PRIVACY POLICY

(INNOVAWAY ALBANIA Sh.p.k)

1. INTRODUCTION

INNOVAWAY ALBANIA Sh.p.k is pleased to welcome you to the space dedicated to our personal data processing policy (referred to as the "Privacy Policy"), within the framework of information on the processing of personal data pursuant to Article 13 of Law No. 124/2024 "On the Protection of Personal Data" (Article 13 of GDPR 2016/679).

This "Privacy Policy" relates exclusively to the processing carried out by INNOVAWAY ALBANIA Sh.p.k and this company is considered the controller for the processing described therein.

"Personal data" refers to any information relating to a data subject (as defined in point 3, Article 5 of Law No. 124/2024 "On the Protection of Personal Data").

The protection of your privacy and personal data is an important matter to which the INNOVAWAY Group and specifically INNOVAWAY ALBANIA Sh.p.k pay special attention. We respect the confidentiality of your personal data and always act in compliance with the provisions of Law No. 124/2024 "On the Protection of Personal Data" and this Privacy Policy.

This Privacy Policy aims to describe to "Data Subjects" in a simple and transparent manner what personal data is processed, for what purpose, by whom and by what methods, and to inform them about the measures applied to protect their rights and freedoms, as well as the security and confidentiality of personal data.

This privacy policy applies to all processing operations carried out by INNOVAWAY ALBANIA Sh.p.k during its activity and is valid for all data subjects. The purpose of the privacy policy is to provide maximum transparency regarding the information and personal data collected/processed and how they are used.

2. Who is the Controller?

A "Controller" is any natural or legal person, as well as any public authority, which alone or jointly with others determines the purposes and means of the processing of personal data (as defined in point 8, Article 5 of Law No. 124/2024 "On the Protection of Personal Data").

The website is managed by the parent company INNOVAWAY SPA based in Naples, Italy. For the personal data of Albanian citizens (data subjects) that may be processed through the website, the parent company is considered the "controller".

For personal data processed locally, within the framework of other processing operations carried out by INNOVAWAY ALBANIA Sh.p.k within the territory of the Republic of Albania, the controller is INNOVAWAY ALBANIA Sh.p.k.

3. Categories of Data Subjects

- **Clients** (who outsource services to Innovaway under a service contract);
- **Data subjects** whose data is collected by Innovaway's clients;
- **Partners/collaborators**;
- **Interested persons** via the website;
- **Visitors** to the company's office premises;
- **Job applicants/candidates**;
- **Employees**.

4. General Information

Data subjects are informed of the following general policies and rules, valid for all areas of processing:

- All data is processed in a lawful, fair, and transparent manner towards the data subject, in accordance with the general principles set out in Law No. 124/2024 "On the Protection of Personal Data" and the GDPR;
- We collect and process your data only for the purposes indicated in this Notice or for specific purposes that have already been shared with you and/or for which you have given your consent;
- We aim to collect, process, and use as little personal data as possible;
- When we need to collect your personal data, we ensure that it is as accurate and up-to-date as possible;
- If the personal data we collect is no longer needed for any purpose and we are not legally required to retain it, we will do everything possible to delete, destroy, or anonymize it;
- Specific security measures have been taken to prevent data loss, unlawful or improper use, and unauthorized access;
- Your personal data will not be disseminated, sold, made available, or communicated to entities other than those indicated in this Privacy Policy.

5. Regarding the processing operations carried out by INNOVAWAY ALBANIA Sh.p.k

- **Personal data we process**

We take care to inform you *"regularly and in full"* regarding the categories of data we process, the methods, purposes, security measures, as well as the rights you enjoy. In general, data is collected directly from you and with your consent as a data subject.

INNOVAWAY ALBANIA Sh.p.k, within the scope of fulfilling its business purpose, processes the following categories of personal data:

- **Clients** who outsource services to Innovaway under a service contract. Generally, personal data of the legal representatives of client companies

with which INNOVAWAY ALBANIA Sh.p.k cooperates in the provision of services is processed. Specifically, *data on name, surname, ID number, signature, email* of the administrator, legal representative, or contact person, which is managed manually through physical documentation signed between the parties as well as through electronic email communications.

- **Data subjects** whose data is collected by clients and for whom Innovaway, within the scope of service provision, may access certain categories of personal data (solely for the purposes of providing the service), specifically: *name, surname, date of birth, identification document number, telephone number, credit card details.*
- For **partners/collaborators**to whom certain services may be delegated in order to achieve the company's objectives, through cooperation contracts physically managed in the company's archive, data such as *emri, mbiemri, pozicioni, numër kontakti, email* dhe *nënshkrimi.*
- For **interested persons**via the website, which enables them to obtain information on services, submit complaints or requests, data such as *name, surname, position, contact number, email, and signature* are accessed.
- For **Visitors** to the company's office premises, through the entry-exit logbook, data such as *name, surname,* and reason for visit are collected for security purposes. Meanwhile, image data is collected through the CCTV system, also for security purposes.
- For **job applicants/candidates,** they are required to send a CV to the email address recruitingtirana@innovaway.it. In this context, the following data is processed: *name, surname, email, telephone number, date of birth, qualifications, and professional experience* (information typically included in a CV). This data is accessed electronically only by the Company Administrator and the Human Resources Specialist, who oversee the recruitment process. The data of candidates not selected for the vacant position is deleted immediately after the completion of the recruitment selection process and the announcement of the successful candidate.
- For **employees** the following data is processed: *name, surname, email, telephone number, educational data, signature, salary, bank account number, ID, qualifications and professional experience, data on fitness for work and health, residential address, and criminal record certificate.* This

data is accessed manually (via physical file) only by the Administrator, the Human Resources Specialist, and the Finance Specialist.

- **Purpose of data processing**

The purposes of processing personal data depend on the relationship that **data subjects** have with INNOVAWAY ALBANIA Sh.p.k, as well as the services provided by the company.

- Personal data of **Clients who outsource services to Innovaway** under a service contract is processed for the smooth running of specific contractual relationships and the most accurate and complete provision of services.
- Personal data of **Data Subjects,** collected by Innovaway's clients and for whom Innovaway, in the context of providing the service, may access certain categories of personal data, is processed solely for the purpose of providing the service stipulated in the contract between the parties (between Innovaway and its client company).
- Personal data of **partners/collaborators**to whom certain services may be delegated by Innovaway Albania Shpk to achieve the company's objectives through cooperation contracts, is processed within the framework of contractual obligations and civil law legislation for respecting the rights and obligations between the parties.
- Personal data of **interested persons**, **via the website**, is processed for the purpose of informing them about the company's services, as well as handling their requests or complaints.
- Personal data of **VizitorëveVisitors to the company's office premises, through the entry-exit logbook or via the CCTV system,** is processed to ensure their physical safety, as well as the security of company assets and monetary values.
- Personal data of **job applicants/candidates** is processed to ensure the functioning of the recruitment and selection process, with the aim of hiring qualified individuals and professionals in this sector.

- Personal data of **employees** is processed to ensure the proper functioning of the employment relationship, compliance with obligations between the parties, and in accordance with labor legislation.

- **Legal basis for data processing**

We inform you that, pursuant to Article 5 point 8, Article 7, and Articles 22 and 23 of Law No. 124/2024 "On the Protection of Personal Data", the personal data you provide will be processed in accordance with the stipulated legislation, legal processing criteria, as well as in accordance with the rights and obligations arising therefrom.

- **Your consent,**particularly in your capacity as an Interested Person/Website Visitor, Visitor to the company's office premises, Job Applicant/Candidate, or Employee of the company;
- **Contractual relationship** between you and Innovaway Albania Shpk. This applies particularly if you are an employee, client, or data subject of a client with whom the company has a service contract, or a partner/collaborator of Innovaway Albania Shpk;
- **Compliance with our legal and regulatory obligations**, primarily referring to commercial legislation, civil law legislation governing legal relations between parties, contracts and obligations, employment legislation and procedures, as well as tax and banking legislation, which define the purposes of any processing activity or procedure that we are obligated to carry out in compliance with these laws;
- **Our legitimate interests**, particularly for the protection of our offices and premises and the physical integrity of our employees and visitors (CCTV monitoring of the premises).

Within the framework of the processing, the following secondary legislation approved by the Commissioner for the Right to Information and Personal Data Protection applies:

- Instruction No. 03, dated 30.04.2025 *"On the processing of personal data by video surveillance systems"*;
- Instruction No. 11, dated 08.09.2011 *on "Processing of employee data in the private sector", as amended;* as amended;
- Instruction No. 12, dated 21.12.2011 *"On identity control at building entrances";*;
- Instruction No. 19, dated 03.08.2012 *on "Regulating the relationship between controller and processor in cases of delegation of data processing and the use of a standard contract in cases of such delegation"* as amended;
- Instruction No. 42, dated 22.07.2014 *on "Processing of personal data of job candidates"*;

- **Data retention period**

- Personal data of **clients who outsource services to Innovaway** under a service contract and personal data of **partners/collaborators**, to whom certain services may be delegated by Innovaway Albania Shpk, will be stored physically within the framework of contractual documentation management for a period of 15 years in accordance with tax, notarial, and archival legislation.
- Personal data of **subjects,** , collected by Innovaway's clients and for whom Innovaway, within the scope of service provision, may access certain categories of personal data, will be processed and accessed **throughout the validity period of the contract and up to 2 years after its termination.**.
- Personal data of **interested persons**, **via the website,** will be retained **for the duration of processing the request/complaint and for a maximum period of 1 year after completion of the processing**, unless longer retention is legally permitted for other lawful reasons.
- Data of **job applicants/candidates** will be retained **until the completion of the recruitment process for the vacant position**. Once the candidate for the vacancy is selected, the data of other applicants will be destroyed**.**
- Data of **employees** will be retained for the entire duration of the employment relationship **and up to two years after the termination of**

the employment relationship, corresponding to the period in which the employee has the right to file legal claims against the employer (pursuant to the Civil Code of the Republic of Albania).

- Të **CCTV data** collected from the company's premises will be stored according to server capacity, i.e., up to **2 weeks.**
- Data of **Entry-exit log** will be retained for a period of **1 month** and will then be destroyed.

6. Regarding data processing via the website managed by the parent company INNOVAWAY SPA based in Naples, Italy

For data processed via the website, the parent company INNOVAWAY SPA is considered the "controller".

To be informed regarding this processing operation as well as for any requests, please refer to the "Privacy Policy" of INNOVAWAY SPA.

For requests or complaints regarding personal data processed via the website, please contact the email address privacy@innovaway.it .

7. Rights of the Data Subject

Pursuant to Articles 13–21 of Law No. 124/2024 "On the Protection of Personal Data", you have rights regarding your personal data, according to the methods and within the limits set by current legislation, and you may request additional information at any time regarding the processing of your personal data. You have the following rights:

- The right to be informed (Article 13);
- The right of access (Article 14);
- The right to rectification or erasure (Article 15);
- The right to be forgotten (Article 16);

- The right to restriction of processing (Article 17);
- The right to data portability (Article 18);
- The right to object (Article 19);
- The right not to be subject to automated decision-making (Article 20);
- The right to lodge a complaint (Article 86);
- As well as, in general, to exercise all rights recognized by the current provisions of the law.

Requests must be addressed to the respective Data Controller by writing to the following addresses:

1) For requests or complaints regarding personal data processed locally, within the framework of processing operations carried out by INNOVAWAY ALBANIA Sh.p.k, please contact the email address dpo@innovaway.al .

2) To contact the Personal Data Protection Officer (or DPO), also refer to the email address dpo@innovaway.al

In the event that data is processed based on legitimate interests, the rights of data subjects are guaranteed (except for the right to portability which is not provided for by regulations), in particular the right to object to processing, which may be exercised by sending a request to the data controller.

8. Security Measures

Security measures are essential to protect personal data, preserve integrity and comply with legal and ethical standards. Our company operates in accordance with Albanian and European data-protection legislation and has established the necessary policies and rules.

We ensure privacy and the protection of personal data by securely storing your information and obtaining your informed consent before collecting data. Personal information will not be disclosed to any person outside the company. Individuals have the rights provided for by applicable law, including the right to access,

rectify and erase their data.

To protect personal data and preserve the integrity of processing activities and operations, we implement the following measures:

- **Data Storage** – We use encrypted data storage methods, secure servers, and restricted access to protect personal data.
- **Access Control** – We enforce strict access controls to limit access to personal data, ensuring that only authorized personnel can view, access, delete, or modify specific information or data.
- **Physical Security of Equipment / Premises** – The equipment and premises where we store personal data are located in a secure environment with restricted physical access (e.g., locked cabinets and rooms).
- **Data Retention Policy** – We have established rules regarding data retention periods and secure deletion to mitigate the risk of unauthorized access to data.
- **Data Security Training** – Prior to commencing their duties, relevant personnel are trained in data protection, receiving regular updates on our specific data management standards, practices, and protocols for data security.

9. Data Controller and Data Protection Officer

1) The Data Controller is INNOVAWAY ALBANIA Sh.p.k with its registered office at: Municipal Unit No. 9, 'Jordan Misja' Street, Gener 2 Building, 1st Floor, Object D, Apt 1, Tirana, Albania.

The Data Protection Officer (DPO) can be contacted at the email: dpo@innovaway.al .

2) For data processed via the website, the parent company INNOVAWAY SPA is considered the "controller".

INNOVAWAY SPA has its registered office at (80143) Naples, Via G. Porzio

No. 4, Centro Direzionale Isola G1.

The Data Protection Officer (DPO) can be contacted at the email: dpo@innovaway.it .

10. Changes to this Privacy Policy

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying data subjects and users through this page. Therefore, please consult this page frequently, referring to the date of the last modification indicated at the bottom.

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