

## Privacy Policy

### 1. Privacy Policy and Protection of Your Personal Data

The Privacy Policy and protection of your personal data of LLC Georgia Sea Ways, Georgia, Poti, Gegidze Str, №20, F. 5 (hereinafter referred to as the Agency) is an integral part of the Public Offer Agreement (User Agreement), available at the following link, and establishes the methods by which the Agency processes the personal data of clients and other data subjects in its possession.

For the purposes of this Privacy Policy, processing means any automated or other activity carried out with personal data or databases of personal data (collection, storage, organization, classification, retention, arrangement or modification, extraction, consultation, use, publication by transfer or dissemination, granting access in any other way, combination, restriction, deletion, or destruction); any activity carried out with personal data.

For the purposes of this Privacy Policy, personal data means any information related to a data subject that can directly or indirectly be used to identify a person, for example, name, e-mail address, or contact address.

Customer satisfaction is the Agency's highest priority. To ensure better service quality and the fulfillment of all contractual and legal obligations, the Agency processes clients' personal data in accordance with the principles set out in this Privacy Policy and as applied to their contract. Proper data processing ensures quick and accurate service, thus serving the best interests of the Agency's clients.

This Privacy Policy does not apply to and does not protect the processing of anonymous data or data of legal entities.

### 2. Respect for Your Privacy

The Agency respects your right to privacy and the confidentiality of your personal data obtained as a result of using this Website and takes all necessary measures to preserve its confidentiality and security, including the use of generally accepted technological and operational protection standards against possible loss, misuse, alteration, or destruction.

Considering the features and threats of the information space, the Agency cannot guarantee absolute protection of your data but will make every effort to ensure your personal data is maximally safeguarded.

### 3. Contact Information

For all questions related to the processing, storage, and use of your personal data, please contact the Agency at:

Georgia, Poti, Gegidze Str, №20, F. 5

Email: [gseaways1@gmail.com](mailto:gseaways1@gmail.com)

### 4. Processing of Your Personal Data

The processing of your personal data is carried out in accordance with the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), other legislative acts of Bulgaria, and the terms set out below. Please read the conditions of this Privacy Policy (hereinafter the Terms).

Providing your personal data to the Agency is voluntary. If you do not agree with the Terms set out herein, you must not use the Website and must leave it immediately.

## 5. Acceptance of the Terms

If you continue to use this Website and register on it or create a Booking, you:

unconditionally, fully, and without modifications accept these Terms;

are informed that your personal data may be collected and processed on this Website by means of the Agency's technical capabilities;

give your consent to the collection and processing of all personal data provided by you for the purposes specified in these Terms and the Public Offer Agreement;

consent to the processing and cross-border transfer of your personal data, if required by the conditions of using the Website and provision of Services;

consent to the transfer of personal data to third parties (including Service Providers/Carriers) for the purpose of fulfilling the Agreement and providing Services;

give your consent to the collection and storage of your personal data without limitation of duration, until you submit a request or wish to stop the processing of your personal data and/or their deletion, or until termination of the relationship at the Agency's initiative or on other grounds in accordance with the law.

In the "My Orders" section, you may modify your personal data at any time convenient to you.

You may withdraw your consent to the processing of personal data by sending a message to [gseaways1@gmail.com](mailto:gseaways1@gmail.com).

In such a case, the rules for terminating relations with the Agency according to the Public Offer Agreement will apply, and all your personal data, including information in the "My Orders" section, will be deleted without the possibility of recovery.

Notwithstanding the withdrawal of consent, certain data may be retained by the Agency if required by law. In such a case, your personal data will be deleted immediately once the legal retention requirements cease.

The Agency has the right to process your personal data for marketing purposes related to the provision of services through the Website, namely, to send you newsletters containing information about current and planned services and promotional offers.

## 6. Definition of “Agency”

For the purposes of these Terms, the term Agency also includes its affiliated persons or group companies, as well as representatives, directors, agents, employees, or partners who may gain access to your personal data as a result of your use of this Website.

## 7. Data We Collect and Process About You

We receive and store any information you enter on the Website, send to gseaways1@gmail.com, or provide to the Agency in any other way, as far as it is necessary for the provision of services or the fulfillment of contractual obligations to you. Personal data may also be collected and processed automatically when using the Website (for example, through cookies).

This may include:

identification data (surname and first name, date of birth, gender, nationality, mobile phone number, postal address, and email address);

identity document details (e.g., passport number and series, validity period);

automatically collected data and system files (IP address, browser type, referring/exit pages and URLs, number of clicks and interactions with the Website, domain name, target pages/content, viewed pages/content, device ID, and location);

profile information (settings, search history, booking history, travel plans, and other information);

any other information you voluntarily provide on the Website.

The above data may be collected through cookies (see section 10 of this Privacy Policy).

The Agency may also request additional information, which may include “sensitive” personal data (e.g., data concerning your or the recipient’s health status or religious beliefs) to provide the highest level of services. This may concern seat preferences, need for assistance, or use of special equipment when using services.

After creating an account in the “My Orders” section, you may add any information you wish to share with the Agency that is necessary to create a Booking.

You understand that any personal and “sensitive” data you provide on the Website is given by your conscious choice and solely for the provision of the services you selected. You also understand that without certain data, it may not be possible to provide services.

## 8. Data We Collect and Process About Third Parties (Buyers/Passengers/Clients)

If you create a Booking and pay for Services on behalf of or in the interest of third parties, the information you provide about them is also collected and processed by the Agency under the same conditions as your personal data.

By providing such information, you confirm that the third party is aware of these Terms, understands the consequences, and gives full and unconditional consent to the collection and processing of their personal data under these Terms. You also agree that access to such information is possible only from your “My Orders” section.

#### 9. Collection of Data of Minors

If you are a minor, do not use this Website and leave it immediately.

This Website is not used or intended for collecting information about minors, nor for disseminating information about Services to children without the consent of their parents or legal representatives.

The Agency processes personal data of minors only if such data is provided by their parents or legal representatives and solely for the purpose of creating a Booking.

If the Agency becomes aware that a minor has used the Website and provided personal data, or if parents/legal representatives request deletion of such data, the information will be deleted within a reasonable time, and the Agency will make every effort not to store or process personal data of minors.

#### 10. Automated Data Collection and Cookies

The Agency may, from time to time, collect and receive additional data and information about you. For example, when using the Website, automated collection of information about the equipment you use to access the Website takes place, including software, operating system, IP address, referral sources, pages you viewed on the Website, your preferences regarding certain types of Services, the links you used to access the Website, and more.

Such automated collection of data is carried out to improve your experience with the Website’s Services, provide you with suitable offers, and prevent possible fraud.

Using Google services, we may collect information to analyze your behavior on the Website and your preferences in choosing Services. The collection and processing of your data through such services is carried out in compliance with these Terms and Google’s privacy policy.

The automated collection of some data and the use of technologies such as cookies and web beacons help improve the Website’s functionality, develop user-friendly Services, evaluate advertising and marketing campaigns, and provide information most relevant to you.

Cookies are small text files that may be stored on your computer (or other device) during your first visit to the Website and allow your computer to be recognized during future visits (for example, remembering your login to the “My Orders” section). Cookies cannot in any way affect your computer’s operation or data or introduce viruses.

The Website uses both short-term and persistent cookies, which you can delete from your computer at any time. Note that some saved data in cookies (such as passport details) are encrypted for security purposes. If you are not registered on the Website, cookies do not contain confidential information. If you block cookies, some Website functions may not be available.

Web beacons are small graphic data files usually used together with cookies. They may be placed on the Website or in messages you receive from the Website. Their use is similar to cookies. If you block cookies, web beacons will

also not function.

For questions regarding the use of cookies and web beacons, please contact our Customer Care Service.

#### 11. How We Use Your Data and Third-Party Data

We use your personal data to:

ensure the provision of Services and fulfillment of contractual obligations with Service Providers/Carriers;

communicate with you regarding ordered Services and send confirmations of your Bookings;

manage your Booking;

provide support in using the Website and its Services;

provide information about existing or future services and offers;

improve the Website and customer service;

respond to your inquiries and comments;

credit bonuses if you participate in our loyalty programs;

invite you to surveys and request feedback;

study services that may interest you;

resolve claims;

notify you of possible prohibited or illegal activities;

resolve issues arising under the Public Offer Agreement or its performance;

any other purposes of which you will be notified.

Payment card data is used to confirm payment of Bookings you created on the Website.

To ensure the highest level of service, we may send you emails regarding the status of your Bookings and/or information with offers that may be of interest to you. If you do not wish to receive such messages, you may unsubscribe.

## 12. Transfer of Your Data

By using this Website and creating a Booking, you agree that your data may be transferred to third parties solely for the proper provision of the Services you selected, which could not be provided otherwise.

When creating a Booking on the Website, you consent to the transfer of personal data to third parties. The Agency may transfer your data to:

carriers, agents, and operators.

We do not transfer your email address to operators except when required for the provision of Services you ordered from the Agency. Third parties may use such data only for these purposes.

We do not impose any other restrictions on operators regarding the use or disclosure of your personal data. Therefore, we recommend that you familiarize yourself with the privacy policy of each operator providing Services ordered on the Website.

Please note that such operators may contact you for additional information, assist with your Booking, or respond to your comments. In particular, you consent to the transfer of your email address and mobile phone number to independent operators acting on our behalf, as well as to operators processing payment card data, business analysts, customer service managers, marketers, survey providers, and fraud-prevention experts.

We may also allow independent operators to use data on our behalf if necessary for proper Website functioning or sending online messages that may interest you. Independent operators receive only the information necessary for their tasks and are prohibited from sharing or using it for other purposes.

Similarly to us, they are obliged to follow the same data protection rules.

We may also transfer your personal data to:

business partners with whom we jointly offer products and services, or whose products/services are offered on our Website. Please note that we do not control the privacy policy of such business partners.

websites that referred you to us (via links). In such cases, we may provide certain information about you to those websites. We do not restrict their use of your confidential information and recommend reviewing their privacy policies.

affiliated persons/companies of the Agency, representatives, officials, agents, employees, or partners, to fulfill the Agreement.

We may disclose your information:

in response to a subpoena, court order, or legal process;

to protect against unlawful claims;

to comply with other legal requirements (with the right to appeal in court);

if deemed necessary to respond to illegal actions, conduct analysis of wrongful acts, or take measures;

to protect or safeguard our rights, property, or safety, as well as those of the Website or consumers;

in relation to contracts (including liquidation, mergers, acquisitions, capital consolidations, or sale, and in rare cases, bankruptcy).

In all other cases not mentioned here, you will be notified about the disclosure of your personal data to third parties, and you may allow or prohibit such transfer.

### 13. Cross-Border Data Transfer

You agree that, in order to provide Services, the Agency may store and process your personal data (all or part of the data specified in section 7 of these Terms), including conducting security checks of transactions, on servers and resources located outside of Ukraine.

You give your unconditional consent to the transfer of any or all of your personal data outside Ukraine solely for the purpose of ensuring the proper level of Services ordered.

The storage and processing of your personal data may take place on servers and resources owned by the Agency or independent contractors and may be located in any country in the world (including, but not limited to, EU/EEA countries, the USA, and Canada).

If you use this Website while being in the European Union, you hereby consent to the transfer of your personal data outside the EU/EEA.

You are informed and agree that your personal data may also be transferred to the USA. Any cross-border transfer of data is carried out solely for the fulfillment of the Public Offer Agreement, these Terms, and the provision of Services you ordered.

All cross-border data transfers are limited to those categories of data and recipients necessary to comply with the Rules, these Terms, and the provision of Services.

### 14. Your Rights Under the General Data Protection Regulation (EU) 2016/679 (GDPR)

Under GDPR, you have the following rights:

Right to Information – You have the right to receive complete and clear information regarding the processing of your personal data, including its purposes, legal basis, and scope. The purpose of this Policy is to provide you with exhaustive information regarding personal data processing in connection with the provision of Services.

Right of Access – You have the right to obtain confirmation of whether your personal data is being processed, as well as the right to access your personal data, information about its processing, and your rights concerning it.

Right to Rectification – You have the right to request correction of inaccurate or incomplete personal data.

Right to Erasure (“Right to be Forgotten”) – You have the right to request deletion or destruction of your personal data if there are no legal grounds and/or obligations for its further storage and processing.

Right to Object – You have the right to object to the processing of your personal data and/or request its restriction under certain conditions. If your request is justified, we will comply. If we believe there are legitimate grounds for continuing processing or that it is necessary to establish, exercise, or defend legal claims, we will inform you.

Right to Restriction of Processing – You have the right to request restriction of processing if grounds under GDPR apply.

Right to Data Portability – You have the right to receive your personal data in a structured, commonly used, machine-readable format, and the right to transfer that data to another controller, or request direct transfer to another controller, where technically feasible.

Right Not to Be Subject to Automated Decision-Making – You have the right not to be subject to decisions based solely on automated processing (including profiling) that produce legal effects or significantly affect you, unless permitted by data protection laws and accompanied by safeguards.

Right to Withdraw Consent – If you have given consent for your personal data to be processed for a specific purpose, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing prior to withdrawal.

Please note: the exercise of these rights may be limited if fulfilling your request would result in the disclosure of another person’s personal data, or if we are legally required to retain certain information, or if we have legitimate grounds for its retention.

## 15. Data Retention Periods

We retain your personal data only for as long as necessary to achieve the purposes for which it was collected, including for fulfilling the contract and providing the Services you ordered, as well as for compliance with legal, accounting, or reporting requirements.

After the retention period expires, we delete or anonymize personal data, unless otherwise required by applicable law.

If legislation sets mandatory retention periods (e.g., for tax or accounting documents), we will retain data for that duration. If no such periods are defined, data will be stored only for the period necessary to protect our legal rights and interests.

You have the right to request deletion or restriction of your personal data. However, this right may be limited if we are legally obligated to store the data or need it to protect our legal position in potential disputes.

#### 16. Methods of Protecting Personal Data

We take all necessary technical and organizational measures to protect personal data from unauthorized or unlawful access, alteration, disclosure, destruction, loss, or any other unlawful form of processing. Such measures include:

storing personal data on secure servers with restricted physical and logical access;

implementing access control policies for employees and contractors authorized to process personal data;

regularly updating software and security systems;

conducting staff training on proper handling of personal data;

using antivirus protection and intrusion detection systems.

We also require all persons who gain access to personal data to comply with confidentiality and information protection requirements under contracts and legal

#### 17. Amendments

The Agency may, at its discretion, amend these Terms from time to time. The Agency will publish such amendments on this Website. The Agency has no obligation to notify you of changes other than publishing them here.

Amendments take effect from the date of publication. You agree to independently and regularly check for updates to these Terms.

You acknowledge and agree that your explicit acceptance of these Terms and/or your use of this Website after the publication date of amendments constitutes your full and unconditional consent to the amended Terms.

If you do not accept the amended Terms, you must stop using the Website.

#### 18. Agency Details

LLC Georgia Sea Ways

Registered address: Georgia, Poti, Gegidze Str, №20, F. 5

Phone: +995 (32) 2 223987 (24/7, according to operator tariffs)

Email: [gseaways1@gmail.com](mailto:gseaways1@gmail.com)