

Privacy Policy

Tbilisi, 16 September 2026

1. General Provisions

1.1. This Privacy Policy ("Policy") is issued and applied by P/E Anna Ivchenko, Georgia, Tbilisi, Gldani district, Rezo Gabashvili street, N1, floor 2, "B" block ("Operator", "we", "us"), and governs the processing of personal data of visitors and users of the Site.

1.2. Where the Data Subject is located in the European Economic Area (including Cyprus and Spain), the Operator processes personal data in accordance with Regulation (EU) 2016/679 (the "General Data Protection Regulation" or "GDPR"). Where the Data Subject is located elsewhere, this Policy is applied together with any other applicable data protection legislation.

1.3. Terms used in this Policy are understood in accordance with the definitions given in Section 2 and, where applicable, the definitions used in the GDPR.

1.4. Matters concerning the processing of personal data not covered by this Policy are governed by applicable data protection legislation.

1.5. This Policy establishes the main principles and rules for the Operator's processing of personal data and includes:

- a description of the procedure for processing personal data of individuals in contractual or other relations with the Operator ("Data Subjects");
- the purposes, legal grounds, scope and methods of processing personal data;
- information on the security and confidentiality measures applied to personal data;
- the procedure for interacting with Data Subjects when handling their requests;
- the storage periods, conditions and methods of processing personal data;
- the procedure for the destruction of personal data upon completion of processing or on other grounds;
- information about international transfers of personal data and the safeguards applied to them.

1.6. The current version of this Policy is published online at:

https://avi-seogeo.info/documents/Privacy_Policy_EN.pdf and is available to Data Subjects at any time.

1.7. Lack of familiarity with this Policy does not exempt a Data Subject from the consequences of its application and cannot serve as grounds for claims against the Operator.

1.8. If a Data Subject disagrees with the provisions of this Policy, they must stop using the Site and refrain from providing personal data through its services.

2. Data Controller

2.1. The data controller (Operator) responsible for the processing of personal data described in this Policy is:

P/E Anna Ivchenko, Georgia, Tbilisi, Gldani district, Rezo Gabashvili street, N1, floor 2, "B" block. Contact e-mail: zakaz@avigroup.pro.

2.2. The Operator has not appointed a representative in the European Union, in reliance on the exemption under Article 27(2) of the GDPR: the processing carried out via the Site is occasional, does not include large-scale processing of special categories of personal data or data relating to criminal convictions and offences, and is unlikely to result in a risk to the rights and freedoms of individuals, taking into account the nature, context, scope and purposes of the processing.

2.3. Data Subjects may address any requests regarding the processing of their personal data, or complaints, to the contact details above.

3. Definitions

3.1. This Policy uses the following terms:

- Personal data – any information relating to a directly or indirectly identified or identifiable individual (Data Subject).
- Processing of personal data – any action (operation) or set of actions performed, with or without the use of automation tools, on personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (disclosure, provision, access), cross-border transfer, anonymization, blocking, deletion and destruction of personal data.
- Confidentiality of personal data – a mandatory requirement for the Site Administration not to allow their disclosure without the Data Subject's consent or another lawful basis.
- Site User (“User”) – a person who has access to the site (the “Site”) via the internet and uses it for their own purposes.
- Cookies – a small piece of data sent by a web server and stored on the user's device, which the web browser sends back to the server with each request when accessing the relevant site.
- IP address – a unique network address of a node in a computer network built on the IP protocol.
- Data Subject – an individual who provides their personal data to the Operator, or whose data is otherwise processed by the Operator via the Site.
- Site – the combination of information, text, graphic elements, design, images, photo and video materials and other results of intellectual activity, and software contained in an information system that ensures the availability of such information on the internet at the Site's network address(es), including subdomains.

4. Rights and Obligations of the Operator

4.1. The Operator has the right to:

- request and receive from the User reliable information and/or documents containing personal data necessary to achieve the purposes of processing;
- if a User withdraws consent to the processing of personal data, continue processing where another legal basis applies under applicable law;
- independently determine the list of organizational, legal and technical measures necessary to comply with data protection legislation, unless otherwise provided by applicable law.

4.2. The Operator is obliged to:

- process personal data lawfully, fairly and in a transparent manner, for specified, explicit and legitimate purposes, on the basis of one of the legal grounds set out in Section 9 of this Policy;
- provide the Data Subject, upon request, with information about the processing of their personal data, in accordance with applicable legislation;
- respond in a timely manner to requests from Data Subjects and/or their legal representatives, ensuring the exercise of their rights established by law, and in any event within one month of receiving a request from a Data Subject located in the EU (extendable by two further months for complex requests, with the Data Subject informed of the extension and its reasons);
- provide the necessary information to a competent data protection authority upon a reasoned request, within the timeframe required by applicable law;
- ensure open and unrestricted access to this Policy by publishing it on the Site;
- take appropriate legal, organizational and technical measures to protect personal data from unauthorized access, destruction, modification, blocking, disclosure and other unlawful actions;
- stop processing and/or destroy personal data in cases provided for by law, including upon a substantiated request from the Data Subject;

- upon discovering an unlawful or accidental transfer, disclosure or access to personal data that resulted in a violation of the Data Subject's rights, notify the competent supervisory authority within the timeframe required by applicable law (72 hours under the GDPR, where feasible) and take the necessary measures;
- fulfil other obligations imposed on the Operator by applicable data protection legislation.

5. Rights and Obligations of the User

5.1. A User who is a Data Subject has the right to:

- receive information about the procedure and purposes of processing their personal data (right to information / access);
- require the Operator to rectify, complete, block or delete their personal data if the data is incomplete, outdated, inaccurate, unlawfully obtained, or no longer necessary for the stated purposes of processing (right to rectification and erasure);
- request that the Operator restrict the processing of their personal data in the cases provided for by applicable law (right to restriction of processing);
- receive their personal data in a structured, commonly used and machine-readable format, and transmit it to another controller where technically feasible (right to data portability);
- object, on grounds relating to their particular situation, to the processing of their personal data, including profiling, where such processing is based on the Operator's legitimate interest (right to object);
- set a condition of prior consent for the processing of personal data for the purposes of promoting goods, works and services, and to object to such processing at any time, free of charge;
- withdraw previously given consent to the processing of personal data at any time, without affecting the lawfulness of processing carried out before the withdrawal;
- lodge a complaint with a competent supervisory authority (in particular, the data protection authority of their country of habitual residence, place of work, or the place of the alleged infringement) or appeal to a court;
- exercise other rights provided for by applicable legislation.

5.2. The User is obliged to:

- provide the Operator with reliable and up-to-date personal data;
- promptly inform the Operator of any changes (updates, clarifications) to previously provided personal data.

5.3. Persons who have provided the Operator with knowingly inaccurate information about themselves, or data of other persons without their consent, bear responsibility in accordance with applicable law.

5.4. The User confirms that all information submitted through forms on the Site relates to them personally, is accurate, and does not violate the rights of third parties or applicable law.

6. Legal Basis for Processing

6.1. The Operator processes personal data only where at least one of the following legal grounds applies:

- the Data Subject has given consent to the processing for one or more specific purposes (e.g., subscribing to marketing communications, non-essential cookies);
- processing is necessary for the performance of a contract to which the Data Subject is party, or in order to take steps at the Data Subject's request prior to entering into a contract (e.g., responding to a service enquiry submitted via a form);
- processing is necessary for compliance with a legal obligation to which the Operator is subject;
- processing is necessary for the purposes of the legitimate interests pursued by the Operator (e.g., basic Site security and fraud prevention, aggregated Site analytics that does not rely on non-essential cookies), except where such interests are overridden by the interests or fundamental rights of the Data Subject.

6.2. Consent obtained for one purpose (e.g., marketing communications) is not used as a basis for processing for an unrelated purpose, and consent to non-essential cookies is requested separately from, and is not a condition for, submitting an enquiry form.

7. Data Subject's Consent to the Processing of Personal Data

7.1. Where consent is relied upon as the legal basis for processing, the Data Subject confirms that they have read this Policy, accept its terms, and provide informed, specific and unambiguous consent to the processing of their personal data on the terms established by this Policy and applicable law. Consent is considered given in the following cases:

- when the Operator receives a Consent executed as an electronic document signed by the Data Subject;
- when filling in a feedback form on the Site or via external online services (Telegram, WhatsApp, etc.) and submitting it, upon clicking "Submit," "Order" or a similar button, in respect of the data entered into that form;
- for non-essential cookies and similar technologies, when the Data Subject makes an affirmative selection in the cookie consent banner described in Section 11 of this Policy — mere continued browsing of the Site does not constitute consent to non-essential cookies;
- when written consent is provided on paper and delivered to the Operator.

7.2. Consent to the processing of personal data is valid from the moment it is given and remains valid for the period necessary to achieve the purposes of processing, unless otherwise stated in the text of the consent itself or withdrawn earlier.

7.3. The Data Subject has the right to withdraw consent to the processing of personal data at any time, as easily as it was given.

- Consent is withdrawn in writing by sending a corresponding request to the email address specified in this Policy, as a paper document signed by the Data Subject, or, for cookies, via the "Cookie Settings" control available on the Site at any time.
- To prevent unauthorized withdrawal of consent by third parties, the Operator may request additional information to confirm the identity of the requester.
- The Operator reviews the request to withdraw consent and notifies the Data Subject of the outcome within 10 (ten) business days of receiving the request.

7.4. If applicable, consent to the processing of personal data permitted for disclosure is given separately from the consent referred to in clause 7.1 of this Policy, by completing a dedicated form provided by the Operator, specifying: name, and contact information — phone number and email address. The validity period of such consent is set out in the text of the consent itself.

7.5. The Operator does not knowingly process personal data of persons who have not reached the age of digital consent established by applicable law. If the Operator discovers that personal data has been obtained from such a person without the consent of their legal representative, the Operator suspends processing of such data pending clarification of the circumstances and deletes it where required.

7.6. This Policy applies only to this Site. The Operator does not control and is not responsible for third-party sites that the User may access via links available on this Site.

8. Guarantees, Liability, and Data Subject Awareness

8.1. The Operator does not verify the accuracy of personal data provided by the Data Subject, nor does it verify the Data Subject's legal capacity. Responsibility for the completeness, accuracy, relevance and lawfulness of the personal data provided (including in cases of providing third-party data without their consent) lies solely with the Data Subject or their legal representative.

8.2. The Data Subject acknowledges that, in the case of consent to the processing and disclosure of personal data permitted for such disclosure, this data may be published by the Operator on the Site or in electronic services used by the Operator (including, but not limited to, Telegram, WhatsApp, etc.), where it becomes

available to third parties, unless direct restrictions have been established by the Data Subject in the text of the relevant consent.

8.3. The Data Subject is informed of the right to prohibit the transfer of the specified personal data to an unrestricted group of persons, and the processing of personal data by an unrestricted group of persons, except for necessary access (see Sections 9–10).

9. Personal Data We Collect and Purposes of Processing

9.1. The Operator processes the User's personal data only if it is filled in and/or submitted by the User themselves through dedicated forms on the Site, or collected via cookies/analytics as described in Section 11. The Operator may process the following personal data of the User:

- Full name;
- Phone number(s);
- Email address;
- Company name, as specified by the User when completing a request on the Site;
- Place of residence and other data voluntarily provided via forms;
- Technical and cookie data described in Section 11 (IP address; device, browser and operating system information; on-site activity; referral source; click identifiers for advertising campaigns).

9.2. The Operator does not process special categories of personal data, including information on racial or ethnic origin, political views, religious or philosophical beliefs, trade union membership, or data on health, sex life or sexual orientation, and asks Data Subjects not to submit such data through the Site's forms.

9.3. Purposes of processing personal data:

- responding to enquiries and requests submitted via forms on the Site (legal basis: pre-contractual steps / contract performance);
- concluding, performing and terminating service agreements (legal basis: contract performance);
- sending informational and promotional materials, where separate consent has been given, with an unsubscribe option in every message (legal basis: consent);
- analyzing aggregated Site usage and measuring advertising campaign performance (legal basis: consent for non-essential cookies, or legitimate interest for strictly necessary/aggregated analytics);
- complying with applicable legal requirements (legal basis: legal obligation).

10. Interaction with Third Parties and International Transfers

10.1. The Operator engages the following third parties (processors/contractors) to support the operation of the Site and the provision of services:

- the Site's hosting provider;
- amoCRM — CRM and request processing;
- Google Tag Manager and Google Ads — web analytics, advertising and conversion tracking, operated under Google Consent Mode;
- CookieYes — cookie consent management.

10.2. Personal data is transferred to such third parties on the basis of agreements (including, where applicable, data processing agreements) that impose confidentiality obligations and require data protection measures in accordance with applicable law.

10.3. Where a processor is located outside Georgia or the European Economic Area, the Operator only transfers personal data to it where the transfer is covered by an adequacy decision of the European Commission, by Standard Contractual Clauses (SCCs) approved by the European Commission, or by another safeguard recognised under Article 46 of the GDPR. A summary of the safeguards used for each such transfer is available from the Operator on request at the e-mail address given in Section 2.

10.4. All third parties who gain access to personal data on the Operator's behalf are required to use it solely for the purposes defined in this Policy and may not transfer the data to other persons without the Data Subject's consent or another lawful basis.

10.5. The Operator is not responsible for the actions of third parties if the transfer of personal data to them is carried out by the User independently (for example, when following links from the Operator's Site to third-party sites, or when messaging the Operator through a third-party messenger whose own privacy policy then applies to that channel).

11. Use of Cookies and Analytics/Advertising Services

11.1. The Operator uses cookies and similar technologies, grouped into the following categories:

- Strictly necessary — required for the Site to function (e.g., remembering cookie preferences, form security); these do not require consent.
- Analytics — used to understand how visitors use the Site and improve it; loaded only after consent.
- Advertising/measurement — used to measure the performance of advertising campaigns (e.g., Google Ads conversion tracking, click identifiers, device type, interaction with messenger buttons); does not include the User's name, phone number or e-mail address; loaded only after consent, and operated in accordance with Google Consent Mode, so that no advertising cookies are set before the User has made a choice.

11.2. On first visiting the Site, the User is shown a cookie consent banner ("CookieYes") allowing them to accept all, reject all (other than strictly necessary cookies), or customize their choice by category. No analytics or advertising cookie is set until the User has made an affirmative choice. The User may change or withdraw their choice at any time via the "Cookie Settings" link in the Site footer.

11.3. Anonymized/aggregated data obtained through analytics systems that cannot reasonably be linked back to an identifiable individual is not treated as personal data. Where analytics or advertising data can be linked to an identifiable individual (e.g., combined with form submissions), it is treated as personal data and handled in accordance with this Policy.

11.4. The User may also restrict or disable the use of cookies through their browser settings. The Operator notes that disabling strictly necessary cookies may affect the correct functioning of certain features of the Site.

11.5. The processing of information obtained through third-party analytics and advertising services is also governed by the agreements and privacy policies of those services, which the User may review independently (e.g. Google's privacy policy for Google Ads/Analytics).

12. Retention Period and Termination of Personal Data Processing

12.1. The Operator retains personal data only for as long as necessary for the purposes for which it was collected, applying the following default periods unless a longer period is required by applicable law (e.g., accounting or tax rules) or a shorter period is requested by the Data Subject:

- Enquiry/contact-form data from a person who does not become a client: up to 12 months from the last interaction, after which it is deleted or anonymized;
- Client/contract data: for the duration of the contractual relationship plus 3 years thereafter (general default retention period), unless a longer period is required by applicable law;
- Marketing consents and unsubscribe records: retained until consent is withdrawn, plus a reasonable period afterwards solely to evidence that the withdrawal was honoured;
- Cookie/analytics data: retained for the period set by the relevant analytics/advertising tool's default settings (typically 14–26 months), after which it expires automatically.

12.2. Processing of personal data is also terminated at the User's initiative (withdrawal of consent, deletion request, opting out of mailings), upon discovery of unlawful processing (within 3 business days of the violation being discovered), upon achievement of the purpose of processing where no other legal ground applies, or upon closure, liquidation or cessation of operations of the Site or the Operator.

12.3. Upon receiving a request from a Data Subject to terminate the processing of their personal data or to erase it, the Operator acts on the request within 10 (ten) business days (extendable by up to 5 additional business days, with the Data Subject notified of the reasons for the extension), save where a longer retention is required by law.

13. Ensuring Confidentiality and Security of Personal Data

13.1. The Operator undertakes to maintain the confidentiality of personal data and not to disclose it to third parties without the prior consent of the Data Subject, except as provided by applicable law.

13.2. The Operator takes appropriate legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, copying, disclosure, and other unlawful actions by third parties, and requires the same of any processor acting on its behalf.

13.3. In the event of a personal data breach likely to result in a risk to the rights and freedoms of Data Subjects, the Operator notifies the competent supervisory authority without undue delay (within 72 hours where feasible) and, where the risk is high, the affected Data Subjects, in accordance with applicable law.

14. Final Provisions

14.1. Any changes to this Policy are reflected in its current version published on the Site. This Policy remains in effect until replaced by a new version adopted and published by the Operator.

14.2. The Operator may amend this Policy. Material changes affecting the scope of processing or the Data Subject's rights are notified on the Site (or, where feasible, by e-mail to affected Users) in advance of taking effect. The Data Subject is responsible for reviewing the current version of the Policy when accessing the Site or its services.

14.3. The updated version of the Policy takes effect from the moment it is published on the Site. Continued use of the Site after the publication of a new version is considered confirmation of the Data Subject's agreement with the current version of the Policy and its terms, without prejudice to any rights that require fresh consent under applicable law.

14.4. If the Data Subject disagrees with the terms of a new version of the Policy, they must stop using the Site and its services.

14.5. The current version of this Policy is freely available online at:
https://avi-seogeo.info/documents/Privacy_Policy_EN.pdf.