

Personal Data Processing Policy

Information About Us

Dabi Group Georgia LLC (the **Company/Hotel**) acts as a data controller (the **Person Responsible for Processing**) when processing your data, within the framework of the Law of Georgia "On Personal Data Protection" (the **Law**).

The legal address of the Company is: Tbilisi, Vake District, I. Chavchavadze Avenue, No. 43, and the actual address of the Company is: Tbilisi, 29 Rustaveli Ave. [The Biltmore Hotel Tbilisi]. Contact information: info.bhtg@biltmorecollection.com, 032 272 72 72.

Purpose of This Policy

The purpose of this Policy is to promote transparency and security in the processing of your Personal Data within the scope of services provided to you by the Company. The Company respects and protects fundamental human rights and freedoms, including the rights to the inviolability of private and family life, personal space, and communications.

The Policy is intended for Hotel guests, as well as for all persons/visitors who use or wish to use the Hotel's services (including the spa, gym, dining facilities, photo sessions, etc.).

General Overview

The Company processes Personal Data in accordance with the Law, for specific, clearly defined purposes and on the grounds provided by the same Law. The Company processes only the data necessary to achieve the Company's legitimate purposes. When processing Personal Data, all data processing principles established by the Law are observed, as well as appropriate organizational and technical security measures.

The Company observes the following principles when processing data:

- Data must be processed lawfully, fairly, transparently for the data subject, and without infringing their dignity. The obligation of transparency in Data Processing does not extend to exceptional cases established by the Law;
- Data must be collected/obtained only for specific, clearly defined, and legitimate purposes. Further processing of data for purposes incompatible with the original purpose of data processing is prohibited;
- Data must be processed only to the extent necessary to achieve the relevant legitimate purpose. Data must be proportionate to the purpose for which it is processed;
- Data must be authentic, accurate, and, where necessary, updated. Taking into account the purposes of data processing, inaccurate data must be corrected, deleted, or destroyed without unjustified delay;
- Data may be stored only for the period necessary to achieve the relevant legitimate purpose of data processing. After achieving the purpose for which the data is processed, it must be deleted, destroyed, or stored in a depersonalized form, unless data processing is determined by the Law and/or a subordinate normative act issued in accordance with the Law, and data storage is a necessary and proportionate measure in a democratic society to protect overriding interests;
- To ensure data security, technical and organizational measures must be taken during data processing that adequately ensure data protection, including protection from unauthorized or unlawful processing, accidental loss, destruction, and/or damage.

Additionally, the Company has a Personal Data Protection Officer who helps us ensure a high standard of data protection. The Personal Data Protection Officer is the Company's contact person for Data Subjects on issues related to Data Processing. Furthermore, we ensure maximum accessibility of this Policy to you. Even though this Policy is publicly available, when using the hotel's services, you may request and receive a copy of it upon request.

Definitions

Personal Data – any information that relates to an identified or identifiable natural person. A natural person is identifiable when it is possible to identify them directly or indirectly, including by name, surname, identification number, geolocation data, electronic communication identification data, physical, physiological, mental, psychological, genetic, economic, cultural, or social characteristics;

Special Category Data – data relating to a natural person's racial or ethnic origin, political opinions, religious, philosophical, or other beliefs, trade union membership, health, sexual life, status as an accused, convicted, acquitted, or victim in criminal proceedings, conviction, criminal record, diversion, recognition as a victim of human trafficking or a crime under the Law of Georgia on "Elimination of Violence against Women and/or Domestic Violence, Protection and Assistance to Victims of Violence," imprisonment and enforcement of punishment against them, as well as biometric and genetic data processed for the purpose of unique identification of a natural person;

Data Processing – any action performed on data, including its collection, obtaining, access, photographing, video monitoring and/or audio monitoring, organization, grouping, interconnection, storage, modification, restoration, retrieval, use, blocking, deletion, or destruction, as well as disclosure of data by its transfer, publication, dissemination, or otherwise making it available;

Data Subject – any natural person whose data is being processed;

Consent of the Data Subject – the will freely and clearly expressed by the data subject, by active action, in writing (including electronically) or orally, after receiving the relevant information, to process data about them for a specific purpose;

Person Responsible for Processing – the Company (Dhabi Group Georgia LLC);

Person Authorized for Processing – a natural person, legal entity, or public institution that processes data for or on behalf of the person responsible for processing. A natural person in an employment relationship with the person responsible for processing is not considered a person authorized for processing;

Data Recipient – a natural person, legal entity, or public institution to which data has been transferred, except for the State Audit Office;

Third Party – a natural person, legal entity, or public institution, other than the data subject, the State Audit Office, the person responsible for processing, the person authorized for processing, the special representative, and the person authorized to process data by direct assignment of the person responsible for processing or the person authorized for processing;

Video Monitoring – processing of visual image data using technical means installed/mounted in public or private spaces, specifically video surveillance and/or video recording (except for covert investigative actions);

Direct Marketing – direct and immediate delivery of information to the data subject by telephone, mail, email, or other electronic means for the purpose of forming, maintaining, realizing, and/or supporting interest in a natural person and/or legal entity, goods, ideas, services, work, and/or undertaking, as well as image and social topics;

Incident – a breach of data security that causes unlawful or accidental damage to data, loss, as well as unauthorized disclosure, destruction, modification, access to data, collection/obtaining, or other unauthorized processing;

Other terms used in this Policy have the meanings defined by the Law.

What Types of Data We Process About You

We process only the data that you provide to us voluntarily after receiving appropriate information that we need to provide services to you/for you to purchase services, and/or for your support, as well as data that becomes known to us in the process of providing services to you. You are responsible for the accuracy of the data you provide and should inform us of any changes as necessary.

For the purpose of providing services to you and during the service provision process, as well as on the basis of your consent for the purpose of informing the public about the Company's activities, the following types of data are/may be processed*:

- Your first name, last name;
- Identity card/passport data (ID number, date of birth, citizenship, etc.) and its copy;
- Contact information (email address, phone number, address);
- Country/region (according to identity card/passport) and company (if the visit is carried out directly with the involvement of the company);
- Credit card data;
- Vehicle data (for the purpose of using the Hotel's parking lot);
- Information about Millennium Rewards club membership;
- Copy of a diplomatic card and data contained therein – if presented by you;
- Signature;
- Your video recording (within the scope of video monitoring conducted in the Hotel building and on the exterior perimeter of the building);
- Your photo and video materials, opinions about the Hotel's activities, as well as information about activities/education/achievements – only on the basis of your consent;

*The above data subjects may include minors. We process the personal data of minors in accordance with the legislation of Georgia, including in the manner established by the Law of Georgia on "Personal Data Protection," taking into account the best interests of the minor.

- Information related to planned visits and received services (including information about reservations, type and date of service received, Hotel room number and check-in/check-out information, expenses incurred, etc.). Also, data voluntarily shared by you with us.

How We Process Your Data

Reservation: We offer the possibility of advance booking of hotel services (room, photo session, dining facility, massage) via website, email, telephone, other booking platforms, and on-site application. When making a reservation, your first name, last name, contact information, and data about the desired service and the period of its receipt are mandatorily processed. Without this data, making a reservation is impossible. Depending on the specifics of the service to be booked, additional data may also be processed, including data voluntarily provided by you. In certain cases (e.g., during high occupancy or when booking a room from the website), it is mandatory to provide credit card details. If you are already a hotel guest, when booking other services, your room number will additionally be processed.

Registration: When checking into a hotel room (Check-in), a registration card is filled out, within which the guest's first name, last name, identity/passport data are mandatorily processed, and a copy of the identity card/passport is made. Additionally, address, telephone, email, company, and information about Millennium Rewards club membership may be processed. The registration card also contains information about the room, number of guests, and duration of stay, and requires the guest's signature.

Registration is also mandatory when purchasing a spa (sauna/massage/jacuzzi), gym, and pool subscription, during which first name, last name, personal number, mobile phone, and information about the desired package and duration are processed. Use of the parking lot requires submission of vehicle data. During registration for photo session services, first name, last name, identity/passport data, and, where possible, email or telephone are processed. In all cases, a copy of the identity document/passport is made, and the registration form requires a signature.

Dining Facilities: As a rule, data is not collected when using dining facilities. An exception is the case where a customer (e.g., a spa subscriber) is entitled to a discount – in such cases, first name, last name, and signature are collected for identification purposes.

Video Monitoring: For the purpose of your security and property protection, protection of minors from harmful influence, as well as tasks attributed to the Company's other legitimate interest sphere, and the Company's fulfillment of legislative obligations, 24-hour video monitoring is conducted on the hotel's internal and external perimeters. You are warned about this in accordance with the legislation, through appropriate warning signs placed in visible locations. Recordings obtained as a result of video monitoring may be processed in cases provided by legislation, in accordance with rules and conditions established by the Company.

Direct Marketing: When contacting us via communication means (telephone, email, social network), we process only information voluntarily provided by you. Direct marketing is carried out only on the basis of your prior consent and aims to inform you about hotel services, news, promotions, and offers.

Service Delivery Stage: During service delivery, information about services received, special requests, discounts, expenses, and products purchased may be processed. For your security, information about room entry and exit is processed. When charges are applied to the room (e.g., massage, spa product, dining), first name, last name, room number, and signature are processed. Within the framework of events, we collect data that you have voluntarily provided to us or that is necessary for participation.

Photo-Video Material and Promotion: Only on the basis of your consent, for the purpose of promoting the hotel's activities and informing the public, your photo-video material, as well as first name, last name, opinions about the hotel's activities, and information about activities/education/achievements may be processed. With your consent, this data may be posted on the Company's social networks and website.

Purposes of Data Processing

For receiving services and/or at the stage of receiving services, your data is processed by the Company for the following purposes:

- Use of the Company's services, provision of services by the Company;
- Fulfillment of obligations undertaken by the Company to the customer;
- Compliance with regulations established by the legislation of Georgia towards the Company;
- The Company's significant legitimate interest;
- Data processing based on the customer's consent.

Legal Bases for Data Processing

The table below presents the process of processing your personal data and the purpose of processing, with reference to the relevant legal bases, which will help the data subject understand each detail of the processing of their personal data:

Process	Personal Data	Purpose of Processing	Legal Basis
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<p>Customer Reservation [via website, email, telephone, other booking websites, and on-site]</p>	<p>Depends on the booking method and the type of service to be booked. As a rule, the following are processed on a mandatory basis: first name, last name, contact information, and information about the desired service and the period of service. Depending on the booking method and the specifics of the service to be booked, other data is/may additionally be processed, including credit card data (e.g., during high hotel occupancy, as well as when booking a hotel room through the website), and in the case of a guest, additionally the room number. Also, other information voluntarily provided by the data subject.</p>	<p>Ensuring accessibility/simplification of services, ensuring the possibility of making a reservation (hotel room, photo session, dining facility (restaurant/bar) and/or massage service)</p>	<p>Data processing is necessary for the performance of obligations under a transaction concluded with the data subject or for concluding a transaction at the request of the data subject;</p> <p>Data processing is necessary for considering the data subject's application (for providing services to them).</p>
<p>Customer Registration [Check-In]</p>	<p>First name, last name, copy of identity card/passport and data contained therein (ID number, country, citizenship, date of birth, etc.), signature; address, telephone, email, as well as company (if applicable), information about Millennium Rewards club membership may also be processed. In the case of a person holding a diplomatic card – additionally a copy of the diplomatic card. The registration card contains information about the services to be received.</p>	<p>Provision of services and effective management of the Hotel, ensuring the guest's accommodation in the Company/Hotel's room</p>	<p>Data processing is necessary for the performance of obligations under a transaction concluded with the data subject or for concluding a transaction at the request of the data subject;</p> <p>Data processing is necessary for considering the data subject's application (for providing services to them);</p> <p>Data processing is required for the person responsible for processing to fulfill obligations imposed on them by the legislation of Georgia.</p>
<p>Management of the Spa [Sauna/Massage Area/Jacuzzi], Gym, and Pool</p>	<p>When an external customer purchases a subscription, the following are processed: first name, last name, electronic copy of identity card/passport and data contained therein, telephone, signature, and, if applicable – vehicle data (for the purpose of using the Hotel's parking lot). In the case of a person holding a diplomatic card – additionally a copy of the diplomatic card. Also, information about the desired package and duration.</p>	<p>Customer registration, ensuring the use of the relevant service</p>	<p>Data processing is necessary for the performance of obligations under a transaction concluded with the data subject or for concluding a transaction at the request of the data subject;</p> <p>Data processing is necessary for considering the data subject's application (for providing services to them);</p> <p>Data processing is required for the person responsible for processing to fulfill obligations imposed on them by the legislation of Georgia.</p>

<p>Management of Dining Facilities [Restaurant/Bar]</p>	<p>First name, last name, and signature; in the case of a person holding a diplomatic card – additionally the diplomatic card number and a copy of the diplomatic card</p>	<p>Use of discounts by persons entitled to discounts, identification of persons entitled to discounts</p>	<p>Data processing is necessary for the performance of obligations under a transaction concluded with the data subject or for concluding a transaction at the request of the data subject;</p> <p>Data processing is necessary for considering the data subject's application (for providing services to them);</p> <p>Data processing is required for the person responsible for processing to fulfill obligations imposed on them by the legislation of Georgia.</p>
<p>Use of Photo Session</p>	<p>First name, last name, identity card/passport data of the person wishing to have a photo session; email and telephone number may also be processed.</p>	<p>Ensuring the use of photo session service</p>	<p>Data processing is necessary for the performance of obligations under a transaction concluded with the data subject or for concluding a transaction at the request of the data subject;</p> <p>Data processing is necessary for considering the data subject's application (for providing services to them);</p> <p>Data processing is required for the person responsible for processing to fulfill obligations imposed on them by the legislation of Georgia.</p>
<p>Service Delivery Process and Communication with the Customer</p>	<p>In the communication part, data is not collected from the data subject. At the stage of receiving services, additional information may be processed regarding services received, declared needs/special requirements, benefits, service period, purchased products, expenses incurred, etc. For the purpose of your own safety and property protection, information about entry and exit from the Hotel room is also processed. Furthermore, Hotel guest data is additionally processed when the guest does not make payment on-site and the charge is applied to the hotel room (e.g., when using massage services, purchasing products at the spa, using dining facilities, etc.). In such cases, the guest's first name, last name, room number, and signature are additionally processed.</p>	<p>Proper provision of services, customer safety, as well as identification of a guest who does not make payment at the time of receiving the service but subsequently at Check-Out</p>	<p>Data processing is necessary for the performance of obligations under a transaction concluded with the data subject or for concluding a transaction at the request of the data subject;</p> <p>Data processing is necessary for considering the data subject's application (for providing services to them);</p> <p>Data processing is required for the person responsible for processing to fulfill obligations imposed on them by the legislation of Georgia.</p>
<p>Video Monitoring</p>	<p>Video recording of a person within the video monitoring area</p>	<p>Protection of the safety and property of customers and visitors, protection of minors from harmful influence, as well as fulfillment of tasks attributed to other legitimate interests of the Company. Fulfillment of legislative obligations.</p>	<p>Article 10 of the Law of Georgia on "Personal Data Protection";</p> <p>Significant legitimate interest of the person responsible for processing.</p>

Social Media/Website	In the part of promoting the Hotel's activities and informing the public, photo and video materials may be processed, as well as the first name, last name of the person depicted in the photo/video materials, their opinions about the Hotel's activities, and information about the said person's activities/education/achievements.	Promotion of the Hotel's activities and informing the public, including about services and offers.	The data subject has declared consent to the processing of data about them for one or more specific purposes; Significant legitimate interest of the person responsible for processing.
Direct Marketing	First name, last name, email address	Providing information about the Hotel's services, products, news, promotions, discounts, advertising, and other types of offers	Article 12 of the Law of Georgia on "Personal Data Protection"; The data subject has declared consent to the processing of data about them for one or more specific purposes.

Transfer of Data to Third Parties

We may transfer your data to third parties:

- To service providers who assist us in carrying out services, including providing support in the management of electronic systems/platforms, assisting us with financial settlement matters, etc.;
- In cases directly provided by legislation and for the purpose of fulfilling obligations imposed on the Company by legislation, to authorized entities;
- Based on the Company's significant legitimate interests, to authorized entities.

In the event that the third-party data recipient, in accordance with the Law, constitutes a Person Authorized for Processing, a written agreement is executed between us and the Person Authorized for Processing, which defines the following issues:

- The grounds and purposes of data processing;
- The categories of data to be processed;
- The term of data processing;
- The rights and obligations of the person responsible for processing and the person authorized for processing;
- The obligations of the Person Authorized for Processing: to process data only in accordance with the written instructions or directions of the Person Responsible for Processing; to ensure that the natural person directly participating in data processing has a confidentiality obligation; to ensure data security in accordance with the Law, etc.

Data Storage

Data obtained/collected for the purpose of and during the process of providing services is stored by the Company for the period established by the legislation of Georgia, while data for which the legislation of Georgia does not define a retention period is limited to the period of achieving the legitimate purpose defined for the processing of such data. Specifically:

- Video recordings obtained as a result of video monitoring are stored for a period of 2 months, except in cases where, on the basis of the rules and conditions established by the Company, a specific segment of the video recording is archived for a certain period of time;
- Data related to hotel room reservations is stored for a period of no more than 3 years, while data related to photo session, dining facility (restaurant/bar), and massage service reservations is stored for a period of no more than 6 months;
- The guest registration card, a copy of the guest's identity card/passport, and, if applicable, a copy of the diplomatic card are sent to the finance department after the guest's Check-Out, where these documents are stored for a period of 3 years;
- Within the scope of spa registration, documents are stored for the duration of the subscription and for 6 months from the date of expiration of the subscription; copies of diplomatic cards and signed checks are sent to the finance department and stored for 3 years;
- When using dining facilities, copies of diplomatic cards and signed checks are sent to the finance department and stored for 3 years;
- Customer data in electronic systems is stored based on the requirements provided by legislation and for the duration of the Company's legitimate interest;
- Data posted on the Company's social media account and/or website with the customer's consent is stored for a period based on the needs of the Company's marketing strategy;

- Within the scope of direct marketing, data is stored for the duration of direct marketing activities. The time and fact of granting consent and withdrawing consent are recorded and stored for the duration of direct marketing activities, and in the case of termination of direct marketing activities – for 1 year from the date of termination.

Data Security

We ensure all organizational and technical measures for the protection of your personal data, as required by the Law and other regulatory legal acts. Access to personal data is strictly protected, and only authorized employees designated by first-tier management have personalized access to only the volume of data necessary for the performance of their official duties (access levels are defined). However, we cannot be held responsible for the full or partial loss of your personal data caused by cybercriminals and other criminal acts. In such cases, the Company acts in accordance with applicable legislation, and for the purpose of ensuring prevention, the Company has developed an incident management policy and procedure that facilitates rapid and immediate response to any Incident.

Your Rights

In accordance with the Law of Georgia on “Personal Data Protection,” you have the right to:

- ✓ Request confirmation of whether your personal data is being processed and receive information about the processing of personal data, indicating the basis, purpose, and retention periods of processing;
- ✓ Access personal data collected about you and/or request copies thereof;
- ✓ Request the correction, updating, and/or completion of incorrect, inaccurate, and/or incomplete data;
- ✓ In the event of appropriate grounds, request the blocking of personal data held about you by us;
- ✓ In the event of appropriate grounds, request the cessation of data processing, deletion, or destruction;
- ✓ Request the withdrawal of consent given by you;
- ✓ Request the realization of other rights guaranteed by Chapter III of the Law of Georgia on “Personal Data Protection.”

You are guaranteed unrestricted access to the Company's Personal Data Protection Officer. Information about the Personal Data Protection Officer is posted on the Company's website, and is also indicated at the end of this Policy.

Furthermore, we ensure maximum accessibility of this Policy to you. Despite the fact that this Policy is publicly available, when using the hotel's services, you may request a copy of it upon request.

Restriction of Rights

In accordance with the Law, the rights of the data subject may be restricted if it is directly provided by the legislation of Georgia, does not violate fundamental human rights and freedoms, is a necessary and proportionate measure in a democratic society, and the exercise of these rights may pose a threat to:

- State security, information security, and cybersecurity and/or defense interests;
- Public security interests;
- Prevention of crime, criminal investigation, criminal prosecution, administration of justice, execution of imprisonment and deprivation of liberty, execution of non-custodial sentences and probation, operational-investigative activities;
- Interests related to significant financial or economic (including monetary, budgetary, and tax), public health, and social protection matters for the country;
- Detection of violations of professional, including regulated profession, ethics norms by the data subject and imposition of liability on them;
- The rights and freedoms of the data subject and/or other persons, including freedom of expression;
- The protection of state, commercial, professional, and other types of secrets provided by law;
- The substantiation of a legal claim or defense;
- The exercise of functions and powers of regulatory and/or supervisory bodies in the above-mentioned areas (except for the protection of state, commercial, professional, and other types of secrets provided by law).

The measure provided for restricting your rights as a data subject may be applied only to the extent necessary to achieve the purpose of the restriction. When grounds for restricting rights exist, the Company's decision is communicated to the data subject in a manner that does not harm the purpose of the restriction of rights.

Policy Changes and Updates

In the event of changes to individual matters related to data processing, the Policy is subject to updating as needed. Additionally, the Company is authorized to modify this Policy in accordance with legislative changes and/or changes in our personal data processing practices.

Contact Us

If you have questions regarding this Policy and our practices related to the protection of personal data, please contact us by email at: info.bhtg@biltmorecollection.com, by telephone at: 032 272 72 72, and/or contact us directly at the Company's address: Tbilisi, 29 Rustaveli Ave. [The Biltmore Hotel Tbilisi].

Our Personal Data Protection Officer is: Loialte LLC, contact information: legal@loialte.com.ge