

# PRIVACY POLICY

## SCOPE OF THIS PRIVACY NOTICE

Your privacy is important to us. Below we explain what personal data we collect, for what purposes we process it, and what rights you have in connection with such processing.

This Privacy Policy applies to individuals using the EV24 service, visiting websites related to the service, as well as persons associated with business customers, suppliers, partners, stakeholders, or investors.

In this Privacy Policy you will learn, among other things:

- What personal data we collect.
- For what purposes we process personal data.
- How long we store personal data.
- How you can access, update, or delete your data.
- Where to direct questions or concerns regarding data protection.

In addition, local privacy policies may apply in specific countries and further specify data processing in accordance with local law.

## PROCESSING OF PERSONAL DATA OF MINORS AND CHILDREN

- Personal data of children may be collected only with the consent of a parent or legal guardian.
- We do not knowingly collect personal data of individuals under the age of 16. If you are under 16 years of age, please do not provide us with your personal data.
- Due to the nature of our services related to electric vehicle operation, we assume that the Service is used exclusively by individuals over 16 years of age.

## WHO IS THE DATA CONTROLLER

The data controller is:

**QRSOLVE Sp. z o.o.**

ul. Reformacka 6

35-026 Rzeszów, Poland

Website: [www.qrsolve.com](http://www.qrsolve.com)

QRSOLVE Sp. z o.o. provides the EV24 service both directly and through partners (dealers) operating the service in selected countries.

## WHAT PERSONAL DATA WE COLLECT AND PROCESS

We collect information about you when you use our services, create an account, provide billing information, visit our websites (e.g. [ev24.cloud](http://ev24.cloud)), or interact with us via social media.

Examples of collected data include:

- Contact and identification data: first name, last name, address, phone number, email address
- Billing-related data: tax identification numbers, bank account numbers
- Payment data: payment card details entered in our portal are transmitted directly via an embedded Stripe plugin to our payment service provider. We do not store or have direct access to these data – they are processed exclusively by Stripe in accordance with its privacy policy. Stripe, as a payment service provider, meets high security standards and complies with data protection requirements (e.g. PCI-DSS).

If you have any additional questions regarding the processing of payment data, please contact us at: [support@ev24.cloud](mailto:support@ev24.cloud)

## **WHERE WE STORE PERSONAL DATA**

Personal data are stored exclusively within the European Economic Area (EEA), in data centers located in Switzerland (Zurich) and Germany (Frankfurt).

## **PURPOSES OF PROCESSING PERSONAL DATA**

We process personal data only when we have a legal basis and a clearly defined purpose.

### **Purposes of processing personal data:**

- Provision of products and services: order fulfillment, service delivery, invoicing, and payment processing.
- Account and customer relationship management: communication, account administration, customer support, and marketing activities.
- Identity verification: securing accounts and preventing unauthorized access.
- Development and improvement of our products and services: analysis of customer needs, research, and service enhancement.
- Fraud prevention and detection: protection of your data and transaction security.

### **Legal bases for processing personal data:**

- Performance of a contract: processing necessary to conclude and perform a contract (e.g. payment processing).
- Pre-contractual actions: actions taken at the request of the data subject prior to entering into a contract.
- Legal obligation: processing required by applicable laws or regulations.
- Legitimate interests: processing necessary for our business interests (e.g. service improvement, analytics), provided that it does not override your rights and freedoms.
- Consent: processing based on your explicit consent. You may withdraw your consent at any time without affecting the lawfulness of processing carried out before its withdrawal.

### **Additional purposes of processing personal data:**

We may process your data for secondary purposes closely related to the primary purposes, such as:

- Data storage, deletion, or anonymization.
- Audits and investigations: internal controls, audits, and insurance-related activities.
- Dispute resolution: handling legal disputes or defending against claims.
- Statistical and scientific research: analysis and reporting for business development.

We also process data for the purposes of:

- Protecting our assets and personnel.
- Complying with legal and regulatory obligations, including anti-money laundering (AML), anti-corruption, and anti-bribery regulations.

## **AML COMPLIANCE CHECKS**

Anti-money laundering (AML) verification and sanctions screening are performed by our payment service provider, Stripe. Stripe processes such data in accordance with its own privacy policy and legal obligations.

These checks do not involve profiling or automated decision-making that would produce legal effects concerning you within our system.

## **CONSEQUENCES OF FAILURE TO PROVIDE PERSONAL DATA**

Failure to provide personal data may prevent us from providing services, fulfilling agreements, or contacting you.

## **DATA RECIPIENTS**

Personal data are processed solely for the purposes described above and are disclosed only to entities and institutions on a need-to-know basis, i.e. only where necessary.

### **Personal data may be disclosed to the following recipients:**

- **Internal organizational units and affiliated entities**  
For administrative purposes, corporate strategy implementation, audits and monitoring, compliance control, and research and development.
- **External service providers**  
*Stripe*: data required to create a Stripe account and perform AML verification are transferred to Stripe and processed in accordance with its privacy policy.
- **Competent public and regulatory authorities**  
Where disclosure is required to comply with legal, regulatory, or tax obligations.

Data are disclosed in accordance with data protection principles and only to the extent necessary to achieve the stated purposes.

## **TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES**

Personal data may be transferred outside your country of residence, including outside the European Economic Area (EEA), subject to appropriate safeguards.

Where data are transferred to:

- **Affiliated entities and business partners**, or
- **Authorized agents, service providers, and subcontractors**,

we apply organizational, contractual, and legal measures to ensure that:

- data are processed in accordance with this Privacy Policy and applicable law (including GDPR),
- standard contractual clauses or other appropriate safeguards are used where data are transferred to countries not recognized by the European Commission as providing an adequate level of protection.

Where data are processed outside your country of residence, we take all reasonable steps to ensure compliance with privacy and security standards.

## **SECURITY OF PERSONAL DATA**

We have implemented appropriate technical and organizational measures to protect personal data, including:

- **Data encryption** – during transmission and storage,
- **Access control and authentication** – limited to authorized personnel only,
- **Security testing and audits** – regular reviews and assessments.

We take all necessary measures to ensure a high level of personal data protection.

## DATA RETENTION PERIODS

- **Contract-related data**  
Stored for the duration of the contract and up to 10 years after its termination.
- **Sanctions and AML verification data (Stripe and/or ELAVON)**  
Stored for up to 15 years, in accordance with AML regulations.
- **Longer retention periods**  
Where required by law.
- **Shorter retention periods**  
Where there is no longer a legitimate purpose for processing.

## YOUR RIGHTS

You have the right to:

- **Access your data,**
- **Rectify your data,**
- **Erase your data,** where it is no longer necessary,
- **Opt out of marketing communications,**
- **Restrict processing,**
- **Not be subject to profiling,**
- **Data portability,** where technically feasible.

To exercise your rights, please contact us at: [support@ev24.cloud](mailto:support@ev24.cloud). We will respond as soon as possible.

## CONTACT REGARDING PERSONAL DATA

- For questions or complaints, contact us at: [support@ev24.cloud](mailto:support@ev24.cloud)
- If you are not satisfied, you have the right to lodge a complaint with the competent data protection authority in your country of residence (a list is available on the European Commission's website).

## CHANGES TO THIS PRIVACY POLICY

- This Privacy Policy may be updated from time to time. Any changes will be published on this page.

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**Effective date: 19 December 2025**