

Privacy Notice

When you use our services, you're trusting us with your information.

Development Solutions LTD (“we”, “us”, “our”) has created this privacy statement in order to demonstrate our firm commitment to protecting the privacy and security of your personal data. This privacy notice aims to give you information on how we collect and process your personal data when you interact with us, including any data you may provide to us.

For the purposes of Georgian legislation, Development Solutions LTD is the data controller. This means that we are primarily responsible for making determinations about how and why we process your personal data.

Last Updated: March 2020.

The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you, without limitation, all personal data provided by you such as:

- Identity data – name and surname
- Contact data – email address and cell number
- Technical data – your IP address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform.
- Usage data – information about how You use Our website
- Marketing and communications data – your preference in receiving advertising from Us and Our third parties.

How is Your Personal Data Collected

We use different direct interactions to collect data from and about you. You may give us your Identity Data by filling in forms or by corresponding with us by post, phone, email or otherwise. Personal information may be obtained when you provide it to Us, e.g., when logging on Our Website through Google. We may obtain your Personal Information, when you sign up for Our Wi-Fi, sign-up as a subscriber

We may also receive your Personal Information from other sources, such as joint marketing partners, booking engines, social media platforms and other third parties. When you connect your social media account to your Website account, Personal Information of your social media account will be shared with Us, and it may include not only your, but your friends' Personal Information.

Purpose of Collecting Your Personal Data

We process Personal Information for improving your experience and excelling Our services. Also, customizing Our services to your needs and identifying any shortfalls that We might have in providing Information on Us through Our Website. We also communicate with you (including circulating promotional offers and client surveys), promote Our services, send to you newsletters. Therefore, some promotions require your Personal Information to be shared with the third party, such as marketing and communication companies. These companies are contracted by Us and protect Personal Information transferred by Us.

We also Use collected data for analytic and statistics purposes, i.e. to understand the way the users interact on Our Website. From time to time We perform quality surveys and actions to know the degree of satisfaction of Our customers.

How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Our affiliates, which implies entities affiliated with/related to Us, including any other entity and/or person that is directly or indirectly controlled by Us, is under common control with Us or is controlled together with Us by other affiliated entity. The term “control” means the possession, directly or indirectly, of the power to direct or cause the direction of the management and policies of an entity/person, whether through the ownership or control of interests or voting securities, by contract or otherwise;
- Third party contractors, providing payment processing, data analysis, auditing services or marketing and advertising services to Our company or its affiliates;
- Governmental and public authorities, as required under applicable laws.

How do we store your data?

We securely store your data at [ENTER THE LOCATION AND DESCRIBE SECURITY PRECAUTIONS TAKEN].

We will keep your data for the period of 6 (six) years. Once this time period has expired, we will delete your data by [ENTER HOW YOU DELETE USERS’ DATA].

Subscription

Only on the basis of your subscription, We shall obtain your e-mail address for the purposes of sharing Information about Us. You may unsubscribe anytime.

If you subscribe to Our newsletter, We shall process your Personal Data to manage your subscription, including sending customized information on Our products and services via e-mail. We shall contact you for updates and informative notices related to Our products and services, to establish the degree of customer satisfaction.

Cookies

By visiting Our Website, your computer or device may be provided a cookie, which tracks your preferences. This Information helps Us improve Our services and update/improve Our Website.

We process Personal Information by Using cookies as per Our Cookie Policy.

Security and Data Storage

We treat your Personal Information with utmost diligence and confidentiality and have implemented all the technical and internal security measures for the purposes of protecting this Information from unlawful usage, loss, alteration, processing or any other unauthorized forms of processing. These measures are implemented as per applicable law.

We shall keep your Data for the period that is requested under Georgian legislation.

Your Rights

Under Georgian legislation, you may request to access your Personal Data that We hold. You may also request to modify or the Personal Data about you. You are also allowed to request restriction of processing or object to processing of your Personal Information.

You are liable for any loss or damage inflicted to Us or third party for submitting erroneous, inaccurate or incomplete Information in the newsletter registration forms. Please note, that you should provide only your own data and you are not allowed to provide Information on the third parties. If you share with Us Personal Data that belongs to the third parties, we imply, that you have due authority and legal capacity to collect and transfer such third party's Personal Data to us.

Please note that certain Information should be kept by Us for recordkeeping purposes and for completing transactions that were commenced by you prior to requesting change or deletion.

You may request to erase your Personal Data, but only to the extent that data is no longer compulsory/necessary to be retained for the purposes for which We need to keep processing them or We are no longer statutorily required to keep.

If you give Us your consent to process your data, you are also allowed to withdraw this consent. Such request should be clearly provided to Us through the contact details provided below.

If We demonstrate that We have substantiated legitimate grounds to process your Information, this may overrule your rights regarding deletion or restriction to processing your Data.

Enquiries, Requests or Concerns

All enquiries, requests or concerns regarding this Notice or relating to the processing of your personal data, should be sent to Development Solutions LTD.

Postal Address: 37 Rustaveli Ave. Tbilisi, Georgia.

E-mail Address: contact@silkdevelopment.ge

Cookie Policy

What are Cookies?

Cookies are small sized text files kept in your computers, pads, mobile phones or other devices. Information kept in cookies is not damaging for your devices. Cookies are used for improving Our website and your experience here. Cookies are keeping the information on your navigation on Our website.

What Kind of Cookies We Use

- **Necessary Cookies.** Cookies that are necessary to enable Our website to work. These cookies also enable you to move around on Our website. These cookies do not identify personal information.
- **Targeting or Advertising Cookies.** These cookies are used to deliver content that is more relevant to you and your interests. They are also used to deliver targeted advertising

or limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns. Most types of these cookies track consumers via their Device ID or IP address therefore they may collect personal data.

- **Social media cookies:** used for sharing pages and content in social media. Such cookies may also be used for advertising purposes. These cookies collect information about gender, age, preferences and interest of our visitor.
- **Analytical cookies:** these files preserve information on your usage of Our website. For instance, the pages, that are most visited by the user. These files do not receive any personal information of specific user. All data obtained through these cookies are anonymous and carry merely statistical value. Analytical cookies are used to make Our website more interesting, to let us know which pages are the most popular among the visitors, which advertisement/information is the most efficient, etc.

We do not store your address, your password, your credit or debit card data, etc. in the cookies We use.

Google Analytics and Facebook Pixel

We use Google Analytics and Facebook Pixel services. This service enables us to obtain statistical data about visitors of Our website (content of search, certain page of the web they visit and etc.). We get the information from which city/state the user reached Our website, what is the time spent by the visitor on Our website, which operational system is used by the visitor of the website and etc. We also get the information on our visitors' age, gender, interests, device language, location, device type, behavior (engagement, interaction with the website, frequency and recency of website visits).

This information is processed merely for statistical purposes and does not enable us to identify the user, unless you subscribe to our newsletter or book your stay with us.

Who Uses Cookies

We are the main users of cookies and the information stored on them. From time to time We may transfer them to the third-party contractors. The purpose of such transfer is to obtain access statistics and to improve Your experience on the Website.