

The present “**Privacy Policy**” (hereinafter referred to as the “Policy”) has been developed by the limited liability company "Fitness One" (identification number 405523483, address: Georgia, Tbilisi, Vake-Saburtalo district, Vazha-Pshavela avenue No. 71) (hereinafter referred to as the "Company") and the company is the “Data controller”, the executor of the Law of Georgia on personal data protection. The present policy applies to the processing of all types of personal data provided by employees, visitors and customers (hereinafter referred to as the “Data Subject”) through the website, social networks, e-mail correspondence, digital attachments, surveys, contracts and other sources.

**1. The following principles must be observed, by the Company during data processing:**

- 1.1. data must be processed fairly and lawfully, without impinging on the dignity of a Data Subject;
- 1.2. data may be processed only for specific, clearly defined and lawful purposes;
- 1.3. data may be processed only to the extent necessary to achieve the respective legitimate purpose;
- 1.4. The Company, the staff working in the company and all those persons to whom the company entrusts the information of the Data Subject, will keep the data only for the period necessary to achieve the purpose of data processing.

**2. The grounds for the Company for data processing will be:**

- 2.1. there is a Data Subject’s consent;
  - 2.2. Data processing is necessary to fulfil the obligation assumed by the Agreement with the data subject or to conclude the Agreement by the request of the data subject;
  - 2.3. data processing is provided for by Law;
  - 2.4. data processing is necessary to protect interests of the Data Subject - (to review the application of the Data Subject; to enter into a contract; to protect vital interests of a Data Subject/third person.
3. Confidentiality of Personal Data, the Company and other persons who have gained access to personal data are obliged not to disclose personal data to third parties and not to distribute personal data without the consent of the personal Data Subject, unless otherwise provided by law of Georgia.

**4. The Company will collect and use personal data for the following purposes:**

- 4.1. to improve and make the relevant website(s) more “user-friendly”;
- 4.2. to improve and make the relevant social network(s) more “user-friendly”;
- 4.3. to adapt the material of the Company's website and social network in such a way as to provide more personalised experience to users and to draw their attention to the services offered by the fitness club that may be of interest to Customers.
- 4.4. to conclude appropriate Agreement/Contract based on Customers needs.

5. Processing of data on minors is allowed only with his/her consent (if the minor has reached the age of 16, it is possible to be allowed only with the consent of the minor by himself/herself).
6. The personal Data Subject has the right to receive information from the Company regarding the processing of his personal data, if such right is not limited in accordance with the laws of Georgia. The personal Data Subject has the right to demand that the Company clarify his personal data, block it or destroy it.
7. The processing of personal data in order to promote goods, works, services on the market by direct contacts with a potential consumer through means of communication is allowed only with the prior consent of the personal Data Subject. Such processing of personal data shall be deemed to be carried out without the prior consent of the personal Data Subject unless the Company proves that such consent has been obtained. The Company shall immediately stop processing its personal data for the above purposes at the request of the personal Data Subject.
8. Other rights and obligations of the Company as a personal Data Controller shall be determined by the legislation of the Georgi in the field of personal data. If the employees of the Company, who have access to the personal data, guilty of violating the norms governing the processing and protection of personal data shall bear material, disciplinary, administrative, civil or criminal liability in accordance with the procedure established by laws of Georgia.
9. Agreeing to this Privacy Policy, the Customer agrees that his/her data will be processed for direct marketing purposes, which includes sending him / her notifications related to the company's activities via email and / or contact number. For direct marketing purposes only: data subject's name, surname, phone number and email address will be processed.
- 10. Recipients of personal data**
  - 10.1. *The Company transfers the personal data of the subjects, if necessary, to the following persons:*
  - 10.2. an affiliated person;
  - 10.3. persons providing services to the Controller, including in such areas as accounting and personnel accounting, recruitment, legal services, information technology, while these persons process data as subcontractors on the basis of an agreement with the Controller and only in accordance with his instructions; banks, in the case of making payments; to government agencies or other organizations in accordance with the requirements of the legislation.
  - 10.4. When transferring personal data to third parties, the Company must ensure that there is an appropriate legal basis and, if possible, sufficient measures to protect personal data from unauthorized access.
11. The Company will retain data only for the period necessary to achieve the relevant legitimate purpose of data processing. Once the purpose for which the data is processed has been achieved, they will be automatically deleted. The Customer's personal data will be

automatically deleted within a maximum period of 5 years after the end of the service relationship, unless otherwise provided by law, or the customer has no other request.

## **12. Video monitoring**

**Video monitoring is carried out in the territory of the fitness club. A corresponding sign is placed at the place of video monitoring.**

- 12.1. Video monitoring is permitted for the purposes of crime prevention, crime detection, public safety, the protection of personal safety and property, the protection of minors (including from harmful influence).
- 12.2. Access to video monitoring is available only to persons specifically defined by the company, who are appointed to the position of "head of the department".
- 12.3. Video monitoring is carried out on the territory of the Fitness Club 24 hours a day.
- 12.4. Personal data collected by video monitoring is stored for no more than 14 calendar days, after which it is destroyed by software.

## **13. Final provisions**

- 13.1. The policy regarding the processing of personal data is subject to updating as the requirements of the legislation change, as well as the procedure for processing personal data in the Company. In the event of a change in the current legislation of Georgia, this Policy is applied to the extent that it does not contradict the legislation before making adjustments to it.
- 13.2. After the purposes of processing have been exhausted, data processing stops, except for the part of storage for the purpose of reporting to the Georgian authorities for 3 years after the purposes of processing have been exhausted. After passing this period, personal data is deleted.
14. Within the present **"Privacy Policy"**, the Company will process the Customers confidential information only with their consent (except for the cases stipulated by the law), the Customer always can refuse to provide confidential information and/or using the information which the Company has already received.
15. The Company has the right to establish rules for processing personal data in the Organization, make changes and additions to this Regulation, independently develop and apply forms of documents necessary to fulfil the duties of the Operator and exercise other rights provided for by the legislation of Georgia and local legal acts of the Organization in the field of processing and protection of personal data within the framework of legal requirements. The Company is obliged to inform the subjects about this and, in case of deterioration of their legal situation, request consent to these changes.

While making consent to data processing, the Data Subject has read and understood the present Privacy Policy and has the basic knowledge of the Georgian legislations.



The present Privacy Policy enters into a force from 15th of March, 2024

Representative of the director / Director:

Evgeniia Puhova