

Personal Data Collection and Processing Policy

1. Purpose of this policy

1.1 This document defines the rules and conditions under which the Company will collect and process the personal data of users to provide services. The data processing is based on the corporate service agreement concluded between your/your family member's employer organization and Fitpass Georgia LLC (ID: 406271895), hereinafter referred to as the "Company," as well as your consent expressed in the mobile application upon completing registration and agreeing to the full package of terms and conditions offered by the Company. For the purpose of providing services to you, the Company will process your personal data in accordance with the conditions outlined in this document.

2. Basis and Purpose of Personal Data Processing

2.1 The Company collects and processes the personal data of users solely for the purpose of providing services, monitoring the services rendered, improving service quality, compiling statistics, and for any other purposes that do not exceed the objective of providing comprehensive services to the user. The Company undertakes not to use personal data for any other purpose, not to disclose it to any third party unless required by law, and not to violate the rules of personal data processing in any way.

2.2 The Company is authorized to process personal data obtained during the service delivery process for statistical purposes aimed at improving services, developing the business, and analyzing business strategies.

3. Data Collection

3.1 The Company reserves the right to collect and process the following data. Mandatory data is required for the use of services, while voluntary data is provided by the user at their discretion.

Mandatory Data:

- User's first and last name
- User's personal identification number
- User's email address
- User's contact phone number
- Information about the user's visits to partner entities of the Company
- Geolocation of the user's primary device at the moment of QR code scanning
- User's unique code
- User's membership history
- Bank card details when and if using <https://myfitpass.ge>.

Voluntary Data:

- User's photo in the application
- Geolocation of the user's primary device for generating a list of nearby facilities.
- Other data, beyond the mandatory data, that the user may provide during account creation, modification, or use of services.

3.2 With the user's prior consent and ensuring maximum security, the Company uses the geolocation data of the primary device only after the user grants permission from the application. This permission may be for a one-time session ("Allow Once") or for the duration of app usage ("Allow While Using App"), and is utilized for the following specific purposes:

- To identify the user when scanning a QR code via the application at a partner entity, ensuring the condition that one account is used by only one user is upheld
- To generate information about the user's visit to the Company's partner entity
- To generate a list of nearby facilities within the application.

4. Transfer of Data to Third Parties

4.1 The Company will disclose user data to its partner entities solely for the purpose of identifying the user. Additionally, the Company reserves the right to disclose user data to any other third party if it is necessary for fulfilling the Company's obligations and providing comprehensive services to the user.

5. Data Retention Period

5.1 The deletion of personal data specified in this policy will be carried out according to the following rules:

5.1.1 If the user remains inactive for a period of 1 year (defined as the account/profile being in "inactive status"), the user's account will be automatically deleted. During this 1-year period, the user will hold an "inactive status," but, as outlined in the terms and conditions, the user retains the ability to reactivate their account and continue using the Company's services under "active status."

5.1.2 The user has the right to request the cessation of data processing, deletion, or destruction of their data, which simultaneously implies the termination of their access to the Company's services.

5.2 If the user submits a request to delete their personal data in accordance with clause 5.1.2 of this document, such data will be deleted within no later than 10 business days from the date of the request, unless there is a valid reason to deny the request. This action implies the user's withdrawal from the Company's services.

5.2.1 The user may delete their account using the application.

5.2.2 Alternatively, the user may send a request to the Company's service center via the email address provided below.

5.3 The Company reserves the right to disclose information about the termination of service or refusal to provide services to the user's employer (organization) with which a corporate service agreement has been signed.

5.4 The deletion/destruction of the user's personal data entails the removal/destruction of such data, including from databases located in foreign countries as outlined in clause 6.1.

6. International Transfer of Data

6.1 The storage of users' personal data will be carried out on a database located in a country included in the list of countries that provide adequate guarantees for personal data protection.¹

7. User Rights:

7.1 In the context of rights provided by personal data protection legislation, the Company particularly highlights the following rights:

- The right to receive information about the data processing
- The right to access and obtain copies of data
- The right to correct, update, and complete data
- The right to request the cessation, deletion, or destruction of data
- The right to appeal.

7.2 Right to Receive Information about Data Processing

Upon the user's request, the Company will provide information free of charge regarding whether their data is being processed, the basis and purpose for processing, the specific data being processed, as well as the source of the personal data, retention period or criteria for determining the period, data transfer to third parties, and related purposes and grounds. Additionally, any other information required by law will be provided, unless such disclosure is prohibited by law.

7.3 Right to Access and Obtain Copies of Data

The user has the right to access their personal data and obtain copies of such data free of charge in the format in which it is stored by the Company. Furthermore, the user may request copies of their data in a different format, for a reasonable fee set by the Company,

¹ The list of countries with appropriate guarantees of personal data protection is determined by the Decree #007, dated April 14, 2026 of the General Auditor of the State Audit Service.

provided that it is technically feasible.

7.4 Right to Correct, Update, and Complete Data

The user has the right to request the correction, updating, or completion of incorrect, inaccurate, or incomplete personal data about them.

7.5 Right to Cease, Delete, or Destroy Data

The user has the right to request the cessation, deletion, or destruction of their personal data in accordance with the procedures outlined in clause 5 of this document. Submitting such a request implies the termination of the user's access to the Company's services.

7.6 Right to Appeal

In case of violation of rights provided under personal data protection laws, the user has the right to file a complaint with the Personal Data Protection Service, a court, and/or a higher administrative body in accordance with the legal procedures.

7.7 Restriction of Rights

The restriction of the above-mentioned rights may only occur in cases specified by law

8. Security Measures

8.1 The Company takes appropriate technical and organizational measures to ensure the security of users' personal data and to prevent their loss, unauthorized access, alteration, or disclosure

9. Third-Party Services

9.1 Please note that in order to provide our services, we use the following third-party services:

- **Wifisher**
Used to send news and information to users' phone numbers via SMS. You can review their privacy policy at the following address: <https://www.wifisher.com/privacy-policy>
- **Brevo**
Used to send news and information to users' email addresses. You can review their privacy policy at the following address. <https://www.brevo.com/gdpr/>
- **Facebook Pixel**
A website code used for advertising campaigns to measure, optimize, and create audiences. You can review their privacy policy at the following address: <https://www.facebook.com/privacy/policy/>

- **Strive Cloud**

Used for Gamification software, processing the following data: gym name, entry time, entry date, member name, and subscription details. You can review their privacy policy at the following address.

10. **Contact Information Regarding Personal Data Matters**

10.1 Please note that if you need to clarify any matter regarding this policy document or request the deletion/correction of your personal data, please contact us using the following contact information:

LLC Fitpass Georgia; Address: University street #2, Tbilisi; Email address: privacy@fitpass.ge.

In such cases, we will contact you or fulfill your request within 10 calendar days of receiving your communication, in accordance with this policy and its terms and conditions.