

Privacy Statement

Silk Rewards Privacy Statement

Who are we?

This Privacy Statement applies to the processing of personal data through the Silk Rewards application.

Data Controller: Silk Hospitality LLC (Identification Number: 404613094, Republic Square, Mtatsminda District, Tbilisi), hereinafter referred to as the “Company”.

Our customers: Any individual registering through the Silk Rewards application for the purposes of using our services.

The protection of human rights and freedoms, including the right to privacy and the protection of personal data of individuals, is an important value for us. We place great importance on ensuring data protection and security throughout the data processing process.

We process personal data with due care and in accordance with the principles prescribed by law. We are committed to ensuring consistent and high-quality protection of our customers’ personal data.

This Statement has been prepared to ensure transparency in relation to our practices and principles, and to maintain accountability to you. Should you have any questions regarding any matter set out herein, please contact us at: dpo@silkhospitality.com

This Statement provides information on how we process your personal data in connection with:

- Your use of our services and participation in the Silk Rewards loyalty program.

This Statement applies to the processing of personal data by automated and semi-automated means, and sets out the Company’s values, principles and approaches in relation to personal data processing. This Statement also provides information regarding your rights and the means available for their protection.

What data do we process?

We process the following categories of personal data:

First name, surname, phone number, email address, date of birth, gender, country of residence/citizenship, membership status, loyalty points history, transaction data, and behavioral and technical data.

We collect your personal data:

We collect your personal data directly from you upon registration through the Silk Rewards application. We also collect personal data generated through your use of the application in connection with transactions, bookings and visits history, as well as information relating to your accumulated loyalty points and spending activity.

How do we use your personal data?

We process your personal data solely for legitimate purposes, including the provision of services to you and the protection of our legitimate interests. Your personal data is processed for the purposes of operating the loyalty program, accumulating and using loyalty points, improving service quality, and developing new products and offerings.

We process certain personal data on the basis of your consent, including for marketing communications.

Data sharing

In order to properly provide our services, we engage various service providers, including companies providing technical services. Such service providers are contractually bound to maintain appropriate data security standards and to process personal data solely on our instructions and only for the purposes of, and to the extent necessary for, the provision of services.

If the user voluntarily links a third party to the Silk Rewards application or enters the relevant data, the Company may collect and process information received from the aforesaid third party solely for the purposes for which such linking is carried out. By performing the above action, the user is deemed to have provided explicit consent to the transfer and processing of personal data.

We may also disclose personal data to appropriate public authorities, in accordance with applicable Georgian law.

For marketing purposes, personal data may be disclosed to third parties solely on the basis of your explicit consent.

Please find the relevant policies published on such third parties' websites.

How do we protect your personal data?

We protect your personal data, and treat its confidentiality and security with due care. We implement all reasonable physical, technical and organizational measures to protect personal data against accidental or unlawful destruction, alteration, disclosure, acquisition, any other form of unlawful use and accidental or unlawful loss.

We protect the confidentiality of personal data. Access to your personal data is restricted to employees and service providers who require such access for the performance of their duties.

Although we continuously strive to protect our systems, websites, operations and information, due to the nature of the Internet as an open global means of communication, as well as other risk factors, we cannot guarantee that any information, while being transmitted to or stored in our systems, will be fully protected against unauthorized access by third parties.

How long do we retain your personal data?

We process and retain your personal data to the extent and for the period necessary to achieve the purposes provided in this Statement, including compliance with legal, regulatory, tax or reporting requirements.

Personal data is retained during the membership period and for up to 2 years following its termination. Upon expiry of that period, the data is anonymized or deleted.

Your rights

As a data subject, you may exercise the following rights at any time and free of charge:

Right to receive information – To obtain information regarding what personal data relating to you is being processed, the purpose and legal grounds for such processing, as well as information concerning the source from which the data was collected and any disclosure of such data. You have the right to access records held by us relating to you and to obtain copies thereof;

Right to rectification, updating, completion, blocking, erasure and destruction of data – This right enables you to request, at any time, the immediate rectification or updating of inaccurate/incorrect personal data relating to you, as well as the completion of incomplete data, taking into account the purposes of the

processing, including by submitting additional information or documentation. You also have the right to blocking, erasure or destruction of your personal data where there is no clear legal basis for its processing, etc.

Right to object to profiling – You have the right to erasure or destruction of data collected for the purposes, or obtained as a result, of profiling, and to object at any time to the processing of your personal data for profiling purposes.

Right to withdraw consent – This right enables you, at any time and without providing any justification, to withdraw your consent previously given for the processing of your personal data.

Where there is no other legal ground for the processing of personal data, we will ensure that the relevant action is taken no later than 10 (ten) working days following receipt of such notice.

Right to lodge a complaint – You have the right to lodge a complaint with a supervisory authority or apply to a court for the protection of your rights.

Your rights may be restricted if the exercise of such rights may jeopardize the detection, investigation or prevention of crime, the important financial or economic interests of the country, and/or the rights and freedoms of the data subject or others. Any restriction of your rights shall be applied only to the extent necessary and proportionate to the purpose of such restriction.

You may also exercise any other rights provided by the Law of Georgia on Personal Data Protection.

Please note that, if you request the erasure or destruction of personal data that is necessary for the provision of services to you, we may no longer be able to provide such services to you.

To exercise your rights, please contact us at: dpo@silkhospitality.com

Your obligations

We expect that you will provide us only with your own personal data. If you also provide us with personal data relating to other individuals, it is deemed that you have obtained such data on the basis of the appropriate permission and in compliance with applicable legal requirements, and that you are duly authorized to provide such data to us.

You shall be liable for any damage caused to us or to third parties as a result of the provision of inaccurate, false or misleading information.

We also expect that the personal data provided to us is accurate and complete, and that you will promptly notify us of any changes or updates to your personal data.

Contact

Should you have any questions, complaints, requests or claims, please contact us at: info@silkhospitality.com or contact our Data Protection Officer (Privacy Logic Group LLC, Identification Number: 405222619) by email at: dpo@silkhospitality.com

You may also lodge a complaint to the personal data protection supervisory authority – State Audit Office.