



**PERSONAL DATA
PROTECTION SERVICE**

**STATISTICS OF THE ACTIVITIES OF THE
PERSONAL DATA PROTECTION SERVICE OF
GEORGIA
FOR 9 MONTHS OF 2025
/January-September/**

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CONTROL OF THE LAWFULNESS OF PERSONAL DATA PROCESSING

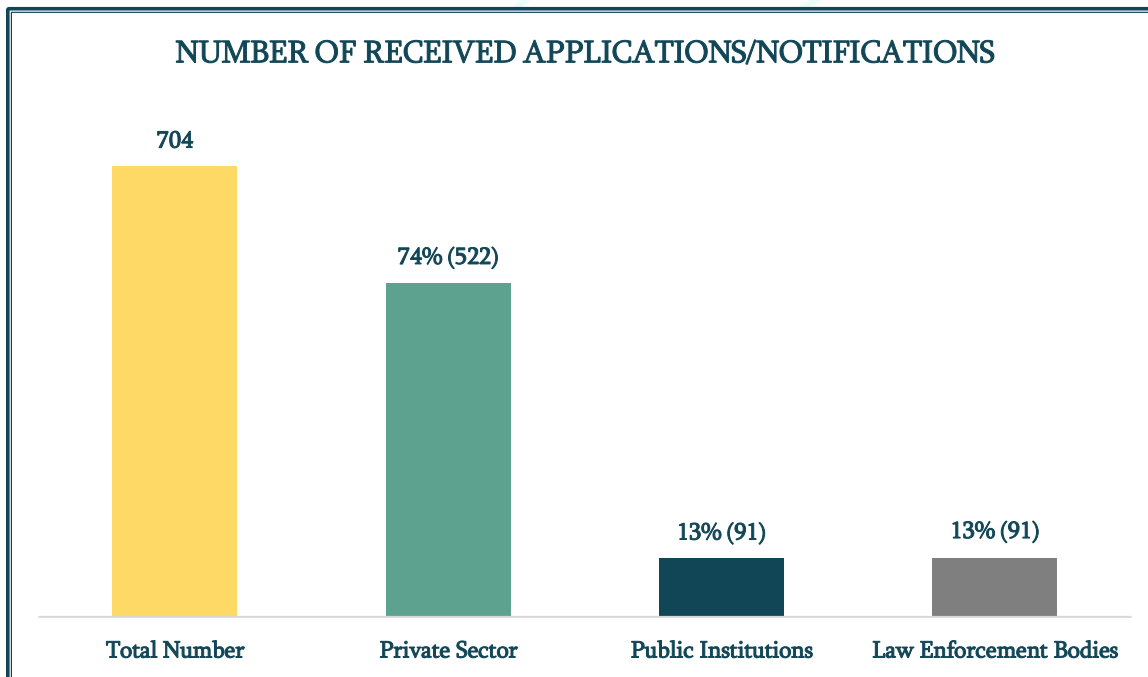
To control the lawfulness of personal data processing, the Personal Data Protection Service of Georgia studies the legality of personal data processing by private and public institutions upon its initiative - in the scopes of planned inspection, and unplanned inspection, including on the basis of the notification of interested parties and applications of the citizens.

In order to address the deficiencies discovered during data processing, the Service, in addition to imposing administrative penalties, issues recommendations and mandatory instructions to be carried out.

The Service implements preventive measures, including, rendering consultations to interested parties, raising public awareness, holding informational meetings and training, issuing advisory guidelines and publishing annual and special reports on the state of data protection, and monitoring covert investigative actions and activities carried out at the central databank of electronic communications identification data.

CITIZENS' APPLICATIONS

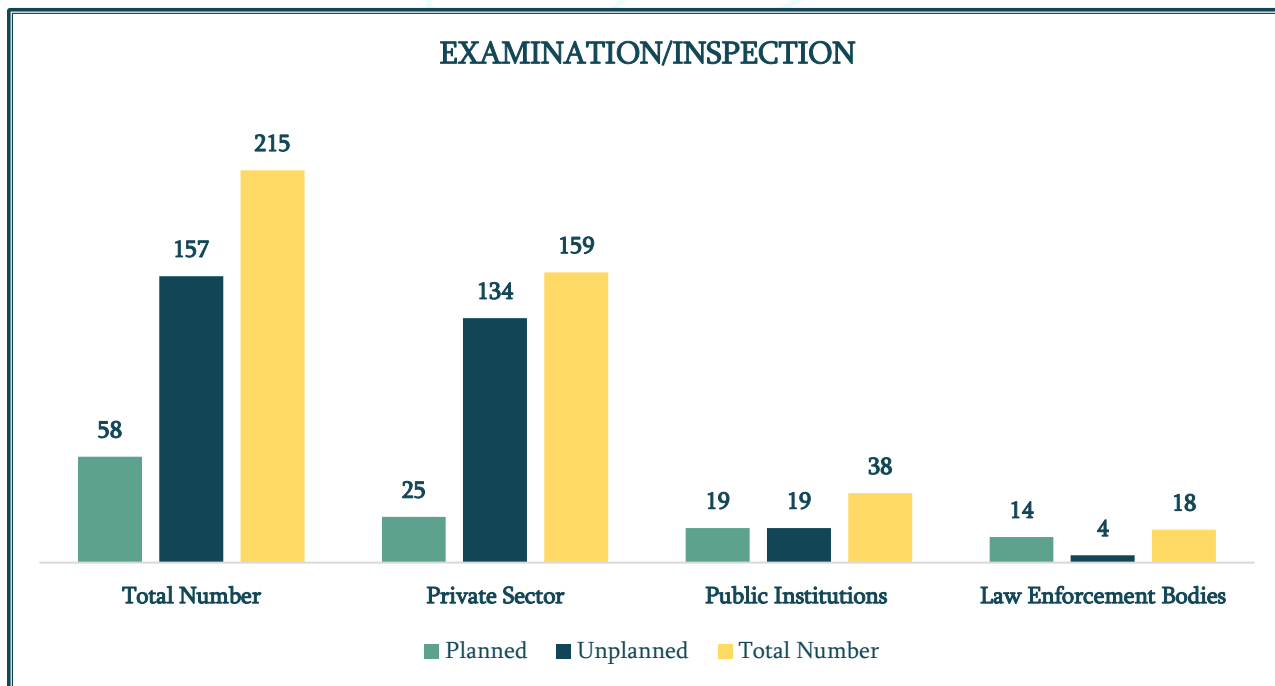
The Service received 704 applications/notifications. 522 (74%) applications/notifications related to data processing in private sector, 91 (13%) — in public institutions and 91 (13%) — in law enforcement bodies.



EXAMINATION OF THE LAWFULNESS OF DATA PROCESSING (INSPECTION)

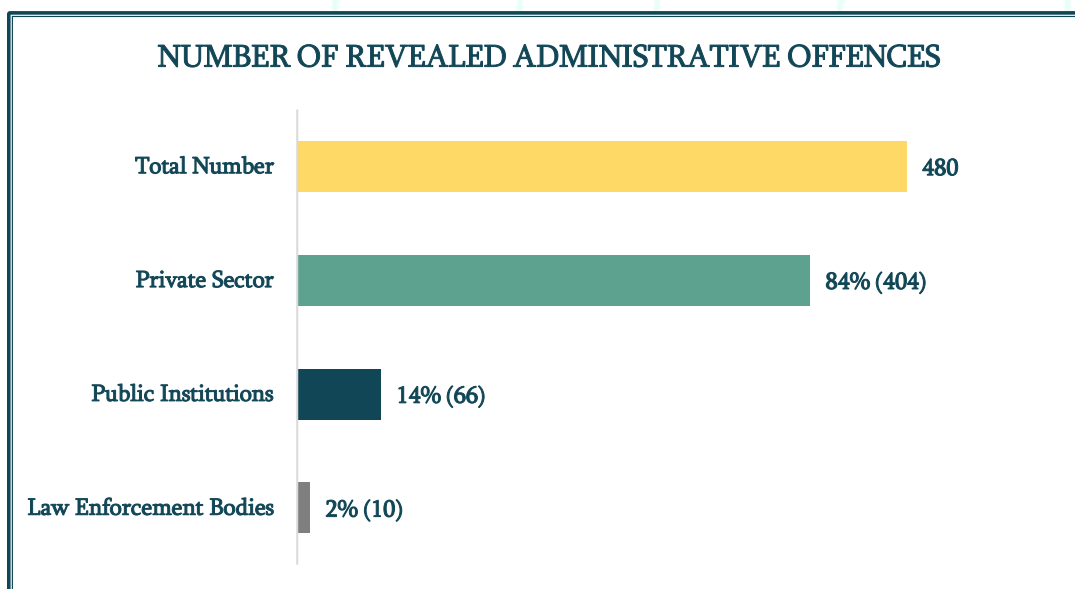
The Service inspects the lawfulness of data processing by public and private institutions, law enforcement bodies via planned and unplanned inspections. According to the order № 8 / 1259 – 2024, December 31, 2024, of the President of the Personal Data Protection Service, “On the Approval of the 2025 Plan for the Planned Examinations (Inspection) of the Lawfulness of Personal Data Processing”, the planned examination (inspection) of the lawfulness of data processing is carried out in line with the annual plan of inspections approved by the individual legal act of the President of the Service. Whereas the unplanned examinations (inspections) of the lawfulness of data processing are conducted by the Service on its own initiative or based on the received notifications of the interested persons.

In the reporting period, the Service initiated 215 examinations (inspections) of data processing lawfulness, out of which 27% (58) were planned, whereas 73% (157) were unplanned inspections.

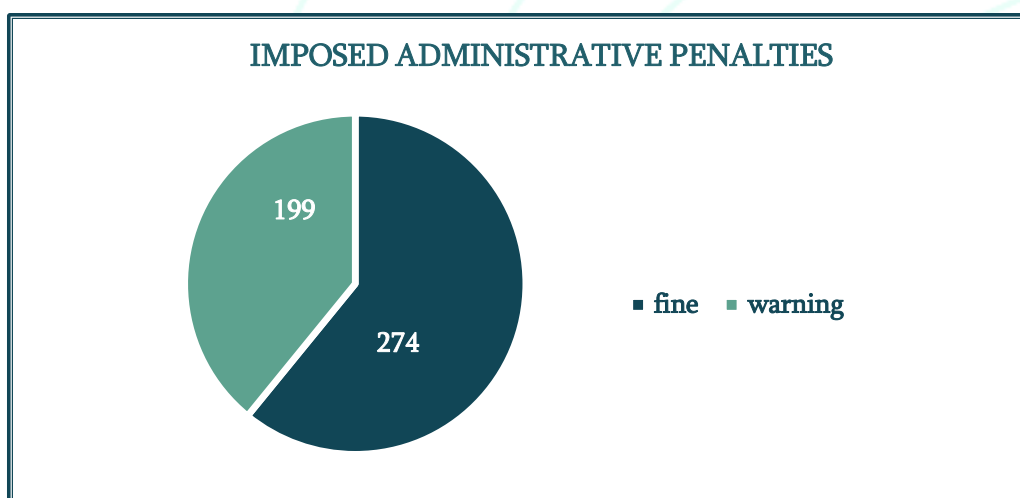


REVEALED ADMINISTRATIVE OFFENCES

The Service identified 480 cases of unlawful processing of personal data, out of which 103 cases were studied in the scope of the examinations (inspections) initiated in 2024 and conducted (completed) in the reporting period, while 377 cases were studied in the scope of the examinations (inspections) initiated and conducted in 2025. 84% (404) of administrative offences revealed by the Service related to unlawful data processing in the private sector, 14% (66) — in the public institutions, and 2% (10) — in law enforcement bodies.



The Service imposed fines and warnings as administrative penalties in 473 cases. 75 fines were imposed in the scope of the examinations (inspections) initiated in 2024 and conducted (completed) in the reporting period and 199 fines were imposed in the scope of the examinations (inspections) initiated and conducted in the reporting period. 27 out of 199 warnings referred to the examinations (inspections) initiated in 2024 and conducted (completed) in the reporting period, while in 172 cases the warnings were imposed in the scope of the examinations (inspections) initiated and conducted in the reporting period.



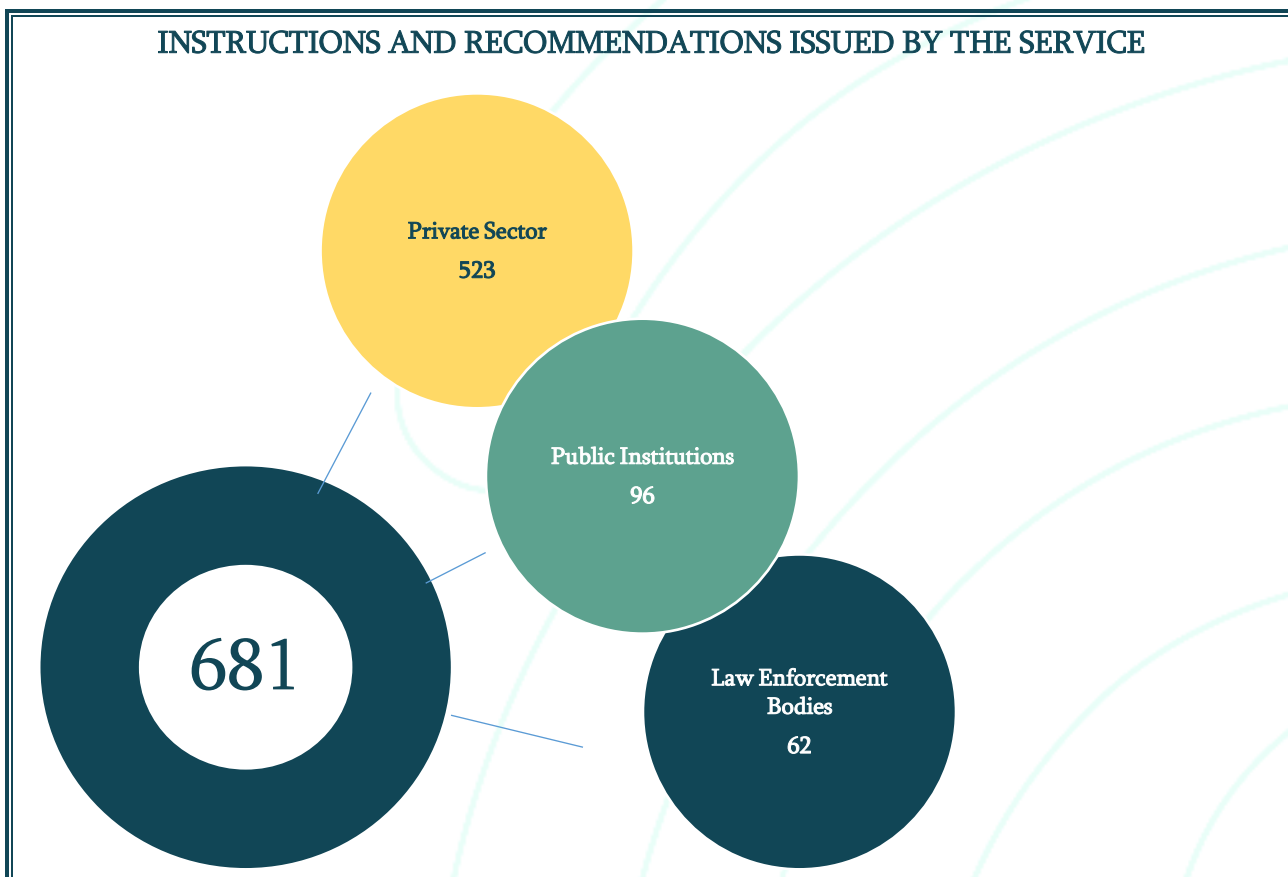
INSTRUCTIONS AND RECOMMENDATIONS ISSUED BY THE SERVICE

Except for the administrative penalties, to eliminate the revealed deficiencies, the Service issued 681 instructions¹ and recommendations.² for public institutions and representatives of private sector. Out of the 663 instructions issued, 121 were directed to the examinations (inspections) initiated in 2024 and conducted (completed) in the reporting period, while 542 instructions referred to the examinations (inspections) initiated and conducted in the reporting period. 7 out of the 18 recommendations referred to the examination (inspection) initiated in 2024 and conducted (completed) in the reporting period, while 11 recommendations referred to the examinations (inspections) initiated and conducted in the reporting period. 77% (523) out of the issued 681 instructions and recommendations related

¹ **The instruction** is a mandatory order issued by the Service to the data controller or/and the data processor in written form in order to implement the measures provided by Article 52, paragraph 1, subparagraphs “a”-“d” of the Law of Georgia “On Personal Data Protection”.

² **The recommendation** is a written advice issued by the Service to the data controller or/and the data processor in order to reduce the risks of violations during the data processing.

to private sector, 14% (96) — public institutions, while 9% (62) concerned to law enforcement bodies.



OBLIGATION TO NOTIFY THE PERSONAL DATA PROTECTION SERVICE ABOUT A DATA BREACH (INCIDENT)

According to Article 3, subparagraph “Z”, of the Law of Georgia “On Personal Data Protection”, an incident is a breach of data security leading to the unlawful or accidental damage or loss of data, or the unauthorised disclosure, destruction, alteration of or access to data, or the collection/obtaining of data, or other unauthorised processing.

Pursuant to Article 29 of the Law, a controller is obliged to register an incident, its resulting outcome, the measures taken, and to notify the Personal Data Protection Service about the incident, not later than 72 hours after the identification of the incident, in writing or electronically, except for the case where it is least expected that the incident would cause

significant damage and/or pose a significant threat to fundamental human rights and freedoms.³

During the reporting period, the Service received a total of 30 notifications regarding the data breach (incident) from the data controllers.

CONSULTATIONS PROVIDED BY THE SERVICE

The Service provides consultations on issues of personal data processing. Consultations are provided both orally (via telephone communications and in-person meetings) and in writing.

TOTAL NUMBER OF CONSULTATIONS
PROVIDED

7054

³ Law of Georgia “On Personal Data Protection”, Article 29 (1).

MONITORING OF THE COVERT INVESTIGATIVE ACTIONS AND THE ACTIVITY CARRIED OUT AT THE CENTRAL DATABANK OF THE ELECTRONIC COMMUNICATION IDENTIFICATION DATA

One of the functions of the Service is to monitor covert investigative actions and activity carried out at the central databank of electronic communications identification data. The Service supervises the covert investigative actions defined by the first part of Article 143¹ of the Criminal Procedure Code of Georgia, also in terms of observing the clauses and mandatory norms provided by Chapter XVI¹ of the mentioned Code.

In order to control covert investigative actions and activity carried out at the central databank of electronic communications identification data, the Service receives, round-the-clock, court rulings on granting authorization to carry out a covert investigative action, prosecutor's resolutions on conducting covert investigative actions due to urgent necessity, and records in writing from law enforcement bodies on covert investigative actions. The Service also receives notifications from electronic communication companies about transferring the electronic communication identification data to law enforcement authorities.

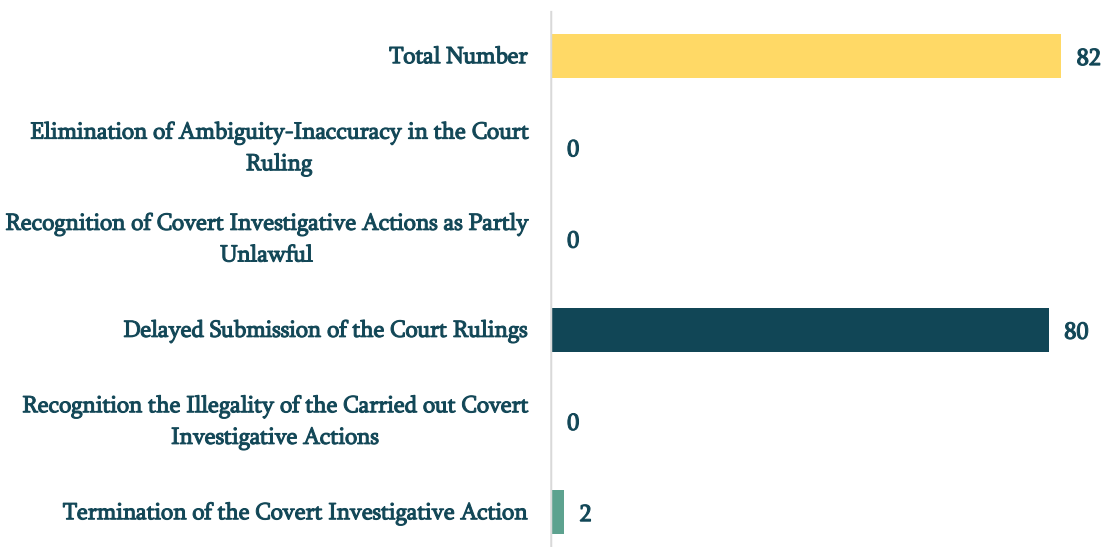
The Service verifies submitted documents, compares them with the information provided in the electronic systems, and enters the data provided by the documents into the internal electronic system of registration of covert investigative actions and analyses them.

In addition to the mentioned mechanisms, the Service uses electronic and special electronic control systems to monitor covert eavesdropping and recording of telephone communications during the covert investigative actions, whereas for the monitoring of the activities carried out at the central databank of electronic communications identification data the electronic communication system for controlling the central databank of identification data is used.

SUSPENSION MECHANISM

In the reporting period, the Service used the suspension mechanism of covert eavesdropping and recording of telephone communications (via electronic control system) in 82 cases, 80 of which were caused by the delayed submission of the court rulings, and 2 - by the termination of covert investigative action.

The Use of Suspension Mechanism



OTHER STATISTICAL INFORMATION



The court considered 534 motions for covert eavesdropping and recording of the telephone communications, of which 77% (410) were approved, 14% (73) were not approved, and 9% (51) were partially approved.



The court considered 133 motions regarding the extension of the period of covert eavesdropping and recording of the telephone communications, of which 86% (114) were approved, 4% (5) were not approved and 10% (14) were partially approved.



The court considered 831 motions regarding covert video and/or audio recording, photo-taking, of which 90% (749) were approved, 8% (63) were not approved, and 2% (19) were partially approved.



The court considered 76 motions regarding the extension of the period of covert video and/or audio recording, photo-taking, of which 80% (61) were approved, 15% (11) were not approved and 5% (4) was partially approved.



One motion, regarding covert investigative action - removal and fixing of information from the communication channel, computer system, was considered by the court.



The motions, concerning the ongoing collection of Internet traffic data, were not considered by the court.



The motions, concerning the extension of the period of ongoing collection of Internet traffic data, were not considered by the court.



The Service received the prosecutors' decrees on the conduct of covert investigative actions with urgent necessity. Out of the 114 decrees received 85% (97) were related to covert video recording and/or audio recording, photo-taking, and 15% (17) were related to covert wiretapping and recording of the telephone communications.



The Personal Data Protection Service of Georgia received the court rulings and the decrees of the prosecutor occasioned by the urgent necessity to carry out the investigative actions, the request for the document or information pursuant to Article 136 of the Code of Criminal Procedure. Out of the submitted documents (1847) in relation to Article 136 of the Code, the prosecutors' decrees were 4% (68), while 96%

(1779) were court rulings. 1771 court rulings were approved, 6 were partially approved and 2 were not approved.



The Personal Data Protection Service used 5 ambiguity-inaccuracy notification mechanisms regarding the permits issued by the court to the LEPL “Operative-Technical Agency of Georgia” for the covert wiretapping and recording of the telephone communications.



Two incidents were detected through the electronic monitoring system during the covert wiretapping and recording of the telephone communications.



According to the information received via the electronic monitoring system of the central databank for electronic communications identification data, based on the permit issued by the court, the LEPL “Operative-Technical Agency of Georgia” disclosed data from the central databank for electronic communications identification data for 49 times.



No deficiencies or incidents have been revealed as a result of monitoring of the activities carried out at the central databank of electronic communication identification data.

LEGAL EXPERTISE OF THE PROJECTS OF INTERNATIONAL AGREEMENTS AND COVENANTS

As part of the expertise, the Service reviews the draft agreements, the legislative and institutional mechanisms of personal data protection in the State party, and assesses the general risks of human rights violations in data processing, based on which recommendations for amendments are issued.

During the reporting period, the Service carried out legal expertise on 15 drafts of international agreements. Recommendations were issued in 3 cases and were not issued in 12 cases.

LEGAL EXPERTISE OF THE PROJECTS OF INTERNATIONAL AGREEMENTS/COVENANTS

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PUBLIC AWARENESS RAISING, INFORMATIONAL MEETINGS AND TRAINING

The Service actively carries out educational activities on data processing and protection-related topics. In order to raise awareness about personal data protection, the Service systematically conducts public lectures, information meetings and training sessions for representatives of the private and public sectors, law enforcement agencies.

The Service held a total of 46 meetings with 3873 participants for data subjects and data controllers/data processors. Out of these, 27 meetings were held with 800 school students as part of the new project: “Confidentiality Lessons.”

THIRD QUARTER OF 2025 STATISTICS ON ENSURING ACCESS TO PUBLIC INFORMATION

/July 1, 2025 - September 30, 2025/

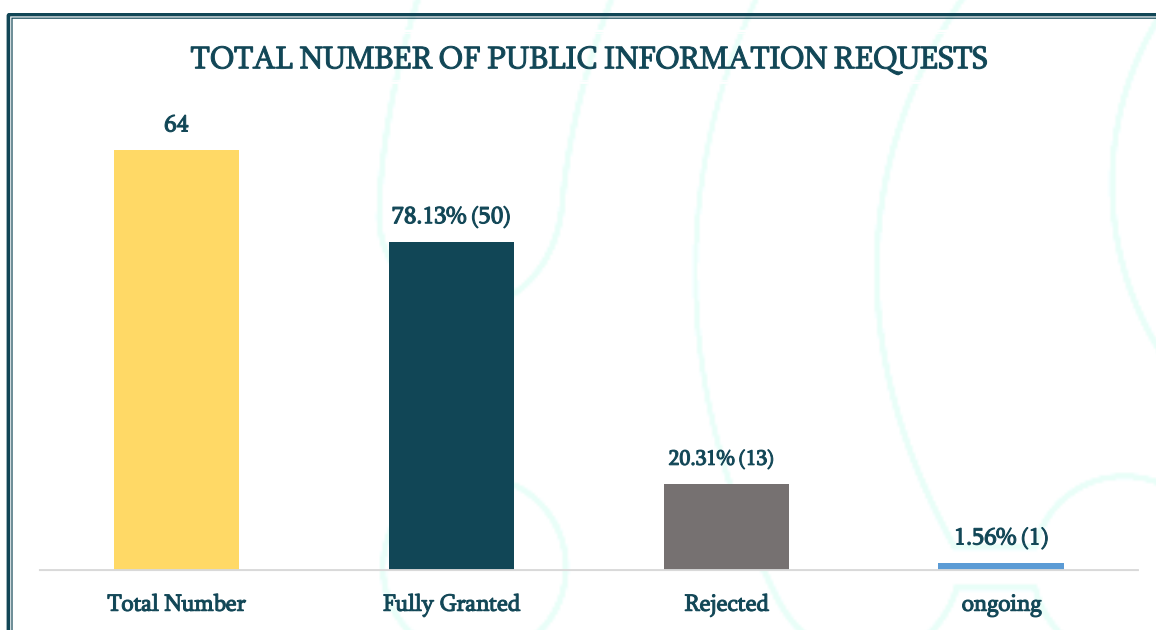
According to Article 49 of the General Administrative Code of Georgia, the document contains information regarding the provision of public information and personal data processing by the Personal Data Protection Service of Georgia from July 1, 2025 to September 30, 2025.

REQUEST FOR PUBLIC INFORMATION

From July 1, 2025 to September 30, 2025, the Personal Data Protection Service of Georgia received 64 requests for public information, out of which 50 were fully granted, and 13 were not granted, because:

- In 11 cases, the information was not requested in the form prescribed by law, which resulted in a deficiency that the applicants did not correct. As a result, the requests remained unconsidered, and the applicants were given substantiated responses and explained the procedure for filing complaints;
- In 2 cases, the applicant was informed that the office would not prepare sample documents, as the requested information was not considered public information.

1 request received during the reporting period is under review.



APPEALING REFUSAL TO ISSUE PUBLIC INFORMATION

From July 1, 2025 to September 30, 2025, the Personal Data Protection Service of Georgia made a decision to refuse 13 requests for public information, none of which was appealed.

APPLICATIONS TO RECTIFY PUBLIC INFORMATION

From July 1, 2025 to September 30, 2025, the Service did not receive any requests to rectify the public information.

GROUND FOR REFUSAL TO PROVIDE PUBLIC INFORMATION

During the decision-making process on granting the request for public information, the Service operated in accordance with the General Administrative Code of Georgia, the Law of Georgia “On Personal Data Protection” and the Order № 24 of the President of the Personal Data Protection Service of Georgia of February 29, 2024 - “Standard for requesting public information in electronic form in the Personal Data Protection Service”.

INFRINGEMENT OF THE REQUIREMENTS OF THE GENERAL ADMINISTRATIVE CODE OF GEORGIA

Infringement of requirements of the General Administrative Code of Georgia by employees of the Service was not revealed. Respectively, a disciplinary proceeding was not conducted.

COSTS

- ✓ The costs of processing and issuing public information amounted to 0 GEL (the documents were requested and transmitted in an electronic form).
- ✓ No costs related to the appeal arose.

PERSON RESPONSIBLE FOR ISSUING PUBLIC INFORMATION

The person responsible for providing public information is the Head of the Legal Department of the Personal Data Protection Service of Georgia.

INFORMATION TO BE PUBLISHED PROACTIVELY AND PERSONAL DATA PROCESSING

- ✓ On the webpage of the Personal Data Protection Service (pdps.ge), decisions are published (<https://pdps.ge/ka/content/980/gadawyvetilebebi>) in a format that does not allow the identification of individuals and private law entities.
- ✓ During the process of reviewing applications/permits of natural persons and legal entities and exercising other powers assigned by the legislation of Georgia, the Service processes personal data in accordance with the legal grounds and principles stipulated by the Law of Georgia “On Personal Data Protection”. Decisions made by the President of the Personal Data Protection Service of Georgia, containing the personal data of applicants and the third parties, are transferred to the third parties in a non-identifiable form.
- ✓ Public information can also be requested via e-mail at - office@pdps.ge and foi@pdps.ge.