## **Privacy Policy**

At Evahelp.ai, we are committed to protecting your privacy and ensuring the security of your personal data.

This Privacy Policy is designed to help you understand how we collect and process your personal data when you use our Services.

We believe that everyone has the right to control their personal data, and as such, we have also outlined the various rights you have with regards to your personal data, including your right to object to certain uses or the right to access, update or delete your data.

#### 1. Definitions

The capitalized words in this document will have the meaning given below:

- "Data Controller": means the person/entity who makes decisions on Your Personal Data. For instance, the Data Controller decides which Personal Data to collect, where to store such data, for how long, etc.
- "Data Processor": means the person/entity who uses Your Personal Data on behalf of the Data Controller and under the Data Controller's instructions. For instance, our hosting services provider acts as Data Processor when it stores Your Personal Data on Our behalf and under Our instructions.
- "Incognito Mode": means the feature that allows You to not display your Requests and Outputs History when using Our Chat Services.
- "Evahelp.ai" or "We": means Evahelp.ai, Georgian individual entrepreneur Vitalii Strikanov, legal address: Georgia, Tbilisi, Chugureti district, Iv. Javakhishvili Street, N91, Floor 1, Apartment 2 b, registered by LEPL National Agency of Public Registry of Georgia 09/06/2022.
- "Evahelp.ai Training Data": means Evahelp.ai's data set used to train Evahelp.ai's Models.
- "Model": means any of Our artificial intelligence settings models that we make available to You as part of Our Services including our prompts.
- "Personal Data": means any data that directly or indirectly relates to You.
- "Platform": means the platform located at <a href="https://evahelp.ai/">https://evahelp.ai/</a> We operate.
- "Privacy Policy": means this document describing the Processing activities carried-out by Evahelp.ai as Data Controller. This Privacy Policy covers the Processing activities relating to Your use of Our Services. Privacy Policy is an integral part of Terms of Use of the Website and the Service located at <a href="https://account.evahelp.ai/en/docs/terms">https://account.evahelp.ai/en/docs/terms</a> of use.pdf.
- "Processing": means any operation relating to Your Personal Data (for instance: collection, use, access, transfer, deletion, etc.).
- "Services": means all the Evahelp.ai services located on Website, including the software available to Users via the Internet, which provides the User with the opportunity to receive information upon request.
- "User", "Customer" or "You": means any person who subscribes to, accesses or uses Our Services.
- "User Data": means
  - > the "Feedback": means Your feedback pertaining to the accuracy, relevance, and effectiveness of the Outputs, including but not limited to any identified discrepancies or errors.
  - > the "Requests": means any and all content/information given by You to the Model in order to generate an Output as a result of our Services.
  - > the "Outputs": means any and all content generated by Our Services in response to Your Requests.
- 2. Who is the Data Controller?
- 2.1. Evahelp.ai as Data Controller

Evahelp.ai is a Georgian Individual entrepreneur Vitalii Strikanov, identification Number: 302222734.

You can contact us by email at hello@evahelp.ai

2.2. Evahelp.ai as Data Processor

In case if you are acting on behalf of a business, Evahelp.ai may also process Personal Data on Your behalf, as Data Processor.

In such a case, the Processing activities We carry-out are described in the Data Processing Agreement specified below entered into between You and Us.

This Privacy Policy only covers the Processing activities We carry out as Data Controller.

- 3. What kind of Personal Data do We collect?
- 3.1. Personal Data You provide to Us

- Identity, account and contact data. We collect Personal Data about Your identity when You sign-up to Our Services (first name, last name, email address, identifiers, etc.), when You subscribe to receive information from Us (newsletters, etc.) and/or when You contact Us.
- Payment and billing information. We may collect Your payment details (payment method, applicable fees, etc.) and your billing information (billing address, billing contact, etc.) when You subscribe to Our fee-based Services and pay us directly without any paying services.
- Requests and Outputs. We only use Your Requests and/or Outputs:
  - > To monitor any breach by You of the Terms of Service, or
  - When You report an illicit Output. In such a case, we may use Your Request and/or Your Outputs to improve our Services.
  - > To display your Requests and Outputs history on Your Account when You use your User Account.
  - To improve Our Models. We may use your Requests or Outputs or information related to them to improve Our Models at any time.
- Feedback. Where applicable, We may collect and use the Feedback You provide to Us to improve our Service.
- 3.2. Personal Data generated by Your Use of Our Services
- Security Logs. We collect security logs to monitor and analyze system activities, maintain the integrity and security of Our Services, and comply with the applicable security standards and regulatory requirements. These logs document activities such as access attempts, changes made to the Services, and potential security incidents. They may contain information such as IP addresses, timestamps, user actions, and device information.
- Technical Information. We may use cookies to collect technical information that is essential for the proper functioning of Our Services, such as Your language preferences.

## 3.3. Personal Data that is indirectly provided to Us

Our Models are trained on data that are publicly available on the Internet, which may contain Personal Data. To know more about Your rights regarding the training data set, please refer to Section 8 of this Privacy Policy.

4. Why do we use Your Personal Data?

We use Your Personal Data for the following purposes:

#### Provide Our Services

- Create and administer Your account on the Platform.
- Manage the security of the Services.
- Generate Outputs based on Your Requests.
- Communicate with You for purposes other than marketing.
- Answer to your assistance requests.
- Display Your Requests and Outputs to You.
- Train Our Models and AI services we use.
- Make aggregated statistics about the use of the Services.

Legal basis: Performance of the contract. Our legitimate interest in (1) providing quality Services and continuously improving our Services and (2) developing Our Models for the purpose of providing them to You.

## Marketing operations

- Send you Our newsletters about Our Services.
- Lead development.
- Invite You to Our events.

Legal basis: Your Consent. Our legitimate interests to promote Our Services and to grow Our business.

## Commercial Management

- Contract management.
- Invoice the applicable fees.
- Processing Your payment.

Legal basis: The performance of the contract. Our legal obligation to invoice for Our Services.

Dispute resolution

- Investigate and resolve disputes
- Enforce Our contract (suspension of Your Account, monitor abuse, etc.)

 $\label{legal basis: Our legitimate interest in protecting and exercising Our legal rights. The performance of the contract.$ 

Data Subject Requests

Reply to Your requests to exercise Your rights on Your Personal Data.

Legal basis: Our legal obligation to reply to Your requests.

5. How long do We store Your Personal Data?

We may keep Your Personal Data for as long as necessary to achieve the purposes mentioned in Section 4 of this Privacy Policy. We may retain your Personal Data for longer periods when We are required by applicable law to do so or when it is necessary to exercise Our rights in legal proceedings.

For illustrative purposes, please find below the applicable data retention periods:

Personal Data We use to Provide the Services:

- Identity and contract/subscription data: for the duration of your registration on the Platform and for 5 years from the end of your registration for evidentiary purposes.
- Account data: for the duration of your registration on the Platform and for 1 year from the end of your registration for evidentiary purposes.
- Security data: the security logs are stored for 1 rolling year.
- User Input Data (for Customers Acting as Consumers): for the duration of your registration on the Platform and/or until You delete such data.
- Technical support/assistance requests: for the duration of the Processing the request and for 5 years from the processing of Your request for evidentiary purposes.
- Personal Data We use for commercial management purposes:
- Identity, account and contact data, contract/subscription data: for the duration of your registration on the Platform and for 5 years from the end of your registration for evidentiary purposes.
- Invoices: for ten (10) years from the year-end date.

Personal Data we use for marketing operations:

- Leads identity and contact data: 3 years from the collection of Your Personal Data.
- Guests identity and contact data: 1 year from the collection of Your Personal Data, unless You consent to Your Data being stored for a longer period of time.
- Personal Data We use for dispute resolution purposes:
- Requests and Outputs: for 30 rolling days to monitor abuse, unless you validly opt out, and in case of voluntary reporting of illicit content.
- Identity, account and contact data, contract/ subscription data: for the duration of your registration on the Platform and for 5 additional years from the end of your registration for evidential purposes.
- Legal data (e.g. court decision, legal evidence, etc.): until the expiration of the appeal period. We may retain such legal data for archival purposes.
- Personal Data we use to reply to Your requests to exercise Your rights:
- Identity, account and contact data and any data regarding your request: for up to three (3) months and for an additional 6 years period for evidential purposes.
- 6. Who do we share Your Personal Data with?

We may share Your Personal Data to the following persons or entities on a need-to-know basis:

- The authorized members of our team,
- Financial organizations (banks, etc.),
- Supervisory authorities of Georgia,
- Where appropriate, the competent courts, mediators, accountants, auditors, lawyers, bailiffs, debt collection agencies.
- AI-technology providers we are working with to provide Services.

We may also share all or part of Your Personal Data with Our providers. Before engaging with any provider, we conduct audits to assess their privacy and security standards and we sign a dedicated data protection agreement.

Do we transfer Your Personal Data Outside of Georgia and/or the European Union?

We prioritize selecting providers within Georgia and/or the European Union that strictly adhere to the GDPR. However, in exceptional cases, we may opt for non-EU providers that meet our high standards of data security and Personal Data protection.

We take the necessary steps to ensure that all contracts with service providers who process personal data outside the European Union have adequate safeguards in compliance with Article 46 of the GDPR. Additionally,

#### 7. Your rights

#### You can exercise:

- Access. You have the right to know if Evahelp.ai processes Your Personal Data. You also have the right to request a copy of such Personal Data and to obtain further information about the way We process Your Personal Data.
- Rectification. You have the right to update or correct Your Personal Data.
- Deletion. You have the right to delete and/or ask us to delete Your Personal Data.
- Objection. You have the right to object to the processing of Your Personal Data. This right does not apply when we have a legal obligation to process Your Personal Data.
- Consent withdrawal. You have the right to withdraw Your consent to the processing of Your Personal Data at any time.
- Limitation. You have the right to ask us to freeze the processing of Your Personal Data.
- Automated decision. You have the right to not be subject to an automated decision (including profiling) and to appeal such a decision. Evahelp.ai does not engage in profiling or automated decision-making in the Processing of Personal Data.
- Portability. You have the right to obtain and transfer Your Personal Data to another entity.
- Post mortem. You have the right to tell us how You would like us to process Your Personal Data after your death.
- Lodge a complaint. You have the right to lodge a complaint before the competent data protection authority, including the French data protection authority in Georgia.

We will take every step to make sure we reply to Your requests. However, when your request concerns the training of Our Models, it's important to note that Your rights have technical limitations and fulfilling Your requests might involve a complex technical process.

You can exercise these rights:

- By sending us an email at hello@evahelp.ai
- By making a request using Our Support Chatbot, available directly on Our Platform
- 8. Changes to this Privacy Policy

We may amend this Privacy Policy from time to time as Our Services continuously evolve. Make sure to check this Privacy Policy frequently.

9. Legislation.

This Privacy Policy is governed by the laws of Georgia (Republic of Georgia) and also corresponds to GDPR. in case of divergence between Georgian legislation and GDPR, the Georgian legislation shall prevail.

## **Evahelp.ai Personal Data Processing Policy**

Version 2.0 dated 15/06/2024

#### 1. SCOPE OF APPLICATION

- 1.1. This Policy applies to Evahelp.ai, Georgian individual entrepreneur Vitalii Strikanov, legal address: Georgia, Tbilisi, Chugureti district, Iv. Javakhishvili Street, N91, Floor 1, Apartment 2 b, registered by LEPL National Agency of Public Registry of Georgia 09/06/2022 (hereinafter referred to as the **Company or Evahelp.ai**) and sets forth procedures for obtaining, processing and protecting any information, including personal data ofindividuals (hereinafter referred to as the **Personal Data Subject or Subject**), within the meaning ofapplicable law, in connection with:
- 1.1.1. business activities carried out in accordance with the Company's statutory documents aimed at meeting the needs of other persons (hereinafter referred to as the **Service**);
- 1.1.2. implementation of employment relations;
- 1.1.3. conclusion and execution of contractual obligations, as well as in the course of execution of any agreements and contracts relating to Personal Data Subjects.
- 1.2. The Personal Data Processing Policy (hereinafter referred to as the **Policy**) is an appendix to the Privacy Policy and applies to any information including personal data of individuals (hereinafter referred to as the **Personal Data**).
- 1.3. The individual who provided his Personal Data to the Company in the process of receiving the Service from the Company and using any websites (hereinafter referred to as the **Website**), programs, products and/or Internet services of Evahelp.ai (hereinafter referred to as the **Services**), is a User.
- 1.4. The main categories of processed personal data subjects are specified in Appendix 1.
- 1.5. This Policy shall apply to:
- 1.5.1. Evahelp.ai personnel (Evahelp.ai personnel shall mean employees under employment contracts and partnersproviding services to Evahelp.ai under civil contracts) (hereinafter referred to as the **Personnel**), if applicable;
- 1.5.2. Evahelp.ai or it's affiliates shareholders, if applicable;
- 1.5.3. Evahelp.ai or it's affiliates directors, if applicable;
- 1.5.4. Services users, Partners, and potential users;
- 1.5.5. Evahelp.ai counterparties, if applicable.
- 1.6. The requirements of the Policy shall be taken into account and applied to legal entities:
- 1.6.1. members of the Evahelp.ai Group (hereinafter referred to as the **Group Companies**), if applicable;
- 1.6.2. other persons when it is necessary for them to participate in the processing of Personal Data (e.g., whendata is routinely transferred from Evahelp.ai to Group Companies and other counterparties on the basis of orders for the processing of Personal Data, other agreements and contracts).
- 1.7. The list of such legal entities is specified in Privacy Policy.

## 2. PURPOSES AND LEGAL BASIS OF PROCESSING

- 2.1. The purposes for processing Personal data determine its content and scope.
- 2.2. Evahelp.ai shall collect and use Personal data for the following purposes:
- 2.2.1. necessity for our legitimate business interests;
- 2.2.2. contract with Subjects to use the Services as defined in the Articles of Association;
- 2.2.3. ensuring financial and economic activities of the Company;
- 2.2.4. compliance to legal obligations;
- 2.2.5. protection of its legal rights and execution of judicial and/or administrative orders, if necessary.

## 2.3. Legal basis for processing personal data

2.3.1. The Policy has been developed taking into account the provisions of legislation in the field of Personal Data processing, in particular but not limited to the law of Georgia "About the protection of personal data" and refers to the European General Data Protection Regulation approved by Regulation (EU) 2016/679 of the European Parliament and of the Council dated April 27, 2016 (hereinafter referred to as the **GDPR**).

Purposes of Personal Data Processing	Rights and obligations of the Company and the personal data subject
2.3.2. Fulfillment of contractual obligations	<ul> <li>provision of paid and free services to the personal data subjects;</li> <li>exercise and performance of rights and obligations, including for the performance of the contract, a party or beneficiary or guarantor of which is the personal data subject, as well as for the conclusion of the contract at the initiative of the personal data subjector the contract under which the personal data subject will be a beneficiary or guarantor;</li> <li>improving the quality of the services provided, as well as related services;</li> <li>communicating with Subjects when necessary, including for sending notifications, information and requests related to the provision of Services, as well as for processing applications, requests and other communications received from them.</li> <li>(1) These notifications include:</li> <li>payment information,</li> <li>marketing and promotional notifications (mailings) about Evahelp.ai's news, products and Services (messages are sent only if the Subject consents to receive them).</li> <li>(2) At any time on a gratuitous basis the Subject has the right to refuse to receive notifications (mailings) and other information, using a special procedure of refusal of such mailings, if it does not affect the quality of the Services provided.</li> </ul>
2.3.3. Compliance with statutory requirements and obligations	<ul> <li>execution and fulfillment of functions, powers and duties assigned as a processor(operator);</li> <li>execution of a judicial act, act of another authority or official to be executed inaccordance with the enforcement proceedings;</li> <li>fulfillment of orders of other personal data processors.</li> </ul>
2.3.4. Ensuring legitimate interests	<ul> <li>carrying out activities stipulated by the Company's statutory documents;</li> <li>creation of new products and offers;</li> <li>Collecting, processing and presenting statistical data and other research based on impersonal personal data;</li> <li>Recruitment (selection of Personnel), including for the purpose of ensuring that candidates for vacant positions are selected for the relevant vacant positions, and employment of successful candidates for the relevant vacant positions;</li> <li>conclusion, execution and termination of civil contracts;</li> <li>exercising and fulfillment of rights and obligations arising from labor relations, including for the purpose of assisting employees in employment, education and promotion, ensuring their personal safety, monitoring the quantity and quality of work performedand safeguarding property, payment of wages and other payments due to theemployee, in accordance with law or contract, as well as making tax and social deductions;</li> <li>exercising the rights and legitimate interests as an operator or third parties, including protection against copyright infringement, fraud and other unfair behavior;</li> <li>settlements with the personal data subjects.</li> </ul>

#### 3. PROCEDURE AND TERMS OF PERSONAL DATA PROCESSING

Personal Data Processing means any operation or set of operations that is performed on Personal Data or sets of Personal Data, whether or not used by automated means, such as collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, disclosure by transmission, dissemination or other provision, alignment or combination, restriction, depersonalization or destruction.

#### 3.1. Collection of data

- 3.1.1. Personal data shall be collected directly from the Personal Data Subject. If provision of the requested information is mandatory in accordance with legal requirements, the Subject shall be explained the legal consequences of refusal to provide it.
- 3.1.2. Receipt of Personal Data from other persons shall be possible only on legal grounds, and with the notification of the Subject.
- 3.1.3. Collection and processing of Personal data that does not meet the stated purposes shall not be permitted.
- 3.1.4. If the Subject does not wish to update Personal data or wishes to opt out of receiving newsletters (e.g.,marketing), he may fill out an opt-out form and send it to the email address <a href="mailto:hello@Evahelp.ai">hello@Evahelp.ai</a>.

## 3.2. Obtaining the Subject's consent to the Personal data processing

- 3.2.1. Personal data processing shall be carried out in accordance with the provisions of applicable law and theagreement with the Subject, after obtaining explicit and specific consent from him.
- 3.2.2. Consent may be expressed by the Subject in the form of a contingent action, e.g.:
- 3.2.2.1. marking, filling in the appropriate fields in the forms, blanks;
- 3.2.2.2. electronic correspondence, which states about processing;
- 3.2.2.3. passing to the Company's office territory after familiarization with the warning signs, if applicable;
- 3.2.2.4. other actions performed by the Subject, from which his will can be judged.

## 3.3. Description of information processed on the basis of consent

- 3.3.1. In certain cases provided for by law as well as other applicable requirements, consent shall be in writing or in standard forms.
- 3.3.2. When processing Personal data received not from the Subject directly, but from other persons on the basis of a contract or an order for processing, the obligation to obtain the consent of the Subject shall be imposed on the person from whom the Personal data was received.
- 3.3.3. If the Subject refuses to provide sufficient Personal data, the Company will not be able to carry out thenecessary actions to achieve the purposes of the processing (for example, if the Subject does not complete the registration procedure in the Service, the Service under the contract may not be provided to him, or his resume will not be considered for a job, etc.).
- 3.3.4. The Personal Data Subject has the right to withdraw his consent to the Personal Data processing by sending the corresponding request to Evahelp.ai or an authorized representative (DPO) by mail to <a href="mailto:hello@evahelp.ai">hello@evahelp.ai</a>.

## 3.4. Storage conditions

- 3.4.1. When storing Personal data, Evahelp.ai shall follow the Standard Contractual Clauses approved by the European Commission to ensure an adequate level of protection of Personal data. The list of providers of Personal data storage Services is specified in Appendix No. 2.
- 3.4.2. The subject located in the territory where consent is required for the transfer of his Personal data to another jurisdiction, shall provide Evahelp.ai with his explicit and unambiguous consent for such transfer or storage, and/or processing of information in other specified jurisdictions.
- 3.4.3. Evahelp.ai shall store Personal data in Georgia and/or in the European Economic Area (hereinafter

## 3.5. Storage period

- 3.5.1. Personal data shall be stored for as long as necessary to achieve the purpose for which it was collected or to comply with legal requirements or other regulations governing the conditions for its processing.
- 3.5.2. A longer storage period may be required or permitted on the basis of legal requirements, as well as provided for by contractual or user agreements.

Category	Storage period
3.5.3. Personal data subject	84 months after receipt of the Service
3.5.4. Contractor processing Personal Data	one month after termination of the contract

## 3.6. Conditions for destruction or depersonalization

- 3.6.1. At the end of the period of storage of Personal data due to the purposes of its processing, Evahelp.ai shalldo the following:
- 3.6.1.1. deletes excess Personal Data; or
- 3.6.1.2. depersonalizes it so that it is no longer tied to the User or the Personal Data Subject. Such depersonalized data may be used for research, statistical purposes or to improve the quality of our Services. At the same time, Evahelp.ai has the right to use it indefinitely without prior notice.

Conditions for destruction or depersonalization	Storage period	Subject
3.6.2. Achievement of the purpose of Personal Data processing or the maximumperiod of its storage	within 30 days	Evahelp.ai
		(manually or automatically)
3.6.3. Loss of necessity in achieving the purposes of Personal Data processing	Within 30 days	automatically)
3.6.4. Provision by the Personal Data Subject or his legal representative of confirmation that the Personal Data is illegally obtained or is not necessary forthe stated purpose of processing	1	
3.6.5. inability to ensure the lawfulness of Personal Data processing	Within 10 days	
3.6.6. Withdrawal of consent to the Personal Data processing by the Personal Data Subject, if the preservation of personal data is no longer required for thePersonal Data processing	;	
3.6.7. Withdrawal of consent by the Personal Data Subject to use Personal Datafor contacts with potential consumers in the promotion of goods and services	Within 2 days	
3.6.8. Expiration of the limitation period for legal relations, within whichPersonal Data is processed or was processed		

3.6.9. Liquidation (reorganization) of the Company, if the processing was	
carried out exclusively in the interests of this organization and there is no	
legalsuccessor	

# 4. UPDATING, CORRECTING, DELETING AND DESTROYING DATA, RESPONDING TO SUBJECTS' REQUESTS FOR ACCESS TO PERSONAL DATA

- 4.1. Evahelp.ai does not verify the Personal Data provided to it, except as provided in contractual or user agreements or in the terms of use of certain Services and cannot judge its accuracy and does not have sufficient legal capacity to provide the Personal Data.
- 4.2. The accuracy of the Personal data and its adequacy and relevance in relation to the purposes of processing shall be ensured if it is necessary to protect the legitimate interests of Evahelp.ai. In this case, if inaccurate or incomplete Personal Data is detected, it may be clarified and updated.

Right	What the Subject has the right to do	How to exercise the right	Notes
4.3. To get access to Personal Data	<ol> <li>To get confirmation of Personal Data processing;</li> <li>To get access to the Personal data, as wellas information about its processing.</li> </ol>	please contact the DPO	The companymay ask you to verify youridentity before responding toa
4.4. To correct inaccurate data	To request correction of any incomplete or inaccurate data.	please contact theDPO	request, and in certaincircumstance s may chargea fee to coverour costs.
4.5. To object to processing	To object to the Personal Data processing if we process it for our own legitimate interests, use it for direct marketing or for statistical purposes.		The responsetime is one month after
	Under certain circumstances, to request a copy of Personal data in a structured, commonly used and machine-readable format.		your request is received. If your request takes longer to process, we will notifyyou. In any
4.7. To remove the Personal Data (in whole or in part)	Under certain circumstances, to request the deletion of Personal data. For example, if we no longer need it, or if the Subject withdraws the consent that was the basis for processing the data.	•	case, we cannot extend the response time for morethan two months beyond the first month of your request.
4.8. To withdrawconsent to data processing	To revoke the consent to the Personal Dataprocessing.	please contact DPO the	
4.9. To limit processing	To ask to limit or stop the collection, use, processing and/or disclosure of Personal data.	please contact DPO the	
4.10. To be informed about the precautionswe take whentransferring data to athird country orinternational organization	To ask us about these measures	please contact DPO the	

4.11. To	file	To complain to the data protection	please contact
complaints		supervisory authority about our collection	your local
		and use of Personal data.	regulatory
			authority

- 4.12. The Subject or his legal representative may submit the request to provide/update information about the processing of his Personal data, or to delete it, but the request shall not include a requirement to provide/change data relating to other Subjects. The request of the Subject or his/her representative shall contain (at least):
- 4.12.1. the number of the main document certifying the identity of the Subject or his/her legal representative;
- 4.12.2. information confirming the Subject's participation in a relationship with Evahelp.ai (contract number, contract conclusion date or other information), or information otherwise confirming the fact of PersonalData processing;
- 4.12.3. signature of the Personal Data Subject or his legal representative.
- 4.13. Evahelp.ai has the right to reject the Subject's request to enforce rights if it is permitted or required under:
- 4.13.1. Republic of Georgia data protection legislation, which we shall comply with;
- 4.13.2. the legal requirements that the data controller with whom we cooperate shall comply with.
- 4.14. In case of rejection of the claim, Evahelp.ai shall provide a response, stating the grounds for the rejection.
- 4.15. The subject or his or her legal representative has the right to file a complaint against our rejection with the supervisory authority.
- 4.16. Ensuring the protection of information
- 4.16.1. Personal data belongs to the category of confidential information and shall be protected from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution, as well as from other unlawful actions in relation to it.
- 4.16.2. When Personal Data processing, the Company shall take reasonable and sufficient legal, organizational and technical measures, maintaining a balance between its legitimate interests and protection of confidentiality of Personal data.

## 5. POLICY UPDATE

- 5.1. Evahelp.ai has the right to make changes at its discretion, including, but not limited to, where the relevant changes relate to changes in applicable law.
- 5.2. This Policy is written in English and Georgian. In the event of any discrepancies or any inconsistencies in the meaning of the terms of this Policy, the English version of this Policy shall prevail.

#### 6. POLICY PLACEMENT

Unrestricted access to this Policy and its Appendices shall be provided to all interested parties, including Personal Data Subjects and authorities exercising control and supervisory function in the field of Personal Data processing.

## 7. CONTACTS

If you have any questions, comments or requests regarding this Policy, please contact our Data Protection

Officer at <a href="mailto:hello@evahelp.ai">hello@evahelp.ai</a>.

## 1. The main categories of processed personal data subjects

1.1. Personal information shall be collected and processed in order to fulfill contractual obligations, as wellas the legitimate interests of the Company.

Category	Personal data
1.2. Shareholders and founders of Evahelp.ai	Information necessary for registration of employment and civil law relations, in particular documents containing the name, surname, photo, date of birth and the main identity document number.
	(1) Information necessary for registration of employment and civil law relations, in particular, but not limited to: documents containing the name, surname, photo, date of birth and the main identity document number.
	(2) Evahelp.ai has the right to further verify the Personal data provided by the Subject.
relationship (e.g., applicants for vacant positions)	(3) Personal data about next of kin and/or references may be collected in the course of employment and civil law relations.
1.4. Individuals listed in publicly available and other sources that are lawfully obtained and used in the provision of Evahelp.ai Services as data sources	Personal data provided in publicly available and other sources, such as: name, contact information (e.g., phone number and/or email), and other information necessary to provide the Services (e.g., address, age, etc.)
1.5. Users, representatives of Users which are legal entities	copy of the identity document and bank account details (on request); full name; email address; phone number; links to user account in Google; accounts in messengers: WhatsApp, Viber, Telegram, Skype; whether you open our emails and follow the links in them; current location; purpose of receiving of services; area of work.
1.6. potential user (you register on the Platform, but you do not purchase Services).	full name; email address; phone number; current location; purpose of receiving the Services; occupational field; whether the user opens our emails and clicks on links in them; language; address (city and region/area)
1.7. the user responsible forlaunching corporate program inthe company	full name; email address; phone number; current location
1.8. Partner	copy of identification document; photo; gender; date of birth; photographs, videoand audio recordings of Services; current location; qualification information; examination certificates; resume; phone records
1.9. Individuals who havecontacted Evahelp.ai with requests, messages, statements, complaints, suggestions using contact information or	Information confirming the author of the request, in particular, but not limited to: documents containing the name, surname, date of birth and number of the main document certifying the identity of the applicant or the identity of his representative.
means of collecting feedback	Evahelp.ai has the right to further verify the Personal data provided by the Subject.
1.10. Individuals participating in interviews, surveys, analytical and marketing research onEvahelp.ai activities	Personal data necessary for the interaction, such as: name, contact information(e.g., telephone number and/or email).
1.11. Visitors to Evahelp.ai website	Personal data necessary for the interaction, such as: name, contact information(e.g., telephone number and/or email).