

Clean Kinetic Jordan LLC – Privacy Policy

Clean Kinetic Jordan LLC (“Company”, “we”, “us”, or “our”) is committed to protecting the privacy and personal data of individuals who access or use our electric vehicle (“EV”) charging software platform, mobile applications, websites, and related services (collectively, the “Platform”). This Privacy Policy explains how we collect, use, disclose, store, and protect personal data in accordance with **Jordan Personal Data Protection Law No. 24 of 2023 (“PDPL”)** and applicable regulations.

By accessing or using the Platform, you acknowledge that you have read and understood this Privacy Policy and consent to the processing of your personal data as described herein.

1. Personal Data We Collect

We collect personal data that you voluntarily provide and data generated through your use of the Platform to operate and improve our services.

Where applicable, this may include:

Account and Contact Information: name, email address, mobile number, billing address, password, and account identifiers used to create and manage your user account.

Charging Session Data: details of your EV charging sessions such as charging station identifiers, start and end times, energy consumed, payment confirmations, and session status.

Vehicle Information: details about your electric vehicle such as make, model, and unique identifiers necessary to facilitate charging.

Payment and Billing Data: payment method tokens, billing history, transaction identifiers, and related account details.

Location and Device Data: GPS location associated with charging events, IP address, device type, operating system, and app usage logs.

Communications Data: customer support interactions, inquiry forms, emails, and related correspondence.

2. How We Use Your Personal Data

We use the collected personal data for the following purposes:

- To create, manage, and secure your user account.
- To authenticate and authorize charging sessions conducted through the Platform.
- To process and confirm payments, issue invoices, or provide receipts.
- To provide customer support and respond to inquiries.
- To maintain, optimise, and improve the Platform and user experience.
- To comply with legal and regulatory obligations.
- To send service-related notifications where necessary.

- To monitor and resolve faults, errors, and misuse of the Platform.

Some processing is necessary for the performance of the contract between you and the Company, while other processing may be based on legitimate interests or consent where required by law.

3. Legal Basis for Processing

We process your personal data under the following lawful bases:

- **Performance of a Contract:** to perform obligations under the service agreement between you and the Company.
- **Consent:** where explicitly obtained for purposes such as marketing communications.
- **Legitimate Interests:** to operate, administer, and secure the Platform, improve services, and prevent fraud, provided such interests are not overridden by your rights.
- **Legal Obligations:** to comply with applicable laws, regulations, or legal processes.

4. Disclosure of Personal Data

We may share your personal data with the following third parties:

- **Service Providers:** including payment processors, cloud hosting and infrastructure partners, and technical support vendors.
- **Charging Station Partners:** operators or network partners necessary to facilitate charging sessions.
- **Professional Advisors:** auditors, legal counsel, and other advisors as required.
- **Government and Regulatory Authorities:** where required by law or to respond to lawful requests.

We do not sell personal data to third parties.

5. Cross-Border Data Transfers

Your personal data may be transferred or processed outside your country of residence, including within or outside the European Economic Area (“EEA”). When such transfers occur, we will ensure appropriate safeguards are implemented to protect your personal data in accordance with GDPR requirements (for example, using Standard Contractual Clauses or other approved transfer mechanisms).

6. Data Retention

We retain personal data only as long as necessary to fulfil the purposes outlined in this Policy, to comply with legal obligations, to resolve disputes, and to enforce our agreements. When personal data is no longer required, it will be securely deleted or anonymised.

7. Your Rights Under GDPR

Subject to applicable law, you have rights in relation to your personal data. These include the right to:

- Access the personal data we hold about you.
- Request correction of inaccurate or incomplete data.
- Request deletion of your personal data (“Right to be Forgotten”).
- Restrict or object to processing of your personal data.
- Request portability of your personal data, where applicable.
- Withdraw consent where processing is based on consent.

To exercise these rights, please contact us at the details provided below.

8. Security of Personal Data

We implement appropriate technical and organisational measures to safeguard personal data from unauthorized access, alteration, disclosure, or destruction. These measures include encryption, access controls, logging, and secure storage.

While we strive to protect your personal data, no system can guarantee absolute security.

9. Cookies and Tracking Technologies

We and our service providers use cookies and similar tracking technologies to understand how users interact with the Platform, to personalise your experience, and to improve our services. You can manage cookie preferences through your device or browser settings.

10. Changes to This Privacy Policy

We may update this Privacy Policy periodically to reflect changes in law, practices, or Platform features. The “Effective Date” at the top reflects the date of the latest revision. Continued use of the Platform after changes constitutes acceptance of the updated policy.

11. Contact Information

If you have questions about this Privacy Policy or wish to exercise your data-protection rights, please contact:

Clean Kinetic Jordan LLC

Email: contact@ck.com.sg