



PRIVACY POLICY

Effective Date: April 29, 2025

This document is an integral part of the Digital Artwork Commission Agreement.
The latest version is always available at: missrina.com/privacypolicy.

1. INTRODUCTION

In this Privacy Policy, **"the Artist"** refers to **Napolova Margarita Andreevna**, an individual entrepreneur registered in Georgia (Identification Number 345786367), trading under the name Miss Rina.

The Artist respects your privacy and is committed to protecting your personal data in compliance with:

- The Law of Georgia **"On Personal Data Protection" (No. 5669 of 2021);**
- The **Digital Artwork Commission Agreement;**
- Industry-standard confidentiality practices.

By using the Artist's website (missrina.com) or services, you acknowledge that you have read, understood, and agreed to the terms of this Privacy Policy.

2. INFORMATION COLLECTED BY THE ARTIST

The Artist may collect and process the following categories of personal data:

- **Contact Details:**
 - Full name;
 - Email address;
 - Country of residence;
 - Links to social media profiles (if provided voluntarily).
- **Payment Information:**
 - Transaction details processed via PayPal or other payment platforms;
 - Payer's country (for tax compliance purposes).
- **Order-Related Data:**
 - Character references (images, descriptions);
 - Artistic preferences and style specifications;
 - Order comments or special requests.

- **Technical Data:**

- IP address;
- Browser type and version;
- Limited analytics on website usage (non-identifiable).

- **Correspondence History:**

- All communications related to order fulfillment, support requests, or technical inquiries.

3. HOW THE ARTIST USES YOUR DATA

Your personal data is processed **strictly** for the following purposes:

1. Order Fulfillment:

- To create and deliver commissioned digital artwork as per the Terms of Service (missrina.com/tos);
- To communicate with you regarding project updates, approvals, or revisions.

2. Legal Compliance:

- To maintain accounting records as required by Georgian tax legislation (retention for up to 6 years);
- To respond to lawful requests from regulatory authorities.

3. Service Improvement:

- To analyze anonymized website traffic data for technical optimization;
- To enhance customer support processes.

The Artist does NOT:

- Use your data for targeted advertising or behavioral profiling;
- Sell, rent, or share your data with third parties for marketing purposes.

4. DATA RETENTION

Your data is retained only for as long as necessary:

- **Accounting Records:** 6 years (as mandated by Georgian tax law);
- **Order Data:** Duration of collaboration + 2 years after project completion;
- **Correspondence:** Up to 3 years (unless you request earlier deletion).

Note: Payment data is processed exclusively via PayPal (missrina.art@gmail.com) in accordance with PayPal's Privacy Policy and the payment terms specified in the Agreement.

5. DATA SHARING AND ACCESS

The Artist **does not disclose** your personal data to third parties, except in the following cases:

1. Legal Obligations:

- To comply with tax, financial, or regulatory requirements under Georgian law.

2. Trusted Service Providers:

- PayPal (for payment processing);
- Google Drive (for secure file delivery, encrypted transfers only).

3. Authorities:

- Upon formal request by Georgian regulatory bodies (e.g., tax office, data protection agency).

No international data transfers occur outside these secured channels without your explicit consent.

6. LEGAL BASIS FOR PROCESSING

The Artist processes your data under the following legal grounds:

- **Contractual Necessity:** To fulfill obligations under the Digital Artwork Commission Agreement.
- **Consent:** When you voluntarily provide data via forms, emails, or order specifications.
- **Legal Obligation:** To meet Georgian tax and reporting requirements.
- **Legitimate Interest:** To prevent fraud, ensure service quality, and maintain website security.

7. YOUR RIGHTS

Under the **Georgian Law "On Personal Data Protection" (No. 5669/2021)** and **GDPR principles**, you have the right to:

1. **Access:** Request a copy of your personal data held by the Artist.
2. **Rectification:** Correct inaccurate or incomplete data.
3. **Erasure:** Request deletion of your data (where legally permissible).
4. **Objection:** Challenge processing based on legitimate interest.
5. **Lodge Complaints:** Contact the [Personal Data Protection Service of Georgia](#).

To exercise these rights, email the Artist at: missrina.art@gmail.com.

8. DATA SECURITY MEASURES

The Artist implements **technical and organizational measures** to protect your data, including:

- **Encryption:** Secure protocols (TLS/SSL) for data transfers;
- **Access Controls:** Restricted access to personal data;
- **Backups:** Regular encrypted backups to prevent data loss.

9. COOKIES AND ANALYTICS

The Artist's website uses:

- **Essential cookies:** For basic functionality (e.g., session management);
- **Anonymous analytics:** Aggregate data on page visits (no personalized tracking).

You may disable cookies via your browser settings, but this may affect website usability.

10. POLICY UPDATES

The Artist reserves the right to update this Privacy Policy. Changes will be:

- Published at missrina.com/privacypolicy;
- Effective immediately upon posting (unless stated otherwise).

Contact Information:

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Approved and effective as of: April 29, 2025