



CLAXI PRIVACY POLICY

Last update December 1st, 2020

Claxi is committed to protecting its visitors' and Claxis' privacy. The following Privacy and Cookie Policy outlines the information Claxi (hereafter 'Claxi', "we", or "us") may process and how we may use that information to better serve visitors and Users while using our websites and our web application for delivery www.claxi.net, www.claxi.mk and www.claxi.com.mk (the 'Website') our mobile applications for passengers and drivers (the 'App') and our on-demand services (collectively the "Service"). Please review the following carefully so that you understand our privacy practices.

If you have questions about this Privacy and Cookie Policy, please contact us at contact@claxi.net.

1. DEFINITIONS

1. "User" means a person who has signed up and is registered with Claxi for the use or potential use of the Website, Apps and/or Service.
2. "Partner" means the party having cooperation agreement for a defined territory.
3. "Driver" means the party having sole responsibility for the driving transportation service. and who provides the passenger or delivery rides to the Users.
4. 'Vehicle' means a vehicle that is owned and/or used by a Driver to provide the ride or to provide other services.
5. "Store" means any type of registered store (restaurant, lunch bar, boutique, gift shop, pharmacy etc.) who has signed up and is registered with Claxi for the use or potential use of the Service.

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2. GENERAL

Claxi is the processor of your personal data through the Website, App and Service.

CHILDREN UNDER THE AGE OF 18

Claxi cares about the safety of children. Because the Service is not directed towards children under 18, or the age of legal majority in your jurisdiction (if different than 18), they are not allowed to register with or use the Service, or provide personal data. We do not knowingly collect personal information from anyone under the



age of 18. If we discover that we have collected personal information from a child under 18, we will delete that information immediately.

3. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

3.1 TECHNICAL AND FUNCTIONAL MANAGEMENT OF THE WEBSITE AND APP

When you visit our Website, our website administrators' process technical data such as your IP-address, visited webpages, the internet browser you use, your previous/next visited websites and the duration of a visit/session to enable us to deliver the functionalities of the Website. In addition, in certain instances the browser may prompt you for your geo-location to allow us to provide you with an enhanced experience and delivery module auto-location for address. With this technical data our website administrators can manage the Website and Service, for instance by resolving technical difficulties or improving the accessibility of certain parts of the Website. This way, we ensure that you can (continue to) find the information on the Website in a quick and simple manner.

For this purpose, we also use cookies. See below, paragraph 8 for our cookie policy.

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When you use our App and Service, we also process technical data such as your IP-address, Device ID or MAC-address, and information about the manufacturer, model, and operating system of your mobile device. We use this data to enable us to deliver the functionalities of the App and Service, resolve technical difficulties, and provide you with the correct and most up to date version of the App and to improve the function of the App and Service.

When you use the App, we recommend adding a PIN number to your profile. The PIN number is added to provide two step security for data protection. By sharing your PIN number, you are willingly sharing your data to Third party providers and users or the Service.

3.2 CUSTOMER SERVICE

When you register as a User, we will collect your name, email address, country, language, password, mobile phone number, IP-address and MAC-address, and social media info if you register with Third-party applications.



We will use your contact details to send you a welcoming verification email or SMS to verify your mobile phone, username and password, to communicate with you in response to your inquiries, and to send you service-related announcements, for instance, if our Service is temporarily suspended for maintenance. We will use your registration information to create and manage your Claxi Account. We may deactivate your Account if we suspect that you use our App, Website or Service to commit fraudulent or illegal acts or if you violate our terms of use.

3.3 ENHANCING YOUR CLAXI EXPERIENCE

GEO-LOCATION INFORMATION

When you use the App and Service through your mobile device, PC or other smart device, and only if you have consented thereto, we will track your geo-location information, on a real time basis only. We use this information to allow you to view the Drivers in your area that are close to your location, set your pick-up location and send it to the requested Driver, and see the accepted Driver approaching on a map in real time. We may also use this real-time geo-location information to connect Stores on the delivery module with Drivers, to track delivery status, and to view the Drivers in the pickup area that are close to the Store location. We may also use this real-time geo-location information to address user or driver support, technical, or business issues that may arise in the course of your use of the App, Website and Service. If you contact Claxi customer service while on a ride, and it is necessary to use your real-time geo-location information to address your question, our support personnel will have to access your real-time geo-location to enhance your experience.

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If you do not consent to the tracking of your geo-location, you will still be able to use the basic features of the App, Website and Service. You can turn the geo-location tracking off at the device level, also temporarily. Your mobile device informs you when geo-location is tracked by displaying the GPS pin icon. When using browser, your smart device informs you when geo-location is tracked on Service by displaying the GPS pin icon, usually next to the web-address.

If you are traveling in a Vehicle, we will collect the Driver's geo-location information from the Driver's device. Because you are travelling in the Vehicle, this means we will also indirectly collect your location information. This information is necessary, to view your history in your Claxi profile, and handle complaints from you or Drivers. We will also use the Driver's geo-location information in an anonymized and aggregated form in



order to generate statistical information and management information and to provide you with increased App functionality.

PERSONAL INFORMATION

When you request transportation or delivery via your use of the App and/or Service, we provide your first name and/or last name and phone number to the Driver who accepts your request for transportation so that the Driver may contact and find you. When you request delivery by Third party that uses the Service, we provide your full name, location, home address added in the 'My Places' section, total number of successfully completed and total number of fake orders and rides, rating and phone number to the Store if you consent to share your PIN number at your will.

TELEPHONE NUMBER AND PUSH NOTIFICATIONS

If you have requested a ride through the App, from the time that you accept one ride offer by the Drivers, until you reach your final destination, you and the Driver will have the ability to contact each other, via the phone number added on your Account or on the in-app messenger. During that time and only if you have consented, we will send you push notifications to your mobile phone to let you know about the status of the ride, like when the Driver is on his way to your location or when he has arrived at your location. To send you push notifications we will process your telephone number.

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If you have requested a delivery through the Service, from the time that the Driver starts the delivery, until he reaches the final destination, you, the Driver and the Store will have the ability to contact each other, via the phone number added on your Account or on the in-app messenger. During that time, and after your phone verification by Store and only if you have consented, we will send you push notifications to your mobile phone to let you know about the status of the delivery. To send you push notifications we will process your telephone number.

3.4 MARKETING

Claxi may use your contact details to send you general updates regarding Claxi news, special offers and promotions. You may at all time opt-out of receiving these updates by unsubscribing the e-mail by sending e-mail with unsubscribe request to contact@claxi.net or simply by clicking unsubscribe if offered.



3.5 GENERATING MANAGEMENT INFORMATION AND STATISTICAL DATA

Claxi uses your personal data in an anonymized and aggregated form to closely monitor which features of the Service are used most, to analyze usage patterns and to determine where we should offer or focus our Service. We may share this information with Third parties for industry analysis and statistics.

3.6 ADMINISTRATING JOB APPLICATIONS

If you wish to apply for a job on our Website, we will collect personal information such as your name, email address, phone number and additional information such as resume and gender. We use the information collected within this area of the Website to register and process your application, to determine your qualifications for the position for which you have applied and to contact you.

3.7 TELL-A-FRIEND

If you choose to use our referral feature in the App to tell a friend about our Service, you will be prompted to enter your friend's email address or mobile phone number or log into your preferred social network. If you select to refer a friend, we will automatically populate a message for you to send to your friends inviting them to try the Service on your behalf, however the actual message will be sent via your mobile device or social network and you will be able to edit the final message before you send it. We do not store your friend's data until they start using the Service.

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3.8 ADMINISTRATING PUBLIC FORUMS

The Website, the Service and the App may offer publicly accessible blogs and community forums. We will use your personal data such as your name, email address, the messages or content you choose to post to administrate and provide you with these services. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information from our blog or community forum, please contact us at contact@claxi.net.

4. OUR DISCLOSURE OF YOUR INFORMATION

We may hire Third party companies and individuals to facilitate or provide the Service on our behalf, to process payment, provide customer support, provide marketing incentives, provide geo-location information to our Users, to host our job application form, to perform Website-related services (e.g., without limitation, maintenance services, database management, web analytics and improvement of the Website's features), to assist us in analyzing how our Service is used or to cooperate with us for providing Service for defined region/state as Partner (each Partner co-operation is subject to unique Cooperation Agreement) etc. These



Third parties have access to your personal information only to perform these tasks on our behalf and are contractually bound not to disclose or use it for any other purpose.

Claxi will disclose your personal data to the extent that this is legally required, or necessary for the establishment, exercise or defense of legal claims and legal process; or in the event of an emergency pertaining to your health and/or safety.

5. YOUR RIGHTS

As a User, you have the right for information regarding your personal Account, including information that you've provided to us and information regarding each ride requested via the App or delivery requested via the Service. You may at any time request correction or erasure of your personal data, and object to any processing of your personal data by emailing us at support@claxi.net. We will respond to your access and/or correction request within four weeks. You may also amend your personal details and withdraw any given consent by deleting your Account.

6. RETENTION

Unless specified otherwise in this Privacy Policy, we will retain your information until you cancel your Account, or until your Account has been inactive for a year. If you wish to cancel your Account or request that we no longer use your information to provide you services, please contact us at support@claxi.net. Upon expiry of the one-year period of inactivity, we will alert you and give you two weeks to re-activate your Account or retrieve any personal information you want to keep. After deletion of your Account we will anonymize your data, unless these data are necessary to comply with a legal obligation or resolve disputes.

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7. SECURITY

Claxi has taken appropriate technical and organizational security measures against loss or unlawful processing of your personal data. To this purpose, your personal data are securely stored within our database, and we use standard, industry-wide, commercially reasonable security practices such as encryption, firewalls and SSL (Secure Socket Layers) safeguards of the locations where data are stored.

However, as effective as encryption technology is, no security system is impenetrable. We cannot guarantee the security of our database, nor can we guarantee that information you supply won't be intercepted while being transmitted to us over the Internet. Any transmission of information by you to Claxi is at your own risk. We recommend that you do not disclose your password to anyone.



8. COOKIE POLICY

The Website uses "cookies". A cookie is a small text file that we place on your computer or smart device to enable various features of the Website. You can change your cookie settings to accept or not accept cookies in your browser settings.

THE WEBSITE USES THE FOLLOWING COOKIE CATEGORIES:

Essential: Claxi uses cookies necessary to enable or enhance certain functionality of the Website, such as recalling your recent actions on the Website or remembering your Website settings. Claxi uses Session cookies, which are used to identify the User's session on the server. A session cookie, also known as an in-memory cookie, transient cookie or non-persistent cookie, exists only in temporary memory while the user navigates the Website. Web browsers normally delete session cookies when the User closes the browser. If you have cookies disabled in your browser, these cookies will be blocked. Non-essential: Claxi uses Google Analytics' cookies. If you have cookies disabled in your browser, these cookies will be blocked. Google Analytics is a web analysis service that is offered by Google LLC. Google Analytics uses cookies to analyze the usage of the Website by Users to give Claxi an insight in the way Users use the Website.

9. CHANGES IN THIS PRIVACY POLICY

We may update this privacy statement to reflect changes to our information practices. If we make any material changes, we will revise this Privacy Policy to reflect such changes and revise the Last update date included at the top of this policy. We encourage you to periodically review this page for the latest information on our privacy practices.

10. CONTACT DETAILS

contact@claxi.net

www.claxi.net

www.claxi.mk

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