

SOD Agency Privacy Policy

Effective from October 13, 2026

1. Who processes your data

Your data is processed by Sergey Orlov, an individual who provides website, online store and Telegram bot development services under the name SOD Agency. Country: Georgia.

For any question about your data: @sodagency on Telegram.

2. What data we receive

Data you give us yourself: your name, contact details (phone, email, messenger username), a description of your task, links and our correspondence, when you send a request on the website or write to us.

Data from publicly available sources: if you publicly post a request for services we provide, such as a website, an app or a bot, we may see that request and the contact details you yourself included in the post or in your public profile.

Website visit data: anonymous statistics without cookies. This covers the country, device type, browser, referral source and how long a page was read. Your IP address is not stored: together with browser data it is turned into an anonymous code whose key changes every day and is deleted after two days. If your browser sends a Global Privacy Control signal, no statistics are collected.

Data that protects the form from spam: an encrypted fingerprint of your IP address is kept with your request, and the address itself cannot be recovered from it. We use it to limit how many requests come from one address. The form is also checked by Cloudflare Turnstile, which looks at technical browser data to tell a person from a program.

3. Why we process it and on what basis

To reply to your request, prepare a proposal and discuss the work. Basis: steps taken at your request before entering into a contract (Art. 6(1)(b) GDPR and the corresponding ground of the Law of Georgia on Personal Data Protection).

To do the work, deliver the result and settle payments. Basis: our contract with you.

To offer our services to a person who is publicly looking for a contractor for such a task. Basis: our legitimate interest (Art. 6(1)(f) GDPR). We write once about a specific request and do not continue if you decline.

To understand how the website is used and improve it. Basis: legitimate interest; the statistics are anonymous.

To calculate the fee of a partner who referred you, if you came through their link or recommendation. Basis: our legitimate interest.

To protect the request form from spam and automated submissions. Basis: our legitimate interest.

We do not make automated decisions about you that have legal effects, and we do not sell data.

4. Who receives your data

Only the services the website and our communication depend on: website hosting and spam protection of the form (Cloudflare), the statistics database (Neon, servers in the EU), the messengers and social networks used for correspondence (Telegram, WhatsApp, Instagram, Threads), the email service, and Upwork, Contra and Fiverr when work goes through them. Each of these services processes data under its own privacy terms.

If you came through a link or recommendation from one of our partners, that partner sees in their account your business name, the status of your request and the payment amounts their fee is calculated from. The partner does not see your contact details or our correspondence with you.

5. International transfers

The servers of these services may be located outside Georgia and the European Union, including in the United States. We use major services that apply their own data protection safeguards, including the EU standard contractual clauses.

6. How long we keep data

Requests and correspondence that did not turn into a project are kept for up to 12 months after the last contact. Data from completed projects is kept while it is needed for support, warranty and payments, and no longer than 3 years after the work ends. Statistics are anonymous and not linked to a person.

If you ask us not to write to you again, we keep only your contact marked "do not contact" so that we do not write to you by mistake.

7. Your rights

You can find out what data we hold about you, get a copy, correct it, delete it, restrict or object to its processing, move it to another provider, and withdraw consent where processing was based on consent.

You can ask us at any time to stop sending you offers: simply reply in the same chat or write to us on Telegram. After that we do not write again.

We reply to requests within the time limits set by law. If you believe your rights have been violated, you can complain to the State Audit Office of Georgia, which supervises personal data protection, or, if you are in the EU, to the supervisory authority of your country.

8. How to delete your data

Write to @sodagency on Telegram, say that you want your data deleted and tell us where we were in touch (website, Telegram, WhatsApp, Instagram, Threads, email). This also covers data received through Instagram and Threads. We will delete it within the time limits set by law.

9. Security

Only we have access to the data. We use services with encrypted connections and do not keep data longer than stated above. If a breach occurs that may affect your rights, we will notify the supervisory authority and you within the time the law requires.

10. Changes

If this policy changes, the new version will be published at the same link with a new date.