

# **PRIVACY POLICY**

## **1. General provisions**

1.1 This Privacy Policy (hereinafter referred to as the "Policy") of the individual entrepreneur Kovach Denys defines the following conditions, goals, procedures and measures to ensure the security and protection of personal data of Visitors to the site <https://deniskovach.com>.

1.2 The Policy is developed in compliance with the requirements of the Law of Georgia "On Personal Data Protection". The terms used in the Policy shall be interpreted according to their conditions in this section, taking into account the section "Terms and Conditions". Individual entrepreneur Kovach Denys guarantees confidentiality of the received personal data of the Website Visitors.

## **2. Terms and definitions**

2.1 Personal data means information or a set of information about an individual who is identified or can be specifically identified by the data provided by him/her;

2.2 The Website is an information resource on the Internet at <https://deniskovach.com> (and its subdomains).

2.3 A visitor to the website <https://deniskovach.com> is a personal data subject, a person who has access to the website via the Internet and uses the materials and information of the website.

2.4 Individual entrepreneur Kovach Denys - personal data operator, Contractor in accordance with the Offer.

2.5 IP address is a unique network address of a node in a computer network based on the IP protocol.

## **3. Ways of processing personal data**

3.1 The Contractor shall process personal data of the Website Visitors in the following ways: collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (provision), deletion, destruction of personal data.

3.2 The personal data of the Website Visitors is stored exclusively on electronic media and used for the purposes specified in clause 4.3 of the Policy.

3.3 The Contractor has the right to entrust the processing of personal data to a third party in compliance with the requirements provided for by the Law of Georgia "On Personal Data Protection"

3.4 The provision of personal data of the Website Visitors at the request of state authorities, local governments is carried out in the manner prescribed by the current by the legislation of Georgia.

## **4. The concept and composition of personal data, the purpose of their processing**

4.1 The list of personal data subject to protection by the Contractor is formed on the basis of the Law of Georgia "On Personal Data Protection".

4.2 When viewing the Site <https://deniskovach.com>, reading information and downloading materials, certain data about the computer from which the personal data subject views the Contractor's Site is automatically registered. When viewing the site, the Contractor collects the following technical information:

- IP address;
- information from cookies;
- type of browser and operating system;
- access time;
- The URL of the website from which the transition was made.

4.3 The Contractor processes and protects the personal data of persons who have filled out any feedback forms on the website <https://deniskovach.com> in accordance with the following purposes:

4.3.1 Providing interested parties with information about the Contractor's services and courses;

- 4.3.2 Conclusion of agreements at the initiative of the Website Visitors under which the personal data subject will be the beneficiary or guarantor;
- 4.3.3 Performance of the Agreement;
- 4.3.4 Sending reference, marketing and advertising information to the Site Visitors with their consent by sending such messages to the specified E-mail;
- 4.3.5 Providing Website Visitors with consultations on issues related to the training course or other services provided by the Contractor;
- 4.4 By filling out any forms on the Site, the personal data subject voluntarily agrees to the Policy, and also voluntarily agrees to the processing of personal data specified in clause 4.3 of the Policy.
- 4.5 The processing of personal data of the Website Visitors is carried out without any time limit, in any legal way, including in personal data information systems using automation tools.
- 4.6 The Contractor shall take the necessary organizational and technical measures to protect the Visitor's personal information from unauthorized or accidental access, destruction, blocking, copying, distribution, as well as from other illegal actions of third parties.
- 4.7 Consent to the processing of personal data is given by the Visitor of the Site <https://deniskovach.com> for the entire period necessary for the Contractor to achieve the goals processing.

## **5. Rights and obligations of the personal data subject (website visitor)**

- 5.1 The personal data subject has the right to:
  - 5.1.1 Demand clarification of your personal data, its updating, blocking or destruction.
  - 5.1.2 Demand notification of all persons to whom his/her incorrect or incomplete personal data was previously communicated about all corrections and additions made.
  - 5.1.3 Appeal in accordance with the procedure established by law against unlawful actions or omissions in the processing of his/her personal data.
  - 5.1.4 The personal data subject also has other rights provided for by the Law "On Personal Data Protection".
- 5.2 Site visitors are obliged to provide only accurate information about themselves.
  - 5.2.1 Consent to the processing of personal data may be withdrawn by the Site Visitor by sending a written application to the Contractor's electronic communication means.
  - 5.2.2 Persons who have transferred information to the Contractor through the Site about another subject of personal data without the consent of such subject whose personal data were transferred, shall be liable in accordance with the laws of Georgia.

## **6. Rights and obligations of the Contractor**

- 6.1 The Contractor does not process any special categories of personal data. The Contractor shall not be entitled to transfer personal data of the Website Visitors to third parties, except for the following exceptions:
  - 6.1.1 Authorized state bodies within the scope of their authority.
  - 6.1.2 To persons to whom the Contractor is obliged to transfer them in order to comply with the legislation of Georgia.
  - 6.1.3 Persons to whom the Contractor transfers personal data in order to fulfill the contract with the personal data subject.
  - 6.1.4 Persons to whom the Contractor entrusts the processing of personal data.
  - 6.1.5 To the Contractor's successors in case of its reorganization;
  - 6.1.6 Other persons, with the consent of the personal data subject.
- 6.2 The Contractor undertakes to warn the persons who have received the Visitor's personal data that this data may be used only for the purposes for which it was provided, and to require these persons to confirm that this rule has been observed.

## **7. Ensuring the protection and security of personal data**

7.1 The Contractor shall take measures for technological and operational security to protect the information provided by the Website Visitors from unauthorized access, disclosure, distortion, blocking or destruction.

7.2 The measures applied by the Contractor include:

7.2.1 Appointment of a person responsible for organizing the processing of personal data;

7.2.2 Application of legal, technical and organizational measures to ensure the security of personal data;

7.2.3 Use of anti-virus software on the Contractor's computers;

7.2.4 Establishing rules for access to Personal Data control over the measures taken to ensure the security of Personal Data.

7.2.5 Access to personal data shall be granted exclusively to authorized persons of the Contractor who have undertaken to keep such information confidential.

## **8. Final provisions**

8.1 The Policy is subject to change or amendment in the event of relevant changes or amendments to the current legislation of Georgia on personal data protection.

8.2 The Policy may be changed unilaterally at any time at the discretion of the Contractor.

8.3 All relations involving the Contractor that relate to the processing and protection of personal data and are not directly reflected in the Policy are regulated in accordance with to the provisions of the current Georgian legislation on personal data protection.

8.4 The Policy is freely available for review and viewing on the Website.

8.5 Control over compliance with the requirements of the Policy shall be exercised by the Contractor or the person responsible for organizing the processing of personal data.

## **9. Contact Details**

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