

PRIVACY POLICY

UKLON CORPORATE

This Privacy Policy (hereinafter referred to as the "Policy") has been developed by LIMITED LIABILITY COMPANY "UKLON CORPORATE", Company code 44378710, location: 20B Bandery Avenue, Kyiv, 04073 (hereinafter referred to as the "Company", "we", "us") to explain how and why we collect and process personal data, how long we store it, and what rights the personal data subjects have in connection with our processing of such data.

One of our priorities is consistent and effective data protection, so we make every effort to ensure that your personal data is secure and processed in accordance with applicable law and industry best practices.

The Policy applies to those persons whose personal data is processed or may be processed in the future by us as a data owner, including if such persons use special sections of our website <https://uklon.com.ua/business/>, <https://corporate-portal.uklon.com.ua> and/or <https://uklon.com.ua/delivery> (hereinafter referred to as the "Website") , send us the appropriate registration form, contact us with inquiries, order our services for the delivery of B2B orders and/or corporate trips for employees (hereinafter referred to as the "Services") , which is accompanied by the collection of personal data.

When we control the methods of collecting personal data and determine the purposes for which such data is used, the Company acts as a personal data owner within the meaning of the Law of Ukraine "On Personal Data Protection" dated 01.06.2010 No. 2297-VI (hereinafter referred to as the "Law").

By using the Website (in the relevant part) and/or using the Services, you agree and represent that you have read, understood, accepted and agreed to be bound by the terms of this Policy. If you do not agree to the processing of your personal data in accordance with this Policy, please do not let us know your information.

We may amend or change this Policy from time to time without prior notice, including if it's required by law. You hereby give your consent to the amendments to the Policy without receiving any special confirmation from you. We would recommend that you regularly check the current version of the Policy on the Website to stay informed of the latest changes.

What personal data we process

We collect and process personal data that you voluntarily provide us with, including, but not limited to: name, surname, position, email address, phone number, and location address.

This personal data may be provided by you both when completing the registration form on the Website and when completing your profile later, after you have registered the account.

At the same time, if a business entity (legal entity or individual entrepreneur) creates an account on the Website, the account may contain personal data of employees and other individuals who may use our Services. Accordingly, the Company will process such personal data, in particular, name, surname, email address, phone number, position, order information.

We also process your data when you contact our customer support team or contact us through other communication channels. In this case, we may record our conversations and/or correspondence, which may also contain personal data.

Personal data that we process automatically

We may automatically process certain data, including your IP address, the date and time you used

our Services, information about the hardware and software and the Internet browser you are using, as well as information about the operating system of your computer or mobile device (for example, language settings). We may also collect information about clicks on certain buttons and visits to web pages on the Website.

Such data is typically collected through cookies and similar technologies used by the Company to operate the Website and provide you with functionality and personalized communications.

Personal data of other persons that you provide us with

You can place orders not only for yourself. You can order the Transportation Service for any person by providing us with his/her phone number, name and address.

In addition, when ordering the B2B Order Delivery Service, you provide us with the personal data of the recipient of the dispatch: the location address, name and/or surname, and telephone number. The Company shall have the right to use the contact details of the recipient of the dispatch received during the order of the Service to notify the recipient of the dispatch, clarify the location, as well as receive feedback on satisfaction with the Service and the Company's ability to provide similar Services (direct marketing).

In this regard, we should note that you are responsible for ensuring that the person whose personal data you have provided knows that you have done so, understands and agrees to the way we use their personal data (in particular, as set out in this Policy). Please make sure that you have a lawful basis for transferring the personal data of another person to us in order to provide the relevant Service.

Information obtained from other sources

This information may include user feedback such as ratings or compliments, information from users or others who provide information in connection with claims or disputes, information from insurance providers and from public sources (such as social media). We may combine the information collected from these sources with other information in our possession.

How we process your personal data

The processing of personal data means any action or series of actions in relation to personal data that are necessary to achieve the above goals, including, but not limited to: collection, systematization, accumulation, storage, adaptation, clarification (updating, modification), use, distribution (including through sale or transfer), cross-border transfer, depersonalisation, blocking, destruction, as well as any other actions with personal data in accordance with the current legislation of Ukraine.

By accepting the terms of this Policy when registering on the Website, you agree to the terms of personal data processing and confirm that you act of your own free will and understand the legal consequences thereof.

Consent to the processing of personal data is provided by you in cases where there is no other legal basis for the processing of the relevant personal data, for example, for the purpose of sending advertising. At the same time, when you order our Services, thereby entering into a transaction with us (on the terms of a public offer or an individual agreement), or when the processing of personal data is required by applicable law, the Company does not need to obtain consent to process such data.

It should also be noted that this Policy is a written notice to the personal data subject that they are included in the personal database of the Company, which acts as the personal data owner.

Why and on what basis we process your personal data

We process your Personal Data for the following purposes:

- **Fulfillment of the terms of the contract:** fulfillment of obligations in accordance with the terms of the contract for the provision of passenger transportation services or delivery of B2B orders (on the terms of a public offer or an individual agreement). In particular, this includes obligations that are necessary to enable you to use the Website.
- **Placing and fulfilling orders:** we use personal data in order to place orders for passenger transportation and/or delivery of B2B orders by you, as well as to transfer personal data to Uklon partners in order for the partners to fulfill the relevant orders.
- **Customer service:** the processing of personal data by the customer service team can help you with your orders and answer related questions, as well as any other questions you may have.
- **Account:** when users create an account on the Website, the Company uses the information provided to manage the account.
- **Communication with you:** we may contact you on other issues, in particular, to evaluate the quality of our Services, to respond to a previously received request. Such requests are usually made by e-mail, telephone (call or SMS) and through push notifications on the Website.
- **Call tracking:** when you call our support team, we use an automatic caller ID system to identify your phone number with your order. Conversations with support staff may be listened to in real time or recorded for the purpose of monitoring the quality of the Services and further training of our team. The records are stored for a limited period of time and deleted automatically, unless we deem it necessary to retain them for a longer period (if necessary, including for the purpose of investigating cases related to violations of the law or violations of your rights).
- **Legal purposes:** in some cases, we may use your personal data to process and transfer it to the competent authorities in accordance with the current legislation of Ukraine.
- **Marketing purposes:** the Company may provide you with marketing information in several ways, including by e-mail, telephone, text messages (including through messengers) and online (when using the Website). We send you marketing materials with your explicit consent or if we have a legitimate interest in doing so for direct marketing purposes.

Disclosure and transfer of personal data to third parties

Under certain circumstances, the Company may transfer your personal data to third parties:

- **Executors of placed orders:** we transfer your personal data to Uklon partners in order to fulfill your orders (transportation or delivery). Also, in some cases, at the request of a partner, we may share your phone number, but only if you have given us your consent.
- **Third party service providers:** we may use third party services to process your personal data on our behalf. This processing takes place for various purposes, for example, to send out information (e.g., SMS messages). Independent service providers agree to comply with the appropriate level of personal data protection and are not allowed to use your personal data for any purpose other than that specified by us to provide the relevant service.
- **Competent authorities:** We may disclose personal data to state, local, other regulatory,

administrative or law enforcement authorities, as well as to the courts to the extent required by applicable law of Ukraine or if it is necessary to prevent, detect or stop criminal acts and fraud. In addition, personal data may be disclosed to competent authorities to protect our rights or property, as well as the rights and property of our partners.

Personal data storage periods

Your personal data is stored for the period necessary to achieve the processing purposes or for the established information retention period, if required by applicable law.

If your account is deleted, your personal data will also be deleted from the database, unless this data is required for legal, accounting and fraud prevention purposes.

Personal data necessary for the above purposes may be stored after the termination of our cooperation with you for 3 (three) years (limitation period) or for a longer period established for the storage of a particular type of information/data, if provided by applicable law.

After the expiration of the above period, we delete or anonymize your personal data so that it can no longer be associated with you personally.

Please note that logging out of your device or deleting your user account does not delete all personal data. Personal data may be deleted on the Company's side.

How we protect your personal data

We know that information security is important to our users and customers, and we care about the security of your personal data. In particular, we maintain technical and administrative security measures to protect all personal data from loss, misuse, unauthorized access, disclosure or alteration.

Some of the measures we use include firewalls, data encryption, physical access controls to our data centers, and information access controls. Only authorized personnel have access to personal data during their work.

How we treat children's personal data

We consciously do not collect or store personal data of individuals under the age of 18.

The Website and our Services are not intended for use by individuals under the age of 18. If you are under the age of 18, please do not use or access the Website or use our Services.

If you believe that your child has accessed the Website or otherwise provided their personal data, we recommend that you contact us immediately by sending detailed information to privacy@uklon.com.ua and we will use our best efforts to remove such information.

Cookies

A cookie is a small piece of data that is sent to a browser on your computer or mobile device. Cookies are used for various purposes. They help to recognize you as the same user on different pages of the Website.

Cookies usually do not contain any personally identifiable information, but the personal data we store about you may be linked to information stored in and derived from cookies, such as IP address, device ID, country or region, and clickstream history.

In order to better understand cookies and make informed choices, we recommend that you read the cookie guide of your respective browser or visit www.aboutcookies.org or www.allaboutcookies.org.

We may use cookies, web beacons, tags, scripts, local shared objects such as HTML5, and

advertising identifiers (including mobile identifiers such as Apple's IDFA or Google's Advertising ID) and similar technologies (collectively, "Cookies"), in connection with your use of the Website for certain purposes, namely authentication, remembering preferences, collecting statistical information, personalization and other purposes as described below.

When you visit the Website, you will be informed about this by means of a corresponding banner with cookies.

Any user of the Website can decide whether to accept or reject some or all types of cookies, with the possibility of controlling this through the browser settings on their device. Browsers usually allow you to refuse to accept and delete cookies.

Please note that if you disable cookie settings, you may encounter some difficulties when using certain features of the Website.

Rights of data subjects

We guarantee you the exercise of the rights to protect your personal data and other rights provided for in Article 8 of the Law. In particular, as a personal data subject, you have the following rights:

- 1) to know about the sources of collection, location of their personal data, the purpose of their processing, location or place of residence (stay) of the personal data owner or administrator or to give an appropriate order to authorized persons to obtain this information, except in cases established by law;
- 2) to receive information on the conditions for granting access to personal data, including information about third parties to whom personal data is transferred;
- 3) to access their personal data;
- 4) to receive a response on whether your personal data is processed no later than thirty calendar days from the date of receipt of the request, except as provided by law, and to receive the content of such personal data;
- 5) to submit a reasoned request to the personal data owner with an objection to the processing of your personal data;
- 6) to submit a reasoned request to change or destroy your personal data by any personal data owner and administrator if such data is processed illegally or is unreliable;
- 7) to protect your personal data from unlawful processing and accidental loss, destruction, damage due to intentional concealment, failure to provide or untimely provision, as well as to protect against the provision of information that is inaccurate or discrediting the honor, dignity and business reputation of an individual;
- 8) to file complaints about the processing of your personal data with the Ukrainian Parliament Commissioner for Human Rights or a court;
- 9) to apply legal remedies in case of violation of the legislation on personal data protection;
- 10) to make reservations regarding the restriction of the right to process your personal data when giving consent;
- 11) to withdraw consent to the processing of personal data;
- 12) to know the mechanism of automatic processing of personal data;
- 13) to protect yourself from an automated decision that has legal consequences for you.

Please note that when you contact us, you need to go through the identification process and submit your specific requirements so that we can process your request and provide a response legally. If

we are unable to identify you through communications or have reasonable suspicions about your identity, we may ask you to provide proof of identity. This is the only way we can avoid disclosing your data to a person who may impersonate you, i.e. the identification process is carried out in your best interests. Any additional information collected for verification purposes will only be used to confirm your identity.

We process requests as quickly as possible, but please note that providing a complete and legitimate response is a complex process that can take up to a month or more. We will notify you if we need more time to prepare a response.

How you can withdraw your consent to data processing

You may withdraw your consent to the processing of all or part of your personal data, if we process this data on the basis of your consent, by sending a notice to the following e-mail address: privacy@uklon.com.ua

Please indicate "Withdrawal of consent to data processing" in the subject line of your notice to speed up the processing of your request and provide you with a response.

In this case, withdrawal of consent to the processing of personal data is possible only in relation to the future processing of personal data. Decisions and processes made during the processing of personal data cannot be revoked in the past.

Please note that we may not delete certain personal data if this data is required for legal purposes, purposes of fulfilling the terms of the contract or preventing fraud and/or if we need this personal data to fulfill our obligations under the laws of Ukraine. We will inform you about this in our response.

How to contact us

We have appointed a person responsible for the protection and processing of personal data. Please send all questions, comments, requests regarding this Policy or the exercise of your legal rights regarding the processing of personal data to the following e-mail address: privacy@uklon.com.ua.

This version is effective as of July 2, 2024.