

Personal Data Protection Policy

CRRC-Georgia

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Introduction

N(N)LE – CRRC Georgia (Registration No. 404997152), hereinafter referred to as CRRC-Georgia, is a non-governmental, non-profit research organization that collects, analyzes, and publishes statistical data on political and social processes in Georgia. The organization is dedicated to advancing social science research and public policy analysis in the South Caucasus region.

The Personal Data Protection Policy ensures transparency in how CRRC-Georgia processes personal data. CRRC-Georgia takes its responsibility to protect personal data seriously. The organization complies with the Law of Georgia On Personal Data Protection and processes respondents' data based on specific, clearly defined purposes and legal grounds in accordance with this law. Additionally, CRRC-Georgia adheres to internationally recognized best practices and standards in data protection.

This policy applies to the processing of personal data by CRRC-Georgia for the purpose of conducting research. It is publicly accessible and available on the CRRC-Georgia website: www.crrc.ge.

The Personal Data Protection Policy is reviewed and updated as necessary. Following any amendments, the revised policy is published on the organization's website.

The Personal Data Protection Officer of CRRC-Georgia is a member of Data Protection Team LLC (email: info@dpt.ge; tel: +995 599 086 198). The Officer supports the organization in maintaining high standards of data protection and serves as the primary contact for data subjects regarding any personal data-related inquiries.

Key words

personal data – any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, including by his/her name, surname, identification number, location data and electronic communication identifiers, or by physical, physiological, mental, psychological, genetic, economic, cultural or social characteristics;

special categories of data – data connected to a person's racial or ethnic origin, political views, religious, philosophical or other beliefs, membership of professional unions, health, sexual life, status of an accused, convicted or acquitted person or a victim in criminal proceedings, conviction, criminal record, diversion, recognition as a victim of trafficking in human beings or of a crime under the Law of Georgia on the Elimination of Violence against Women and/or Domestic Violence, and the Protection and Support of Victims of Such Violence, detention and enforcement of his/her sentence, or his/her biometric and genetic data that are processed to allow for the unique identification of a natural person;

processing of data – any operation performed on personal data, including collecting, obtaining, accessing, photographing, video monitoring and/or audio monitoring, organising, grouping, interconnecting, storing, altering, retrieving, requesting for access, using, blocking, erasing or destroying, and disclosing by transmission, publication, dissemination or otherwise making available;

data subject – any natural person whose data are being processed (Further also - respondent);

consent of the data subject – consent freely and unambiguously expressed by a data subject after the receipt of the respective information, by an active action, in writing (including in electronic form) or verbally, to the processing of data concerning him/her for specific purposes;

Written consent of the data subject – consent that the data subject has signed or otherwise expressed in writing (including electronically) after receiving relevant information to the processing of data concerning him or her for a specific purpose;

controller – a natural person, a legal person, or a public institution, who individually or in collaboration with others determines the purposes and means of the processing of data, and who directly or through a processor processes data;

processor – a natural person, a legal person, or a public institution, which processes data for or on behalf of the controller. A natural person who is in labour relations with the controller shall not be considered a processor;

personal data protection officer – a person designated/appointed by a controller or a processor, who performs the functions as provided for by Article 33 of Law on Personal data protection of Georgia;

data depersonalisation – the processing of data in such a manner that the data cannot be attributed to the data subject or attributing them to the data subject involves disproportionate effort, expense and/or time.

1. CRRC-Georgia's Data Protection Responsibility and Relations with customers

CRRC-Georgia, as a rule, collects personal data directly from respondents, who are responsible for the accuracy of the information they provide. The organization conducts surveys both independently—on its own initiative and with its own resources—and on behalf of clients, based on service agreements.

If CRRC-Georgia processes personal data for or on behalf of a customer, and the customer determines the purposes and means of processing, then in accordance with the Law of Georgia On Personal Data Protection, a written agreement must be concluded between the customer (as the data controller) and CRRC-Georgia (as the data processor). Alternatively, a relevant legal act may be issued to define the roles and responsibilities of the parties regarding the processing of personal data.

CRRC-Georgia is committed to the principle of data minimization and strives to store personal data in a depersonalized form whenever possible. All personal data collected by CRRC-Georgia is treated as confidential and is not disclosed to third parties, except in cases explicitly provided for by Georgian legislation—such as for court proceedings or the fulfillment of legally mandated functions.

2. Legal Basis for Personal Data Processing

CRRC-Georgia employs both quantitative and qualitative research methods to collect information. The organization processes personal data based on various legal grounds, including the consent of the data subject, which may be obtained either verbally or in writing, depending on the context and method of data collection.

2.1. Data Processing within the Scope of Quantitative Research

Within the framework of quantitative research, CRRC-Georgia ensures, to the greatest extent possible, that personally identifiable data is not processed. Data is stored exclusively in a depersonalized and statistical format. Specifically, quantitative interviews are stored in a manner that makes it impossible to identify individual respondents. Ultimately, the collected data is aggregated and generalized, resulting in purely statistical information.

Before data collection begins, CRRC-Georgia identifies the target research audience. At this stage, the methodology for selecting respondents is defined, and the organization collects only the volume of data necessary to achieve the research objectives. Depending on the specific aim of the research, the audience may vary and include different categories of data subjects.

CRRC-Georgia follows the approach outlined below for data processing within the framework of quantitative research:

- In the case of **face-to-face population surveys**, respondents' personal data (such as identity or specific address) is not predetermined and remains unknown prior to data collection. As a result, personal data is not processed at this initial stage of the research process.
- For **telephone interviews**, respondents' phone numbers are randomly generated in advance. Interviewers contact these randomly selected numbers without prior knowledge of the identity of the data subject. Therefore, no personal data is processed at this stage of the research process either.

- Depending on the purpose of the research, CRRG-Georgia may, in certain cases, receive contact details of specific respondents. Such data may be provided by the client, who is responsible for ensuring that the information was collected in compliance with the Law of Georgia on Personal Data Protection.
- On rare occasions, contact data may be obtained from open and publicly accessible sources, primarily from the Internet. In such cases, the legal basis for processing is subparagraph “e” of paragraph 1 of Article 5 of the Law of Georgia On Personal Data Protection, which permits data processing when the data is publicly available by law or has been made public by the data subject.

CRRG-Georgia may retain the contact information of respondents from quantitative surveys based on the organization’s legitimate interest, specifically for the purpose of conducting follow-up monitoring related to the survey.

2.2 Data Processing within the Framework of Qualitative Research

In qualitative research, data collection is typically conducted through audio or audio-video recordings. The primary purpose of these recordings is to create accurate transcripts, after which the original audio and video files are securely destroyed.

Because respondents can be personally identified from these recordings, and the data collected may include special categories of personal data, data collection is carried out based on the written consent of the respondent as the data subject. Accordingly, consent serves as the legal basis for both the processing of personal data and the use of audio and/or video recordings.

CRRG-Georgia may retain the contact information of respondents from qualitative research based on the organization’s legitimate interest, specifically to avoid contacting individuals who have already participated in a qualitative study.

3. Informing the data subject and obtaining consent for data processing

When processing personal data within the framework of a research study, the data subject shall be informed about the processing of their personal data prior to the start of the interview. The following information shall be provided to the data subject:

- The identity and contact details of the data controller, their representative (if applicable), and/or the data processor (if applicable);
- The purposes and legal basis for the processing of personal data (including audio or audio-video recordings);
- Information about the compelling legitimate interests of the data controller or a third party, if the data is processed on the basis of such interests — for example, when respondents’ phone numbers are stored to prevent repeat interviews and to enable research monitoring.¹;

¹ In such cases, phone numbers are stored separately in a manner that prevents any possibility of linking a phone number to a specific interview.

- The identity and contact details of the Data Protection Officer;
- The duration of personal data storage, or if a specific period cannot be determined, the criteria used to determine the storage duration;
- If the respondent's personally identifiable data is not stored, this will be clearly explained to them;
- Information about the data subject's rights, including the respondent's right to refuse to answer specific questions. If the respondent's personally identifiable data is not stored, it will be explained that the interview is saved in a manner that even the organization's staff cannot identify the respondent. Accordingly, the respondent does not qualify as a data subject and the rights defined in Chapter III of the Law of Georgia on Personal Data Protection do not apply.²

After providing the above information, the data subject may consent to the processing of personal data. Consent must be given through an active expression (in writing, including electronically, in cases involving special categories of data), and must be freely and clearly expressed.

The data subject may refuse the processing of their personal data, in which case the interview will not be conducted. If the data subject withdraws consent during the interview—i.e., refuses further processing—the interview will be terminated immediately, and no further data about the individual will be processed.

In addition, the data subject has the right to decline to answer any individual question(s), which will not affect the continuation of the interview.

4. Data subject rights

The data subject has the right to:

- **Request confirmation** as to whether their personal data is being processed and to receive information regarding such processing, including the legal basis, purpose, and retention period;
- **Access** the personal data collected about them or request copies of it;
- **Refuse** the audio or audio-video recording of an interview in the context of qualitative research;
- **Request the correction, update, and/or completion** of personal data that is incorrect, inaccurate, or incomplete;
- **Request the blocking** of their personal data held by the organization, provided there are appropriate legal grounds;
- **Request the termination, deletion, or destruction** of their personal data processing, if justified by appropriate legal grounds;
- **Withdraw previously given consent** at any time, without providing a reason.

If you believe that your rights or the regulations established by the Law of Georgia on Personal Data Protection have been violated, you may file a complaint with the Personal Data Protection Service or apply to the court in accordance with the procedures established by law.

² In such cases, these rights may apply only to contact phone numbers (except in cases defined by the Law of Georgia on Personal Data Protection), provided that the phone numbers are stored separately from the interviews.

You are guaranteed unrestricted access to the Company's Personal Data Protection Officer. You may contact the Officer for consultations or to obtain additional information. Details about the Personal Data Protection Officer are available on the Company's website and are also provided in this policy document.

5. Restriction of rights

In accordance with the Law of Georgia on Personal Data Protection, the rights of a data subject may be restricted if such restriction is expressly provided for by Georgian legislation, does not violate fundamental human rights and freedoms, is a necessary and proportionate measure in a democratic society, and the exercise of these rights may pose a threat to:

- State security, information security and cybersecurity and/or defense interests;
- Public security interests;
- Crime prevention, investigation, criminal prosecution, administration of justice, execution of imprisonment or deprivation of liberty, execution of non-custodial sentences and probation, or operational-investigative activities;
- Interests related to financial or economic matters (including monetary, budgetary, and tax issues), public health, or social security that are important to the country;
- Detection of violations of professional or ethical standards (including in regulated professions) by the data subject, and the imposition of corresponding liability;
- The rights and freedoms of the data subject and/or other individuals, including the right to freedom of expression;
- Protection of state, commercial, professional, or other secrets as defined by law;
- The substantiation of a legal claim or response;
- The exercise of the functions and powers of regulatory and/or supervisory authorities in the areas covered by these provisions.

A measure intended to restrict the rights of the data subject may be applied only to the extent necessary to achieve the purpose of the restriction.

If there are grounds for such restriction, CRRC-Georgia's decision shall be communicated to the data subject in a manner that does not compromise the purpose of the restriction.

6. Data retention period

Interviews conducted within the framework of quantitative research are stored in a depersonalized form, making it impossible to identify individual respondents.

Any personal data (if collected) is retained only for the period necessary to fulfill the legitimate purpose of its processing. Once this purpose has been achieved, the personal data is either deleted or further depersonalized, unless continued processing is required by Georgian legislation.

CRRC-Georgia stores personal data (if any) for the following periods:

- **Respondents' contact information (e.g., phone numbers):** Retained until the completion of monitoring activities. Specifically, a portion of respondents may be re-contacted to verify their participation in the study. Monitoring may be conducted within **three months** following the end of the survey.
- **Audio or audio-video recordings (qualitative research):** Stored until the transcript is prepared. Transcription must be completed within **three months** of the in-depth interview or focus group. All identifiable information is removed from the transcript to ensure anonymity.
- **Consent forms (including the accompanying information sheet):** Stored for **four months** after the deletion of personal data or until the end of the research project -whichever comes later.
- **Focus group participant data:** To prevent the same individual from participating in multiple focus groups within the same research framework, their data is retained for **one year** following the focus group session.

7. Data storage location and security measures

CRRC-Georgia implements all organizational and technical measures required by the Law of Georgia "On Personal Data Protection" and applicable regulatory legal acts. The organization takes all necessary and adequate measures to safeguard personal data from unauthorized or accidental access, destruction, alteration, blocking, copying, dissemination, or any other unlawful actions by third parties.

Access to personal data is limited and role-based, granted only to authorized employees in accordance with their job functions and responsibilities. Employees are granted access solely to the extent necessary for the performance of their official duties. Additionally, they are bound by a confidentiality obligation, which constitutes an essential and integral part of their employment contract.

Office computers used for data storage are accessible only to specific users through individual usernames and passwords. Each employee has a unique set of login credentials to ensure accountability and secure access. Physical documents - such as consent forms and notification forms - are stored in a secure, access-controlled location, and only authorized personnel are permitted to access them.

To conduct online in-depth interviews or focus groups, CRRC-Georgia uses a registered Zoom platform account. Recordings are stored on Zoom servers located in the European Union, where the provisions of the General Data Protection Regulation (GDPR) apply.

Contact information

If you have any questions regarding this Privacy Policy or CRRC-Georgia's data protection practices, please contact the Data Protection Officer:

Data Protection Officer:

Data Protection Team LLC

Email: info@dpt.ge

Phone: +995 599 086 198