

## ALComm Solutions Sh.p.k — Privacy Policy

Sep 18, 2025

**1. Who we are:** ALComm Solutions Sh.p.k. is the data controller for the personal data described in this policy.

Controller ALComm Solutions Sh.p.k.

NUIS M01427004J

Registered address Rr. Todi Shkurti, Nr. 8/4, Tiranë, Albania

Telephone +355 44 533 533

General enquiries sales@alcomm.al

Privacy enquiries privacy@alcomm.al

Website www.alcomm.al

This policy explains what personal data we collect, why we collect it, who we share it with, how long we keep it, and what rights you have. It applies to visitors to [www.alcomm.al](http://www.alcomm.al), to people who contact us or request an offer, to representatives of our clients, suppliers and partners, to job applicants, and to visitors at our premises and project sites.

It does not apply to third-party websites we link to, or to personal data we process solely on behalf of a client under a service contract. In those cases the client is the controller and its own privacy notice applies; we act as processor under Article 28-equivalent terms.

## 2. Legal framework

We process personal data under Law No. 124/2024 "On the Protection of Personal Data" of the Republic of Albania, which entered into force on 1 February 2025 and repealed Law No. 9887 dated 10 March 2008. Law No. 124/2024 is aligned with Regulation (EU) 2016/679 (GDPR), so the definitions, legal bases and data subject rights used in this policy follow the GDPR model.

Where we offer goods or services to individuals in the European Union, or monitor their behavior there, the GDPR applies directly in addition to Albanian law.

Key terms used below:

- **Personal data** — any information relating to an identified or identifiable natural person.
- **Processing** — any operation performed on personal data, including collection, storage, use, disclosure and deletion.
- **Controller** — the party that determines the purposes and means of processing. For the activities in this policy, that is ALComm Solutions Sh.p.k.
- **Processor** — a party that processes personal data on the controller's instructions.
- **Data subject** — the individual the personal data relates to.

## 3. Personal data we collect

We collect only what we need for the relationship we have with you. We do not sell personal data.

| Category | Examples | Source |
|----------|----------|--------|
|----------|----------|--------|

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Web [www.alcomm.al](http://www.alcomm.al)

E-mail [info@alcomm.al](mailto:info@alcomm.al)

|                             |                                                                                                                  |                                             |
|-----------------------------|------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| Contact and identification  | Name, job title, company, email, telephone, postal address                                                       | You, directly                               |
| Commercial correspondence   | Enquiries, quotation requests, offers, contracts, project correspondence                                         | You, directly                               |
| Client and supplier records | Billing details, NUIS, bank account for payment, purchase orders, invoices                                       | You, or your employer                       |
| Recruitment                 | CV, cover letter, education, employment history, references                                                      | You, directly                               |
| Website technical data      | IP address, browser type and version, device type, operating system, pages viewed, date and time, referring page | Collected automatically                     |
| Cookies and analytics       | Cookie identifiers, session data, aggregated usage statistics                                                    | Collected automatically, subject to consent |
| Site access and CCTV        | Name, company, time of entry and exit, vehicle registration, video footage                                       | Collected at our premises and project sites |

We do not knowingly collect special categories of data (health, biometric, political or religious views, trade union membership) through the website. Where a specific project or employment obligation requires such data — for example occupational health records or site safety records — we process it only on a legal basis permitted by Article 9-equivalent provisions of Law No. 124/2024, and we tell you separately at the point of collection.

Providing personal data is generally voluntary. If you do not provide the data needed to answer an enquiry, issue an offer, or perform a contract, we may not be able to proceed.

#### 4. Why we process it, and on what legal basis

Every processing activity rests on one of the legal bases in Law No. 124/2024.

| Purpose                                                                | Legal basis                                                     |
|------------------------------------------------------------------------|-----------------------------------------------------------------|
| Answering enquiries and preparing quotations and technical offers      | Steps taken at your request prior to entering a contract        |
| Performing contracts for supply, installation, maintenance and support | Performance of a contract                                       |
| Managing client, supplier and subcontractor relationships              | Legitimate interests in running our business                    |
| Invoicing, payment, accounting and tax records                         | Legal obligation under Albanian tax and accounting law          |
| Warranty, after-sales and technical support                            | Performance of a contract                                       |
| Site access control and CCTV at our premises and project sites         | Legitimate interests in security of people, property and assets |
| Recruitment and assessment of applications                             | Steps taken at your request prior to employment                 |
| Marketing emails, newsletters and event invitations                    | Your consent, withdrawable at any time                          |
| Website analytics and performance measurement                          | Your consent, given through the cookie banner                   |
| Website security, fraud prevention and abuse detection                 | Legitimate interests in keeping our systems secure              |

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Establishing, exercising or defending legal claims

Legitimate interests, and legal obligation where applicable

Where we rely on legitimate interests, we have assessed that our interest does not override your rights and freedoms. You can ask for a summary of that assessment, and you can object to the processing — see Section 10.

We do not use automated decision-making or profiling that produces legal effects for you or similarly significantly affects you.

## 5. Cookies

Our website uses cookies and similar technologies. Strictly necessary cookies are set automatically. All other categories are set only after you accept them in the cookie banner.

| Category           | What it does                                                            | Consent needed |
|--------------------|-------------------------------------------------------------------------|----------------|
| Strictly necessary | Page delivery, security, load balancing, remembering your cookie choice | No             |
| Functional         | Language preference, form state, embedded content                       | Yes            |
| Analytics          | Visitor counts, pages viewed, traffic sources, aggregated statistics    | Yes            |
| Marketing          | Measuring campaign performance, showing relevant advertising            | Yes            |

You can change or withdraw your choice at any time through the cookie settings link in the website footer. You can also block or delete cookies in your browser settings, though some parts of the site may then not work as intended.

We do not respond to browser "Do Not Track" signals, because there is no agreed standard for interpreting them.

## 6. Who we share it with

We disclose personal data only where there is a lawful reason to do so, and only to the extent needed. Recipients fall into these groups:

- **Service providers acting as processors** — hosting and email providers, IT maintenance and support, accounting and payroll providers, CRM and marketing platforms, courier and postal services. Each is bound by a written processing agreement covering confidentiality, security and deletion.
- **Manufacturers, distributors and technology partners** — where warranty registration, licensing, technical certification or manufacturer support requires it.
- **Subcontractors** — engineering, installation and maintenance partners engaged on a specific project, limited to the contact and access data needed for that project.
- **Professional advisers** — external lawyers, auditors and insurers, where necessary.
- **Public authorities** — tax authorities, courts, police and regulators, where disclosure is required by law or needed to establish or defend a legal claim.
- **Acquirers** — in the event of a merger, sale or reorganisation of the business, subject to equivalent protection.

We do not sell, rent or trade personal data, and we do not disclose it for third-party marketing.

## 7. Transfers outside Albania

Some of our providers — cloud hosting, email and collaboration platforms, analytics — are established outside Albania, mainly in the European Economic Area and the United States.

Where personal data leaves Albania, we rely on one of the following:

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Web [www.alcomm.al](http://www.alcomm.al)

E-mail [info@alcomm.al](mailto:info@alcomm.al)

1. The recipient country provides an adequate level of protection, as recognised under Law No. 124/2024.
2. Standard contractual clauses or equivalent appropriate safeguards are in place with the recipient.
3. Authorisation from the Commissioner has been obtained, where the law requires it.
4. A derogation applies, such as your explicit consent or necessity for the performance of a contract.

Before transferring, we document a transfer risk assessment identifying the level of protection in the recipient jurisdiction and any supplementary measures needed. You can request details of the safeguards applied to a specific transfer by writing to [privacy@alcomm.al](mailto:privacy@alcomm.al).

## 8. How long we keep it

We keep personal data only as long as needed for the purpose it was collected for, or as long as the law requires.

| Data                                             | Retention period                                                            |
|--------------------------------------------------|-----------------------------------------------------------------------------|
| Website enquiries that do not lead to a contract | 12 months from last contact                                                 |
| Quotations and offers not accepted               | 3 years from issue                                                          |
| Contracts and related correspondence             | 10 years from the end of the contract, for limitation and warranty purposes |
| Invoices, accounting and tax records             | As required by Albanian tax and accounting legislation                      |
| Unsuccessful job applications                    | 12 months from the decision, unless you consent to a longer period          |
| Marketing contact data                           | Until you withdraw consent or unsubscribe                                   |
| CCTV footage                                     | 30 days, unless retained for an incident under investigation                |
| Website server logs                              | 12 months                                                                   |

When a retention period ends, we delete the data or anonymize it so that it can no longer be linked to you. Where deletion is not technically possible — for example in encrypted backups — we isolate the data and delete it on the next backup cycle.

## 9. Security

We apply technical and organizational measures appropriate to the risk, including:

- Encryption of data in transit (TLS) and of data at rest on company devices and servers.
- Role-based access control, with access granted on a need-to-know basis and reviewed periodically.
- Multi-factor authentication on email, cloud and administrative accounts.
- Network segmentation, firewalls and endpoint protection.
- Regular backups, with restoration tested periodically.
- Confidentiality undertakings and data protection training for staff.
- Written processing agreements with all providers that handle personal data on our behalf.
- Logging and monitoring of access to systems holding personal data.

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E-mail [info@alcomm.al](mailto:info@alcomm.al)

If a personal data breach is likely to result in a risk to your rights and freedoms, we notify the Commissioner within 72 hours of becoming aware of it, and we inform affected individuals without undue delay where the risk is high.

## 10. Your rights

Under Law No. 124/2024 you have the following rights in relation to your personal data:

| Right            | What it means                                                                                                                                |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| Access           | Obtain confirmation of whether we process your data, and a copy of it                                                                        |
| Rectification    | Have inaccurate data corrected and incomplete data completed                                                                                 |
| Erasure          | Have your data deleted where there is no longer a lawful reason to keep it                                                                   |
| Restriction      | Have processing limited while a dispute over accuracy or lawfulness is resolved                                                              |
| Portability      | Receive data you provided in a structured, machine-readable format, and have it transmitted to another controller where technically feasible |
| Objection        | Object to processing based on legitimate interests, and to direct marketing at any time                                                      |
| Withdraw consent | Withdraw consent at any time, without affecting the lawfulness of processing before withdrawal                                               |

To exercise any of these rights, write to **privacy@alcomm.al** or to Rr. Todi Shkurti, Nr. 8/4, Tiranë. We respond within one month of receiving your request. Where a request is complex or you have made several requests, we may extend this by two further months and will tell you why within the first month.

We do not charge a fee. If a request is manifestly unfounded or excessive we may charge a reasonable administrative fee or refuse to act, and we will explain our reasons. Where we have reasonable doubts about your identity, we may ask for additional information to verify it before acting.

## 11. Complaints

If you believe we have processed your personal data unlawfully, please contact us first at [privacy@alcomm.al](mailto:privacy@alcomm.al) so we can try to resolve it directly.

You also have the right to lodge a complaint with the supervisory authority:

Authority Commissioner for the Right to Information and Protection of Personal Data (IDP)

Address Rr. "Abdi Toptani", Nd. 5, Postal Code 1001, Tiranë

Telephone +355 4 223 7200

Free line 08002050

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

Website [www.idp.al](http://www.idp.al)

You may also bring proceedings before the competent Albanian courts.

## 12. Children and video surveillance

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Web [www.alcomm.al](http://www.alcomm.al)

E-mail [info@alcomm.al](mailto:info@alcomm.al)

**Children.** Our website and services are directed at businesses and public institutions, not at children. We do not knowingly collect personal data from anyone under 16. If you believe a child has provided us with personal data, contact [privacy@alcomm.al](mailto:privacy@alcomm.al) and we will delete it.

**Video surveillance.** We operate CCTV at our offices, warehouse and certain project sites, for the security of people, property and equipment. Cameras are signposted at every monitored entrance. Footage is retained for 30 days unless it is needed for an incident under investigation or a legal claim. Cameras are not installed in areas where people have a reasonable expectation of privacy, such as changing areas or sanitary facilities, and footage is not used to monitor employee performance. Access to recordings is restricted to authorised personnel and is logged.

### 13. Changes to this policy

We review this policy at least once a year and update it when our processing activities or the applicable law change.

The version in force is the one published at [www.alcomm.al](http://www.alcomm.al), with its effective date shown at the top. Where a change materially affects how we use your personal data, we will notify you by email or through a notice on the website before it takes effect.

| Version | Effective date | Change |
|---------|----------------|--------|
|---------|----------------|--------|

|     |                            |                                          |
|-----|----------------------------|------------------------------------------|
| 1.0 | [to be set on publication] | First publication under Law No. 124/2024 |
|-----|----------------------------|------------------------------------------|

### 14. Contact

For any question about this policy or about how we handle your personal data:

ALComm Solutions Sh.p.k. Rr. Todi Shkurti, Nr. 8/4, Tiranë, Albania NUIS M01427004J Tel. +355 44 533 533 [privacy@alcomm.al](mailto:privacy@alcomm.al) · [www.alcomm.al](http://www.alcomm.al)

We have not appointed a Data Protection Officer, as we are not required to under Law No. 124/2024. Privacy enquiries are handled by the Administrator.

**ALComm Solutions Shpk**

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