

Privacy Policy and GDPR Compliance

PmP Records

Effective date: 12.09.2025

Last updated: 08.10.2026

1. General Provisions

1.1. PmP Records (“PmP Records”, “we”, “us”, or “our”) respects the privacy of website visitors, customers, artists, collaborators, and business partners.

1.2. This Privacy Policy explains how personal data may be collected, processed, stored, used, disclosed, and protected when individuals visit our website, communicate with us, purchase music, request licensing, commission custom musical works, or otherwise use our services.

1.3. Our data protection practices are governed by applicable legislation, including the Law of Georgia on Personal Data Protection and, where applicable, Regulation (EU) 2016/679, commonly known as the General Data Protection Regulation (GDPR).

1.4. We are committed to the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, confidentiality, and accountability.

1.5. This Privacy Policy applies to personal data processed through the PmP Records website and related business communications. Independent third-party platforms may operate under their own privacy policies.

2. Data Controller and Responsible Person

2.1. The person responsible for the processing and protection of personal data in connection with PmP Records is:

Individual Entrepreneur Iuliia Bliumenberg

Business location: Tbilisi, Georgia

Registered business address: Registration address: st. Ivane Javakhishvili, 91, apt. 2b, 0102, Tbilisi, Georgia

TAX ID 105335637,

small business certificate #002-01937

Website: <https://pmp-records.com>

2.2. Individual Entrepreneur Iuliia Bliumenberg acts as the data controller for personal data processed for the purposes described in this Policy, insofar as she determines the purposes and means of such processing.

2.3. All written requests concerning personal data, including requests for access, correction, deletion, restriction, and other applicable rights, may be submitted through the contact form on the Privacy Policy page of this website.

2.4. Additional contact or identification information may be provided where required by applicable law.

3. Categories of Personal Data

3.1. Depending on the nature of the interaction, we may process the following categories of information:

- Identification and contact details, such as name, email address, telephone number, and business affiliation.
- Information submitted through contact forms, inquiries, correspondence, and customer communications.
- Order information, requested services, licensing arrangements, transaction references, and billing information.
- Information provided for custom music commissions, including creative briefs, event details, and materials voluntarily supplied by customers.
- Technical information, such as IP address, browser type, device characteristics, operating system, and website interaction data.
- Cookie preferences and other information generated through permitted website technologies.

3.2. We request only information reasonably necessary for the relevant purpose.

3.3. We do not intentionally request sensitive personal data, such as health information, religious beliefs, political opinions, or biometric identifiers.

3.4. Customers should avoid including unnecessary sensitive personal information in contact forms or creative briefs.

3.5. Payment card information may be collected and processed directly by authorized payment service providers. PmP Records does not require customers to submit complete payment card numbers or security codes through its general contact form.

4. Sources and Methods of Data Collection

4.1. Personal data may be collected directly when an individual:

- Completes a contact or inquiry form.
- Requests information about music, licensing, or services.
- Places an order or commissions a musical work.
- Communicates with PmP Records by email or another authorized channel.
- Submits information necessary for a commercial agreement.

4.2. Certain technical information may be collected automatically through the website hosting platform, essential cookies, security mechanisms, and other technologies that are enabled on the website.

4.3. Information may also be received from payment processors or service providers where necessary to confirm a transaction or fulfill a requested service.

5. Purposes of Personal Data Processing

5.1. Personal data may be processed for the following purposes:

- a. Responding to inquiries and providing customer support.
- b. Preparing quotations, proposals, and commercial offers.
- c. Performing contracts and fulfilling orders for music, licensing, downloads, or custom compositions.
- d. Confirming payments, maintaining transaction records, and meeting accounting or tax obligations.
- e. Managing licensing permissions and protecting contractual and intellectual property rights.
- f. Maintaining website functionality, reliability, and security.
- g. Preventing fraud, unauthorized access, and misuse of services.
- h. Complying with applicable legal and regulatory requirements.
- i. Sending promotional communications where permitted by law and, where required, with the individual's consent.

5.2. Personal data will not be used for purposes incompatible with those for which it was collected unless another lawful basis exists.

6. Legal Bases for Processing

6.1. Where the GDPR applies, processing may be based on one or more of the following grounds:

Consent: Where an individual has freely provided valid consent for a specific processing activity.

Contractual necessity: Where processing is required to enter into or perform a contract.

Legal obligation: Where processing is necessary to comply with applicable legal requirements.

Legitimate interests: Where processing is necessary for legitimate business interests, such as service administration, fraud prevention, and website security, provided those interests are not overridden by the rights and freedoms of the individual.

Other lawful grounds: Where expressly permitted by applicable legislation.

6.2. Where processing relies on consent, consent may be withdrawn at any time.

6.3. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

6.4. Where the Law of Georgia on Personal Data Protection applies, processing must also satisfy the applicable legal grounds and requirements established by that law.

7. Website Hosting and Third-Party Services

7.1. The PmP Records website is hosted on the Wix.com platform.

7.2. Wix provides website hosting, technical infrastructure, data storage, security functionality, and other website-related services.

7.3. Depending on the services and integrations enabled, personal data may be processed by authorized third-party providers, including:

- Website hosting and infrastructure providers.
- Payment processing services.
- Email and communication services.
- Digital music distribution, streaming, or licensing platforms.
- Website analytics or security providers.

7.4. Such providers may act as independent data controllers or data processors, depending on their role and the nature of the service.

7.5. We seek to limit disclosures to information reasonably necessary for the relevant service or legal obligation.

7.6. Independent third-party websites and services are governed by their own privacy policies. Visitors should review those policies before submitting personal information.

8. Payments and Financial Information

8.1. Payments for music, licenses, downloads, or custom services may be processed through external payment providers.

8.2. Payment providers may collect information necessary to authorize transactions, prevent fraud, issue receipts, and comply with financial regulations.

8.3. PmP Records may receive transaction confirmation, payment status, customer identification, and other information required for order administration.

8.4. We do not request that customers transmit complete bank card details, PINs, or card security codes through ordinary website correspondence.

8.5. Financial and transaction records may be retained where required by applicable accounting, taxation, contractual, or other legal obligations.

9. Cookies and Similar Technologies

9.1. The website may use cookies and comparable technologies to support essential functions, maintain security, remember preferences, and, where enabled, analyze website performance.

9.2. Cookies may include:

Essential cookies: Necessary for website operation, security, and core functionality.

Functional cookies: Used to remember selected preferences or provide optional functionality.

Analytics cookies: Used, where enabled, to understand website usage and improve performance.

Third-party cookies: Potentially placed by embedded content or integrated services.

9.3. Where required by applicable law, non-essential cookies will be activated only after obtaining valid consent.

9.4. Visitors may manage cookies through the website's available consent controls and their browser settings.

9.5. Disabling certain cookies may affect website functionality.

9.6. Actual cookies and tracking technologies depend on the Wix configuration and third-party integrations enabled on the website.

10. Data Sharing and Disclosure

10.1. PmP Records does not sell personal data to third parties.

10.2. Personal data may be disclosed only where there is a lawful and legitimate reason, including:

- a. To authorized service providers supporting website operation or service delivery.
- b. To payment processors for transaction administration.
- c. To professional advisers where necessary and subject to appropriate confidentiality obligations.
- d. To public authorities where disclosure is required by applicable law.
- e. To establish, exercise, or defend legal claims.

10.3. We do not authorize service providers acting on our behalf to use personal data for unrelated purposes.

10.4. Where required, appropriate contractual and organizational safeguards will be applied.

11. International Data Transfers

11.1. Because the website and certain services are provided through international platforms, personal data may be processed or stored outside Georgia or the European Economic Area.

11.2. Where international transfers are subject to the GDPR, we will rely on an applicable lawful transfer mechanism, such as an adequacy decision, appropriate contractual safeguards, or another permitted legal basis.

11.3. Transfers governed by Georgian legislation will be subject to the applicable requirements of the Law of Georgia on Personal Data Protection.

11.4. The applicable safeguards depend on the provider, destination, nature of the data, and relevant legal requirements.

12. Data Storage and Retention

12.1. Personal data is retained only for as long as reasonably necessary for the purposes for which it was collected or for a longer period required by applicable law.

12.2. Retention periods are determined by the nature of the information and may depend on:

- The duration of customer correspondence or an active commercial relationship.
- The performance and administration of contracts.
- Applicable accounting and taxation requirements.
- The need to establish or defend legal claims.
- Security and fraud prevention requirements.
- Valid consent, where consent is the applicable legal basis.

12.3. When personal data is no longer required and no lawful basis for continued retention exists, it will be deleted, anonymized, or otherwise disposed of using appropriate procedures.

12.4. Where deletion cannot be completed immediately because of legal or technical restrictions, the information will be handled in accordance with applicable law.

13. Information Security

13.1. PmP Records seeks to implement reasonable technical and organizational measures appropriate to the nature of the personal data processed and the associated risks.

13.2. Such measures may include access controls, secure authentication, appropriate confidentiality practices, platform security features, and limitations on access to customer information.

13.3. Access to personal data is restricted to persons or service providers with a legitimate need to process it.

13.4. No internet transmission or electronic storage system can be guaranteed to be completely secure.

13.5. In the event of a personal data breach, applicable assessment, notification, and reporting obligations will be followed.

14. Rights of Data Subjects

14.1. Depending on the applicable legislation and circumstances, individuals may exercise the following rights:

Right to information: To receive information about the collection and processing of their personal data.

Right of access: To obtain confirmation of whether their personal data is being processed and, where applicable, access to that information.

Right to rectification: To request correction of inaccurate or completion of incomplete personal data.

Right to erasure (Right to Be Forgotten): To request deletion of personal data where the legal conditions for erasure are satisfied.

Right to restriction of processing: To request limitation of processing in circumstances established by law.

Right to data portability: To receive eligible personal data in a structured, commonly used, machine-readable format and, where applicable, request its transfer to another controller.

Right to object: To object to processing in circumstances permitted by applicable law.

Right to withdraw consent: To withdraw previously granted consent without affecting the lawfulness of earlier processing.

Rights concerning automated decision-making: To exercise applicable protections concerning decisions based solely on automated processing, including profiling.

14.2. These rights are subject to applicable legal conditions, limitations, and exceptions.

14.3. Individuals may also have the right to lodge a complaint with the competent supervisory authority or seek judicial remedies.

15. Right to Be Forgotten

15.1. Individuals may request the erasure of personal data concerning them where one or more applicable legal grounds for deletion exists.

15.2. Grounds may include circumstances where:

a. Personal data is no longer necessary for its original purpose.

b. Consent has been withdrawn and no other lawful basis for processing exists.

c. Processing is unlawful.

d. A valid objection has been raised and there are no overriding lawful grounds for continued processing.

e. Erasure is required by applicable legislation.

15.3. The Right to Be Forgotten is not absolute.

15.4. Certain information may need to be retained to comply with legal obligations, protect contractual rights, maintain financial records, or establish, exercise, or defend legal claims.

15.5. Where a deletion request is valid, PmP Records will take the necessary steps to erase the relevant information or arrange its erasure by authorized processors, as required by law.

15.6. Where complete erasure is not legally permitted, the applicant will be informed of the applicable grounds for continued retention, subject to any lawful restrictions.

16. Procedure for Exercising Privacy Rights

16.1. Requests concerning personal data must be submitted in writing through the contact form provided on the Privacy Policy page of the PmP Records website.

16.2. Requests should identify the applicant and clearly describe the action requested.

16.3. For example, an applicant may request:

- Access to personal data.
- Correction of inaccurate information.
- Deletion of personal data.
- Withdrawal of consent.
- Restriction of processing.
- Information about the use or disclosure of personal data.

16.4. Where reasonably necessary, additional information may be requested to verify the applicant's identity and prevent unauthorized disclosure or deletion.

16.5. Identity verification measures will be proportionate to the nature and sensitivity of the request.

16.6. Requests will be handled within the periods established by applicable legislation.

16.7. Where the GDPR applies, requests will generally be answered without undue delay and within one month, subject to legally permitted extensions.

16.8. Where Georgian legislation establishes a different applicable deadline, the relevant statutory requirement will be observed.

16.9. Requests are generally handled without charge, except where applicable law permits a reasonable fee or refusal in specific circumstances.

16.10. Submission of a request does not automatically establish entitlement to the requested action. Each request will be evaluated under the applicable legal requirements.

17. Marketing Communications

17.1. PmP Records may provide information about musical releases, projects, licensing opportunities, or services where permitted by law.

17.2. Where consent is legally required for marketing communications, such communications will be sent only after valid consent has been obtained.

17.3. Individuals may withdraw marketing consent or object to direct marketing as permitted by applicable law.

17.4. Personal data collected for order fulfillment or customer support will not automatically be treated as consent to receive promotional communications.

18. Artificial Intelligence and Creative Technologies

18.1. PmP Records may use artificial intelligence and other digital technologies in musical composition, production, editing, mastering, and related creative activities.

18.2. The use of artificial intelligence in music production does not, by itself, require the collection or processing of website visitors' personal data.

18.3. Personal information supplied for a custom music commission will be used only for purposes supported by an applicable lawful basis.

18.4. Where customer-provided personal data must be processed through an external creative technology service, any necessary disclosures, safeguards, or consents will be addressed according to the nature of the processing and applicable law.

18.5. PmP Records does not treat a customer's submission of personal information as unrestricted authorization to use that information for unrelated artificial intelligence training or other unrelated purposes.

19. Children's Privacy

19.1. The PmP Records website is intended primarily for a general audience interested in music and related services.

19.2. We do not intentionally collect personal data from children in circumstances where such collection would be unlawful.

19.3. Where consent from a parent or legal guardian is required by applicable legislation, appropriate authorization must be obtained.

19.4. If we become aware that personal data concerning a child has been collected or processed without the required legal basis, appropriate corrective measures will be taken.

20. External Links and Embedded Content

20.1. The website may contain links to music streaming services, social networks, digital distribution platforms, payment services, and other external websites.

20.2. External websites operate independently and may collect personal data under their own privacy policies.

20.3. PmP Records is not responsible for the independent data processing practices of third-party websites outside its control.

20.4. Visitors are encouraged to review the privacy policies of external services before providing personal information.

21. Complaints and Supervisory Authorities

21.1. Individuals who believe that their personal data has been processed unlawfully may contact PmP Records through the website's Privacy Policy contact form.

21.2. We will review complaints and take appropriate action where required.

21.3. Individuals retain their rights to contact the competent data protection supervisory authority or seek judicial remedies under applicable law.

21.4. Where the GDPR applies, individuals may have the right to lodge a complaint with a competent supervisory authority in the European Economic Area.

21.5. Where Georgian law applies, individuals may exercise the remedies available under the Law of Georgia on Personal Data Protection, including recourse to the competent Georgian authority or courts.

22. Changes to This Privacy Policy

22.1. PmP Records may update this Privacy Policy to reflect changes in legislation, website functionality, business operations, service providers, or data processing practices.

22.2. The current version will be made available on the website.

22.3. The date of the most recent revision will be indicated at the beginning of the document.

22.4. Where required by law, material changes affecting personal data processing will be communicated through appropriate means.

22.5. Changes to this Policy do not retrospectively establish consent or another lawful basis for processing where such a basis is otherwise required.

23. Contact Information

For all inquiries concerning privacy, personal data protection, GDPR-related matters, and the exercise of data subject rights, please contact:

Individual Entrepreneur Iiulia Blumenberg

PmP Records

Tbilisi, Georgia

Website: <https://pmp-records.com>

Official contact method: Written request through the contact form on the Privacy Policy page.

Requests may concern access, rectification, erasure, restriction, data portability, objections, consent withdrawal, or other rights established by applicable law.

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