## PRIVACY POLICY

HikeSJ ("us", "we", "APP") is committed to protecting YOUR privacy and personal data. This Privacy Policy is published in compliance with the law of Georgia on the "Personal Data Protection" and explains how we collect, process, share and protect personal data and special categories of data of our registered users ("User", "YOU", "YOUR"). It also describes YOUR choices regarding use, access, correction and deletion of YOUR personal information.

If YOU do not agree with the data practices described in this Privacy Policy, YOU should not use HikeSJ or any of its Services.

- BY USING THIS APPLICATION (APP), YOU WILL BE DEEMED TO HAVE READ, UNDERSTOOD AND AGREED TO THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY AND AGREE TO BE BOUND BY THE PRIVACY POLICY.
- AFTER READING THIS DOCUMENT, YOU HEREBY CONSENT TO COLLECTION, PROCESSING AND DISCLOSURE OF YOUR PERSONAL DATA AS DESCRIBED IN THIS PRIVACY POLICY.

### 1. COLLECTION AND PROCESSING OF PERSONAL INFORMATION

HikeSJ collects and processes personal data that is necessary to provide YOU with services and best meet YOUR needs, for obtaining feedback, also only in aggregated or anonymized form for statistical analysis and business intelligence purposes.

We respect YOUR privacy and therefore, Personal data undergoing processing is:

A.processed lawfully, fairly and in a transparent manner;

B.collected for explicit, specified, and legitimate purposes and not processed in a way incompatible with those purposes;

C.adequate, relevant, and not excessive in relation to the purposes for which they are processed;

D.accurate and, where necessary, kept up to date;

YOU hereby consent to the collection and processing of such information for the above-mentioned purposes by HikeSj. Information collected and processed by us from YOU may include the following:

- •Country of residence
- Email address
- date of birth
- •Data regarding Your usage of the services and history of the appointments made by or with You through the use of Services

•Other information that YOU voluntarily choose to provide to us

## 2. PRIVACY STATEMENTS

- 2.1.YOU are responsible for maintaining the accuracy of the information YOU submit to us, such as YOUR contact information provided as part of the account registration. If YOU provide any information that is untrue, inaccurate, out of date or incomplete (or becomes untrue, inaccurate, out of date or incomplete), or HikeSJ has reasonable grounds to suspect that the information provided by YOU is untrue, inaccurate, out of date or incomplete, We may discontinue the provision of the Services to YOU according to the Georgian legislation.
- 2.2.If YOU wish to opt-out of receiving non-essential communications such as promotional and marketing-related information regarding the Services, please send us an email s.javakhetidmo@gmail.com.
- 2.3.This privacy policy applies to APP, software, products and services owned and controlled Samtskhe-Javakheti Destination Management Organization, the owner of HikeSJ (legal entity established and operating pursuant to the Georgian legislation,). YOUR use of and access to the Services is subject to this Privacy Policy, our terms and conditions as well as other policies. HikeSJ does not exercise control over the sites displayed as search results or links from within its Services. These other sites may place their own cookies or other files on the Users' device, collect data or solicit personal information from the Users, for which HikeSJ is not responsible or liable. Accordingly, HikeSJ does not make any representations concerning the privacy practices, nor does we guarantee the accuracy, integrity, or quality of the information, data, text, software, sound, photographs, graphics, videos, messages or other materials available on such websites. If YOU decide to visit a third-party website linked, YOU do this entirely at YOUR own risk. HikeSJ encourages the User to read the privacy policies of third parties.
- 2.4. HikeSJ implements reasonable security practices and procedures to protect the personal data that it has under its control from unauthorized access, improper use or disclosure, unauthorized modification and unlawful destruction or accidental loss. However, for any data loss or theft due to unauthorized access to the User's electronic devices through which the User avails the Services, HikeSJ not be held liable for any loss whatsoever incurred by the User.
- 2.5. HikeSJ implements reasonable security practices and procedures and has a comprehensive documented information security program and information security policies that contain managerial, technical, operational and physical security control measures that are commensurate with respect to the information being collected and the nature of our activity.
- 2.6.We take YOUR right to privacy and personal data protection very seriously and other than as specifically stated in this Privacy Policy, will only disclose YOUR Personal Information in the event it

is required to do so by law, supervisory body or law enforcement agency or when HikeSJ, in its sole discretion, deems it necessary in order to protect its rights or the rights of others, to prevent harm to persons or property, to fight fraud and credit risk, or to enforce or apply the Terms of Use.

- 2.7.To the extent necessary to provide Users with the Services, HikeSJ may provide Information to third party contractors who work on behalf of or with HikeSJ to maintain the APP. In such circumstances, YOU consent to us disclosing YOUR Personal Information to contractors, solely for the intended purposes only.
- 2.8.We make all User information accessible to its employees, agents or partners and third parties only on a need-to-know basis and bind our employees to strict confidentiality obligations.
- 2.9. HikeSJ is not responsible for the confidentiality, security or distribution of YOUR Personal Information by our partners and third parties outside the scope of our agreement with such partners/PROVIDERS and third parties. Further, HikeSJ shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond the reasonable control of HikeSJ including but not limited to, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of Internet service or telephone service of the User etc.

#### 3. CHANGE TO PRIVACY POLICY

We may update this Privacy Policy at any time. In the event there are significant changes in the way we treat User's personally identifiable information, or in the Privacy Policy itself, we will display a notice on APP, so that YOU may review the changed terms prior to continuing to use the Services. Unless stated otherwise, our current Privacy Policy applies to all information that HikeSJ has about YOU and YOUR account.

## 4. CONSENT TO THIS POLICY

YOU acknowledge that this Privacy Policy is a part of the Terms of Use of the APP and the Services, and YOU unconditionally agree that becoming a User of the APP and its Services signifies YOUR (i) assent to this Privacy Policy, and (ii) consent to HikeSJ using, collecting, processing and/or disclosing YOUR Personal Information in the manner and for the purposes set out in this Privacy Policy and the Terms of Use.

# 5. ADDRESS FOR PRIVACY QUESTIONS AND YOUR DATA PROTECTION RIGHTS

If you have any questions about this Privacy Policy or the methods of collection, use and disclosure of your information, you can contact us at the following email address: s.javakhetidmo@gmail.com. We will use reasonable efforts to respond promptly to any request, question, or concern you may have regarding our use of "your" personal information.

YOU have the right to complain to a Data Protection Authority about our collection and use of YOUR Personal Data.