

PRIVACY POLICY

Personal data protection policy document

The Personal data protection policy describes the processing of personal data by Macrosmatic LLC and guarantees the protection of the rights of the personal data subject during the processing of personal data.

The terms used herein shall have the meanings defined by the Law of Georgia “On Protection of Personal Data”.

Macrosmatic LLC respects Georgian law and international standards for the protection of human rights. Protecting the privacy of our users, employees and persons in a contractual relationship with us is of particular importance. Accordingly, we implement all necessary organizational and technical security measures to protect your personal data.

1. Legislation underlying the personal data protection policy document:

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

Your rights are protected under Georgian law and the European Data Protection Regulation (GDPR).

We take into account the recommendations of the Georgia Privacy Office to ensure the highest standard of protection of your rights.

In accordance with the aforementioned provisions, you are entitled to request details regarding the processing of your personal data.

We are prepared to provide you with the requested information in a timely manner, in accordance with the time limits set forth by Georgia law.

2. The party responsible for the processing of personal data is:

Company name: Macrosmatic LLC (hereinafter referred to as "we")

Identification number: 400403648

Georgia, Tbilisi, Free Economic Zone

E-mail: info@macrosmatic.tech

3. The person authorized to process personal data.

We process personal data in-house and do not engage the services of other authorized individuals in this process. However, it may be necessary to disclose information containing data to our authorized personnel and/or grant them access rights (e.g., for technical updates to the website, to provide facilities management services, to send technical notifications, or to provide assistance) when appropriate in the delivery of services.

4. Protection of the principles of data processing by us.

In our data processing, we adhere to the following principles:

Principle of lawfulness and fairness - we process your personal data in accordance with the rules and grounds established by law. We ensure that your rights are adequately protected by following the principle of equality (non-discrimination).

Transparency principle - the data processing procedure is designed to be transparent to the data subject. You may contact us at any time to request information regarding the processing of your personal data in accordance with the established procedures and terms set forth in Georgian legislation.

Purpose limitation principle - we only process personal data for the specific purpose for which it was obtained, in accordance with the instructions provided by the data subject. Should we wish to use the data collected with your consent for another purpose, we will request your consent again.

Data minimization principle - we process data in a proportionate manner, only to the extent necessary to achieve the specified goal.

Data accuracy principle - we guarantee that the personal data we possess about you is accurate and truthful. We rectify or remove inaccurate data without delay upon receipt of your request or upon discovery of an error.

Time limitation principle - we only retain data for as long as is necessary to fulfill the purpose for which it was collected. In regard to the storage of personal data, we define a specific period of time in advance or specify a criterion for determining the period of time.

Data Security Principle. To ensure the security of our data, we have implemented technical and organizational measures during data processing that provide adequate protection for our data, including protection against unauthorized or unlawful processing, accidental loss, destruction, and/or damage.

5. What purpose we process personal data for:

Macrosmatic LLC processes personal data for a number of reasons related to the scope of our business. These include the provision of our services, improving the quality of those services and their delivery, complying with security measures, and carrying out the employment activities of persons employed by Macrosmatic LLC.

We process personal data for the following specific purposes:

- Provision of the products and services offered;
- Execution of automated payment procedures;
- Establishment of contractual or transactional obligations;
- Management of labor relations with individuals employed by Macrosmatic LLC
- Dissemination of special offers and marketing materials to customers and partners.
- For events held on the premises of Macrosmatic LLC;
- For analytical and statistical purposes, to understand how our users interact with the service;
- To conduct various researches to improve products and services; To improve service quality and take into account user preferences;

Upon registering on the Macrosmatic LLC website, data subjects provide information and indicate their consent for the processing of personal data by checking the appropriate box.

About our website visitors:

When you visit our website, we collect information in accordance with our Cookie Policy and in line with the data subjects' preferences, as outlined in our data collection procedures.

How we collect data for direct marketing:

The receipt of personal data for direct marketing purposes is contingent upon the acceptance of an offer on the Macrosmatic LLC website by the data subject, in accordance with the procedure established by the Law of Georgia "On Personal Data Protection".

6. Rights of data subjects

We safeguard the rights of individuals with regard to their personal data, as set forth in the Georgian Personal Data Protection Act and the European General Data Protection Regulation (GDPR). In light of the scope of our activities, it is essential to be aware of the following fundamental rights:

The right to be informed about data processing

The data subject has the right to request and we will provide him/her with the following information within 10 days: what data we process about him/her, the basis and purpose of the data processing, the source of the data collection/extraction, the retention period of the data and, if it is not possible to determine a specific period, the criteria by which we will determine the period, to whom we will transfer his/her data and with what legal safeguards.

We will promptly notify the data subject of any incident (defined as a data security breach resulting in unlawful or accidental damage, loss, unauthorized disclosure, destruction, alteration, access, collection/extraction, or other unauthorized processing of data) if the incident is likely to cause significant harm and/or a significant threat to the fundamental rights and freedoms of individuals. In the event of an incident, we will promptly inform the data subject of the incident and the circumstances surrounding it. We will also inform the data subject of the measures taken or planned to mitigate or remedy the alleged or unavoidable harm caused by the incident, as well as the contact details of the data protection officer.

Right to access and receive a copy of the data

A data subject may request copies of their personal data in electronic form, free of charge. We reserve the right to impose a reasonable fee if the data subject requests issuance in a form other than storage, as this would require us to expend additional resources. In this instance, the aforementioned fee will not exceed the amount of resources expended.

The right to correct, update and supplement the data:

The data subject has the right to request that we correct, update and/or complete false, inaccurate and/or incomplete data concerning him or her. We will correct the error at the request of the data subject and in the event that the error is detected and notify the data subject, unless the error is of a technical nature.

In the event of an error, we will also notify all recipients of the data, the person responsible for all other processing of the same data and the person authorized for processing to whom we have transferred the data.

The right to stop processing, delete or destroy data

The data subject has the right to demand that the person responsible for processing cease processing, delete, or destroy the data concerning him or her. The request must be fulfilled within 10 days. In accordance with Georgian law, the data subject may refuse deletion and destruction of data only in exceptional cases.

Right to block data

In the event that one of the following circumstances arises, the data subject is entitled to request that the individual or entity responsible for processing the data block it: In the event that the data subject disputes the authenticity or accuracy of the data, or if the processing of the data is unlawful but the data subject objects to its deletion and requests the blocking of the data, the data may be blocked. Similarly, if the data is no longer necessary to achieve the purpose of its processing, but it is necessary for the data subject to lodge a complaint or claim, the data may be blocked. Furthermore, if the data subject requests the termination, deletion, or destruction of the data processing, and this request is considered, the data may be blocked. However, the data subject may only be refused data blocking in exceptional cases established by Georgian law.

Right to withdraw consent

The data subject shall have the right to withdraw consent at any time without explanation or justification. In the event that consent is the only basis for data processing, and consent is withdrawn, the data processing shall be terminated and/or the processed data shall be deleted or destroyed no later than 10 working days after the request. The data subject has the right to withdraw consent using the same form in which consent was initially provided. Prior to withdrawing the data subject's consent, we will provide information on the potential consequences of doing so upon request.

7. Data security

We guarantee the reliable protection of your data and apply all necessary technical and organizational measures to that end.

We safeguard your personal information from unauthorized or unlawful access, accidental loss, damage, disclosure, or destruction.

Once the purpose of processing personal data has been achieved, we delete and destroy personal data or store it in an anonymized form for analytical and statistical purposes.

The same standards of personal data protection apply to our affiliated companies.

Our contracts with individuals or third parties authorized to process personal data include specific provisions to guarantee the protection of personal data.

8. Data transfer to third parties

We will not share the personal data we process with other parties, except in the following circumstances:

- Affiliated companies are bound by an agreement containing guarantees of confidentiality and protection of personal data.
- Employees, company partners, and other individuals who are involved in fulfilling the tasks assigned to Macrosmatic LLC.
- Companies and individuals who send messages or information on our behalf in accordance with a contractual agreement. In this instance, they will only be furnished with your phone number or email address.

9. Cookie Policy

"Cookies " is a small text file that a website stores on your computer or mobile device during your visit. The use of cookies enables us to manage and improve the effectiveness of the website. Cookies store information related to your navigation on our website.

Please be assured that we do not store any of your personal information, including your address, passwords, credit or debit bank card details, in cookies.

We employ a range of digital services.

These services enable us to gather statistical data about our website visitors, including search content and the specific website page they visit. We receive information about the city or country from which the user accessed our website, the duration of the user's visit, the operating system used by the website visitor, and so on.

Furthermore, we collect data regarding the age, gender, interests, language, location, device type, and behavior (engagement, interaction with the website, frequency of visits, and length of visits) of our visitors. This information is processed for statistical purposes only and is not used to identify individual users.

Please be advised that upon visiting our website, you will be required to accept our cookie policy in order for us to collect the aforementioned information.