

Personal Data Collection and Processing Policy

1. This document sets out the terms and conditions under which Fitpass Georgia LLC, ID: 406271895 (hereinafter referred to as the “Company”) will collect and process customer personal data for the purpose of providing services to its customers. If you use the Company services in frameworks of the corporate service agreement between your / your family member's employer organization and Fitpass Georgia LLC, we will process your personal data in accordance with the terms and conditions set forth in this document, unless the corporate service agreement concluded between the employer organization and Fitpas Georgia Ltd provides for different terms from this document, in which case the terms of the corporate service agreement shall prevail.
2. The Company collects and processes the Customer 's (also referred to as the - Customer) personal data only for the purpose of providing services, monitoring the services provided and improving the quality of services, producing statistics and any other purpose that does not go beyond the corporate service agreement executed between Company and relevant employer organization. The Company undertakes not to use the personal data for any other purpose, not to transfer it to any other person unless it is required by law or for the purposes of the corporate service agreement and otherwise does not violate the rules of personal data processing.
3. The Company reserves the right to collect and process the following data:
 - Customer’s Name and surname.
 - Customer's date of birth.
 - Customer personal number.
 - Customer's email address.
 - Customer’s contact phone number.
 - Information about the visit of the customer company to the partner entity.
 - Customer's photo.
4. The Company will disclose the Customer’s data only to its Partner Entities only for the purpose of identification of the Customer. The Company also reserves the right to disclose Customer’s personal data to any other third party if required to comply with the terms of the Corporate Services Agreement.
5. The Company undertakes to ensure the processing of personal data in accordance with the legislation of Georgia.
6. The Company reserves the right, to process the information about the customer provided for in paragraph 3 for the purposes of direct marketing (specifically, Customer’s e-mail address and phone number), in accordance with the rules established by the legislation of Georgia, including after termination of the relevant corporate service agreement for any reason.
7. Except in the case provided for in paragraph 6, after the termination of the Corporate Service Agreement for any reason for any reason, the Company shall ensure the destruction of Customers' personal data within a reasonable time, unless the law provides for the obligation to store such data.

8. The company reserves the right to disclose information about the termination / refusal to provide services to the customer to the relevant employer (organization) with which the corporate service agreement is concluded.
9. Personal data of Customers shall be stored on a database in any country included in the list of countries with appropriate guarantees of personal data protection.¹
10. Deletion / destruction of the Customer's personal data means the deletion / destruction of the Customer's personal data, including on a server located in a foreign country referred to in paragraph 9.

¹ The list of countries with appropriate guarantees of personal data protection is determined by the Decree #03, dated March 2, 2022 of the Inspectorate of the personal data protection.