

PRIVACY POLICY

Effective Date: 30/06/2025

TABLE OF CONTENTS

1. Introduction
2. Personal Data Collected
3. External Links
4. Purpose and Legal Basis
5. Personal Data is Used
6. Sharing with Third Parties
7. Transfer of Personal Data Abroad
8. Cookies Used
9. Personal Data Security
10. Personal Data Retention
11. Manage and Exercise your Personal Data
12. Updates to this Privacy Policy
13. Contacting ApartHotels Collection by ELT

1. INTRODUCTION

Welcome to ApartHotels Collection by ELT **Website** ("Website", "we," "our," or "us"). We are committed to protecting your privacy and ensuring the security of your personal information. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data when you use our Website or our services.

When you visit our Website and avail yourself of our services, it is understood that you have read and consented to the use of your Personal Data as described in this Privacy Policy.

2. PERSONAL DATA COLLECTED

We may collect various types of personal data to provide services, enhance user experience, and meet legal obligations.

- **Contact Information:** Your name, address, phone numbers, and email addresses. We collect this information for booking confirmations, communication, and billing purposes.
- **Payment Information:** We may collect payment details such as credit card numbers, expiration dates, and billing addresses to process reservations and payments securely.
- **Booking Details:** Information about room preferences, check-in and check-out dates, special requests, and reservation history is collected to ensure a smooth and personalized experience.
- **Identification Documents:** In some cases, we collect copies of government-issued identification documents (e.g., passports or driver's licenses) to comply with legal requirements, such as verifying your identity.

- **Communication Records:** This includes emails, chat messages, or records of phone conversations with our staff for customer service, inquiries, or resolving issues.
- **Geolocation Data:** We may collect geolocation data to offer location-based services, such as providing directions our hotel or nearby attractions.
- **Device Information:** Information about the device used to access the Website, including the device type, operating system, browser type, and IP address, may be collected for security and analytical purposes.
- **Website Usage Data:** We may gather data on how users interact with our Website, including pages visited, time spent on each page, and clicks, to improve the Website's functionality and user experience.
- **Cookies and Tracking Technologies:** We often use cookies and similar technologies to collect data about users' online behavior, including preferences and browsing patterns. This data helps personalize the Website, track marketing effectiveness, and offer relevant promotions.
- **Reviews and Feedback:** If you provide reviews or feedback through the Website, this information may be collected and used for improving services and showcasing positive experiences.
- **Marketing Preferences:** We may ask for consent to send marketing communications, newsletters, or promotional offers. You can typically opt in or out of these communications.
- **CCTV Footage:** We may refer to our closed-circuit television (CCTV) cameras which may capture your images and movements for security and safety purposes.

3. EXTERNAL LINKS

Our Website may contain links to third-party websites or services. Please note that once you click on these links and leave our site, we do not have control over the content, privacy practices, or security of those websites or services. We cannot be responsible for the protection and privacy of any information you provide while visiting such sites, and they are not governed by this Privacy Policy. We advise you to exercise caution and review the privacy policies of these external websites or services before sharing any personal information with them.

4. PURPOSE AND LEGAL BASIS

PURPOSE	LEGAL BASIS
Reservation and Booking Management and Customer Support	Processing your data for reservation and booking management is necessary to fulfill the contractual agreement with you. It ensures that your booking is confirmed and that relevant information is provided.
Communication	Communications including sending booking confirmations, pre-arrival information, and post-stay feedback requests, is necessary to fulfill the contractual obligations and ensure you are well-informed.

Customer Feedback and Improvement	We have a legitimate interest in collecting feedback and conducting surveys to enhance service quality. This interest is based on continuous improvement and ensuring a better experience, while respecting your rights.
Marketing and Promotions	For marketing and promotional activities, explicit consent is obtained. You have the option to provide or withdraw consent, ensuring they have control over our data for marketing purposes.
Security and Fraud Prevention and Other Disclosure Purposes	Processing your data to maintain security and prevent fraud is based on our legitimate interest in safeguarding its operations and protecting your interests. Processing your data for legal and regulatory compliance, such as tax record-keeping and safety measures, is required by law. It is necessary to meet legal obligations imposed on us.

5. PERSONAL DATA IS USED

Your Personal Data may be used for the following purposes:

- Reservation and booking services
- Check-In and Check-Out Procedures
- Communications related to your booking of our services
- Payment processing related to your services
- Customer Service
- Marketing and Promotions

6. SHARING WITH THIRD PARTIES

To enhance your experience and provide essential services, we may collaborate with trusted third parties who adhere to stringent data protection standards.

Third Parties

We collaborate with trusted third parties to enhance your experience, including secure payment processors for transactions, online travel agencies for bookings, marketing partners for tailored offers, and analytics services for Website improvements. Hotel reviews may be shared for transparency, and occasional collaborations with other businesses enable comprehensive packages. We prioritize your privacy throughout these interactions.

Where required by law.

In certain cases, we may be legally obligated to share your personal data with government authorities or legal entities to ensure compliance with local, national, or international laws and regulations. We will only disclose the necessary information required to meet these legal requirements, respecting your privacy at all times.

7. TRANSFER OF PERSONAL DATA ABROAD

We may transfer your personal data to countries with different data protection laws. We ensure data security and compliance through legal safeguards, trusted recipients, and, in some cases,

your consent. Your data protection rights remain upheld, and you can contact our Data Protection Officer at k.dantsova@ipmgeorgia.ge to exercise them. Your use of our services implies consent to these data transfers, while we continue to prioritize data security and compliance with all relevant laws.

8. COOKIES

Our Website utilizes cookies and similar tracking technologies to enhance your browsing experience, analyze website traffic, and personalize content. These technologies may collect data such as your IP address, browser type, and device information. We use both first-party and third-party cookies for various purposes, including analytics, advertising, and improving website functionality. By using our Website, you consent to the use of these cookies. You can manage cookie preferences through your browser settings or opt-out of certain third-party cookies by following the instructions in our Cookie Policy. However, please note that disabling cookies may affect your ability to access certain features of our Website. For more information on the types of cookies we use and how we handle your data, please refer to our Cookie Policy.

9. PERSONAL DATA SECURITY

Your personal data's security is paramount to us. We implement standard safeguards, including encryption and access controls, to protect against unauthorized access. While we strive for the highest security standards, please understand that no method of data transmission is entirely risk-free. We continuously enhance security practices and promptly address any breaches in accordance with the law. If you suspect unauthorized access to your data, contact us at k.dantsova@ipmgeorgia.ge. Your privacy and data security are our top priorities.

10. PERSONAL DATA RETENTION

We retain your personal data only for the duration necessary to fulfill the purposes stated in this Privacy Policy, unless a longer retention period is required or permitted by law. After this period, we securely delete or anonymize your data to maintain your privacy and data security.

11. MANAGE AND EXERCISE YOUR PERSONAL DATA

You can manage your Personal Data by contacting us at k.dantsova@ipmgeorgia.ge.

You are entitled to your rights, depending on your location and local data protection laws:

Access, Correction, and Deletion: You have the right to access, update, correct, or delete your personal data held by us. You can review and modify your information by accessing your account settings on our Website or by contacting our Data Protection Officer at k.dantsova@ipmgeorgia.ge.

Data Portability: You may request the transfer of your personal data to another data controller in a structured, commonly used, and machine-readable format, where technically feasible.

Consent Management: You have the right to withdraw consent for processing your data when consent is the legal basis for processing. This withdrawal does not affect the lawfulness of processing before consent was withdrawn.

Restriction of Processing: You can request the restriction of processing your personal data under certain circumstances, such as when accuracy is contested, or processing is unlawful.

Objection to Processing: You have the right to object to the processing of your personal data for specific reasons, including direct marketing.

Lodging Complaints: If you believe your data protection rights have been violated, you have the right to lodge a complaint with a supervisory authority.

To exercise any of these rights or to inquire further about them, please contact our Data Protection Officer at k.dantsova@ipmgeorgia.ge. We are committed to helping you manage your personal data and uphold your data protection rights.

12. Updates to this Privacy Policy

We may periodically update this Policy, with any changes being posted on this page and the "Effective Date" being revised accordingly. If there are substantial changes on this Policy we will notify you on our Website. If you continue to use our services without explicitly consenting to or opting out of the changes, your actions will be considered as consent to these modifications. We strongly recommend that you check this page regularly to ensure you are updated on our latest Privacy Policy, as it is your responsibility to stay informed about any revisions.

13. Contacting ApartHotels Collection by ELT

If you have any questions, concerns, or inquiries regarding this Privacy Policy, our data practices, or your personal data, please feel free to contact our Data Protection Officer at k.dantsova@ipmgeorgia.ge. We are here to assist you and address any privacy-related issues promptly and thoroughly. Your privacy matters to us, and we are committed to ensuring a transparent and secure experience when interacting with our Website and services.