

Privacy policy

This privacy policy defines the established guidelines for the "Coca-Cola Rewards Application 2024" (hereinafter referred to as "the Promotional Game"), outlining the collection, processing, storage, and disposal of participants' personal data during the promotional game. The Promotional Game is conducted by JSC "Coca-Cola Bottlers Georgia" (identification number: 201948063) (Controller - hereinafter referred to as "Organiser"), with technical support provided by Techzy LLC (registration number: 405663893), representing the "authorized data Processor" (hereinafter referred to as "the Company").

This privacy policy outlines the process of handling the personal data of Promotional Game participants once they choose to participate in the Promotional Game, register on the relevant platform, and provide their consent for the processing of their personal data.

The Personal Data, which are processed/maybe processed by us are as follows:

Name, Surname;

Date of Birth;

Telephone Number;

Within the scope of the "Coca-Cola" Promotional Game, 10 symbol code given on the cap of Coca-Cola bottle;

Audio recording of telephone conversations (if any) with promotional game participants, specifically the ticket holder chosen from Lottery Wheel during the draw.

In addition, upon awarding prizes to the promotional game winners, special photos and video recordings will be captured directly during the prize presentation. These recordings will encompass various moments, including the prize presentation itself, departure shots for travel prizes. During these recordings, the winners' personal photos and video footage will be processed by the company, containing their data. The company may also process information, photo, and/or video material containing personal data shared with the company by individuals participating in the promotional game.

Given that any citizen of Georgia can participate in the promotional game (with exceptions as defined by the promotional games Regulations), the purpose of processing participants' personal data is to identify them.

The purpose of processing the personal data of promotional game participants, including their telephone number, is to establish appropriate communication with the promotional game winner.

The legitimate purpose of processing the personal data of promotional game participants is to prevent fraud.

The purpose of processing photo/video material containing personal data of promotional game participants is for the organizer to confirm the accuracy and reliability of the promotional game results, ensuring that winners receive their

corresponding prizes directly. Additionally, the consequences of the promotional game may be used for marketing purposes.

Source of collection and processing of personal data:

Personal data is collected by the company as a result of the voluntary sharing of personal data by the promotional game participant.

The company collects the personal data of promotional game participants when they voluntarily register on application and enter their personal data.

The company may process the personal data of the promotional game participant if it is otherwise provided by the promotional game participant, such as when the participant shares photo/video material related to the promotional game with the promotional game organizer and/or the company.

The grounds for processing the personal data:

The basis for processing the personal data is subsection "a" of Article 5, Paragraph 1 of the Law of Georgia "On Personal Data Protection", specifically: the consent of the data subject to the processing of their personal data.

Refusal on processing the personal data:

The promotional game participant voluntarily provides their personal data to the company when they register on the promotional game platform.

During registration on the relevant platform, the promotional game participant declares their consent to process their personal data, including their agreement to participate in a special photo/video shooting in the event of winning. They also consent to the use of the visual material captured during this shooting by the promotional game organizer for advertising purposes, across all media and social platforms without territorial limitations.

The promotional game participant also consents to the publication of their information, including their name and surname, on the website <http://cokerewards.ge> and on social media platforms within 3 (three) calendar days after the end of the promotional game in the event of their victory.

The promotional game participant gives the appropriate consent before participating in the promotional game, during registration on the above-mentioned application. Therefore, the winning participant of the promotional game does not have the right to refuse to participate in further photo/video shooting.

A person who refuses the processing of their personal data cannot participate in the promotional game, as the winner of the promotional game is determined based on the processing of their personal data.

Using of personal data:

Any personal data processed during the draw will be used to:

during the Promotional Game

to identify the winning individual in the promotional game.

for the validation of the ten-digit codes indicated on the Coca-Cola cap for the draw.

to distribute prizes to the winners of the promotional game.

to communicate with the participants in the promotional game regarding their accounts (meaning registration on the application to participate in the promotional game) and prizes.

will be used for marketing purposes (photo/video material containing personal data of winners).

Storage of personal data:

Any personal data collected during the promotional game will be stored on the Azure Cloud, managed by Microsoft's Azure CosmosDB. This platform offers high-quality, scalable storage for large amounts of data.

Personal data collected during the draw will be stored until February 15, 2025. After this date, the mentioned data will be destroyed.

Personal data security and encryption:

For the security of the personal data collected during the promotional game, the Advanced Encryption Standard (AES) encryption system is utilized for storage.

Azure Key Vault is used for the secure storage of personal information of participants in the promotional game.

For the secure storage of personal data, Azure Front Door and Cloudflare Web Application Firewalls (WAF) DDoS are utilized to protect against unauthorized access.

For the security of personal data collected during the promotional game, if the codes on the Coca-Cola cap are entered incorrectly into the system multiple times during registration on the application, the user will be temporarily restricted from accessing the application.

In order to manage the number of requests on the server for the security of personal data collected during the promotional games, the rate will be limited.

Compliance of personal data protection with the Law of Georgia "On Personal Data Protection":

Security measures will be applied to the protection of personal data processed during the promotional game, which are in compliance with the Law of Georgia on "Personal Data Protection."

All personal data collected during the promotional game will be encrypted and securely stored.

Personal data will be protected as much as possible from unauthorized access and from falling into the hands of third parties.

When processing personal data using the specified systems (as mentioned in the section on personal data storage), technical and organizational measures will be followed to ensure data protection. These measures include protection against unauthorized or illegal processing, accidental loss, destruction, and/or damage.

The company confirms that the personal data collected during the promotional game will not be sold or otherwise transferred to third parties.

Rights of the subject of personal data processing:

The subject of personal data processing (hereinafter referred to as "**Subject**") has the right to request the company to confirm whether personal data about them is being processed, as well as whether the data processing is justified.

The subject has the right to request access to their personal data that is being processed.

The subject has the right to request correction of their personal data if it is incorrect or inaccurate.

The subject has the right to request the deletion of their personal data.

The subject has the right to request the transfer of its personal data to the third person/organization;

The subject has the right to request their personal data processed by the company at any time, after which the information will be transferred to them within 10 (ten) working days from the submission of the relevant request.

The subject should contact the company at the following email address - support@cokerwards.ge - with a notification about the request for their processed personal data.

The subject can request the transfer of information in the form they prefer, either in writing or orally. They must also make an appropriate reservation in the message/statement sent to the company's email.

The subject has the right to receive information about the termination, deletion, and/or destruction of their personal data processing.

The subject has the right to request the withdrawal of consent given by them to the processing of personal data at any time, without any explanation or justification. In such a case, upon the data subject's request, the data processing must be stopped and/or the processed data must be deleted or destroyed within 10 working days from the request.

If the subject requests the withdrawal of consent given by them regarding the processing of personal data, and their personal data is already placed in the promotional game Lottery Wheel, in such a case, if the said data comes out of the Lottery Wheel, the company will not contact the winning subject, and the personal data available electronically outside the Lottery Wheel will be destroyed.

In order for the subject to exercise the rights granted to them by this privacy policy and the law, it may be necessary to identify their person to prevent information

from being requested by third parties. Accordingly, when exercising these rights, the subject may be required to provide their identifying information.

The subject also fully enjoys all the rights granted to them by the law of Georgia on personal data protection.

Correction/Deletion of the Personal Data:

The subject has the right to apply to the company for correction of personal data up to 5 days before the promotional game (January 09, 2025), but no later than January 09, 2025.

If the subject requests the deletion/change of his personal data directly five days or less before the promotional game, the company may have already placed the subject's personal data in Lottery Wheel. In such a case, the company will not contact the winner with the data of the said subject removed from Lottery Wheel, and the personal data available electronically outside of Lottery Wheel will be destroyed.

The Personal Data of the subject may be deleted no later than 10 (ten) business days from the moment of such a request;

To delete their personal data from the application, the subject must follow these instructions: open their user profile, then click on the deactivation to delete the user.

Changes in the Privacy Policy:

This privacy policy may be updated periodically, with any changes automatically reflected by the publication of the updated text on the site. To stay informed about any changes or updates to the privacy policy, please refer to the latest version available on the site.

Contract Information:

Regarding any questions on Privacy Policy, please contact us on the following address: support@cokerwards.ge