

Legal Assessment of the Use of Vehicle Marking of People with Disabilities to Be Affixed on Vehicles in Terms of Personal Data Protection

The paper reviews the lawfulness of processing the special categories of data by the example of obligatory use of vehicle marking on vehicles of persons with disabilities. At a glance, a simple case, it may be proved to be problematic in terms of personal data protection and imply the excessive disclosure of information undesirable for people with disabilities. The paper suggests an alternative method, which should not be difficult for a data controller to implement.

Keywords: *Personal data, special categories of data, people with disabilities.*

1. Introduction

Throughout the world the great attention is focused on creating the appropriate conditions or guarantees for people with disabilities (“a person with disabilities – a person with substantial physical, mental, intellectual or sensory impairments which, when combined with various barriers, may hinder his/her full and effective participation in society on an equal basis with others”)¹, so that they can have access to all the services or products which are offered to natural persons by the public or private sector. According to the Constitution of Georgia, in order to protect the rights and freedoms of persons with disabilities, the state assumes the obligation to ensure the creation of appropriate conditions for such persons by taking active measures – the state establishes the special conditions to exercise the rights and interest of persons with disabilities². One of such kind of measures is to allocate the parking places specially designated for persons with disabilities aiming to facilitate their movement and the possibility of receiving the various services as well as their adaption to the existing infrastructure. Despite the salient

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¹ The Law of Georgia on the Rights of Persons with Disabilities 6823-RS, 14/07/2020, Subparagraph “a” of Article 2.

² The Constitution of Georgia, 786, 24/08/1995, Paragraph 4 of Article 11.

legitimate goal, it is necessary to create the guarantees in such a way that the status of disability, which, on its part, can lead to stigmatization of persons with disabilities, can be demonstrated at the lowest possible amount.

The present paper shows a kind of discussion about the legitimacy of utilizing the vehicle marking on vehicles of persons with disabilities in terms of protecting personal data.

2. The Rule on Using of Vehicle Marking to Be Affixed on Vehicles in Compliance with the Legislation in Force

Article 19 of the Law of Georgia on “Traffic” stipulates the vehicle marking to be attached on the vehicle. The 1st Paragraph of the aforementioned Article establishes the vehicle marking whose attachment to the vehicle is obligatory, for example, “Hearing-impaired driver”³.

As opposed to Paragraph 1, the 2nd Section of Article 19 of the Law of Georgia on “Traffic” establishes the vehicle marking whose attachment on vehicles is optional for the driver depending on his/her will. The subparagraph “a” of the mentioned Paragraph determines the vehicle marking as that of “Person with Disabilities”.

The Law of Georgia on “Traffic” says nothing more about the above mentioned signs and neither directly sets the goals of their utilization. However, the analysis of Article 19 of the law allows to presume that, the use of vehicle marking serves diverse purposes. As it was above mentioned, it is obligatory to use and attach the sign - “hearing-impaired driver” on the visible place of the vehicle. Occasioned by the specificities of the signs listed in Paragraph 1st of Article 19, it may be said, that the utilization of the aforesaid signs serves the legitimate cause such as traffic security. The point in using these signs is to make them noticeable, so that when, for example, the vehicle is driven by a hearing-impaired driver, another driver can act reasonably, if necessary (e.g. not relying only on the horn, etc.).

According to Subparagraph “j” of Section 2 of Article 16 of the Local Self-Government Code, the management of local motorways and regulation of traffic on local roads, as well as the provision of parking lots for vehicles and regulation of parking/stopping rules, are the own power of Municipalities.

Under Subparagraph “j” of Section 2 of Article 16 of the Local Self-Government Code a number of ordinances have been issued by the Municipality Assembly on the approval of the regulations of vehicle parking over the territory of the corresponding Municipality. The provisions presented in the ordinance are almost identical and contain the similar recordings.

Below there are discussed some ordinances of Municipality Assembly so as to provide the reader with some insight how the aforementioned issue is regulated by Municipalities.

³ The law of Georgia on “Traffic”, 1830-rs, 24/12/2013, subparagraph “z”, of the 1st Paragraph of Article 19.

For example, according to Subparagraph “a” of Paragraph 1 of Article 6 of the Regulation on vehicle parking over the territory of Signaghi municipality approved by the ordinance №30 of October 29, 2010, “the Municipality Assembly of Signaghi is authorized to determine the special parking places and conditions to ensure the movement of persons with disabilities, for parking vehicles with appropriate vehicle marking.” Under the paragraph 3 of the same Article, “the designated parking spaces for vehicles bearing the vehicle marking of the persons with disabilities must be allocated and marked accordingly. Only the vehicles with the disabled persons’ license plates can be parked in such parking places”. And in accordance with Subparagraph “a” of Paragraph 2 of Article 7 of same rule “a driver or owner of the vehicle without an appropriate vehicle marking or status is obliged not to park on the special parking place, including for disabled persons”

The similar provisions are included in the regulation for parking vehicles on the territory of Borjomi Municipality approved by the Resolution №7 of Municipality Assembly of Borjomi of March 18, 2011. Apart from the similar provisions, the regulation approved by the Municipality Assembly of Borjomi stipulates such provisions which are not lied in the ordinance of Municipality Assembly of Signaghi. In particular, under Paragraph 3 of Article 9 of the regulation on vehicle parking on the territory of Borjomi Municipality, “in order to get the vehicle marking the person with disabilities must apply in writing to Municipality and submit the identity documents, also the documents confirming the person’s limited capacity and vehicle ownership together with the application”. In compliance with Paragraph 5 of the same Article “in case of the person with a disability, the vehicle marking shall be issued to the person with disabilities and on his/her vehicle or his /her family member’s vehicle”.

The diverse provisions can be found in the regulation on parking vehicles on the territory of Municipality of Poti City approved by the Resolution №14/18 of Poti Self-governing City Council from July 7, 2014, under the Paragraphs 3, 4 and 5 of Article 6 of which “in order to ensure the movement of persons with disabilities, the special vehicle parking places are determined by the Mayor or the person authorized by the Mayor. In order to ensure the movement of persons with disabilities, the Mayor or the person authorized by the Mayor is liable for issuing the vehicle marking. The vehicle marking will be issued to persons with marked disability as well as the persons with the status of significantly expressed disability. The vehicle marking can be placed on any type of vehicles used by the person with disabilities, irrespective of the ownership of the vehicle. The vehicle marking issued on the other territory has the same legal effect as that issued by the Mayor or the person authorized by the Mayor of the Municipality of Poti City. The parking places designated for vehicle with the vehicle marking of persons with disabilities should be properly allocated and marked. Only the vehicles with the vehicle marking for persons with disabilities can be parked in such parking places”.

The interest should be evinced in the attitude of the Council of Capital City towards the vehicle marking of a person with disabilities. The rules regulating the parking of vehicle within the administrative boundaries of the City of Tbilisi was approved by the Resolution №33-99 of Tbilisi City Municipality of December 27, 2016. Under Paragraph “k” of Article 2 of the mentioned regulation “vehicle marking is a mark issued by a legal entity of public law of Tbilisi Municipality - Transport and Urban Development Agency of Tbilisi City Municipality - for a person with disabilities or a vehicle adapted for a disabled person owned by a legal entity in accordance with this rule”. Pursuant to Paragraph “k” of the same rule, “a person with disability is a person with the marked disability status in accordance with normative acts of Georgia”. According to Subparagraph “a” of Paragraph 2 of Article 9 “the driver and/or owner of the vehicle is obliged not to park in a special parking place, including for persons with disabilities, without a reference sign defined by this rule”. And Article 11 of this rule regulates the issuance of vehicle marking and parking rule for the vehicles having license plate, and according to Paragraph 8 of this Article, “the vehicle marking must be placed on the front windshield of the vehicle so that it can be read by an authorized person”. Pursuant to Paragraph 13 of the same Article, “if the vehicle marking is not placed on the vehicle in accordance with this rule, and this vehicle is parked in a parking place designated for a disabled person, the said case will be considered as parking of a vehicle by an unauthorized person in a parking place designated for a disabled person’s vehicle”.

As the above listed examples clarify, in practice, the vehicle marking of the person with disability still assumes the utmost significance for obtaining the parking license, despite the fact, that Article 19 of the Law of Georgia on “Traffic” clearly establishes the voluntary use of such a mark (the following license plates can be placed on the vehicle according to the driver’ will: ...)⁴. It turns out, that the use of license plate of a disabled person does not depend entirely on the will of the person and its voluntariness is limited only to the period of travelling (driving) by vehicles.

It is also worth noting, that each vehicle marking is valid only within the administrative boundaries of the municipality whose Assembly issued the sign. The mentioned poses serious problems for persons with disabilities, as the person, who was issued the vehicle marking in Borjomi will still be fined for parking in Tbilisi, as the sign will have no legal effect within the administrative boundaries of the City of Tbilisi. In this respect, Assembly of the City of Poti is a shining example, which directly stated that the vehicle marking issued on the territory of other municipalities has the same legal force as the one issued by the Mayor or the person authorized by the Mayor⁵.

⁴ The Law of Georgia on “Traffic” 1830-rs, 24/12/2012, Preamble of Paragraph 2 of Article 19.

⁵ Paragraph 5 of Article 6 of the parking rule of the vehicle within the territory of Municipality of the City of Poti approved by the Resolution №14/18 of Self-governing Council of the City of Poti of July 7 2014.

3. The Vehicle Markings to be Placed on the Vehicle of the Person with Disability as Personal Data and the Legality of its Use in the Perspective of Personal Data Protection

3.1. The Legality of Personal Data Processing

Personal data is any information related to an identified or identifiable natural person (“Personal data – any information connected an identified or identifiable natural person. A person is identifiable when he/she can be identified directly or indirectly, in particular, by a vehicle marking or by physical, physiological, economic, cultural or social features specific to this person”).⁶ The vehicle marking placed on vehicles is easily associated with the driver, whose identification certainly is not difficult as the driver represents the visible object for society. It is also worth noting that, in general, the facial image of a person is approximated to the identity of the person to so a great extent that the need to identify a person is no longer important for the purpose of treating the facial image as personal data. When a person drives a car, it is visible to people around. At this particular moment people may not know the identity of a driver, but the demonstration of a certain status already granted to the person, especially when this status is related to the health condition, represents the violation of his /her privacy, thus the processing his/her personal data is present. In addition, a person can be fully identified by the people who know the identity of the person in question.

In contrast to the above discussion, a question may arise as to when a vehicle with the vehicle marking is parked on the place designated for the person with disability, does not it already specify that the particular person has a disability status? In most cases it does, however, when data are processed in one way (the vehicle marking of the person with disability), it does not necessarily make it legal to process data by any additional means (placing a vehicle marking on the windshield of the vehicle), especially when the latter is not necessary at all. The data subject may not desire to demonstrate his/her own status by placing the license plate on the windshield of his/her vehicle. At the same time, it is also worth noting, that the vehicle marking of the person with disability does not have any alternative, since everybody should be able to see the place designated for such persons so as not to park their own vehicles there. As regards the utilization of vehicle marking, it has quite a straightforward alternative (this issue will be discussed in subchapter 2.3).

Pursuant to Subparagraph “b” of Article 2⁷ (“Special categories of data – data related to a person’s racial or ethnic origin, political views, religious or philosophical beliefs, membership of professional organizations, state of health, sexual life, criminal history, administrative detention,

⁶ The Law of Georgia on “Personal Data Protection”, 5669-RS, 28/12/2011, Sub- para. “a” of Art. 2.

⁷ Ibid, Paragraph “b” of Article 2.

putting a person under restraint, plea bargains, abatement, recognition as a victim of a crime or as a person affected, also biometric and genetic data that allow to identify a natural person by the above features”) of the Law of Georgia on Personal Data Protection the vehicle marking of a person with disability represents the special category of data as the mentioned data concerns the health condition of an individual.

Under Paragraph 1 of Article 4 of the Law on the “Persons with Disabilities, “the state promotes the independent life of a person with a disability and his/her full participation in all the areas of public life on an equal basis with others, as well as the availability of various types of support services and public utility facilities, as well as means of communication, which are necessary for his full participation in public life.” According to Paragraph 2 of the same Article, “in order to achieve the above-mentioned goals, processing the personal data is carried out in accordance with the requirements of the Law of Georgia on “Personal Data Protection”.

Article 4 of the Law of Georgia on “Personal Data Protection” stipulates the principle for data processing. Under Subparagraph “a” of the said Article “the data must be processed fairly and lawfully, without impinging on the dignity of a data subject”. In order to establish the legality of data processing it is necessary to assess the grounds for data processing.

As the vehicle marking of a person with disability represents the special categories of data, it is salient to assess the basis of the mentioned data in terms of Article 6 of the same law, according to which the grounds for processing the special categories of data represent the written consent of a data subject. Pursuant to Subparagraphs “g” and “h” of article 2 of Law of Georgia on “Personal Data Protection” the consent of the data subject must be voluntary which allows to clearly establish the will of the data subject⁸.

The voluntary consent should be expressed freely, and the refusal of the consent must not cause a negative or restricting effect on the data subject.⁹ In the given case, if a person refuses to display the license plate on his vehicle, he will not be allowed to park his vehicle on the place designated for persons with disabilities, he will be fined, and his vehicle will be taken to the penalty parking lot. Accordingly, it is safe to say that a disabled person’s consent for placing the vehicle marking cannot be considered as legal grounds for data processing.

Paragraph 2 of Article 6 of the Law of Georgia on “Personal Data Protection” lists the other grounds for processing the special categories of data, out of which none of them pertain to the obligation to use the special vehicle markings for the persons with disabilities. At the same time, neither Article 3 of the Law of Georgia on “Personal Data Protection” regulating the effective scopes of the law, contains any exceptional recordings which would apply to the given case.

⁸ In addition see *EDPB*, Guidelines 05/2020 on Consent Under Regulation 2016/679, Version 1.1., 2020, <https://edpb.europa.eu/sites/default/files/files/file1/edpb_guidelines_202005_consent_en.pdf> [24.01.2023].

⁹ The comprehensive information relating to standard of consent see *EDPB*, Guidelines 05/2020 on Consent Under Regulation 2016/679, Version 1.1., 2020, <https://edpb.europa.eu/sites/default/files/files/file1/edpb_guidelines_202005_consent_en.pdf> [24.01.2023].

Occasioned by all the above mentioned, the due basis for processing the special categories of data through affixing the license plate on vehicles does not exist, that, on its part, represents the breach of the principle of legality, according to which data must be protected fairly and lawfully without impeding the dignity of the data subject¹⁰.

3.2. Personal Data Processing from the Perspective of Other Principles of Data Processing

Irrespective of the absence of due grounds for processing the special categories of data by placing the vehicle marking on the vehicle of a person with a disability, it is interesting, how another principle of data processing regulated by Article 4 of the Law of Georgia on “Personal Data Protection” is complied with. In particular, subparagraph “c” of the same Article is noteworthy, according to which the data can be processed only to the extent which is necessary to achieve the appropriate legitimate purpose. The data must be adequate and proportional to the purpose for which they are being processed.

The mentioned principle provides quite broad content, however, the paper aims to present the discussions only within the framework of the case in question. According to the “principle of proportionality” the data can be processed only in the volume which is necessary to achieve the appropriate legitimate purpose. In the given case the question arises, as to what is the legitimate purpose of legislation demanding from the disabled person to display the special vehicle marking on the vehicle, in case he/she wishes to exercise the right to park in the place designated for persons with disabilities. The aim in this case is to allow the authorized persons, who implements monitoring, to identify whether the vehicle parked in the appropriate place really belongs to the person with disability. In other cases, when moving directly on vehicles,¹¹ Paragraph 2 of Article 19 of the Law of Georgia on “Traffic” determines the use of vehicle marking by a disabled person as voluntary, since its use is not related to traffic safety.

Since the sole purpose of data processing is to determine the relevant status of the vehicle, the questions arise as to whether it is possible to achieve the same legitimate goal by processing less volume of data, on the one hand, and on the other hand, how adequate and relevant is the disability vehicle marking as the special categories of data for the purpose of determining the status of the appropriate vehicle?

Compliance with the principle of proportionality should be assessed not only by the quantitative but the qualitative measures as well. In particular, the use of only vehicle marking

¹⁰ The Law of Georgia on “Personal Data Protection” 5669-RS, 28/12/2011, Paragraph “a” of Article 4.

¹¹ However, Paragraph 2 of Article 4 of the Law of Georgia on “Traffic” does not specifies when the use of vehicle marking is voluntary and when it is obligatory, that on its part makes the mentioned recordings implicit.

may suffice for the minimization of data in quantitative respect, and the vehicle marking may represent the data in a minimal volume for achieving the above-mentioned aim, however, one has to wonder, to what extent the mechanism used ensures the interference in the human rights and qualitatively, to what extent the minimal data processing is carried out. Consideration should be given to the possibility to use another technologically easier method, because in the wake of technological advancements, what was impossible in the past can be easily achieved today.

The attention should be focused on the obligation of so-called “universal design”, which was assumed by the member states¹² signing the Convention on the Rights of the Persons with Disabilities. According to Article 2 of the Convention, “Universal design”- refers to the design of products, environments, programs, and services, which allows all people to use it to the maximum, without the need for adaptation and the use of special designs. “Universal design” does not exclude the use of assistive devices by a specific group of disabled people when necessary”. Pursuant to Article 4 of the same Convention, “The participating states undertake to ensure and promote the full realization of human rights and fundamental freedoms by persons with disabilities, without any discrimination arising on the basis of disability. For this purpose, the participating countries undertake to carry out or promote the research inventive activity of products, services, installations and devices with such a universal design as defined in Article 2 of the present Convention, the adaptation of which to the specific needs of persons with disabilities require minimal adaptation and funds; promote their use and accessibility and promote the idea of universal design in the creation standards and guidelines”.

“Universal design” serves the very purpose of adapting the needs of persons with disabilities into their daily life in such a way, that the aforementioned is not highlighted and displayed as well as the provision of their needs is as invisible as possible for the outsider.

3.3. The Alternative of Vehicle Marking to Be Affixed on the Vehicle of Disabled Persons as the Minimum Means of Interference in the Human Rights of Persons with Disabilities

Within the framework of discussions on the alternative means it is important to refer to the existing practice used for the purpose of monitoring compliance with parking rules. Nowadays, LLC “Tbilisi Transport Company”¹³ is vested with the authority to fill in a fine receipt – a report on administrative offence pursuant to the rule established by Georgian legislation.

The personnel of LLC “Tbilisi Transport Company” have access to the electronic database through a special electronic tool, where they can instantly see whether a person has paid the

¹² Envisaging the attached declaration Georgia signed the Convention on the Rights of the Persons with Disabilities in 2013. (The Resolution of Parliament of Georgia N1888-rs of December 26, 2013 ratifying the attached declaration of the UN Convention on the Rights of the Persons with Disabilities).

¹³ The official webpage of Tbilisi Transport Company: <<https://ttc.com.ge/>> [24.01.2023].

parking fee or activated the parking zone initiation function. “Tbilisi Transport Company” does not need any vehicle marking for it and except its employees nobody knows whether a particular driver avoids paying a parking charge. The activation of parking function is considerably simplified and Tbilisi Transport Company offers them even several alternatives for it (mobile application, webpage or payroll machine).

The time of material laminated passes is slowly passing and is being replaced by the modern, simple technological means. The use of above mentioned identical mechanisms allows to identify the vehicles of persons with disabilities electronically rather than by a material (physical) vehicle marking with maximum privacy protection. In particular, without any pass, using a special tool a monitoring official can check the vehicle in the electronic database, where the particular vehicle will be conferred the right to park on the place designated to the persons with disabilities. However, in this respect, the problem is posed by the existing practice, according to which vehicle marking will be issued to the person and not on the vehicle. There is the only exception when the owner of the vehicle is the legal entity ensuring the transportation of persons with disabilities. There is some logic in it, since the person with disability is not limited to whose vehicle he/she drives and has the right to place his/her own vehicle marking on any vehicle.

Regardless of the upsides of the registered identification sign, it also has quite a large number of downsides that imply, in particular, the possibility of illegal, improper misuse of vehicle marking. Pursuant to the legislation in force, the person with disability does not have the right to give his/her identification sign to another person, however, in fact, the way to prevent such case does not exist¹⁴. How can the person implementing monitoring establish if the person driving a car is really a disabled person or not, when the license plate affixed on the car does not contain any information about the vehicle?

There exists the risk of losing or damaging the vehicle marking about which the owner is obliged to inform the agency¹⁵ about the corresponding information. In case of losing the vehicle marking its legal owner must apply the agency in writing for the reinstatement of the sign and he/she is charged to pay ten GEL¹⁶ to the account of City Hall of Tbilisi Municipality for reinstatement. The attitude of the state towards persons with disabilities is not expedient. Due to the loss or accidental damage of the vehicle marking, persons with disabilities must not be intentionally created problems to exercise their rights stipulated by the legislation of Georgia.

It is expedient, as with the activation of parking time, instead of vehicle marking the employee of the relevant monitoring service can electronically see whether the parking permit to park on

¹⁴ The vehicle marking should be used only by the person or/and vehicles, it was issued on. Paragraph 9 of Article 11 of the Rules regulating the parking of vehicles within the administrative boundaries of the City of Tbilisi approved by the Resolution N33-99 of December 29, 2016 of Tbilisi City Municipality.

¹⁵ Ibid.

¹⁶ Ibid.

the basis of disability status applies to a particular vehicle. It is necessary that the vehicle marking should not be the only choice and that it should have the alternative. Occasioned by the specific circumstances, several alternatives may exist for persons with disabilities:

First of all, it must be possible to register the vehicles of persons with disabilities, then there will be no need to make any vehicle marking, because the vehicle will be able to be checked electronically. Such an approach also overcomes the barrier of the use of one vehicle marking within the administrative boundaries of various municipality

Secondly, the person with a disability must have the right to register more than one vehicle, if they have to move around in different vehicles (for example, a disabled person has two cars).

Thirdly, if a disabled person is unable to specify in advance the type of transport by which he intends to travel, as an exception, it should be up to him to obtain a vehicle marking.

4. Conclusion

It is important not to take a one-size-fits-all approach, especially if such an approach results in processing special categories of data disproportionately, in any way, and in more volume than necessary to achieve a legitimate goal.

The alternatives given in this paper will allow a person with a disability to register a vehicle and park it in the areas designated for disabled persons, provided the conditions prescribed by law are met. He/she will not need the vehicle marking, as the authorized monitoring person will verify the relevant information according to the vehicle registration number. If a person with disabilities has more than one vehicle or has to travel in more than one vehicle, he/she must have the right to register these vehicles in the appropriate database and be able to park the registered vehicles in a parking place designated for the persons with disability. The above-mentioned methods ensure minimal processing of special categories of data and allow the exemption of the disabled person from the obligation to display the vehicle marking.

In case a person with disabilities wishes to have a registered identification sign (when the license plate does not contain a state vehicle registration number), only at his/her request will he be able to obtain a license plate, which will be used only of his/her own will. In such cases, it is important that all the municipalities within their administrative boundaries should give legal force to the identification mark issued by another municipality (as the municipality of Poti did).

All of the above mentioned ensures that a person with disabilities can decide for themselves, and if, for some reason, they do not have the desire to affix the vehicle marking for the disabled to their vehicle, they should still have the opportunity to exercise the right to park their vehicle in parking places designated for persons with disabilities.

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