

Privacy Policy of Orient Logic LLC

General Information

This website is owned by Orient Logic LLC (hereinafter the Data Controller – ID: 202052054; Legal address: Tbilisi, Saburtalo District, V. Godziashvili St. N71; Alternative address: Tbilisi, G. Danelia St. N4; Tel: +995 (032) 2 54 18 18; Email: info@ol.ge). The company independently regulates the terms and conditions for the use of the website.

By visiting the website, using the information/services published on it, and by providing your personal data for various purposes, you confirm that you fully agree to the website's terms and conditions.

The terms used in this Policy have the meanings defined by the Law of Georgia on Personal Data Protection and other normative acts.

Purpose of the Privacy Policy

The purpose of this Policy is to:

- Explain the legal grounds, purposes, and principles we follow when processing your personal data;
- Inform you how we collect data and what types of data we process about individuals who interact with us;
- Inform you how we protect your personal data;
- Provide information about your rights as a data subject.

We process personal data in accordance with Georgian legislation, including the Law of Georgia on Personal Data Protection, the rules and standards defined in this Policy, and the conditions determined by agreements (if applicable).

Scope of the Privacy Policy

This Policy applies to:

- Individual clients of the company (including individual entrepreneurs) who use our products and services;
- Persons applying for employment at the company who submit their resumes for current or future vacancies;
- Employees of the company;

- Individuals related to an individual entrepreneur or legal entity client through an employment/service or other contractual relationship, who benefit from our services based on a contract between the company and the relevant client, as well as other individuals authorized to use our services (“service beneficiaries”);
- Individuals who are not our clients and have no contractual relationship with us, but contact us to receive services and/or information, or act as contact persons of an individual entrepreneur or a legal entity.

If you use or plan to use one or more of our services, it is understood that you have read and agree to the conditions of this Policy.

Collected Information

During the use of the company’s website(s), we may collect the following information about users: name, surname, personal identification information, address, contact information, field of interest, field of activity, work experience information, and/or any other information necessary to provide you with requested information/services or employment.

Principles of Personal Data Processing

The company processes personal data in accordance with the following principles and legal requirements:

- Data must be processed lawfully, fairly, transparently, and with respect for the dignity of the data subject;
- Data must be collected only for specific, clearly defined, and legitimate purposes;
- Data must be processed only to the extent necessary to achieve the relevant legitimate purpose (data must be proportionate to the purpose);
- Data must be accurate and updated when necessary. Inaccurate data must be corrected, deleted, or destroyed without undue delay;
- Data may be stored only for the period necessary to achieve the relevant legitimate purpose. After the purpose is achieved, data must be deleted, destroyed, or stored in a depersonalized form, unless further processing/storage is required by law;
- Technical and organizational measures must be taken to ensure data protection against unauthorized or illegal processing, accidental loss, destruction, or damage.

Purpose of Using Information

Collected user information may be used for the following purposes:

- To communicate with you;
- To fulfill your requests and/or establish cooperation;
- For business development purposes;
- To obtain and analyze opinions, advice, and recommendations from users/potential users regarding our services and products;
- To respond to user complaints;
- For direct marketing;
- For fulfilling contractual obligations, facilitating processes, ensuring compliance with legal requirements, and providing services;

And for any other legitimate purpose.

Processing of Personal Data

Personal data collected by the company are processed in full compliance with Georgian legislation.

Website User Rights

A website user has the right to request and receive the following information free of charge:

- a) Whether their data is being processed and whether the processing is justified;
- b) The data being processed, the grounds and purpose of processing;
- c) The source of data collection;
- d) The data retention period or criteria for determining the period;
- e) The identity/categories of data recipients, including the grounds and purpose of data transfer if shared with third parties.

A user is entitled to access their personal data stored by the company and obtain copies (in material or electronic form).

A user may request correction, update, completion, blocking, termination of processing, deletion, or destruction of inaccurate, incomplete, outdated, or illegally collected data.

A user may withdraw consent at any time without explanation and request termination of processing and/or destruction of processed data (unless another legal basis exists).

A user may file a complaint with the Personal Data Protection Service (Tbilisi, N. Vachnadze St. 7 or Batumi, Bako St. 48) or Tbilisi City Court (address: Tbilisi, David Agmashenebeli Alley N64).

The company may use an authorized data processor to fulfill obligations. The data subject will be informed about the processor within 10 working days of request. Both the data controller and the processor must maintain confidentiality to high standards.

Data may be disclosed to authorized persons only through written agreements that define strict obligations to process data solely for the purposes defined by the company.

Sources of Personal Data and Types of Data Processed

Data may be obtained through various channels, including:

- When you contact us through different communication channels to purchase services and/or request information, send your resume, or visit our office;
- When you interact with us through different platforms/forms;
- When you enter into a contract with us or use our services, including modifying or canceling them;
- When you contact us by phone or email while receiving services;
- When you submit complaints/claims;
- When you request correction, deletion, blocking, or termination of processing of your personal data.

Depending on the type of service and communication, we may process the following data:

- Identification and authorization data: name, surname, personal number, address, phone number, email address, age, date of birth; copy of ID/passport; resume information relevant to verifying suitability for a position;
- Data about the services you use, including service modification/cancellation/extension;
- Information related to correction, deletion, provision, or withdrawal of consent;
- Any other data for which you have given consent and/or which the law requires us to process.

Sharing Data with Third Parties

Data may be shared only in cases defined by law, with authorized law enforcement agencies, government authorities, based on a court decision, or with your consent.

In all cases, data will be shared only to the extent necessary to achieve the relevant purpose.

Limitations of User Rights

User rights may be restricted if such restriction is directly required by Georgian law and represents a necessary and proportionate measure in a democratic society to protect:

- State security, information security, cyber security, or defense interests;
- Public safety;
- Crime prevention, investigation, prosecution, justice, imprisonment, probation, or operational-search activities;
- Significant national financial or economic interests (including monetary, budgetary, or tax interests);
- Compliance with professional ethics rules and responsibility for violations;
- The rights and freedoms of the data subject or others, including freedom of expression;
- State, commercial, professional, or other legally protected secrets;
- Legal claims or complaints.

Restrictions are applied only to the extent necessary to achieve the specific purpose.

If rights are restricted, the company will notify the user in a manner that does not compromise the objective of the restriction.

Security Measures

The company has implemented appropriate technical and organizational measures to protect your personal data from unauthorized access, unlawful processing, disclosure, accidental loss, alteration, or destruction.

Access to personal data is limited to employees, contractors, and third parties strictly within the scope of their duties.

In case data is transferred to third parties, including foreign organizations, the company ensures that a data transfer agreement is signed, defining the recipient's obligations to protect your data.

Data Retention Period

Data is stored for the duration of the contractual relationship and no longer than 3 years after its termination (except in cases defined by law; tax-related terms follow the Tax Code of Georgia).

For direct marketing, data is processed indefinitely until consent is withdrawn.

Data collected during a vacancy application is stored for 6 months after the vacancy closes. If you submit your resume generally (without a specific vacancy), it is stored for 1 year.

The company ensures maximum confidentiality of the information provided.

The company is not responsible for unauthorized access by third parties at the moment you transmit information to the company.

Confidential information may be transferred only with your prior consent or in cases defined by law.

International Transfer of Data

Data may be transferred internationally in cases defined by law.

If data is transferred outside Georgia, including to countries without adequate data protection guarantees, the company ensures signing a data transfer agreement requiring the receiving party to protect your data.

Possible risks include the absence (or limited existence) of data protection authorities or data subject rights in such countries.

Direct Marketing

Our aim is to provide you with the choice regarding the use of your personal data for direct marketing.

Direct marketing includes periodic communication about our services, promotions, offers, or any information intended to generate or maintain interest in the company's projects, by phone (SMS, calls, voice messages), postal mail, email, or other electronic means defined by law.

With your consent to direct marketing, we may process your contact details and other necessary data to ensure relevant communication.

Depending on your relationship with us, additional categories of data may be processed if necessary for direct marketing, within the limits allowed by this Policy.

Contact Information of the Personal Data Protection Officer

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