**Our Legal Basis for Processing Your Personal Data**

In compliance with local laws, we are committed to outlining the legal grounds on which we process your personal information. These grounds include:

**Legitimate Interests**: We process your data to efficiently provide information and services to you and to ensure the lawful operation of our businesses, always taking your rights into consideration. Additionally, we process data in the legitimate interests of our clients, who rely on our professional services for the management of their organisations.

**Business Development**: We use your data to improve our businesses, services, and technologies, all while respecting your rights.

**Legal and Regulatory Compliance**: Some services necessitate specific processing methods to comply with legal obligations, regulations, or professional body requirements. We do this when required.

**Contractual Obligations**: We process your data as part of fulfilling our contractual commitments to you.

**Consent**: If no other processing condition applies, we will process your data if you have given us your consent for a specific purpose.

**Transfers of Personal Data**

Your personal information may be transferred and stored outside your country, including regions beyond the European Economic Area (EEA), where specific data protection laws may not apply. When we collect your data within the EEA, any transfer outside the EEA will occur under conditions that ensure your data's protection. These conditions may include transferring data to countries offering adequate data protection or following agreements that meet EU standards for data transfers, such as the European Commission-approved standard contractual clauses.

**Third Party Providers**

We may share your personal data with third-party contractors, subcontractors, and their subsidiaries or affiliates. These third parties assist in providing our services and managing our IT systems, including identity management, website hosting, data analysis, data backup, security, and cloud storage services. We ensure that our third-party providers maintain appropriate levels of security and confidentiality, process data according to our instructions, and impose similar obligations on their sub-processors.

**Other Disclosures**

We may disclose personal data in the following circumstances:

**With Professional Advisers**: When necessary to establish, exercise, or defend our legal rights or to obtain legal advice, we may share data with law firms and other professional advisers.

**Explicit Requests**: We will share data when explicitly requested by you.

**Delivery of Publications and Reference Materials**: Data may be disclosed to deliver requested publications or reference materials.

**Legal and Regulatory Requirements**: We may share data with law enforcement, regulatory authorities, government agencies, and professional bodies as mandated by applicable laws and regulations. We will also review your data to determine if disclosure is required or permitted.

**Security**

We adhere to generally accepted technology and operational security standards to safeguard personal data from loss, misuse, alteration, or destruction. Only authorised individuals have access to this data, and they are committed to maintaining its confidentiality. Please note that while we employ security measures to protect your data, the transmission of data over the internet, including by email, is not entirely secure. We make every effort to protect your data, but we cannot guarantee its security during transmission.

**Your Legal Rights Regarding Personal Data**

Under local laws, you may have certain rights concerning your personal data, including:

**Access and Information**: You can obtain confirmation of the processing of your data, receive a copy of your data, and gain insights into how and why we process it.

**Amendment and Rectification**: You have the right to request the correction of inaccurate data and completion of incomplete data.

**Deletion**: You may request the erasure of your data under specific circumstances.

**Restriction**: In certain cases, you can request the restriction of data processing.

**Objection**: You can object to data processing under certain conditions.

**Data Portability**: You have the right to receive your data and transmit it to another organisation, provided certain conditions are met.

**Withdrawal of Consent**: If we process data based on your consent, you can withdraw that consent at any time.

If you believe that the processing of your data infringes the law, you may have the right to file a complaint with the relevant data protection authority. For any queries, requests, or complaints about the handling of your personal data, please contact us.

**Who are we**

We are JSC Guivy Zaldastanishvili American Academy in Tbilisi, legal entity incorporated under the laws of Georgia (Republic of,), with registration number 204958000.