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Privacy Policy

1. Introduction

Adjarabet is committed to protecting and respecting your privacy and ensuring your security when you use our services.

This Privacy Policy is to help you understand how and why your personal information is collected, and processed afterwards.

2. Who we are

Adjarabet (<http://www.adjarabet.com/>) is a brand of the following online gambling operator:

Kosmosi LLC (ID: 404526866), organizer of internet-based totalizator games, operating under Permit No. N19-05/284 issued by the Legal Entity under Public Law – Revenue Service. Legal address: Georgia, Tbilisi, Chugureti District, El. Akhvlediani Rise, No. 6.

Aviator LLC (ID: 405076304), organizer of internet-based gambling games, operating under Permit No. N19-06/125. Legal address: Georgia, Tbilisi, Chugureti District, El. Akhvlediani Rise, No. 6.

(Hereinafter, Kosmosi LLC and Aviator LLC are jointly referred to as "**we**" or "**Adjarabet**").

3. Contacting us

If you have any concerns do not hesitate to get in touch with our Customer Service team via phone, email or live chat - please visit our [Contact](#) us page on the website or in application.

4. Personal information we collect

We collect personal information when you interact with us and use our services. Sometimes, this information is provided to us by you - for instance when you register and when you make use of our products or contact us. Sometimes third parties provide us information about you. In addition, where it is reasonable for us to do so, we may also collect personal data from publicly available sources such as internet searches, business registry, etc.

A) Information you provide to us

At registration/verification:

- Your personal details, such as your country of residency, citizenship, name, last name, personal ID number, email address, address, phone/mobile number, gender, date of birth, etc.;
- Photographic identification/Copy of the identification document (to carry out verification);
- Your account login details, such as your username and user ID number.

Through your use of Adjarabet's services:

- Information about how you interact with our products;
- Information about your online activity and behavior on Adjarabet's website, mobile application, and other online content – please see the "Use of Cookies" section for more details.
- Information about any devices you have used to access our services (such as model, operating system, IP address, browser type, mobile device identifier, application);
- Recording phone calls and other communication (for examples, emails and messages sent through the live chat service) with us or our employees (via email, website, application, cell phone and other means) - we may monitor or record phone calls and your correspondence with us. We might do this to check that we have carried out your instructions correctly; to resolve queries or issues; for regulatory purposes; to help improve our quality of service; to help us train our staff; or to help detect or prevent fraud or other crimes.

Information you shared with us voluntarily or otherwise made public, like social media profiles.

B) Other sources of personal data

- Where we provide personalized services, we may use third party data about you, for example, your Facebook feeds, to get to know you better and to provide more effective personalization.
- Data received from our business partners and from other organizations, such as companies providing verification services.
- Publicly available sources.

C) Information about third parties

If you give us personal information about someone else then you should not do so without their permission. Where information is provided by you about someone else, or someone else discloses information about you, it may be added to any personal information that is already held by us and it will be used in the ways described in this Privacy Policy.

This list of personal data types collected by Adjarabet is not exhaustive and further information may be requested from you when Adjarabet considers it fair and necessary to do so.

5. Why we collect your Personal Data and on what basis

Adjarabet is open about why we collect your data.

First and foremost, collecting your information is essential for providing you the services and products you desire. In addition, your data is used to personalize and improve your experience using our services, and to contact you from time to time with important information. In some cases, we need to collect and use your information to comply with the law. Under data protection laws, we also need to identify a specified lawful basis upon which we are processing your personal information. We rely on different bases for different processing activities.

A) Under the contract - when it is necessary for the performance of a contract to which you are a party. Our [terms and conditions](#), which you have accepted at registration, set out the terms of the contract and the services we will provide:

To make our services available to you as part of our contract

- to provide gaming and betting services, activities or online content, to provide you with information about them and to deal with your requests and enquiries;
- for "service administration purposes", such as password reminders, service messages, such as site/application maintenance, updates to our Privacy Policy or Terms of Use, to let you know if your Adjarabet account has become inactive and to ask if you would like to use it again before we close it;
- to process your transactions;

B) Under legitimate interests - It is necessary to process your data for the purposes set out below, except where our interests are overridden by the interests, rights or freedoms of affected individuals.

To personalize your experience

- to offer a more relevant, tailored service; for instance, we could use your playing history to provide personalized recommendations and products;

To improve our services and products

- to provide you with the most user-friendly online navigation experience;
- for analysis and research purposes so that we may improve the services offered by us;
- testing new products, systems or services and checking upgrades to existing systems;
- evaluating the effectiveness of marketing and for market research and training;
- customer modelling, statistical and trend analysis, with the aim of developing and improving products and services.

To contact and interact with you

- Contact you about our services, for example by phone, email or post or social media;
- Manage promotions and tournaments you participate in;
- Invite you to take part in customer surveys, questionnaires and other market research activities carried out by Adjarabet and by other organizations on our behalf (We carry out market research to improve our services, however, please note that participation in the surveys is not mandatory);
- Respond to your queries and complaints.

To make your game safer and more enjoyable

- to deter, prevent, or detect any activities conducted in breach of the Adjarabet's terms and conditions;
- to prevent or detect Unfair Gaming practices, including without limitation the use of third-party software in peer-to-peer gambling.

C) Under the legal obligation - when it is necessary in order to comply with mandatory legal obligations to which we are subject under the applicable laws (including AML and gambling regulations):

- to determine your actual geo-location to comply with our license requirements;
- to make sure we offer our services to eligible persons under our license conditions;
- to ensure crime detection, prevention, and prosecution;
- to verify your identity and where necessary, establish the source of funding in any transaction;
- to carry out appropriate anti-fraud checks;
- to assess and manage any potential risks.

D) Under your consent

Marketing

We will send you relevant offers and news about our products and services in a number of ways including by email, sms, push notifications, phone call, post, social media targeted advertising.

We may use information which we hold about you to show you relevant advertising on third party sites (e.g. Facebook, Google, Instagram, etc.). If you do not wish to be shown targeted advertising messages from us, some third-party sites allow you to request not to see messages from specific advertisers on that site in future.

6. Potential consequences of not providing the personal information

Please note that if you choose not to provide your personal data it may prevent us from meeting legal obligations, fulfilling a contract, or performing services required to run your account. Not providing your personal data may result in Adjarabet's decision not to provide you with products or services.

7. Use of Cookies

Cookies are small text files containing small amounts of information, which are sent to and stored on your computer, smartphone or other device when you access a website. Cookies are then sent back to the originating website on each subsequent visit or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize a user's device.

Cookies help deliver a better and more personalized service to users.

We use Cookies on the website for a number of reasons including, but not limited to, the following:

- to allow users to log on to their Adjarabet account;

- to identify the account holder's preferred language, so it can be automatically selected when the customer returns to the website;
- to ensure that the account holders receives bonuses for which they are eligible;
- for analysis of the website traffic, so as to allow Adjarabet to make suitable improvements;
- to monitor and collect information about transactions placed on the website;
- for fraud prevention purposes and generally to safeguard privacy.

By using the Adjarabet's website, you are consenting to Adjarabet using cookies in order to provide you with a fully functional gaming experience.

Where links are provided on the Adjarabet's website to third party websites it is important to remember that those websites will have their own cookies and privacy policies, which will govern any information you may submit. If you decide to use any linked third party websites please read their cookies and privacy policies before doing so.

If you would prefer to change cookie preferences for Adjarabet, or any other website, you can use your browser to do this. Your browser's 'help' function should also guide you on this.

For more information about cookies, how they work and how to manage them, please visit: [all about cookies](#).

8. When we share your personal information

We do not share your personal information to third parties outside Adjarabet for marketing purposes. However, there are circumstances when we share your personal data with third parties that provide services to you on our behalf, and with other third parties in the course of complying with our legal obligations and/or for the purpose of improving our products and services offered to our customers. Other examples of when we share your personal information include when we enter any kind of merger or business sale. Even when it is shared, we ensure that your personal information will only be used for the purposes outlined in this policy.

We may share personal data with third parties in the following circumstances:

- providing you with products and services and/or notifying you about either important changes or developments to the features and operation of those products and services;
- in order to ensure the effective performance of legal duties and contractual obligations and compliance with regulations;
- when ordered to do so by any regulatory body and/or under any legal provision contained in the applicable law;
- in order to establish, exercise or defend our legal rights;
- for financial crime and fraud detection and control purposes, we may transfer your personal data to third parties, including but not limited to payment service providers and financial institutions. Furthermore, we reserve the right to disclose the account holder's personal data to relevant parties where Adjarabet has reasonable grounds to suspect irregularities involving your account;

- with service providers to enable us to provide our services, such as companies that help us with technology services, storing and combining data, and processing payments or providing relevant online advertising for our products and services;
- with external auditors who may carry out independent checks;
- to an organization we sell or transfer (or enter into negotiations to sell or transfer) any of our businesses or any of our rights or obligations under any agreement we may have with you. If the transfer or sale goes ahead, the organization receiving your personal data can use your personal data in the same way as us; or
- to any other successors in title to our business.

9. Data transfer outside the EEA

As mentioned above, depending on the products you choose to use we may need to share your personal data with the third parties that provide those services. Furthermore, given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Therefore, by browsing the website or using application and communicating electronically with us, you acknowledge and agree to our (or our suppliers' or sub-contractors') processing your personal data outside the EEA. We will take all reasonable steps to ensure that your information and data is treated securely and in accordance with this Privacy Policy. In some instances, we may be compelled by law to disclose your personal data to a third party and may have limited control over how it is protected by that party.

10. How long Adjarabet keeps your personal data

We will only retain your information for as long as is reasonably necessary to carry out the purposes outlined above and to observe our legal obligations. We store your data for as long as you are an active customer with us. Once you are no longer our customer, we will hold your personal data on our systems for as long as is necessary to comply with our legal obligations, such as those imposed by tax, gambling and AML laws.

11. Your rights over your personal data

By law and subject to certain conditions, you have a number of rights concerning the personal information we hold about you. If you wish to exercise these rights, you should contact us.

You have the right to obtain information on your personal data processed, request its correction, update, addition, blocking, deletion and destruction, in accordance and within the limitations set forth by the laws of Georgia on personal data protection, for instance, when Adjarabet is lawfully authorized to continue processing. You can withdraw your consent on direct marketing at any time.

12. Security of your data

Adjarabet is committed to protecting the personal information you entrust to us. We take all reasonable steps to ensure that all information collected through our websites/application is treated securely and in line with this Policy and data protection standards.

Account(s) involved in suspicious activity will be suspended and investigated to the fullest extent. Should you as user have any doubts about the activity on your account, such as unrecognized transactions in the transaction history or surprising changes in the balance, please contact us immediately.

13. [Complaints](#)

If you wish to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated.

14. [Changes to Privacy Policy](#)

We may update this Privacy Policy from time to time to reflect changes in the way we work or the way our work is regulated - so please review it frequently, including each time you submit personal information to us. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to submit personal information to Adjarabet or use Adjarabet's services in any way. Otherwise, by continuing to do so, you will be deemed to have accepted the changes to the Privacy Policy.

15. [Governing law and jurisdiction](#)

This Privacy Policy is governed by and shall be construed in accordance with the laws of Georgia. The parties submit all their disputes arising out of or in connection with this Privacy Policy to the exclusive jurisdiction of the Courts of Georgia.

16. [Discrepancy between linguistic versions of Privacy Policy](#)

In the event of inconsistency or discrepancy between the Georgian text and any of the other linguistic versions of this Privacy Policy, the Georgian text shall prevail.