

## 1. general provisions

### 1.1. Data Protection Guidelines

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

These Data Protection Guidelines along with the Terms of the Services Provision (“*Agreement on Payment Services*”) provide a basis for dealing with personal data received by the Company from the Users through <http://maxexpress.net> 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.

#### 5. **Treatment personal data**

5.1. Personal data must be collected and processed lawfully and fairly.

5.2. The restriction for a specific purpose. The processing of personal data is possible only with the purpose for which the data was collected. The subsequent change of purpose of data processing is permissible only in exceptional cases and requires the appropriate Foundation.

5.3. The data subject must be informed about how the processing of existing data. As a rule, personal data should be collected directly from the person whom the data concerns. When information is collected, the data subject must know or must be informed:

(a) a person authorized to process data;

(b) purpose of data processing;

(C) third parties to whom the possible transfer of personal data.

#### 5.4 **Data Processing Framework**

5.4.1 During the period of use of the services of Max Express LLC, as well as after the expiration of the contractual relationship, Max Express LLC is authorized to process the available information about the data subject, including personal data processing, for the purposes of this document. data.

5.4.2. The data processing by Max Express LLC, without any restrictions, contains any action taken, in relation to the data, using automatic, semi-automatic or non-automatic means, in particular, obtaining this data from the data subject or listed in this document, collecting, recording, photo printing, audio recording, video recording, organizing, storing, replacing, restoring, requesting, applying or publicizing (including requesting information and / or publicizing to third parties (s)) yaschem document that subsequently will carry out the processing of data for the purposes of certain present document, data transfer, distribution or access opening in another way, the grouping or combination lock is erasure or destruction of the data.

5.4.3. Max Express LLC or third parties listed in this document process information available on the data subject or on the third person (s) named by him (including, without limitation, upon the request of Max Expresspres ”, authorized third parties and / or, when the company MaxExpress LLC itself is an authorized person and, on behalf of third parties as data processors, acts in their favor) and / or transfer of this information to third parties listed in this document for specific s goals, which includes, but is not limited to the following personal information:

- (a) the name and surname of the data subject;
- (b) the personal number and / or unique characteristics of his electronic identity card;
- (c) the registered and / or actual address of the place of residence;
- (d) telephone / mobile number;
- (e) email address;
- (f) transaction history - transfers.
- (g) any data on accounts (those) in the company Max Express LLC and other commercial banks operating in Georgia, including, without limitation, balances available in these accounts by a specific time and date and, transactions carried out to these accounts for a specific period;
- (h) data of the data subject / subscriber’s account recorded with various payment providers (including, without limitation, account / subscriber number, address, balance remaining on the subscriber account for a specific time and date and / or debt, transactions performed subscriber account and / or recharge, and / or debt repayment, etc.);
- (i) any data disclosed on various electronic channels and / or in the Internet space (including non-only, ready-made records, so-called cookies and others) and activity on the indicated channels of the data subject and / or third parties specified by him (him) persons (a) (including, without limitation, the history of logging and actions taken or transactions on such channels);

## **6. DISCLOSURE OF CONFIDENTIAL INFORMATION**

Disclosure of Confidential Information and transfer of personal data of Users is possible in the framework of partnership agreements of the Company with counterparties and only in order to ensure the proper performance of the Company's services, payment processing, elimination of technical errors.

Disclosure of confidential information is possible at the request of regulatory and / or regulatory authorities, in a judicial proceeding, to the implementation of other legal norms.

## **7. 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.

## **8. 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.

## **9. 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.

## **10. Contact Information**

**Max Express LLC**

**Identification Code: 405256574**

**Registration Number: 0078-2904**

Legal address: 45, Vazha Pshavela str., Tbilisi

Actual Address: 45, Vazha Pshavela str., Tbilisi

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