

## PRIVACY POLICY OF IKONS SH.P.K.

**IKONS sh.p.k.**, a company incorporated and operating in accordance with the legislation of the Republic of Albania, registered with the National Business Center under the unique identification number (NIPT) L62113037F, with its registered office at Gramoz Pashko Street, Building opposite the former "Studenti" Kino-Club, Ground Floor, Tirana, Albania, provides professional services and consultancy, including, among others, services in the field of Information and Communication Technology (ICT) and other business support services (hereinafter referred to as the "Services"). For the purposes of Law No. 124/2024 "On Personal Data Protection ", IKONS sh.p.k., to the extent that it determines the purposes and means of processing personal data, acts in the capacity of **Data Controller**.

This Privacy Policy applies to the processing of personal data of visitors to our official website <https://ikons-see.com/>, clients, employment candidates, representatives of business partners, contractors, suppliers, and any other data subjects whose personal data are processed by IKONS sh.p.k. in connection with the provision of its services, the use of its website, or the conduct of its business activities.

Please read this Policy carefully before using our website or providing us with your personal data. By using our website or interacting with IKONS sh.p.k., you acknowledge the processing of your personal data in accordance with this Policy, to the extent that such processing is based on a valid legal basis, such as the performance of a contract, compliance with a legal obligation, or IKONS sh.p.k.'s legitimate interest. **In cases where applicable legislation requires your consent for the processing of personal data, such consent will be requested and obtained separately, freely given, specific, informed, and unambiguous, in accordance with the requirements of the applicable Data Protection Legislation.**

This Policy informs you about how your personal data are processed, the rights granted to you under the applicable personal data protection legislation, and how you may contact IKONS sh.p.k. or the competent supervisory authority to exercise these rights, submit a request, or file a complaint.

# DATA CONTROLLER

The party responsible for the processing of personal data in accordance with this Policy is:

Name: **Ikons Sh.p.k.**

NUIS: **L62113037F**

Address: **Gramoz Pashko Street, Building opposite the former "Studenti" Kino-Club, Ground Floor, Tirana, Albania**

Email: **[info@ikons-see.com](mailto:info@ikons-see.com)**

If you have any questions or require clarification regarding this Policy, you may contact us via the email address provided above.

## DATA SUBJECTS

IKONS sh.p.k. may process personal data belonging to the following categories of data subjects:

- Clients;
- Suppliers;
- Contractors;
- Employment candidates;
- Employees;
- Business partners/collaborators and their representatives;
- Visitors to the official IKONS sh.p.k. website;
- Visitors to IKONS sh.p.k.'s premises;
- Other individuals who communicate or interact with IKONS sh.p.k. in the course of its activities.

## CATEGORIES OF PERSONAL DATA WE PROCESS

We collect and process only those personal data that are necessary, relevant, and proportionate for the purposes for which they are processed. The categories of personal data processed vary depending on your relationship with IKONS sh.p.k., the nature of the services provided to you, and the legal basis on which the processing is based. Depending on the circumstances, we may process the following categories of personal data:

- **Identification data:** name, surname, gender, nationality, date and place of birth, personal identification number, identity card or passport number, as well as other official identifiers.
- **Contact data:** residential or correspondence address, telephone number, email address, professional address, and other contact details.
- **Professional and recruitment data:** Curriculum Vitae (CV), cover letter, employment history, professional qualifications, education, certificates, references, interview and assessment results, information regarding professional skills, as well as any other document submitted during the recruitment process or cooperation.
- **Identification and contractual documentation:** copies of identification documents, contracts, authorizations, declarations, and other documents necessary for establishing or managing the contractual or employment relationship.
- **Financial and tax data:** bank account details, payment information, tax data, as well as other financial documentation necessary for the administration of the contractual relationship, payments, or compliance with legal obligations.

- **Employment relationship data:** job position, salary and benefits, working time management, performance evaluations, training, disciplinary measures, complaints, and any other information necessary for the administration of the employment relationship.
- **Special categories of personal data (sensitive data):** health data, disability information, trade union membership, or other special categories of personal data, which Ikons does not actively gather, but are processed only where permitted or required by applicable legislation and based on a valid legal basis.
- **Technical and website usage data:** IP address, browser type, operating system, device identifiers, cookies and similar technologies, access logs, and other information generated through the use of our website.
- **Security recordings:** recorded footage from the CCTV monitoring system installed at IKONS sh.p.k.'s premises.
- **Other data:** any other personal information made available to us by you or which is necessary for the provision of our services, compliance with legal obligations, or protection of IKONS sh.p.k.'s legitimate interests, in accordance with applicable legislation.

## AUTHORIZED PERSONS FOR PROCESSING

Access to personal data is granted only to authorized persons, to the extent necessary for the performance of their duties and in accordance with the "need-to-know principle".

Depending on the purpose of the processing, authorized persons may include, but are not limited to:

- authorized personnel of the Human Resources Department;
- authorized personnel of the Business Development Department;
- authorized personnel of the Legal Department, where necessary;
- authorized personnel of the Finance Department, where necessary;
- system administrators and Information Technology (IT) personnel, to the extent necessary for the administration and maintenance of systems;
- external data processors and service providers engaged by IKONS Sh.p.k., who process personal data only based on the instructions of IKONS Sh.p.k. and in accordance with the relevant personal data processing agreements.

All authorized persons are required to comply with confidentiality obligations and to process personal data only for the purposes for which they have been granted authorization, in accordance with Law No. 124/2024 "On the Protection of Personal Data" and the internal procedures of IKONS Sh.p.k.

## OUR PROCESSING PRINCIPLES

IKONS sh.p.k. processes personal data in accordance with the principles set out in Article 6 of Law No. 124/2024

- **Principle of lawfulness, fairness, and transparency:** processing is carried out in a lawful, fair, and transparent manner towards the data subject, while respecting fundamental rights and freedoms, particularly the right to the protection of personal data.

- **Principle of processing in accordance with purpose limitation:** personal data are collected for specific, clearly defined, and legitimate purposes and are not further processed for other incompatible purposes.
- **Principle of data minimization:** only data that are adequate, necessary, and limited in relation to the respective processing purposes are processed.
- **Principle of accuracy:** personal data are accurate and, where necessary, kept up to date; appropriate measures are taken to correct or delete inaccurate data.
- **Principle of storage limitation:** data are kept in a form that allows the identification of data subjects only for the period necessary for the purposes of processing, except in cases provided by law for long-term retention (archiving, scientific research, etc.).
- **Principle of integrity and confidentiality:** appropriate technical and organizational measures are implemented to ensure the security of personal data, including protection against unauthorized or unlawful processing, loss, destruction, or accidental damage.
- **Principle of accountability:** IKONS sh.p.k., as the Controller, is responsible for and must be able to demonstrate compliance with the above principles, in accordance with Article 22 of Law No. 124/2024.

## LEGAL BASIS

We process your personal data only when permitted by applicable law and only for the purposes for which they have been collected. The legal basis on which we rely for processing depends on the nature of our relationship with you and the specific processing activity. Some legal bases for processing may overlap, and we may justify the processing of your data on more than one legal basis. We process personal data primarily on the following legal bases:

- **Performance of a contract – Article 7, paragraph 1, letter “b” of Law No. 124/2024:** We may process your personal data in order to enter into or perform a contract with you for the provision of our Services.

This includes:

- entering into a contract with you or taking pre-contractual steps prior to entering into a contract;
- managing and fulfilling obligations arising from contracts entered into with you;
- enforcing the contractual rights and obligations of the parties;
- managing contractual relationships with clients, suppliers, external consultants, contractors, and other contractual parties of IKONS sh.p.k.;

- **Legitimate Interest – Article 7, paragraph 1, letter “dh” of Law No. 124/2024:** We may process your personal data where this is necessary for the pursuit of our legitimate business interests or those of third parties, provided that such interests do not override your fundamental rights and freedoms.

This may include:

- managing commercial and professional relationships with clients, suppliers, partners, and consultants;
- developing and improving our activities and services;
- protecting our legal rights and interests;
- ensuring the security of our systems, information, and premises;
- preventing fraud and unauthorized use of data or systems.

- **Legal Obligation – Article 7, paragraph 1, letter “c” of Law No. 124/2024:** We may process your personal data where this is necessary to comply with legal or regulatory obligations applicable to IKONS sh.p.k., including:
  - fulfilling tax, financial, employment, and accounting obligations;
  - complying with requests from public authorities, state institutions, or court orders;
  - fulfilling obligations related to the prevention of money laundering, where applicable;
  - fulfilling any other legal obligation arising from applicable legislation.
- **Consent – Article 7, paragraph 1, letter “a” of Law No. 124/2024:** In cases where the processing of personal data cannot be based on another legal basis, we will request your explicit consent before carrying out the processing. Consent will be requested, among others, when:
  - the processing is carried out for purposes other than those for which the data were initially collected;
  - applicable legislation requires obtaining your consent;
  - the nature of the processing requires a specific legal basis.

You have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before such withdrawal.

## PURPOSE OF PROCESSING

IKONS sh.p.k. processes personal data only for specific, lawful, and necessary purposes related to the conduct of its activities, in accordance with personal data protection principles. Depending on your relationship with IKONS sh.p.k., your personal data may be processed for the following purposes:

- **Management of contractual and pre-contractual relationships, including:**
  - entering into, administering, and performing contracts with clients, suppliers, partners, external consultants, and contractors;
  - undertaking the necessary actions prior to entering into a contract, upon the request of the data subject;
  - communicating and managing professional and commercial relationships.
- **Recruitment and management of employment candidates, including:**
  - assessing candidates' qualifications, experience, and suitability for available positions;
  - managing recruitment documentation and carrying out pre-contractual procedures.
- **Compliance with legal and regulatory obligations, including:**
  - fulfilling tax, financial, accounting, and employment obligations;
  - complying with the requirements of competent public authorities and other obligations provided for under applicable legislation.
- **Administration and improvement of business activities, including:**
  - managing internal administrative, financial, and organizational processes;
  - analyzing and improving the quality of services provided by IKONS sh.p.k.;
  - conducting internal analyses and statistics for the purposes of business development.

- **Information security and protection of company assets, including:**
  - ensuring the security of information systems and IT networks;
  - preventing, identifying, and managing security incidents, unauthorized access, or improper use of systems;
  - protecting and exercising IKONS sh.p.k.'s legal rights, including in administrative or judicial proceedings.
- **Physical security and access control, including:**
  - managing access to IKONS sh.p.k.'s premises;
  - protecting individuals, information, and company property, including through the use of CCTV monitoring systems, where applicable.
- **Communications and information activities, including:**
  - sending communications related to IKONS sh.p.k.'s services, activities, or notifications, where there is an appropriate legal basis;
  - sending marketing or promotional communications only where required or permitted by applicable legislation and, where necessary, after obtaining your explicit consent.

## METHOD OF PROCESSING PERSONAL DATA

The personal data of data subjects are processed electronically and/or manually, in accordance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, and confidentiality, as set out in Law No. 124/2024 "On the Protection of Personal Data".

IKONS sh.p.k. ensures that the processing of personal data is carried out only for lawful and clearly defined purposes, to the extent necessary to achieve these purposes, and only by authorized persons who are required to respect the confidentiality of the data.

The processing of data is carried out by implementing appropriate technical and organizational security measures, with the purpose of ensuring the protection of personal data against unauthorized or unlawful access, use, alteration, disclosure, loss, destruction, or any other form of unauthorized or unlawful processing, in accordance with the requirements of Law No. 124/2024 "On the Protection of Personal Data" and the applicable implementing regulations.

## RECIPIENTS OF PERSONAL DATA AND TRANSFERS

The personal data we process may be made accessible to or shared with internal and external recipients only to the extent necessary for the fulfillment of the purposes defined in this Privacy Policy and in accordance with the relevant legal basis under Law No. 124/2024 "On Personal Data Protection".

- **Internal recipients**

For the purposes of processing personal data, your data may be accessed by:

- authorized employees and collaborators of IKONS sh.p.k., who require access due to their role and for the performance of their assigned duties;
- departments responsible for managing relationships with clients, suppliers, consultants, employees, and employment candidates;
- persons responsible for the financial, legal, human resources, and administrative functions of the company.

All persons who have access to personal data are required to maintain confidentiality and process such data only in accordance with their authorizations and IKONS sh.p.k.'s internal procedures.

- **External recipients**

Depending on the nature of the relationship and the purpose of processing, your personal data may be disclosed to the following categories of recipients:

- **Clients and contractual partners**, where necessary for the performance of contractual relationships or the provision of requested services;
- **Suppliers and service providers**, including providers of IT services, hosting, system maintenance, communication platforms, financial, or administrative services;
- **External consultants and professionals**, such as legal advisors, accountants, auditors, tax consultants, or other professional service providers, where this is necessary for the activities of IKONS sh.p.k.;
- **Financial institutions**, including banks and payment service providers, where this is necessary for the fulfillment of financial obligations;
- **Public authorities and competent institutions**, including tax authorities, social security institutions, courts, law enforcement bodies, or other regulatory authorities, where required by law or by an official procedure.

IKONS sh.p.k. ensures that personal data are disclosed to third parties only to the extent that they are relevant and necessary for the respective purpose. Where necessary, IKONS sh.p.k. establishes contractual relationships and implements appropriate measures to ensure the protection, confidentiality, and security of personal data.

- **Mandatory disclosure of personal data**

IKONS sh.p.k. may be required to disclose personal data to public authorities or other competent institutions where such obligation is provided for under applicable legislation, including:

- tax and financial authorities;
- social security and health insurance institutions;
- courts and other justice bodies;
- law enforcement or regulatory authorities.

In such cases, IKONS sh.p.k. will disclose only the data that are necessary and proportionate to the purpose for which they are requested.

- **International transfers of personal data**

IKONS sh.p.k. may transfer personal data outside the territory of the Republic of Albania only where the conditions provided under Law No. 124/2024 regarding international transfers of personal data are met.

As part of its international business activities, IKONS sh.p.k. may transfer or make personal data accessible to recipients located outside the territory of the Republic of Albania, including, but not limited to:

- **clients, prospective clients, and contractual partners** located in the Republic of Albania, the European Union, the European Economic Area, or other jurisdictions, where this is necessary for the provision of services, recruitment processes, the management of contractual relationships, or the fulfillment of obligations related to IKONS sh.p.k.'s business activities;

- **other companies within the IKONS Group**, where this is necessary for the administration of business processes, cooperation between group companies, the provision of services, the management of client relationships, or other lawful purposes related to the activities of the Group;
- **subcontractors and service providers** processing personal data on behalf of IKONS sh.p.k., including providers of technology services, cloud services, hosting, communications, software platforms, or other supporting services.

International transfers of personal data are carried out only where the conditions set out in Law No. 124/2024 "On Personal Data Protection" are met. Depending on the destination and the circumstances of the transfer, IKONS sh.p.k. ensures that appropriate safeguards are implemented, including, where applicable:

- adequacy decisions issued by the Commissioner for the Right to Information and Protection of Personal Data in respect of countries providing an adequate level of data protection;
- Data Processing Agreements;
- Standard Contractual Clauses;
- appropriate technical and organizational security measures.

When using international technology service providers (e.g., cloud services, email, or software platforms), IKONS sh.p.k. ensures that processing is carried out in compliance with applicable personal data protection requirements.

## AUTOMATED DECISION-MAKING

IKONS sh.p.k. does **NOT** sell your personal data. Personal data are **NOT** subject to automated decision-making that produces legal effects or similarly significant effects on the data subject.

## RETENTION PERIODS OF PERSONAL DATA

IKONS sh.p.k. retains personal data only for the period necessary to fulfill the purposes for which they were collected and processed, taking into consideration the nature of the relationship with the data subject, legal obligations, the need to protect the rights and legitimate interests of IKONS sh.p.k., as well as the principle of storage limitation of personal data.

After the expiry of the relevant retention period, personal data are deleted, anonymized, or securely destroyed, except where further retention is required or permitted by applicable legislation, or where necessary for the establishment, exercise, or defense of legal claims.

### • Retention during contractual and commercial relationships

Personal data of clients, partners, suppliers, contractors, and other contractual parties are retained throughout the duration of the contractual relationship and for the subsequent period necessary to fulfill legal, administrative, and financial obligations or to protect the legitimate interests of IKONS sh.p.k.

Contractual documentation, official communications, and documents related to commercial relationships are retained for as long as necessary for the management of the business relationship and, after its termination, for the period required by applicable legislation or for the period necessary to protect the company's legal rights.

- **Retention of employment candidate data**

Personal data of employment candidates are retained during the recruitment process and for as long as necessary to evaluate the application and communicate with the candidate.

Where the candidate provides separate consent for the retention of personal data for future employment opportunities (e.g., inclusion in the candidate database), the data may be retained for a period of up to two (2) years, or for another period clearly specified at the time consent is obtained. After the expiry of this period, the data are deleted.

Candidate data that are not covered by a valid legal basis or consent for further retention are deleted after the completion of the recruitment process.

- **Retention of employee data**

Employees' personal data are retained throughout the duration of the employment relationship and thereafter for the period required by labor, tax, social security, accounting legislation, and any other applicable legislation.

- **Retention of financial and accounting data**

Documents and personal data related to invoicing, payments, financial transactions, accounting documentation, and tax obligations are retained for the periods defined under applicable tax and accounting legislation.

- **The legal retention periods are as follows:**

- 5 years – for data and documents related to taxes and taxation (according to the Tax Procedures Law);
- 5 years – for data and documents related to the prevention of money laundering (according to the Law on the Prevention of Money Laundering and Terrorist Financing);
- 10 years – for financial and accounting data and documents (according to the Law on Accounting and Financial Statements).

- **Retention of CCTV recordings**

Recordings from CCTV monitoring systems are retained only for the period necessary for the purpose of security and protection of IKONS sh.p.k.'s premises, generally up to 14 days, except where their retention is required for the investigation of an incident, compliance with a legal obligation, or the defense of a legal claim.

- **Retention of communication data and requests from data subjects**

Personal data contained in communications with IKONS sh.p.k., including requests for information, requests for the exercise of data subject rights, or other communications, are retained only for the period necessary to handle the request and document compliance with legal obligations.

- **Retention for legal protection purposes**

In specific cases, IKONS sh.p.k. may retain certain personal data beyond the standard retention periods where this is necessary for the establishment, exercise, or defense of legal claims, compliance with requests from competent authorities, or management of potential disputes.

In such cases, IKONS sh.p.k. will limit retention only to the data that are necessary and will ensure that they are retained only for the minimum period required.

## YOUR RIGHTS

As a general rule, and depending on the specific circumstances of the processing of personal data, you have the following rights under Law No. 124/2024 "On the Protection of Personal Data" (LMD):

- **Right to be informed (Article 13 of the LMD)** – the right to receive information regarding the processing of your personal data by IKONS Sh.p.k., in accordance with the provisions of this Privacy Policy.
- **Right of access (Article 14 of the LMD)** – the right to request access to and obtain a copy of the personal data that IKONS Sh.p.k. holds and processes in relation to you.
- **Right to rectification (Article 15 of the LMD)** – the right to request the correction of inaccurate personal data or the completion/update of your personal data.
- **Right to erasure, including the right to be forgotten (Article 16 of the LMD)** – the right to request the deletion of your personal data, in the cases and under the conditions provided by law.
- **Right to restriction of processing (Article 17 of the LMD)** – the right to request the restriction of the processing of your personal data in the circumstances provided by law.
- **Right to data portability (Article 18 of the LMD)** – the right to request the receipt of personal data that you have provided to IKONS Sh.p.k. in a structured, commonly used, and machine-readable format, as well as the transfer of such data to another controller, where this right applies under the law.
- **Right to object to processing (Article 19 of the LMD)** – the right to object, in certain circumstances, to the further processing of your personal data by IKONS Sh.p.k.
- **Right not to be subject to decisions based solely on automated processing (Article 20 of the LMD)** – the right to request that decisions concerning you are not made solely based on automated processing of your personal data, in cases where this right applies.

Where your consent has been identified as the legal basis for a specific processing activity, you also have **the right to withdraw your consent (Article 8(3) of the LMD)**. This means that you may withdraw your consent at any time, without affecting the lawfulness of processing carried out before its withdrawal.

We also inform you that, in certain circumstances, the exercise of your rights may be restricted in accordance with the limitations provided under **Article 21 of the LMD**.

To exercise these rights, you may contact IKONS Sh.p.k. via the following email address: [info@ikons-see.com](mailto:info@ikons-see.com)

For security purposes and to prevent unauthorized access to personal data, IKONS Sh.p.k. may request verification of your identity before providing information or fulfilling your request regarding personal data.

As a general rule, IKONS Sh.p.k. will not charge you any fee for exercising your rights. However, if your requests are clearly unfounded or excessive, particularly due to their repetitive nature, IKONS Sh.p.k. may apply a reasonable fee, taking into account the administrative costs involved in providing the requested information or communication, or may refuse to act on the request, in accordance with the limitations permitted by law.

# DATA SECURITY MEASURES

IKONS Sh.p.k. has implemented appropriate organizational and technical measures to protect personal data against unlawful or accidental destruction, accidental loss, alteration, unauthorized access, or unauthorized disclosure. Security measures are applied taking into account the nature, purpose, context, and level of risk associated with the processing of personal data, as well as the sensitivity of the data being processed.

In accordance with the above, the measures implemented by IKONS Sh.p.k. to ensure the security of personal data include, but are not limited to:

- Personal data processing is carried out only by authorized persons and in accordance with their functions, responsibilities, and work-related needs;
- Access to personal data and the relevant information systems is granted only to authorized persons, based on the principle of minimum necessary access for the performance of their duties;
- Access control measures ensure user identity verification and prevent access by unauthorized persons;
- Electronic systems and devices used for the processing of personal data are protected through appropriate technical measures, including the use of individual access credentials, secure passwords, and, where applicable, additional authentication mechanisms;
- Passwords and authentication data are personal and confidential and are not communicated to other persons inside or outside IKONS Sh.p.k. Each user is responsible for maintaining and not sharing their access credentials;
- Personal data are stored and processed in protected systems, using appropriate measures to prevent loss, alteration, or unauthorized access;
- Any modification, update, correction, deletion, or transfer of personal data is carried out only by authorized persons and, where applicable, is recorded and documented in accordance with internal procedures;
- Persons processing personal data on behalf and/or for the account of IKONS Sh.p.k. are required to maintain the confidentiality of such data and not use them for purposes other than those for which they were collected;
- Employees and collaborators of IKONS Sh.p.k. are required to comply with internal policies and procedures regarding information security and personal data protection;
- Physical documents containing personal data, where applicable, are stored in a manner that prevents access by unauthorized persons.

The premises and equipment where personal data are processed are protected through appropriate organizational, physical, and technical measures, in accordance with the level of risk and the nature of the processed data. Physical and organizational security measures include, among others:

- Restricting access to premises where personal data are processed or stored only to authorized persons;
- Protecting equipment and documents containing personal data against loss, damage, or unauthorized use;
- Implementing appropriate measures for the security of electronic devices and information systems used by IKONS Sh.p.k.

In the event of a security incident resulting in a personal data breach, IKONS Sh.p.k. will undertake the necessary measures to assess, document, and manage the incident and, where required by applicable legislation, will notify the Commissioner for the Right to Information and Protection of Personal Data within the legal deadline of 72 hours from the moment it becomes aware of the breach.

## COMPLAINTS

If you believe that the processing of your personal data violates the requirements of Law No. 124/2024, or that the exercise of your rights has been infringed, you may submit a complaint to:

**Albanian Authority for the Protection of Personal Data:**

**Commissioner for the Right to Information and Protection of Personal Data**

"Abdi Toptani" Street, Building No. 5,

Postal Code 1001, Tirana, Albania

Email: [info@idp.al](mailto:info@idp.al)

<https://idp.al/>

## CHANGES TO THE PRIVACY POLICY

IKONS Sh.p.k. reserves the right to update or amend this Privacy Policy at any time, including content related to one or more personal data processing activities covered by this Policy.

Such updates may be necessary to adapt to changes in applicable legislation, secondary legislation, guidelines, or recommendations issued by competent personal data protection authorities, as well as to reflect changes in the manner in which IKONS Sh.p.k. collects, uses, stores, or processes personal data.

Any updated version of this Privacy Policy will be published on the official website of IKONS Sh.p.k. and will enter into force as of the date of publication.