

# Privacy Policy

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## 1. General provisions

### 1.1. Data Protection Guidelines

The company Max Express (hereinafter – the “Company”) hereby undertakes to protect personal data of the Users.

These Data Protection Guidelines along with the Terms of the Services Provision provide a basis for dealing with personal data received by the Company from the Users through maxexpress.ge website hereinafter – the “Site”). The Users’ personal data use, disclosure and processing results from use of the Site services.

### 1.2. Making amendments in the Data Protection Guidelines

The Company shall reserve the right to make amendments in the Data Protection Guidelines at any time and without prior notice if so required by the laws of Georgia and norms of international law.

In the event of making significant amendments in the method of the Users’ personal data use, the Company undertakes to notify the User of such amendments in advance by e-mail indicated during sign-up, before these amendments take effect. If the User does not agree with the amendments that were made, he has a right to close his account by sending a request to the Company support service at the address indicated on the Site.

## 2. Confidential information

Confidential information includes the Users’ data as follows:

- Full name, e-mail address, phone number, date of birth and bank or payment card details;
- Data about the transactions carried out via the Site and using the User’s Dashboard;
- Data about participation in bonus programs;
- Communications with the Company;
- The User IP addresses, operating system and browser;
- The clickstream and action on the Site data.

## 3. Confidential information use

The Company shall use the confidential information obtained from the Users for the purposes as follows:

- Performance of the Company Service services requested by the User;
- Maintenance of the User’s account and Dashboard options;
- Data about the Service innovations, services provided and the Company activity;
- Technical support activities in the event of receiving reports from the Users;
- Statutory regulations fulfillment.

#### **4. Safety of confidential information**

The Company is making due efforts to protect personal data from unauthorized access or unauthorized disclosure or destruction, including:

- checks the processes of information collection, storage and processing, as well as security measures for protection against unauthorized access to personal data;
- The company is engaged in the security of your personal data and constantly protects them from decryption in order to protect personal data from unauthorized access or unauthorized modification, disclosure or destruction. At the same time, only the user can check some encrypted data.

Storage of personal data:

personal data is deleted or destroyed by the Company in the manner established in accordance with the requirements of the current legislation.

Confidential information disclosure

Confidential information disclosure and conveyance of the User's personal data is possible under the Company partner agreements with contractors and only for the purposes of appropriate performance of the Company services, payments processing and technical error control.

Confidential information may be disclosed under the requisition of regulatory and/or supervisory authorities, by judicial procedure, for the purpose of other statutory regulations fulfillment.

#### **5. Fraud**

One of the types of fraud is phishing – attempts to obtain an unauthorized access and to use the web resource User's personal data by stealing it. For this purpose fraudsters use fake e-mail messages in order to direct the User to a fake web page and induce him to enter his personal data.

The Company doesn't send out any e-mail messages for the purposes of obtaining the Users' personal data. The Company employees don't ask the Users to provide their passwords for logging in the Dashboard.

If the User receives such e-mail message or request to provide the data by phone, it's necessary to contact the technical support service via the address indicated on the Company Site.

#### **6. Links to other web resources**

The Company Site contains links to the web resources of the partner companies. When the Users visit such resources by following the links available on the Company Site, they shall take into account the fact that each company has its individual peculiarities of confidential information content and storage, and they may have their special aspects.

The Company shall not be liable for the User's personal data security when the User follows the links to other web resources.

In addition, the Company Site contains clickable buttons of social networks. Social networks

services may collect and process the User's confidential information according to individual rules and their own Data Protection Guidelines.

## **7. Use of cookies**

When visiting or working with the Company Site the User acknowledges

the Company's right to use cookies for the purpose of appropriate services provision and web resource performance.