

Terms updated  
From February 10, 2026



## Data protection policy

Consistent and high-quality protection and security of our users' (yours) personal data is important to us.

### About Us

New Digital Technologies LLC, operating under the brand name “Mycoins” (hereinafter referred to as “Mycoins” or we), is a virtual asset service provider registered by the National Bank of Georgia under the legislation of Georgia under number 0001-9404.

Identification code: 405225439

Address: Georgia, Tbilisi, Vake district, Ilia Chavchavadze Ave., N29

Website: <https://MyCoins.ge>

For New Digital Technologies, as a virtual asset service provider, protecting users' personal data is one of its most important values and strategic goals.

Due to the specifics of our company's activities, the processing of personal data is necessary for customer identification (KYC), anti-money laundering and counter-terrorism financing (AML), and for the proper and secure provision of services.

We are guided by:

- Georgian Personal Data Protection Legislation;
- National Bank of Georgia regulations and recommendations;
- International data protection standards and best practices.

It is important for us that the user knows:

- What types of personal data we collect and process;
- What legal and technical means do we use to protect their security;
- What rights does the user have in terms of personal data protection;

### How do we collect your data

We process your information lawfully, fairly and transparently. We collect data when:

- You contact us to obtain services and products (by telephone, by registering online or by visiting our platform);
- You use our services or virtual asset services;
- You use our remote channels, application or website and its functionalities (for example, chat).

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We also obtain information about you from public sources and third parties only if there is an appropriate legal basis or your explicit consent (for example: credit information bureau, revenue service, etc.).

### **What kind of information do we process about you?**

Depending on the content of the service provided, the information we process may include the following categories of data:

#### **Identification data**

Name, surname, date of birth, personal number, gender, citizenship, nationality, place of birth, photograph, signature sample, etc.;

#### **Identification documents**

ID card, passport, driver's license, birth certificate, residence or temporary identification card, etc.;

#### **Contact data**

Legal and physical address, email, phone number, etc.;

#### **Socio-demographic information**

Place of work, profession, citizenship, education, as well as information on social status/income, etc.;

#### **Marital status/information on family members**

Marriage certificate, identification and documentary data of family members, information about family members, contact persons, etc.;

#### **Financial information**

Information about economic/financial status, transactions and accounts, credit history and solvency, arrears, financial products, income, property, payments and transfers made (including where and when a specific transaction was made);

#### **Contractual information**

Information about the services provided and products supplied by us;

#### **Special category data**

Information about health status, criminal record, charges. Also, biometric data and etc;

#### **Your device data**

IP address, cookies, IMEI code, application logs, behavioral data, location information, etc.;

#### **Recordings**

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Audio and video recordings;

**Data obtained via communication**

Data obtained via email, phone call, chat, social media or other communication channels;

**Public data**

Information obtained from public sources;

**Data created by us**

Data created by us as a result of analyzing information about the user (e.g. data on user behavior, preferences, risk rating, etc.);

**Mandatory data established by law**

Data that we are required to process by law (e.g. data processed for identification, verification, KYC and AML), etc.

The list is not exhaustive and may change or be updated. We may process any information that you provide to us or that we obtain during our business and/or for other legitimate purposes. The amount of data we process depends on the nature of our relationship with you and is determined by the purpose of the data processing, considering the principle of data minimization.

**What are cookies?**

When you use the New Digital Technologies website and other remote channels, we collect so-called cookies, which include the version, model and other unique identifiers of your device's operating system, as well as the time spent on the website, online navigation, your location, the language used and other data.

Through cookies, we try to understand how you use our website and, accordingly, improve your experience: simplify navigation on the website, prepare offers tailored to you, improve search functionality, website design and adapt to your needs.

When visiting our channels, you can refuse the use of cookies and manage the purpose of their use according to your wishes. For example, you can only accept necessary cookies and opt out of their use for analytical and/or marketing purposes.

**Direct Marketing**

We want to provide you with the opportunity to choose whether your personal data is used for direct marketing and advertising purposes.

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New Digital Technologies LLC is authorized, independently or through authorized and/or related persons, in accordance with the Personal Data Protection Policy, to process your identification, contact, financial and other categories of personal data for the purpose of providing you with virtual asset services, products, promotions and other offers by telephone, mail, email, web platform, mobile application and/or other electronic communication means (direct marketing).

Consent to the processing of data for direct marketing purposes is not mandatory. However, in the absence of your consent, the Company will be deprived of the opportunity to provide you with tailored offers through the above-mentioned channels.

Please note that if you are a representative, manager or an associated person of a legal entity that is our existing or potential client, the Company is authorized to process your data for the purpose of providing services to the legal entity, including for direct marketing purposes.

When you agree to the processing of your data for direct marketing purposes, this means that you agree to the following text:

I, the data subject, agree that New Digital Technologies LLC (hereinafter referred to as “MyCoins”) may process my personal data, such as contact, identification, transactional, financial, socio-demographic, interactional, and geo-location data, for direct marketing purposes and using any communication channel. I understand that this includes and is carried out as follows:

- Information about current/planned promotions and offers in Mycoins, which may include information about both the product(s) itself and the services/offers/promotions of partner companies related to these products;
- Marketing offers by Mycoins may be made through any communication channel(s) available to Mycoins, including (but not limited to) a notification in the Mycoins service channel(s) (personal account, application, website), by sending a short text message or phone call to the client's contact phone number, and/or by sending a notification to the email address;
- My consent is indefinite, however, I have the right to withdraw my consent at any time and request Mycoins to stop processing my data for direct marketing (advertising) purposes by sending an appropriate request to the e-mail: [info@emoney.ge](mailto:info@emoney.ge), call center 032 242 46 46 or to the office;
- Mycoins is obliged to stop processing the relevant data for direct marketing purposes no later than 7 (seven) business days after my appropriate request, after which I will not receive Mycoins' offers regarding its services and products;
- Consent to the processing of data for direct marketing purposes is voluntary and granting consent is not a mandatory prerequisite for Mycoins to provide me with services;
- By granting consent, Mycoins will be able to offer products, services, various promotions, however, consent does not oblige me to use Mycoins' services;
- In case of withdrawal and/or refusal of consent, I understand that MyCoins will be deprived of the opportunity to inform me about current promotions, products and other services.

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### **Refusing direct marketing**

You may opt out of direct marketing at any time and request that we stop sending you promotional messages — by email, mobile phone or other electronic means. To do this, you can use the appropriate opt-out mechanisms (SMS off, unsubscribe, etc.), contact us by email or hotline: +995 032 242 00 00.

Please note that it is not considered direct marketing and you cannot request the cessation of the provision of advertising or information materials if they are provided to you directly at service points (for example: advertising banner, flyer, oral offer) or in remote channels controlled by the company (for example, web platform, application, etc.).

We also inform you that upon request to stop processing data for direct marketing purposes, only electronic communications of an advertising nature will be terminated. Other types of contact communications will continue to be made regarding matters arising within the scope of your relationship with the company — for example, providing information related to transactions, billing, or changes to the terms of service.

### **For what purpose do we process data?**

We process your data only for specific, explicit and legitimate purposes and to the extent necessary for the purpose:

- To provide you with virtual asset services (transactions, payments, transfers and other operations);
- To offer and improve virtual asset services and/or products;
- In cases established by law, to ensure access to data for regulatory and/or supervisory authorities;
- To prepare various reports, analytical data, studies and/or reports;
- To ensure data security and prevent threats;
- To comply with our legal obligations, which include, among others, the prevention, detection and suppression of fraud, money laundering, terrorist financing or other crimes;
- To protect the safety and property of the company or other persons;
- To send or deliver a message by the Company;
- To fully and properly fulfill the obligations assumed by the Company under the Agreement, as well as to monitor the fulfillment of your obligations under the Agreement;
- For marketing purposes — which means, with your consent, periodically offering new virtual asset products or services, planning and implementing marketing activities;
- To protect the Company's legitimate interests and/or legal rights.

We do not process data without your consent for other purposes that are incompatible with the original purpose of their processing.

### **On what basis do we process data?**

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The basis for data processing is:

- Your specific, explicit and voluntary consent;
- Obligations provided for by law/regulation;
- Entering into a contract with you or performing an existing contract;
- Providing you with virtual asset services or considering your application;
- Protecting the legitimate interests of the company or third parties;
- Public access to data.

The video surveillance system is used for the purposes of preventing and detecting crime, protecting the safety and property of a person, as well as protecting confidential information.

We process special categories of data only with your written consent. Biometric data is processed when necessary to protect security and property, as well as to prevent the disclosure of confidential information.

#### **When do we share your data?**

Information is shared with third parties to fulfill our obligations under the law or contract and/or where there is another relevant legal basis specified by law.

We may share your data with:

- Your legal representative;
- Parties to the transaction;
- Bodies specified by law in order to fulfill the requirements specified by law;
- Credit information bureau;
- Insurance companies;
- Service providers, including our external auditors, consultants, advisors, courier and research organizations, IT service providers (for example, cloud infrastructure services) and other persons with similar functions;
- Financial organizations and payment systems (for example, intermediary banks in international transfers, payment system providers, blockchain platforms, etc.);
- Our group companies;
- Other third parties with your consent.

Your data will be shared in other countries only if there are grounds provided for by the Law of Georgia "On Personal Data Protection" and the relevant country provides appropriate guarantees for the protection of data and rights.

Suppose we transfer your data to a country where there are no appropriate guarantees for data protection. In that case, New Digital Technologies LLC will enter into an agreement on the transfer of personal data, which will ensure the appropriate protection of personal data in accordance with the

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requirements provided by the legislation and will obtain the permission of the Data Protection Service and/or your consent.

Before transferring personal data, we check whether the third party has taken appropriate organizational and technical measures to protect the data.

We will not transfer your data to third parties if, based on their activities and/or purposes, there is a high risk of inappropriate data processing or violation of your rights.

### **How do we protect data security?**

We store your data in accordance with the legislation and provide physical, technical and organizational guarantees to protect it - we protect the security of our electronic devices, files, premises, we have physical, electronic and procedural control mechanisms to prevent unauthorized access, use, transfer, loss or destruction of your data.

Our employees adhere to data confidentiality and security policies, procedures in accordance with the legislation and internal organizational documents.

### **How long do we store your data?**

We store data in accordance with the terms specified by the legislation of Georgia - for the entire period of service and for a period of 15 years after its completion, or for the period necessary to achieve the specific purpose of processing.

### **Your rights and obligations**

You have the right to:

- Receive information about what data is being processed about you, the purpose and legal basis for their processing, as well as the source and transfer of data;
- Get acquainted with the data about you held by New Digital Technologies LLC and receive copies of documents/records containing your personal data in accordance with the procedure established by the legislation of Georgia;
- Request the correction, updating and completion of incorrect, inaccurate and incomplete data;
- Request the cessation, deletion or destruction of data processing;
- Request data blocking;
- At any time refuse your consent to the processing of personal data and request the deletion of data processed based on it;
- Request the porting of personal data provided by you to New Digital Technologies LLC - i.e. receiving it in a structured form or transferring it to another processor;
- Request the involvement of human resources in automated decision-making;
- In case of violation of your rights, contact the Personal Data Protection Officer of New Digital Technologies LLC, the Personal Data Protection Service or the court.

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**Grounds for restricting your rights:**

Your rights may be restricted if their exercise poses a threat to:

- State security, information security and cybersecurity and/or defense interests;
- Public safety interests;
- Crime prevention, investigation of crime, criminal prosecution or justice;
- Interests related to the financial or economic, public health and social protection of the country;
- Detection of a violation of professional or ethical norms by the data subject and imposing liability on him/her;
- Your rights and freedoms or those of others;
- Protection of state, commercial, professional and other secrets provided for by law;
- Substantiation of a legal claim or defense.

New Digital Technologies LLC uses the measure of restriction of rights only adequately and proportionately to the purpose of the restriction.

**Contact information:**

**The supervisory authority of the virtual asset service provider is the National Bank of Georgia: Website address: [www.nbg.gov.ge](http://www.nbg.gov.ge), Address: 0114 Tbilisi, Georgia Sanapiros Street No. 2**

**Find useful information for consumers on the website of the National Bank of Georgia – [www.nbg.gov.ge/cp](http://www.nbg.gov.ge/cp) and on the hotline – 032 2 406 406**

On issues related to personal data protection, you can contact the Mycoins Personal Data Protection Officer, Tamta Ketiladze, at any time by e-mail: [PDP@Mycoins.ge](mailto:PDP@Mycoins.ge)

In addition, you can contact the Mycoins hotline 24 hours a day at – ++995 032 242 00 00

Your request will be considered and you will be notified of the answer within the period established by law.

**Changes**

Changes to the Personal Data Protection Policy will be reflected on our website with an indication of the date.