in the following cases:
  - 3.1.1. data subject consent;
  - 3.1.2. data processing is provided by law;
  - 3.1.3. data is publicly available;
  - 3.1.4. data was made publicly available by the data subject himself/herself;
  - 3.1.5. data processing is necessary based on the application of the data subject in order to provide services to him/her;
- 3.2. Data processing is carried out in accordance with specific principles:
  - 3.2.1. Fairness and legality - personal data must be processed fairly and legally, without violating the dignity of the person;
  - 3.2.2. Existence of a clearly defined legal purpose - it is necessary to have a specific purpose for which the data is processed. The use of data for other purposes is not allowed.
  - 3.2.3. Proportionality and Adequacy - data must be processed in the minimum volume necessary to achieve the specific purpose of data processing; Data itself should also be relevant to this purpose.
  - 3.2.4. Authenticity and accuracy - data must be true and accurate, if necessary, it must be updated, also the reliability of the information source must be verified, false and inaccurate data must be corrected;
  - 3.2.5. Personal data storage period - Personal data must be kept for the period specified by law or for the period necessary to achieve the purpose. Once the purpose has

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been achieved, they must be blocked, deleted or destroyed or stored in a non-identifying manner, unless otherwise required by law.

- 3.3. Further processing of data for other purposes incompatible with the original purpose is not allowed. Data collected without a legal basis and irrelevant to the purpose of processing must be blocked, deleted or destroyed.

### 4. Personal Data Category and Processing

- 4.1. "Voovly" mainly collects and processes several categories of personal data. In particular: name, surname, personal number, telephone number, e-mail, address, bank account data, bank card data, as well as movable property data legally owned by the user - vehicle brand, model, type, year of manufacture, VIN code, state number, steering wheel, mileage, engine volume, fuel type, technical passport, IP address used to access the Voovly website/application.
- 4.2. Processing of personal data means collecting, recording, photographing, audio recording, video recording, organizing, storing, changing, and restoring personal data of a person using automatic, semi-automatic or non-automatic means.
- 4.3. Personal data is mainly processed by "Voovly" during the provision of any kind of service related to vehicle maintenance and repair to the user remotely, during the review of the user's application, for the purpose of performing contractual relations of various types/contents, employment, direct marketing;
- 4.4. Personal data is processed only if there is a data subject's consent, data processing is provided by law and/or data processing is necessary for "Voovly" to fulfill the duties assigned to it by law.
- 4.5. The consent of the data subject shall be expressed orally, in writing, by telecommunication or other appropriate means, in a manner that allows the consent of the data subject to be ascertained and a corresponding record made.
- 4.6. The company may process data based on the needs of the service or only in special cases with the help of another data processor and on the basis of a written agreement with the partner, which must comply with the strictly established standards of "Voovly" and the requirements established by the legislation of Georgia.

### 5. Direct Marketing

- 5.1. The data subject authorizes "Voovly" to make offers of services, goods, employment or requests for any kind of action through the data subject's phone call, e-mail, other telecommunications means or direct communication with the users in order to implement various marketing offers.
- 5.2. The data subject has the right to request the data processor to stop using data about him/her for direct marketing purposes at any time.

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- 5.3. "Voovly" is obliged to stop the processing of data for direct marketing purposes and/or ensure the termination of data processing for direct marketing purposes by an authorized person no later than 10 (ten) working days after receiving the request of the data subject.
- 5.4. The User authorizes "Voovly" to transfer his/her personal data to third parties for the purpose of carrying out direct marketing offers of various services or goods, which may be provided to the User by phone call, SMS message, e-mail, other means of telecommunication or direct communication with the User.
- 5.5. In case of transfer of User's personal data to third parties for direct marketing purposes, the data processor is the third party and the requirements established by the legislation of Georgia apply to it. The third party is responsible for fulfilling the requirements established by the legislation of Georgia on the protection of the User's personal data.

### **6. Video Surveillance and Audio Recording**

- 6.1. In order to ensure safety and property protection, as well as service quality control, in compliance with the requirements established by the Law of Georgia "On Personal Data Protection of Georgia", the external perimeter and entrances of the building are monitored in the Company through video surveillance and audio recording systems, and audio recording is carried out by "Voovly" during telephone communication through its Contact Center.
- 6.2. In order to improve customer service, the data subject will be informed about the progress of video surveillance and/or audio recording in the places where services are provided by "Voovly", as well as the recording of phone calls during telephone communication with "Voovly" through its Contact Center in accordance with the requirements of the law.

### **7. Transfer of Personal Data to Third Parties**

- 7.1. "Voovly" may transfer the personal data of the data subject to third parties for the following purposes: for providing the perfect service to the data subject, in the cases defined by the legislation of Georgia, in order to fulfill the duties assigned to "Voovly" according to the legislation of Georgia, as well as based on the agreements signed by "Voovly" with other companies, governmental units.
- 7.2. Third parties are natural and/or legal entities, partners of "Voovly", governmental units, with whom the need to communicate and share information arises from obligations arising from the Georgian legislation and/or contractual relationship.
- 7.3. The Company has the authority to transfer personal data to third parties based on the legislation or the agreements signed with the data subject.
- 7.4. "Voovly" transfers personal data to third parties in accordance with the Law of Georgia "On Personal Data Protection".

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## 8. Obtaining Personal Data from Third Parties

- 8.1. "Voovly" may obtain the personal data of the data subject from third parties for the following purposes: for providing the perfect service to the data subject, in the cases determined by the legislation of Georgia, for the purpose of fulfilling the duties imposed on the company by the legislation of Georgia, as well as the obligations assumed by the company based on the agreements signed with other companies, governmental units, partner organizations.
- 8.2. The third party is natural and/or legal entities, partners of "Voovly", governmental units.
- 8.3. The company has the authority to obtain personal data from third parties based on the legislation or the agreements signed with the data subject.
- 8.4. "Voovly" collects personal data from third parties in accordance with the Law of Georgia "On Personal Data Protection".

## 9. Data Processing through an Authorized Person

- 9.1. Based on the terms of this Policy, "Voovly" may act as a data processor and on its behalf, or have data processed for it by an authorized person, only if the Company has signed a corresponding written agreement with the authorized person. Before signing the contract, "Voovly" is always convinced in advance of the party's reliability and the contract stipulates the obligation of the authorized person to take such organizational and technical measures that ensure the protection of the data subject's personal data.

## 10. Data Security

- 10.1. The Company has adopted such reasonable organizational and technical measures that ensure the protection of data from accidental or illegal destruction, alteration, disclosure, extraction, any other form of illegal use and accidental or illegal loss.
- 10.2. Confidentiality of personal data is strictly protected in the Company. Only those employees who need to process the data to perform their duties have access to them.

## 11. Rights and Obligations of the Data Subject

- 11.1. The data subject has the right to request "Voovly" information about data processing. In such a case, the Company shall provide the following information no later than 10 (ten) calendar days after receiving the notification of the request:
  - which category of data is processed about the user;
  - for what purpose the data is processed;
  - on what legal basis is the data processed;
  - in what way personal data was collected;
  - Whether the data has been given to the third party, to whom it was given - the data giver basis and purpose.
- 11.2. The data subject is entitled at any time to apply to "Voovly" and in case the data is incomplete, inaccurate, not updated or if their collection and processing was carried out

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against the law, to request the correction, blocking, updating, addition, deletion or destruction of his/her personal data. In such a case, the Company responds accordingly within 15 (fifteen) calendar days after receiving the notification.

- 11.3. The data subject is entitled at any time, without any explanation, to withdraw (request the termination of data processing and/or the destruction of processed data) the consent given by him/her to "Voovly" regarding the processing of his/her personal data. In the event that the Company processed personal data only on the basis of the consent expressed by the data subject, the Company will ensure the implementation of appropriate actions within 5 (five) calendar days after receiving such notification.

### **12. Contact Information**

For any issues related to personal data protection by "Global Assistance Georgia" LLC, you can contact us at the following e-mail address: [info@voovly.ge](mailto:info@voovly.ge), or/and at the "Voovly" hotline number: (+995 32) 2 801 800.