Privacy Policy for Partners (Drivers)

1. General provisions

1.1. This Privacy Policy for Partners (Drivers) (hereinafter referred to as the "Policy") has been developed by UKLON ALBANIA SH.P.K., NUIS M62228028Q, location: Ibrahim Rugova Str. Sky Tower, Floor 5, Suite 2, Tirana, Albania (hereinafter referred to as the "Company", "We", "Our" in the respective cases), which acts as the data controller within the meaning of Law of Albania No. 124/2024 "On Personal Data Protection" (hereinafter referred to as the "Law"). Where Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "GDPR") applies to specific processing activities, the Company will also comply with the GDPR to the extent applicable.

1.2. The definitions and abbreviations used in this Policy shall be interpreted in the meanings given in the Law and the Terms and Conditions for the Provision of Access to Online Service "Uklon" (Drivers).

1.3. With this Policy, we would like to inform you about what personal data we process and how we process it, as well as the purposes and means of processing and protecting personal data.

1.4. This Policy applies to all types of personal data of Partners that we collect and further process through the website https://al.uklon.eu/ (hereinafter referred to as the "Website"), the Uklon Drive mobile application for iOS and Android (hereinafter referred to as the "Mobile Application"), as well as through other sources specified below in this Policy. By using the Website and/or the Mobile Application, as well as if you are interested in using the Uklon Online Service and, accordingly, communicating with us, you confirm, warrant and declare that you have read and accepted this Policy and, accordingly, agree to our processing of your personal data in accordance with this Policy.

1.5. By using the Website and/or the Mobile Application you confirm, warrant and declare that you have read and accepted this Policy and, accordingly, agree to our processing of your personal data in accordance with this Policy.

If you do not agree to this Policy and the relevant processing of your personal data, do not use the Website and/or Mobile Application, or otherwise use the Uklon Online Service.

1.6. We may amend or otherwise update this Policy from time to time to reflect changes in our processing activities, the services we provide, applicable laws or regulatory requirements.

Where we make material changes to this Policy that may significantly affect your rights or the way we process your personal data, we will provide you with reasonable advance notice and, where appropriate, at least 15 (fifteen) days before the changes take effect, by means of a notification through the Mobile Application, the Website or to your registered contact details.

If any processing activity requires your consent under applicable law, we will obtain such consent separately where required. Your continued use of the Uklon Online Service following an update to this Policy does not, by itself, constitute consent to any processing for which consent is required.

Non-material changes may be made without prior individual notice. The updated version of this Policy will be made available through the Mobile Application and/or the Website, together with the date of the latest update.

1.7. This Policy is drafted in English and is also available in Albanian. In the event of any discrepancy between the English version of this Policy and its Albanian translation, the English version shall prevail and shall be legally binding.

2. What personal data we collect and process

2.1. We process the personal data that you provide to us both when completing the registration form on the Website or in the Mobile Application and when subsequently completing your profile in your account(s), including your first and last name, gender, email address, telephone number, Taxi Driver Certificate, Licence for the Transportation of Passengers by Taxi, Vehicle Registration Certificate, Partner's driving licence, POK wallet details, photo, city or other locality, and other information that you voluntarily provide to us.

2.2. Please note that, in order to register an account, at the first stage of registration you will need to provide us with a contact telephone number for registration. At this stage, you have the opportunity to review this Policy and decide whether to proceed with creating an account and using the Uklon Online Service and, accordingly, whether to provide us with additional personal data. After you provide us with your telephone number, we may use it to send you messages (including SMS messages and push notifications) and to contact you by telephone. In particular, such messages and calls may be made in the event of unsuccessful registration (for example, where you have not completed the registration process) or in order to confirm or clarify certain registration information.

2.3. After registration, we assign you a unique identifier (UID).

2.4. The account(s) you create allow you to save your personal settings, upload photos, view completed orders and use other available account functionality, which in turn allows us to process the relevant information.

2.5. In order to strengthen the security measures for users of the Uklon Online Service and ensure proper additional verification and identification of the Partner, we may also request and process the following additional personal data: date of birth, photographs taken for identity verification purposes, passport or residence permit details, information regarding a valid insurance certificate, as well as other information that you voluntarily provide to us.

2.6. We may request the following documents containing your personal data in order to formalise the contractual relationship and make payments to you: taxpayer identification number (NIPT) and invoicing address.

2.7. We also process your personal data when you contact our Driver Care or contact us through other channels (for example, through social media), or when we contact you where we have a legitimate interest or another applicable legal basis, including for the purposes of enforcing the rules applicable to the Uklon Online Service and handling complaints, negative reviews, incidents or requests. In particular, we may record communications with you.

2.8. By participating in advertising or promotional campaigns, contests or giveaways, you may provide us with personal data depending on the rules and requirements of the relevant promotion.

As a rule, the personal data required to participate in a promotion may include your first and last name, age or date of birth, telephone number, email address and/or city. Where you are selected to receive a prize or reward, we may additionally request information necessary to verify your eligibility, comply with applicable legal or tax requirements, or arrange delivery or payment of the prize, such as your address or tax identification details, where applicable.

2.9. In addition, you may send us feedback about the Website or the Mobile Application, share your opinion or request assistance with using the Website or the Mobile Application. You may voluntarily provide personal data in such feedback or requests, including when you submit a feedback or support

form through the Mobile Application or the Website, or when we send you a feedback form or request through another communication channel, where such form or request is made available to you.

3. Data That We Process Automatically

3.1. We may automatically process certain data, in particular when you use the Website, including your IP address, the date and time when you use the Website, information about your hardware and software, the Internet browser you use, and information about the operating system of your device. We may also collect information about your clicks and the web pages displayed to you.

3.2. When you accept and fulfil an order, our system may record which device or devices were used to accept the order.

3.3. If you use the Mobile Application, we may also receive data identifying your mobile device, its settings and characteristics, location data, application malfunctions, other system operations, and your advertising identifiers.

3.4. With your permission, the Mobile Application may request access to certain functions, services and data available on your mobile device, including, where necessary:

- your location, to enable location-based functionality and determine your location for the proper functioning of the Mobile Application; and
- your device gallery or storage, for example, if you choose to add a picture to your profile.

Access to these functions and data is enabled only after you grant the relevant permission through your mobile device settings or in response to a permission request displayed by the Mobile Application, as applicable. You may manage or withdraw such permissions through your device settings, subject to the functionality that depends on the relevant permission.

3.5. The above types of information may not always contain personal data (i.e. data that identifies or can identify you). Some of this information may be depersonalized data (i.e. data that does not and cannot identify you).

4. Information Received from Third Parties and Other Sources

4.1. We may collect and verify certain personal data about you from publicly available sources, including official public registers, where necessary to verify your identity, assess compliance with applicable safety and eligibility requirements, or obtain, verify or update information required for administrative, contractual, invoicing or tax purposes. Such information may include your registered address, tax identification number (NIPT) and other relevant registration details. Where appropriate, we may add or update this information in your Partner account.

4.2. In addition, if you visit our pages on social media platforms (Facebook, LinkedIn, X, TikTok, Instagram, etc.) and interact with us in any way, such as by posting comments or using “Likes”, the operator of the respective social media platform may make this information publicly available, and we may have access to it, including information about your profile on that social media platform.

4.3. We may also receive information from third-party websites, in particular where Customers (users of the Uklon Online Service) make information about Partners publicly available. Such information may include reviews, ratings and additional information, including information relating to claims or disputes.

4.4. In certain circumstances, we may receive personal data about you from third parties where this is necessary for the purposes described in this Policy and where permitted by applicable law. Such third parties may include our Customers; insurance companies in connection with an accident, incident or

insurance claim; payment and financial service providers in connection with payment processing, payment disputes or suspected fraud; public authorities, and publicly available sources, where necessary for the establishment, exercise or defence of legal claims, compliance with legal obligations, or the protection of our rights and legitimate interests.

5. How we treat personal data of children

5.1. We strictly adhere to the protection of children's personal data. We do not knowingly collect personal data from anyone under the age of 18.

5.2. The Website and Mobile Application are not intended for use by persons under the age of 18.

5.3. If you are under the age of 18, please do not use or access the Website or the Mobile Application at any time or in any manner.

5.4. If a parent or legal guardian believes that their child has accessed the Website and/or the Mobile Application and provided personal data, We strongly encourage the parent or legal guardian to contact Us immediately and We will use Our best efforts to delete such personal data immediately.

6. Purposes and legal grounds for processing personal data

6.1. We process your personal data solely in accordance with the Law. We process your personal data for the following **purposes** on the following **legal basis** (data may be processed on more than one legal basis):

6.1.1. **Use of the Website:** to personalise your experience when visiting the Website using cookies and similar technologies, as well as to provide you with relevant information on the Website (legitimate interest, consent of the data subject);

6.1.2. **Creating an account in the Mobile Application:** to enable you to register an account in the Uklon Drive Mobile Application and, accordingly, to access the Uklon Online Service and use its functionality (entering into and/or performance of a contract, or taking steps prior to entering into a contract);

6.1.3. **Use of the Mobile Application (via your mobile device):** to enable the Mobile Application to access certain functions, services and data available on your mobile device, including, where necessary, your location and device gallery or storage, for the purposes described in Section 3.4 of this Policy (consent of the data subject).

In particular:

● **The "Location" section:** to ensure the quality of the service, in particular to provide up-to-date information about orders placed near your location, as well as to ensure security and prevent and detect fraud. Location data is processed when the Uklon Drive Mobile Application is running in the foreground (open and displayed on the screen) or in the background (open but not displayed on the screen). To stop the processing of your location data, you must close the Uklon Drive Mobile Application.

● **Device gallery or storage:** to enable the Mobile Application to access your device gallery or storage, for example, if you choose to add a picture to your profile, and, where applicable, to write certain temporary technical data (cache) related to your Order to your device storage.

6.1.4. **Performance of Orders:** We process your personal data when you have accepted request for passenger transportation services in order to provide it to the Customer (user of the Uklon Online Service) (performance of a contract, legitimate interest);

6.1.5. **Driver Care:** to process and consider your inquiries, requests or complaints, respond to them and follow up on them, as well as to provide you with round-the-clock online support in connection with the Uklon Online Service, in particular, to assist you with your orders and answer related questions (consent of the data subject, performance of a contract, legitimate interest).

Please note that conversations with support staff may be monitored in real time or recorded for the purposes of monitoring service quality and providing further training to our team. Call recordings are usually stored for a limited period in accordance with the purposes for which they are processed and are automatically deleted unless we deem it necessary to retain them for a longer period (for example, to investigate cases involving violations of the law).

6.1.6. **Communication with you via social networks:** to establish and maintain communication with you, including providing advice and answering your questions (legitimate interest, taking steps prior to entering into a contract, performance of a contract);

6.1.7. **Protection of your life and health during transportation:** to save your life or protect your health and/or prevent a threat of harm to your life or health during the fulfilment of an order (protection of the vital interests of the data subject, legitimate interest);

6.1.8. **Search for personal belongings left in the car:** We transfer your name and telephone number to Customers to assist them in recovering personal belongings left in the car during transportation. We may transfer your telephone number to Customers in other cases only if we obtain your separate consent (legitimate interest, performance of a contract, consent of the data subject);

6.1.9. **Marketing:** to send you information containing news, surveys, and advertising or promotional materials. Some advertising or promotional campaigns may include a condition requiring your consent to the Company's use of the contact information obtained for advertising or marketing purposes in accordance with applicable law (legitimate interest, consent of the data subject);

6.1.10. **Other promotional activities:** We may transfer your personal data to third parties in order to offer or provide you with discounts on the prices of goods and/or services of such third parties, and/or gifts, prizes and/or other incentives offered or provided by such third parties, as well as to determine the participants or winners of advertising or promotional campaigns and enable them to receive the rewards provided for under the terms of such campaigns (legitimate interest of the Company, consent of the data subject, performance of a contract);

6.1.11. **Legal purposes and compliance with legal requirements:** to protect against malicious acts (such as fraud); to detect and/or investigate crimes and address other security considerations; to meet internal and external audit requirements, including information security measures and regular risk assessments of personal data processing; to respond to requests and other legal requirements of regulatory and law enforcement authorities; to prepare a claim or respond to a claim received; and to comply with other legal requirements applicable to us (compliance with a legal obligation, legitimate interest);

6.1.12. **Analytics and statistics:** to conduct internal analytical research; develop, test and improve the features and functionality of the Website and/or Mobile Application and our other services; and obtain your feedback about us and our services (legitimate interest);

6.1.13. **Service quality assessment and monitoring of compliance with the requirements of the Uklon Online Service:** We collect your feedback, comments and ratings regarding your experience with each Order. We also take into account Customers' ride ratings and related comments concerning the level of service provided in connection with Orders accepted by you, in order to ensure mutual respect between Partners and Customers and compliance with the rules for using the Uklon Online

Service in accordance with the Terms and Conditions and the Driver Etiquette (performance of a contract, the Company's legitimate interest, consent of the data subject).

How it works: Your rating, expressed on a scale of 1 to 5 stars, is a dynamic indicator calculated based on Customers' evaluations of their ride experience with you over the last 100 rides. Following an in-depth analysis of all ride details, certain ratings may be cancelled and excluded from the calculation of the Partner rating. Both the Partner and the Customer may opt out of being matched with each other on future Orders if either party gives the Order a 1-star rating after its completion.

We may determine the minimum required Partner rating and, additionally, the minimum required Partner activity score for the purpose of monitoring compliance with Uklon's requirements, in accordance with notifications regarding Driver Activity and Driver Rating, which may have implications for Partners as described in those notifications.

7. Disclosure and Transfer of Your Personal Data

7.1. Under certain circumstances, we may transfer your personal data to data processors (individuals or legal entities to whom we, as the data controller, grant the right to process personal data on our behalf) and/or, where there is an applicable legal basis, to other categories of recipients, including recipients located outside Albania, for the following purposes:

7.1.1. **Customers (Users of the Uklon Online Service):** We transfer certain personal data specified in your account to Customers whose Orders you fulfil, exclusively to the extent reasonably necessary to arrange the fulfilment of those Orders. In addition, at the written or verbal request of the Customers, we may provide them with your name and telephone number to assist them in recovering personal belongings left in the car during transportation.

We may also disclose your personal data to the Customers to the extent necessary to assess service quality and monitor compliance with the requirements for using the Uklon Online Service, in accordance with the applicable Terms and Conditions and Driver Etiquette, including requirements relating to service quality and legality, mutual respect, and user safety.

We receive from the Customers, and process, data necessary for service quality assessment and the handling of inquiries and complaints, including assigned ratings, the overall rating calculated on the basis of such ratings in accordance with the applicable Driver Rating rules, comments concerning the level of service, and data contained in feedback and complaints.

In other cases, at the written or verbal request of the Customers concerning a completed Order for which the period established by Uklon for promptly contacting the Partner has expired, we may transfer your telephone number to those Customers only if we have obtained your separate consent.

When using the Uklon Online Service, Customers may, at their own discretion, share information about their trip with third parties by providing a link or using another method of real-time trip tracking. Such information may include your personal data, such as your name, photograph and telephone number.

The Company provides the technical functionality that enables the Customers to share such information with third parties at their discretion. We process the personal data involved in providing this functionality in accordance with this Policy and applicable data protection law. Users independently decide whether to share trip information and with whom. The Company does not determine the purposes or means of any subsequent processing of the shared information independently carried out by third-party recipients.

7.1.2. **Partners providing electronic communications services to us:** We may use the services of electronic communications providers to which you are a subscriber to process your personal data on our behalf. Such processing is carried out for legitimate purposes. For example, we may engage electronic communications providers to send SMS messages and push notifications containing information and promotional materials on our behalf and in our interests. Such service providers are required to maintain confidentiality, enter into appropriate agreements with us, and use your personal data only for the purposes specified by us or permitted by applicable law.

7.1.3. **External consultants and professional service providers:** We may provide access to your personal data to service providers and/or consultants who provide professional assistance to us and require access to such data to perform their services, for example, providers of technical support and maintenance for the Website, invoice processing, accounting, auditing and legal services.

7.1.4. **Cloud and other service providers:** We may provide access to your personal data to providers of cloud and other services, for example, providers of software and other cloud services, and online services for initiating and managing parking reservations, to the extent necessary to receive the relevant services.

7.1.5. **Our agents:** We may provide access to your personal data to our agents where we authorise them to perform certain activities on our behalf within the scope of the purposes assigned by us, subject to their obligation to maintain confidentiality and protect personal data in accordance with the agency agreements concluded with us.

7.1.6. **Competent public authorities**: We may disclose personal data to law enforcement, tax and other competent authorities only to the extent and in the circumstances in which they are entitled to receive such data, in particular where required by applicable law, as well as on our initiative where necessary to prevent, detect or stop criminal acts, such as fraud. In addition, in certain cases, personal data may be transferred to competent authorities to the extent necessary to protect our rights or property, or the rights or property of the Customers.

7.1.7. **Emergency services:** We may disclose your personal data to emergency services, including the police, rescue services and ambulance services, in order to save your life or protect your health and/or prevent a threat to your life or health during transportation.

7.1.8. **Banks, payment systems and other financial institutions:** We may transfer your order history, certain personal data specified in your account, and data confirming communications with you regarding the acceptance and fulfilment of an order or refusal to fulfil it (for example, screenshots of emails and other communications), which may contain your personal data, at the request of financial institutions or financial service providers, in order to investigate potential fraud and confirm the transportation services you have provided. Such transfer will not constitute a violation of the confidentiality of correspondence. In some cases, we may ask you to provide a written request for a refund, which may contain your personal data, for transmission to the relevant financial institution.

7.1.9. **Our partners who offer or provide you with discounts, gifts, prizes and/or other incentives:** We may transfer your personal data in the manner and to the extent necessary to provide you with the relevant discounts, gifts, prizes and other incentives offered or provided by such partners.

7.1.10. **Interaction with a Car Fleet:**

If you register with the Uklon Online Service as a Partner of a car fleet (“Car Fleet”) or are connected to a Car Fleet, we may make your personal data available to the relevant Car Fleet through its account to the extent necessary to organise and administer your cooperation with that Car Fleet (performance of a contract, legitimate interests).

If your cooperation with a Car Fleet ends, you may request that we discontinue displaying your personal data in the relevant Car Fleet's account. In certain circumstances, including where there is an unresolved dispute or outstanding debt, we may continue displaying relevant personal data for a limited period, subject to applicable law.

Further details regarding the conditions and procedure for discontinuing access to your personal data, including applicable retention periods, are set out in the Terms and Conditions (Sections 9.7–9.11).

7.1.11. **Insurance companies:** We may disclose certain personal data to insurance companies where necessary in connection with an accident, incident or insurance claim involving you, including at your request or in response to a request from an insurance company, where such disclosure is permitted or required by applicable law.

7.1.12. **Intra-group data sharing:** to facilitate coordination between companies operating under the Uklon brand, maintain accounting records, conduct audits and prepare other reports, optimise business processes, improve user experience and enhance the quality of our services (legitimate interests, compliance with a legal obligation, where applicable).

7.2. In the event of a merger, reorganisation or similar corporate transaction, or the sale of the Company or part of its assets, the personal data we collect may be transferred to another company involved in such merger, reorganisation, acquisition or other transaction. All such transfers will be carried out in accordance with applicable law and our obligations under this Policy.

7.3. Where necessary for the purposes described above, we may transfer your personal data to recipients located outside Albania, including in countries that are not recognised as providing an adequate level of personal data protection. Such transfers, including any subsequent processing of your personal data, will be carried out in accordance with applicable data protection law.

7.4. Please note that, to the extent permitted by applicable data protection legislation, where a transfer of your personal data is carried out on the basis of your consent or in accordance with this Policy, we will not require your separate consent or provide separate notice to you for each individual transfer.

8. Rights of Data Subjects

8.1. Under the Law, you have the following rights in relation to your personal data, subject to the conditions and limitations provided by the Law.

8.1.1. Right to information

You have the right to receive clear and accessible information about how we process your personal data, including the purposes and legal bases of processing, categories of personal data, recipients, applicable retention periods, international transfers, automated decision-making and your rights under the Law.

Where we obtain your personal data from another source, you also have the right to receive information about the categories of personal data concerned and their source, where required by the Law.

8.1.2. Right of access

You have the right to obtain confirmation as to whether we process your personal data and, where this is the case, to access your personal data and information about their processing, including the purposes, legal basis, categories of data, recipients and applicable retention period.

8.1.3. Right to rectification

You have the right to request the correction of inaccurate personal data and, taking into account the purposes of processing, the completion of incomplete personal data.

If you have created a Partner account, you may also access and update certain personal data directly through your account, where such functionality is available. You are responsible for ensuring that the personal data you provide to us is accurate and up to date.

8.1.4. Right to erasure

You have the right to request the erasure of your personal data where the conditions provided by the Law are met, including where the data are no longer necessary for the purposes for which they were collected or where you withdraw your consent and there is no other legal basis for processing.

This right is not absolute and does not apply where we are required or permitted to retain or process your personal data under applicable law, including where necessary to comply with legal obligations, prevent fraud or establish, exercise or defend legal claims.

Since certain personal data are necessary to provide you with access to the Uklon Online Service and enable you to fulfil orders, your Partner account may be blocked or deleted if you request the erasure of all your personal data.

Uninstalling the Mobile Application from your device does not delete your personal data from our databases.

If you are connected to a Car Fleet, you may request that we discontinue displaying your personal data in the relevant Car Fleet's account. In certain circumstances, including where there is an unresolved dispute, outstanding debt or other property-related conflict, we may continue displaying relevant personal data for a limited period, subject to applicable law. Further details are set out in Sections 9.7–9.11 of the Terms and Conditions.

Discontinuing the display of your personal data in a Car Fleet's account is separate from deleting your Partner account or personal data processed by us for other purposes. Any request for such deletion will be assessed separately in accordance with applicable data protection law.

8.1.5. Right to restriction of processing

You have the right to request the restriction of processing of your personal data where the conditions provided by the Law are met.

8.1.6. Right to data portability

Where applicable under the Law, you have the right to receive personal data that you have provided to us in a structured, commonly used and machine-readable format and to transmit those data to another controller.

8.1.7. Right to object

You have the right to object to the processing of your personal data where the conditions provided by the Law are met, including where the processing is based on our legitimate interests.

Where your personal data are processed for direct marketing purposes, you have the right to object to such processing at any time and free of charge. Following such an objection, we will stop processing your personal data for direct marketing purposes.

8.1.8. Right to withdraw consent

Where we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal or processing carried out on another applicable legal basis.

If you withdraw your consent, you will not be able to use any services, features or additional benefits that require the processing of personal data collected on the basis of that consent.

You may withdraw your consent by contacting us at privacy@uklon.eu. To help us process your request more efficiently, you may indicate "Withdrawal of consent" in the subject line of your message.

You may also opt out of receiving direct marketing communications at any time by using the unsubscribe functionality provided in the relevant communication, through the applicable settings in the Mobile Application, or by contacting us at privacy@uklon.eu.

8.1.9. Right not to be subject to certain automated decisions

You have the right not to be subject to a decision based solely on automated processing of your personal data, including profiling, where such decision produces legal effects concerning you or significantly affects you, except in the circumstances permitted by the Law.

8.1.10. Right to lodge a complaint

If you believe that your rights relating to the processing of your personal data have been violated, you have the right to lodge a complaint with the Commissioner for the Right to Information and Personal Data Protection of Albania (the "Commissioner"), without prejudice to any other administrative or judicial remedies available to you.

9.2. Exercising Your Rights

To exercise any of your rights, you may contact us using the following contact details: privacy@uklon.eu; UKLON ALBANIA SH.P.K., Ibrahim Rugova Str., Sky Tower, Floor 5, Suite 2, Tirana, Albania.

When you contact us with a request to exercise your rights as a data subject, please specify your request so that we can process it accurately and in a timely manner.

If we are unable to identify you from the information provided or have reasonable doubts about your identity, we may request additional information necessary to verify your identity. This helps us prevent unauthorised disclosure of your personal data. Any additional information collected for verification purposes will be used only to confirm your identity.

We will respond to your request without undue delay and, in any event, within 30 (thirty) days of receiving the request. Where permitted by the Law, this period may be extended by up to 60 (sixty) additional days due to the complexity or number of requests. We will inform you of any such extension and the reasons for it within the initial 30-day period.

The exercise of your rights is generally free of charge. Where permitted by the Law, we may charge a reasonable fee or refuse to act on a request that is manifestly unfounded or excessive.

If we refuse to act on your request, we will inform you of the reasons for the refusal and of your right to lodge a complaint with the Commissioner or seek judicial remedies, as applicable.

9. Data Retention

9.1. Your personal data is stored for as long as necessary to achieve the purposes for which it is processed or for the applicable data retention period where required by applicable law.

9.2. If your Partner account is deleted, we may retain certain personal data where necessary to establish, exercise or defend legal claims, prevent fraud, protect our legitimate interests or comply with applicable legal obligations. Such data may include your name, contact details, information necessary to identify you as a Partner, records of your contractual relationship with us, order history and other information relevant to potential claims or disputes.

We will retain only the personal data necessary for these purposes and only for as long as justified by the relevant circumstances, applicable limitation periods or legal retention requirements.

9.3. We may retain certain personal data necessary for accounting, financial reporting and the verification of financial transactions and settlements for up to five (5) years, including after the deletion of your Partner account, unless a longer retention period is required or permitted by applicable law. Such data may include your full name, tax identification number (NIPT), account balance transaction history and other financial information necessary to verify and substantiate payments and settlements.

We will retain only the personal data necessary for these purposes. Upon expiry of the applicable retention period, such data will be deleted or anonymised unless another valid legal basis requires or permits its continued retention.

9.4. Once the relevant processing purposes have been achieved or the applicable retention period has expired, we will delete or anonymise your personal data so that it can no longer be associated with you personally. Where data has been anonymised and no longer constitutes personal data, we may use such information for statistical, analytical or research purposes, as well as for targeting, without further informing you.

9.5. Uninstalling the Mobile Application from your device does not delete your personal data from our databases.

9.6. Personal data will be deleted or destroyed where:

- the applicable data retention period has expired;
- the processing is no longer necessary for the purposes for which the personal data was collected or otherwise processed, unless there are legal grounds for retaining it;
- the data subject and the data controller have terminated their legal relationship, unless otherwise provided by applicable law;
- the competent authority has issued a relevant order under applicable data protection law;
- a court decision ordering the deletion or destruction of personal data has entered into force; or
- deletion or destruction is otherwise required by applicable data protection law.

10. Location of personal data

10.1. We care about the security of your personal data and therefore store your personal data on servers located in the European Union, and Albania or the United States, where applicable.

10.2. We may also transfer your personal data to recipients located in other countries where necessary for the purposes of processing described in this Policy or where required or permitted by applicable law. Where your personal data is transferred outside Albania, we will take appropriate measures to ensure that the transfer is carried out in accordance with applicable data protection law and that your personal data is adequately protected. Such measures may include an adequacy decision or appropriate safeguards, as provided for by applicable data protection law.

10.3. Where required by applicable data protection law, we will inform you of the relevant international transfer and the applicable safeguards or derogation.

11. How we protect your personal data

11.1. We know that security is important to our users, and we care about the security of your personal data. We use technical, physical and organisational security measures to protect your personal data against loss, misuse, unauthorised access, disclosure, alteration or destruction. These measures may include firewalls, data encryption, physical access controls at our data centres and access controls to personal data.

11.2. Access to personal data is provided to relevant organisational units and/or individual employees where necessary for the performance of their functional duties and the fulfilment of our contractual and legal obligations. Each employee or other authorised person who has access to personal data is subject to confidentiality obligations in relation to the information accessed in the course of performing their duties.

11.3. We also need your help. You are responsible for ensuring that your personal information is accurate and for keeping your password and account registration information secure and not sharing it with unauthorised persons.

11.4. If you pay by bank card when placing an order through the Uklon Online Service, you will be automatically redirected to the website of the relevant financial service provider, where you will provide your personal data and bank card details directly to that financial service provider.

11.5. The Website and the Mobile Application do not collect or store your bank card details.

12. Cookies

12.1. We use cookies and similar technologies, including web beacons, tags, scripts, local storage technologies, Software Development Kits (SDKs) and advertising identifiers, in connection with your use of the Website and Mobile Application. These technologies may be used for purposes such as authentication, remembering your preferences, ensuring the proper functioning of the Website and Mobile Application, analysing their use, improving our services and, where applicable, providing or measuring advertising.

12.2. Some cookies and similar technologies may be placed or accessed by third parties that provide services to us.

12.3. Where required by applicable law, we will obtain your consent before using non-essential cookies and similar technologies. You can manage your cookie preferences through the settings or consent mechanisms made available to you and, where applicable, through your browser or device settings.

12.4. For more information about the types of cookies and similar technologies we use, the purposes for which we use them, the third parties involved, retention periods and how you can manage or withdraw your consent, please see our Cookie Policy.

13. How to contact us

13.1. Questions, comments and requests regarding this Policy may be addressed to Our Customer Support Service at + 35545301390 or to the e-mail address: privacy@uklon.eu.

13.2. You may make a request regarding your personal data by sending a letter to Us at: UKLON ALBANIA SH.P.K., Ibrahim Rugova Str. Sky Tower, Floor 5, Suite 2, Tirana, Albania; or by sending an e-mail to the following e-mail address: privacy@uklon.eu.

13.3. If You believe that We have violated the terms of this Policy, please contact Us and inform Us which terms of this Policy have been violated. We will promptly review Your complaint.

The version of the Policy is valid from 09.11.2026.