

Rules for Reviewing Personal Data-related Applications

2024

1. About the Company

Joint-Stock Company "Microfinance Organization Georgian Capital" (hereinafter – the Company) Identification number: 204568574. Legal address: N 37 Rustaveli Av., Mtatsminda district, Tbilisi, Georgia
Registration date: May 22, 2009.

2. Purpose of the Application Review Rules

For Joint Stock Company "Microfinance Organization Georgian Capital", as a responsible company, it is important to ensure high-quality protection of personal data, inform data subjects, and ensure transparency of personal data-related processes.

In order to create an appropriate mechanism for ensuring the rights of data subjects, these Rules define the procedure for reviewing personal data-related applications in the company.

3. Who Can Submit an Application

An application is submitted to the company by the subject of data. If the person submitting the application acts through an authorized representative, the authorized representative must present written evidence of the transfer of authority to act in relation to the application by the applicant. Additionally, the application must be accompanied by a copy of the identity card (when the application is submitted by the applicant) or a power of attorney and a copy of the identity card (when the application is submitted to the company by the data subject or their authorized representative, in accordance with the rules established by this document).

4. What Issues Can Be Addressed in an Application

According to these rules, an application is submitted to the company only in relation to issues concerning the processing of personal data, when the applicant believes that the company has violated their rights.

5. Procedure for Submitting an Application

The data subject's application must be submitted in written form – either physically or electronically.

- Via email, the application should be submitted to the following email address: info@georgiancapital.ge
- In physical form, the application should be submitted to the following address: 37 Rustaveli Avenue, Tbilisi.

The application must contain the following details:

- a) Name, surname, personal number, actual address (where correspondence can be delivered) of the applicant and/or their representative (if any), and/or email address if the applicant wishes to receive correspondence via email, phone number and/or other contact information.
- d) Description and essence of the circumstances related to personal data that became the basis for submitting the application;
- e) The data subject's request;
- f) Date of submission of the application;
- g) Signature of the applicant or their representative.

The applicant is required to submit the following with the application:

- a) A copy of the applicant's identity document, except when the application is electronically signed and/or stamped in accordance with the Georgian Law "On Electronic Document and Electronic Trust Services" and/or when it is impossible to present a copy of the identity document due to objective reasons;
- b) In case the application is submitted through an authorized representative - the relevant document confirming the authority (for example, a notarized power of attorney), copies of the identity documents of the applicant and the representative, but if the application is electronically signed and/or stamped in accordance with the Georgian Law "On Electronic Document and Electronic Trust Services", it is not mandatory to present the identity document of the signatory.

The applicant has the right to submit evidence confirming the circumstances indicated in their application (if any). A list of evidence should be attached to the application.

If the application and/or attached documents are drawn up in a non-state language, the application and/or attached documentation must be presented translated into the state language of Georgia and notarized.

6. Acceptance of Applications for Review, Establishing Deficiencies, Leaving Without Consideration

An application properly submitted by a data subject/authorized representative by the end of a business day is registered on the same day according to the appropriate procedure and forwarded to the performer. Applications submitted during non-working hours

and/or on holidays and weekends are registered on the next/first business day and forwarded to the performer on the same day.

The performer checks the application's compliance with the requirements established in section 5 of these rules.

If the submitted application does not meet the requirements established in section 5 of these rules, within 5 (five) business days from the registration of the application, the performer/company will provide the applicant with written information about the deficiency and set a reasonable deadline (not exceeding 10 (ten) calendar days) to correct it. If the applicant does not correct the identified deficiency within the period specified by the company, the application will remain without consideration.

When providing information about the deficiency to the applicant, the company is obliged to explain the possible consequence of establishing the deficiency or leaving the application without consideration.

If the applicant fails to correct the deficiency within the specified period, the application will be considered left without consideration immediately after the expiration of the deadline set by the company for correcting the deficiency, and the applicant will not be provided with additional information about this.

If the applicant partially corrects the deficiency within the period specified by the company, the company will only consider the part of the application where the deficiency has been corrected, and if it is impossible to review that part separately, the entire application will remain without consideration.

The company is authorized to re-establish a deficiency according to the procedure established in this paragraph.

7. Review of the Application

The application is reviewed by an authorized representative of the company who makes a decision:

- (a) To satisfy the application;
- (b) To partially satisfy the application;
- (c) To refuse to satisfy the application.

The decision is made in written form and communicated to the interested person in the same form.

It is not permitted for an application to be reviewed by a person who is in any way connected to the person submitting the application or if there are circumstances that preclude their impartial resolution of the case.

The personal data protection officer may be involved in the review process, taking into account the officer's rights and responsibilities and for the purpose of protecting the best interests of the data subject.

8. Timeframe for Reviewing the Application and Making a Decision

The application is reviewed by the company within 10 (ten) business days unless another period is established by law. Considering the complexity of the issue raised in the application, this period may be extended by 10 (ten) business days, which will be communicated to the applicant.

9. Mechanism for Appealing the Decision

The applicant has the right to appeal to the Personal Data Protection Service regarding the issues raised in their application at any time, or to take the matter to court.