



Privacy Policy

This privacy policy applies to Appricot Networking, our iOS and Android mobile applications (together our "App").

In the following privacy policy we inform you about the scope of the processing of your personal data. This policy is in accordance with Kosovo's Law on Protection of Personal Data No.06/L-082 ("LPPD") and the General Data Protection Regulation ("GDPR") and of course we process your personal data accordingly.

General information

What is personal data?

Personal data is any information about personal or factual circumstances relating to an identified or identifiable natural person. This includes, for example, your name, date of birth, e-mail address, postal address or telephone number, as well as online identifiers such as your IP address. In contrast, information of a general nature that cannot be used to establish your identity is not personal data. This includes, for example, the number of users of a website.

What is special category data?

Special categories of data are personal data that need more protection because they are sensitive. This includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data and biometric data. As well as data on a person's health, sex life and sexual orientation. To lawfully process special category data, consent to the processing is required.

What is processing?

"Processing" means any operation or set of operations which is performed upon personal data, whether or not by automatic means. The term is broad and covers virtually any processing of data.

Responsible for data processing

The data controller is Appricot Networking of Ali Hadri 86/6 10000 Prishtinë, Kosovo ("Appricot Networking", "we", "us" or "our"). If you have any questions or would like to exercise your rights, please contact us via our contact form, send us an email at office@appricot.at or write to us at the above address.

The legal bases for the processing of personal data

In accordance with the above laws, we must have at least one of the following legal bases to process your personal data:

You have given your consent,

- the data is necessary for the performance of a contract / pre-contractual measures,
- the data is necessary for compliance with a legal obligation, or
- the data is necessary for the protection of our legitimate interests, unless your interests are overridden.

Where is your data stored?

In the course of our business and app operations, we process data at our Kosovon headquarters. All data collected is usually transferred to our Digital Ocean server, provided by [Digital Ocean](#), 101 6th Ave, New York, NY 10013, USA and our [Google Firebase](#) database, provided by Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA if you are located outside the EU and Google Ireland Limited. The legal basis for the data processing is our legitimate interest in providing our app.

How long is your data stored?

We process and store your personal data only to achieve the respective processing purpose or as long as a legal retention period exists (in particular in Kosovon commercial and tax law up to 10 years).



Privacy Policy

Once the purpose has been fulfilled or the retention period has expired, the corresponding data is routinely deleted.

Processing of automatically collected data

Downloading and installing the APP

The APP can be downloaded from the "Google Playstore", a service of [Google LLC](#), or the Apple App Service "App Store", a service of [Apple Inc.](#) in order to install our APP. Downloading may require prior registration with the relevant App Store and/or installation of the relevant App Store software.

As far as we are aware, Google collects and processes the following data: Licence check, network access, network connection, WLAN connections and location information. However, it cannot be ruled out that Google also transmits the information to a server in a third country. We have no influence on which personal data Google processes during your registration and the provision of downloads in the respective App Store and App Store software. In this respect, Google alone is responsible as the operator of the Google Play Store.

As far as we are aware, Apple collects and processes the following data: Device identifiers, IP addresses, location information, it cannot be excluded that Apple also transmits the information to a server in a third country. This could in particular be Apple Inc. One Apple Park Way, Cupertino, California, USA, 95014. We have no influence on which personal data Apple processes during your registration and the provision of downloads in the respective App Stores and App Store software. In this respect, Apple is solely responsible as the operator of the Apple App Store.

Device information collected by Google and Apple

Google and Apple may collect information from and about the device(s) you use to access the APP, including hardware and software information such as IP address, device ID and type, device-specific and APP settings and properties, APP crashes, advertising IDs (AAID), information about your wireless and mobile network connection such as your service provider and signal strength; information about device sensors such as accelerometer, gyroscope and compass.

Firebase

We use the Google [Firebase](#) Developer App and related features and services provided by Google LLC and Google Ireland Limited. Google Firebase is a platform for developers of apps for mobile devices. The Google Firebase Developer App offers a variety of features. A list of these features can be found at: <https://firebase.google.com/terms/>. The most important information on Firebase security and data protection can be found here: <https://firebase.google.com/support/privacy>.

Permissions and access

We may ask you for permission to store your APP data, including your internet connection and network, location, push notifications, camera, gallery, location and file storage of your device. The legal basis for data processing is our legitimate interest and the provision of contractual or pre-contractual measures. You can deny access to your device via your device's settings/notifications/options; however, this means that our APP may not function as intended.

Push messages

When you use the app, you will receive so-called push messages from us, even if you are not currently using the app. These are messages that we send to you as part of the performance of the contract. You can adjust or stop receiving push messages at any time via the device settings on your device. Where you consent to the use of push messages, consent is the legal basis for the processing.

f) Purchases

When you make in-app purchases, we (Google and Apple on our behalf) may collect the following data from you to process the purchase:



Privacy Policy

- Android or Apple user ID
- Email address
- Payment confirmation from payment data collected by Apple or Google; and
- Device IP and serial number of the device to link history to the device.

Data processing when you use our services

It goes without saying that we cannot help you find a tradesperson or client without knowing some data about you, such as basic profile data and the types of people you want to work with. We also collect data that is generated during the use of our services, such as access logs, but also data from third parties, for example, when you access our services via social networks. You can find more information about this below.

Contacting us

When you contact us, we process the following data from you for the purpose of processing and handling your request: First name, last name, email address and, if applicable, further details if you have provided them, as well as your message. The legal basis for the data processing is our obligation to fulfil the contract and/or to fulfil our pre-contractual obligations and/or our overriding legitimate interest in processing your request.

Registration of an account

When you create an account, we collect your full name, telephone number (we will also send you a one-time password (OTP)), email address, date of birth, gender and the services you are interested in or offer. Within your profile, you have the option to delete your account at any time. The processing of your data is based on your consent.

Alternatively, you can sign in using the convenient sign-in feature of [Google](#), [Apple Inc.](#) or [Facebook](#) log in. The convenient sign-in and registration will ask you to provide your basic information (i.e. name, email address and picture) in connection with your account. If you comply with the prompt, your username and password will be automatically generated for you to enter the rest of the required user information. If you register using the Apple or Facebook Connect feature, you agree to the relevant terms and conditions and consent to certain data from your respective profile being transferred to us.

Profile

As a registered user, you have the option of creating a user profile with just a few clicks and details. If you make use of this option, the relevant profile data you have provided will be transferred to your profile. Of course, you can change the details at any time via the settings in your profile.

When creating a profile, you can specify both personal data and special category data. You can choose which information you would like to include in your profile. You do not have to provide any additional information in your profile, but the profile information will help you to use our services better. It is your choice whether you want to include sensitive information in your profile and make this sensitive information public. Please do not publish personal information in your profile that you do not want to be published.

The legal basis for the processing of your personal data is the establishment and implementation of the usage contract for the use of the service. We store the data until you delete your user account. Insofar as statutory retention periods are to be observed, the storage also takes place beyond the time of deletion of a user account.

When you use our services

We process the data of our registered users in order to be able to provide our contractual services as well as to ensure the security of our services and to be able to develop them further.



Privacy Policy

Some of the personal data you provide may be classified as "special" or "sensitive". This includes personal data relating to, for example, your health, racial or ethnic origin, sexual orientation or religious beliefs. By choosing to provide this data, you consent to us processing it.

You have a choice about what personal data you upload and share. You do not have to provide personal data, but personal data helps you to use our services better. It is your choice whether to add special category data and make that special category data public. Please do not upload or add data that you do not want to be available.

The legal basis for the processing of your personal data and special category data is the establishment and implementation of the user contract for the use of the service as well as your consent. We store the data until you delete your user account. Insofar as statutory retention periods are to be observed, the data is also stored beyond the time of deletion of a user account.

You can revoke your consent and request us to stop using and/or sharing your personal and special category data by submitting your request.

The legal basis for data processing is the fulfilment of our contractual obligations and, in individual cases, the fulfilment of our legal obligations as well as your consent.

Contacting others

Of course, we also process your chats and communications with other users, as well as the content you publish, to the extent necessary for the operation of the services. In addition to the information you provide to us directly, we receive information about you from others. Users may provide us with information about you when they use our Services, for example, when they interact with you or when they submit a report about you.

We also share some user information with service providers and partners who help us operate the Services. You share information with other users when you voluntarily share information on the Service (including your profile). Please be careful with your information and ensure that the content you share is such that you consent to it being visible. The legal basis for data processing is the fulfilment of our contractual obligations and, in individual cases, the fulfilment of our legal obligations and your consent.

Information we receive from others

In addition to the information you provide to us directly, we receive information about you from others, including other users who provide us with information about you when they use our services. For example, we may receive information about you from other users when you contact them about us. We collect information about your activities on our Services, such as how you use them (e.g., the date and time you log in, features used, searches performed, pages clicked and viewed, ratings clicked) and how you interact with other users (e.g., users you connect and interact with, the time and date of your exchanges).

Service Messages

By using our services, you agree to receive notifications and messages by email. These will typically contain administrative information about your account and activity. The legal basis for this is the provision of our services and your consent.

Data management

For optimal user management and customer support, we use the data related to your contract with us in our Admin Panel. This data processing is based on our legitimate interest in providing our service.

Administration, financial accounting, office organisation, contact management



Privacy Policy

We process data in the context of administrative tasks as well as the organisation of our operations, financial accounting and the fulfilment of legal obligations, such as archiving. In doing so, we process the same data that we process in the course of providing our contractual services. The purpose and our interest in processing lies in the administration, financial accounting, office organisation, archiving of data, i.e. tasks that serve to maintain our business operations, fulfil our tasks and provide our services.

Marketing

Where you have also given us your consent to process your personal data for marketing and promotional purposes, we are entitled to contact you for these purposes through the communication channels to which you have given your consent.

You can give us your consent in a number of ways, for example, by ticking a box on a form asking for your permission, or sometimes your consent is implied from your interactions or contractual relationships. Where your consent is implied, this is based on the fact that you would reasonably expect to receive a marketing communication as a result of your interactions or contractual relationship with us.

Our marketing is usually by email but may include other less traditional or new channels. These forms of contact are managed by us or by our appointed service providers. Any directly addressed marketing sent by us or on our behalf will include an option for you to opt out or unsubscribe.

General principles

Obligation to provide personal data

You are under no obligation to provide us with personal data. However, depending on the individual case as described above, the provision of certain personal data may be necessary for the provision of the Services. If you do not provide us with this personal data, we may not be able to provide the requested service.

Minors

Persons under the age of 18 should not provide any personal data to us without the consent of their parent or guardian. We do not request or knowingly collect personal data from minors and children and do not share it with third parties.

Automated decision making

Automated decision making, including profiling, does not take place.

Do not sell

We do not sell your personal data.

Social media

We have a presence on social media based on our legitimate interest. If you contact us via social media apps, we and the respective social media app and we are jointly responsible for the processing of your data and enter into a so-called joint controller agreement. The legal basis for the use of the respective social media app is our legitimate interest, your consent or, in the case of a (pre-)contractual relationship with us, the possible initiation of a contractual performance.

Sharing

We do not share your personal data with third parties unless this is a) necessary for the provision of our services, b) you have consented to the sharing, c) or the sharing of the data is permitted by relevant legal provisions.

We may share your personal information with our business partners for the purposes described in this Privacy Policy, including to carry out transactions you have requested or to respond more quickly to



Privacy Policy

your needs in our operations. We will only share your personal information with business partners who have agreed to protect your personal information and use it only for the purposes we have specified.

In addition, we may disclose your personal information: in connection with law enforcement, fraud investigation or other legal process; if required to do so by law; if Appricot Networking (or any part of Appricot Networking) is sold to or merged with another company; or if we have reason to believe that disclosure is necessary to protect Appricot Networking, its users or the public.

In all cases other than those described above, personal information will not be disclosed by us to third parties for their own marketing purposes without your consent.

International transfers

We process data in the course of our business. This also includes the transfer by transmission to third parties and, where applicable, to so-called third countries outside Kosovo and the EEA. When we transfer data outside of Kosovo and the EEA, we ensure that the processing of your personal data is governed by processing agreements that include standard contractual clauses to ensure a high level of data protection.

Data security

Our data processing is subject to the principle that we only process the personal data that is necessary for the use of our services. We take great care to ensure that your privacy and the confidentiality of all personal data are always guaranteed.

In addition, we implement technical and organisational security measures (TOMs) throughout the company to protect the data we manage from accidental or intentional manipulation, loss, destruction or access by unauthorised persons.

However, databases or records containing personal data may be breached inadvertently or by unlawful intrusion. As soon as we become aware of a data breach, we will notify all data subjects whose personal data may have been compromised and the notification will be accompanied by a description of the steps that will be taken to remedy any harm resulting from the data breach. Notification will be made as soon as possible after the discovery of the breach.

Your rights and privileges

Privacy rights

Under the LPPD and the GDPR, you may exercise the following rights:

- Right to information
- Right to rectification
- Right to object to processing
- Right to erasure
- Right to data portability
- Right to object
- Right to withdraw consent
- Right to lodge a complaint with a supervisory authority
- Right not to be subject to a decision based solely on automated processing.

If you wish to exercise any of your rights, please contact us.

Updating your information

If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and would like to request that it be corrected or deleted, or object to the processing, please contact us.



Privacy Policy

Withdrawal of consent

You may withdraw consent given at any time by contacting us. The lawfulness of the data processing carried out until the withdrawal remains unaffected by the withdrawal.

Request for access

If you would like to submit a request for access to your data, you can inform us in writing. We will respond to your requests for access and correction as soon as possible. If we are unable to respond to your request within thirty (30) days of receiving your request, we will notify you in writing within thirty (30) days of when we will be able to respond to your request. If we are unable to provide you with personal data or make a correction you have requested, we will normally inform you of the reasons why we are unable to do so (unless we are not required to do so under the relevant legislation referred to above).

Complaining to a supervisory authority

You have the right to complain about our processing of personal data to a supervisory authority responsible for data protection. The supervisory authority in Kosovo is: The Information Privacy Agency (<https://aip.rks-gov.net>).

Changes and questions

We may update this Privacy Policy from time to time. If we make changes to this Privacy Policy or materially change our use of your personal information, we will revise this Privacy Policy accordingly and also change the effective date at the end of this section. We encourage you to periodically review this Privacy Policy to be informed about how we use and protect your personal information. If you would like to contact us for any reason regarding our privacy practices, please contact us.

Effective Date

Friday, 21 April 2023