## To the Head of the Anti-Corruption Bureau

Mr. Razhden Kuprashvili info@acb.gov.ge

## In response to the letter of the LEPL Anti-Corruption Bureau dated June 16, 2025, No. 00009735

In response to your letter No. 00009735 dated June 16, 2025, concerning the request for information from the N(N)LE *Sapari*, commercial banks, and the Revenue Service of the Ministry of Finance of Georgia for the period from January 1, 2024, to June 10, 2025, we hereby provide the following:

Information about Sapari's activities, funding, and team is publicly available on our official website: <a href="https://sapari.ge">https://sapari.ge</a>. In accordance with our public accountability obligations, we share the sections of our website where this information can be found:

- Information about Sapari's mission, objectives, and history is available at "About Us";
- Information about the organization's team is available at "Our Team";
- Information about Sapari's project activities and results is available under the sections "What We Do", "Services", "Knowledge Sharing", "Research", "Reports", "Projects", "Sapari Cases", and "Sapari Activities";
- Information about Sapari's funding, donor-supported projects, and the respective agreements is available at "Donors and Partners" and "Projects";
- Information on financial reports prepared regarding Sapari's activities is available at "Financial Reports";
- Information about interesting events within Sapari's activities is available at "News";
- Information on social media accounts: Sapari's official Facebook accounts are <u>Sapari</u> <u>Sapari</u>, <u>Gandzi</u>, <u>Panjara</u>, <u>Safe YOU</u>, <u>Skivri</u>;

On X (formerly Twitter): <u>UnionSapari</u>;

On Instagram: <u>Union.Sapari, Gandzi, Panjara, Safe YOU, Skivri;</u> On TikTok: Union.Sapari, Gandzi, Panjara, Safe YOU, Skivri;

On LinkedIn: Union Sapari;

And on YouTube: sapariunion4415.

Access to these social networks is also easily available via the respective icons in the top panel of our website. Furthermore, we note that any expenses related to social media have been covered from our general operational budget and, for the period from January 1, 2024, to June 10, 2025, these expenses amounted to **\$33,406.74**.

## Regarding information about personal data of our beneficiaries, partners, employees, and other third parties:

We inform you that as a human rights organization, we are obliged to comply with both domestic legislation and international legal norms and principles ensuring the confidentiality of personal data, including the confidentiality of journalists, lawyers, and other special information.

Apart from our employees and partners, the information you have requested concerns individuals under the protection of our organization — namely, women and children who are victims of gender-based violence, including domestic, physical, sexual, psychological, and economic violence, discrimination, sexual harassment, femicide, trafficking, torture, and other forms of ill-treatment. Transferring such individuals' personal data and other details of their private and family lives to the Bureau would constitute a gross violation of **Article 15 of the Constitution of Georgia**, the legislation on personal data protection, the **Criminal Procedure Code of Georgia**, and numerous other provisions ensuring the inviolability of private and family life, non-disclosure of personal data, and the confidentiality of communication between lawyers and clients.

Furthermore, we firmly believe that the "Foreign Agents Registration Act" and any other legislation labeling civil society associations with stigmatizing and offensive terms, nullifying the privacy of individuals working within them and third parties, and aiming to halt the activities of independent media and civil society, contradicts the **Constitution of Georgia** and international human rights law.

For this reason, we have already challenged this kind of legislation (the Law on Transparency of Foreign Influence — the so-called "Russian law") both before the **Constitutional Court of Georgia** and the **European Court of Human Rights** as early as 2024. Similarly, the Foreign Agents Registration Act has been contested in the Constitutional Court, and we are also preparing to challenge it before the European Court of Human Rights. We will take every legal measure and challenge any law that seeks to restrict the civil rights and freedoms of Georgian citizens.

Babutsa (Baia) Pataraia Director