

PRIVACY POLICY

Privacy Notice for the Manamo Home Online Store

Last updated: 27 August 2026

This Privacy Policy explains how the Company collects, uses, shares, stores and protects Personal Data when you use the Website or purchase Products. **We do not sell your Personal Data.**

1. Definitions

For ease of reading, the following defined terms are used throughout this Privacy Policy:

Company: LTD Bmb Mataraci Trans Georgia, registered under identification number 401975449, with its office at David Aghmashenebeli Ave. 156, 3rd Floor, Tbilisi, Georgia. For the processing described in this Privacy Policy, the Company acts as the data controller unless stated otherwise.

Brands: the product brands offered for sale on the Website, including but not limited to Maqma, Vestel, Fakir, Manamo and Taç, as well as any other brands that may be added to the Website from time to time. The relevant trademarks and brand rights remain the property of their respective owners.

Website: the Manamo Home online store available at www.manamo.ge, including its sub-pages and any replacement domain officially operated by the Company for the Brand.

User: a visitor, registered user, customer or other person who interacts with the Website or the Company's online shopping services.

Personal Data: information relating to an identified or identifiable natural person.

Processing: any operation performed on Personal Data, including collection, recording, organisation, storage, use, disclosure, transfer, restriction, deletion or destruction.

Service Provider: a third party that processes information or performs services in connection with the Website or the Company's business activities, such as hosting, IT, analytics, customer support, professional services or delivery.

Payment Provider: a bank, payment institution or other third party used to process or facilitate payment transactions.

Cookies: small files or similar technologies stored on or accessed from a User's device to enable Website functionality, remember preferences, support security or, where applicable, provide analytics or other features.

2. Scope and Data Controller

This Privacy Policy applies to Personal Data processed by the Company in connection with the Website, Accounts, Orders, customer service, delivery, returns, marketing preferences and related online interactions.

It does not govern the independent processing activities of third parties that operate their own websites or services. Such parties may provide separate privacy notices that apply to their processing.

3. Our Privacy Principles

The Company processes Personal Data in accordance with applicable Georgian data protection legislation and seeks to apply the following principles:

- lawfulness, fairness and transparency;
- collection for specified and legitimate purposes;
- data minimisation — collecting only what is reasonably necessary;
- accuracy and reasonable steps to keep information up to date;
- storage only for as long as necessary or legally required; and
- appropriate organisational and technical security measures.

4. Personal Data We May Collect

4.1 Identity and Contact Information

We may collect your name, surname, telephone number, email address, delivery address, billing address and other contact information necessary to provide the Service or fulfil an Order.

Where legally or operationally necessary for a specific transaction, we may also request identification information such as a personal number. Optional profile information, such as date of birth, gender or images, will be collected only where a feature requires it or you choose to provide it.

4.2 Account Information

If you create an Account, we may process your login identifier, Account settings, preferences, authentication and security information, and records relating to your Account activity.

4.3 Order, Purchase and Customer Service Information

We may process information about Products viewed or purchased, Order numbers and dates, quantities, prices, discounts, delivery status, returns, refunds, complaints, customer service requests and related correspondence.

4.4 Payment Information

To complete a purchase, payment-related information may be processed by the Company and/or a Payment Provider. The Company may receive transaction identifiers, payment status, amount, currency, refund information and other information necessary to reconcile or support the payment.

Payment card security: Where card details are collected directly by a third-party Payment Provider, those details may be processed by that provider rather than stored by the Company. The provider's own privacy and security terms may apply to that processing.

4.5 Technical and Log Data

When you use the Website, technical information may be generated automatically, including IP address, browser type and version, device or operating system information, pages visited, date and time of access, time spent on pages, referring pages, error or security logs and similar usage statistics.

4.6 Communications and User-Submitted Content

We may process emails, messages, reviews, questions, photographs or other information that you send to us or submit through the Website, together with records of our responses.

4.7 Marketing Preferences

Where you choose to receive marketing, we may record the contact channel, your consent, the date of consent, marketing preferences, unsubscribe requests and related compliance records.

5. How and Why We Use Personal Data

Depending on the circumstances, the Company may process Personal Data for the following purposes and on a legal basis available under applicable law:

- **To provide the Service and perform a contract:** create and manage Accounts, process Orders, arrange payment and delivery, handle returns and refunds, and provide customer support.
- **To comply with legal obligations:** maintain transaction, accounting, tax, consumer protection and other records required by law; respond to lawful requests; and meet regulatory requirements.
- **For legitimate business and security interests where permitted:** prevent fraud and abuse, protect the Website and Users, troubleshoot technical issues, improve the Service and maintain operational records.
- **With consent where required:** send direct marketing, use non-essential Cookies or analytics where consent is required, or process optional information for a specific purpose explained at the time of collection.

We will not use Personal Data for a materially incompatible purpose without a lawful basis and appropriate notice where required.

6. Cookies and Analytics

The Website may use Cookies that are necessary for core functions such as session management, security, language preferences, shopping cart operation and Account access. The Website may also use analytics or similar technologies to understand performance and usage.

Where Georgian law requires consent for a particular Cookie or similar technology, the Company will seek that consent before using the technology. Users may also be able to manage Cookies through the Website's cookie controls and browser settings. Disabling essential Cookies may affect Website functionality.

If the Company publishes a separate Cookie Policy, that policy will provide additional details and will form part of this Privacy Policy by reference.

7. Sharing Personal Data

The Company does not sell Personal Data. We may share only the information reasonably necessary for the relevant purpose with the categories of recipients described below.

- **Payment Providers and banks:** to initiate, authenticate, settle, reconcile or refund payments and to prevent fraud.
- **Delivery Providers:** to deliver Orders and communicate regarding delivery. This may include name, address, telephone number, Order or delivery reference and other information necessary for delivery.
- **IT, hosting and security providers:** to host, maintain, secure and support the Website and related systems.
- **Analytics and service-improvement providers:** where used and legally permitted, to understand Website performance and usage.
- **Professional advisers and authorities:** where necessary for legal, audit, accounting, insurance, dispute-resolution or regulatory purposes, or where disclosure is required by law.

Service Providers that process Personal Data on the Company's behalf are expected to process it only for authorised purposes and to protect it appropriately. Some third parties, such as banks or payment institutions, may process Personal Data as independent controllers under their own legal obligations.

8. International Transfers

If Personal Data is transferred to a recipient outside Georgia, the Company will take measures required by applicable Georgian law, which may include relying on an applicable legal transfer mechanism and appropriate safeguards. The exact mechanism will depend on the destination, recipient and nature of the processing.

9. Data Retention

The Company keeps Personal Data only for as long as reasonably necessary for the purpose for which it was collected, to maintain appropriate business and security records, to establish or defend legal claims, or to comply with accounting, tax, consumer protection and other legal retention requirements.

Different categories of data may therefore have different retention periods. When Personal Data is no longer required, it will be deleted, destroyed or anonymised in accordance with applicable requirements and the Company's retention practices.

10. Data Security

The Company uses reasonable organisational and technical measures designed to protect Personal Data against unauthorised access, disclosure, alteration, loss, destruction or other unlawful processing. These measures may include access controls, authentication, logging, security monitoring, secure communications and controls over Service Providers, as appropriate to the risk.

No internet transmission or electronic storage method can be guaranteed to be completely secure. The Company therefore cannot promise absolute security, but it will take measures required by applicable law and respond to identified security incidents as required.

11. Direct Marketing and Promotional Communications

Using the Website or purchasing a Product does not automatically subscribe you to direct marketing. The Company will process Personal Data for direct marketing only where it has the consent or other legal basis required by applicable Georgian law.

Where consent is used, you may withdraw it at any time. You can use the unsubscribe mechanism included in a marketing message or contact us at estore@mataracigroup.com. Withdrawing marketing consent does not affect the lawfulness of processing carried out before withdrawal and does not prevent the Company from sending non-marketing messages necessary to perform an Order, maintain an Account or comply with law.

Marketing opt-out: The Company will stop processing your data for direct marketing within the period required by Georgian law and will not charge a fee for exercising this right.

12. Your Data Protection Rights

Subject to the conditions and exceptions provided by applicable Georgian law, you may have the right to:

- receive information about how your Personal Data is processed;
- access Personal Data concerning you and obtain a copy;
- request correction, updating or completion of inaccurate or incomplete data;
- request termination of processing, deletion or destruction of data where the legal conditions are met;
- request blocking or restriction of processing in circumstances provided by law;
- receive or transmit certain data in a structured, commonly used and machine-readable format where the legal conditions for data portability are met;
- withdraw consent where Processing is based on consent;
- object to or stop direct marketing; and
- submit a complaint to the competent Georgian data protection authority or seek another remedy available by law.

To exercise a right, contact the Company using the details in Section 16. The Company may need to verify your identity before acting on a request and will respond within the period required by applicable law.

13. Children and Minors

The Website is not intended to encourage children to provide Personal Data independently of a parent or legal guardian. Where the Company becomes aware that Personal Data of a minor has been processed in circumstances requiring parental or guardian involvement, it will take appropriate steps in accordance with applicable law.

14. Third-Party Links

The Website may contain links to third-party websites or services. The Company does not control the privacy practices of independent third parties. Users should review the privacy notice of any third-party website or service before providing Personal Data to it.

15. Changes to This Privacy Policy

The Company may update this Privacy Policy to reflect changes in law, technology, the Website or the Company's data-processing activities. The current version will be published on the Website and will show the date of the latest update.

Where a change materially affects Users or requires additional notice or consent under applicable law, the Company will take the steps required by law before the relevant change takes effect.

16. Contact Us

For questions about this Privacy Policy, requests concerning Personal Data, or withdrawal of marketing consent, you may contact the Company at:

- **Privacy email:** estore@mataracigroup.com
- **General customer service:** info@manamo.ge
- **Website:** www.manamo.ge
- **Address:** David Aghmashenebeli Ave. 156, 3rd Floor, Tbilisi, Georgia

17. Relationship with the Terms and Conditions

This Privacy Policy should be read together with the Company's Terms and Conditions and any other privacy or cookie notices shown at the point where Personal Data is collected. If a specific notice provides more detailed information for a particular processing activity, that specific notice will supplement this Privacy Policy.