

PRIVACY POLICY

1. PRIVACY POLICY

Jet Bank Sh.A. ("Jet," "we," "the Bank") respects and protects the privacy of every individual who visits our website or interacts with us through our digital channels. We are committed to processing personal data lawfully, fairly, and transparently, in accordance with applicable personal data protection legislation, including the General Data Protection Regulation (GDPR), as well as relevant secondary legislation.

This Privacy Policy explains how and for what purposes Jet collects, uses, stores, and protects personal data when you:

- visit our website.
- register on the waiting list or express interest in the Bank's launch;
- contact us for information, career opportunities, or other matters.

At this stage, Jet is in the preparatory (pre-launch) phase and does not yet offer active banking products or services to the public.

Any processing of personal data through the website is limited to informative, communication, and preliminary relationship-building purposes and does not create any contractual or client-bank relationship.

Jet processes only personal data that are necessary, proportionate, and appropriate for the stated purposes, applying the principles of data minimization, purpose limitation, and retention for a limited period. Personal data processing is based on the explicit consent of data subjects, except where otherwise required by law.

Jet has implemented appropriate technical and organizational measures to ensure the security and confidentiality of personal data and to protect it against unauthorized access, loss, misuse, or unlawful disclosure.

This Privacy Policy is accessible at any time through the website and may be updated periodically to reflect changes in legislation, in data processing practices, or in the status of the Bank. Any material changes will be communicated clearly and transparently.

2. CURRENT STATUS OF JET BANK

Jet Bank has been licensed by the Bank of Albania pursuant to the decision of the Supervisory Council at its meeting held on 25 March 2026, having fulfilled all regulatory requirements for conducting banking activity in the Republic of Albania.

At this stage, the bank is in the process of finalizing preparations for the commencement of its operations, including the development and testing of its operational infrastructure. This includes technological systems, internal processes, regulatory policies and procedures, as well as control and compliance mechanisms, in accordance with the requirements of the Bank of Albania and the applicable legal framework.

Jet Bank's website serves as an informational and communication platform, presenting the bank and enabling registration on the "Waiting List." This list allows individuals to express their interest and

register to be among the first to access the bank's services following the official launch of operations.

Until full operations commence, Jet Bank does not offer or promote active banking products or services to the public. Any information published on the website does not constitute an offer, an invitation to enter into a contract, or financial advice.

3. PERSONAL DATA WE PROCESS

Within the operation of the website and Jet Bank's pre-launch activity, we process only personal data that are necessary and proportionate for the purposes for which they are collected.

Specifically, through the website we may process the following categories of personal data:

- Identifying data, provided directly by you, e.g., name and surname, when registering on the waiting list, contacting us, or applying for job positions.
- Contact data, such as email address and/or other contact information you provide to us, for the purpose of informing you about the Bank's launch, responding to your inquiries, or contacting you regarding career applications.
- Technical and website usage data, which may include IP address, device and browser information, and data collected through cookies or similar technologies. This data is processed only to the extent necessary for the technical functioning of the website and, for non-essential cookies, only after your explicit consent, in accordance with the Cookie Policy.

Jet does not process special categories of data under GDPR (such as health, biometric, political, or religious data) and does not request such data via the website at this stage.

We request that you do not submit on the website any personal information that is not necessary for the purposes mentioned above. Any personal data voluntarily provided is processed in accordance with this Privacy Policy and solely for the purpose for which it was provided.

4. PURPOSE OF PROCESSING

Jet processes personal data collected through the website only for specific, lawful, and limited purposes directly related to the pre-launch phase and preparation for the start of banking operations.

Specifically, personal data is processed for the following purposes:

- Administration of the waiting list, to register and manage expressions of interest from individuals wishing to be informed about the Bank's launch and the start of offering banking products and services, without creating contractual relationships at this stage.
- Notifications regarding the Bank launch and related informative communications during this preliminary phase, including sending information about the Bank's status, start of operations, and other general developments related to the launch, in accordance with the consent given by data subjects.
- Responding to contact requests, including communications initiated by users seeking further information about the Bank, the website, or the pre-launch process.
- Managing career applications for recruitment purposes and preliminary evaluation of candidates, in accordance with internal procedures and legal requirements.
- Processing data for marketing purposes (with separate consent), including sending promotional or informative communications about the Bank launch, future developments, or products and services that may be offered after obtaining the final license, based solely on explicit consent provided by the data subject in accordance with Article 6(1)(a) GDPR. This consent is given

through a separate, clear, and non-preselected checkbox, distinct from general consent for waiting list registration or website use.

Failure to provide this consent does not affect waiting list registration and does not limit access to other website functionalities. Data subjects may withdraw marketing consent at any time, without consequences and without affecting the lawfulness of prior processing, through easily accessible mechanisms (e.g., "unsubscribe" link or dedicated contact).

Personal data processing is not carried out for purposes other than those specified or incompatible with those described above. If Jet intends to use personal data for different purposes in the future, data subjects will be informed in advance and, where necessary, asked for their consent.

5.LEGAL BASIS

Personal data collected for marketing and waiting list purposes is retained only for the period necessary and proportionate to achieve these purposes, in accordance with the principle of storage limitation.

Specifically:

- Data collected for the waiting list is retained until the Bank launch and for a reasonable period thereafter, no longer than 12 months from the launch date, to allow informative communication with registered individuals;
- Data processed for marketing purposes, based on separate consent, is retained until the withdrawal of consent by the data subject or for a reasonable maximum period, in accordance with the Bank's internal policies and applicable legislation.

After the relevant retention periods or upon withdrawal of consent, personal data is securely deleted or anonymized, except where retention is necessary to fulfill legal or regulatory obligations imposed on the Bank.

6.DATA SHARING

Jet treats personal data with a high level of care and does not share, sell, or transfer it to third parties for their independent purposes.

For the purpose of website operation and fulfilling processing objectives described in this Privacy Policy, personal data may be accessed or processed by third-party service providers acting on behalf of the Bank, only to the extent necessary to provide the relevant services.

These service providers may include, among others:

- Hosting and IT infrastructure providers;
- Website maintenance and technical support providers;
- Technology solution providers for communication or application management (e.g., email or career platforms), only if and to the extent used.

All service providers process personal data solely under Jet's instructions, do not acquire any ownership rights over the data, and are bound by contractual agreements with clear obligations regarding:

- Data confidentiality;
- Implementation of appropriate technical and organizational measures for data protection;
- Compliance with GDPR and applicable legislation.

Jet ensures that third-party access to personal data is limited, controlled, and monitored, and only

for the period necessary to provide the relevant services.

Where personal data processing may involve transfers outside the European Economic Area (EEA), Jet ensures such transfers are conducted in compliance with GDPR requirements, applying appropriate legal and technical safeguards.

7.YOUR RIGHTS AS A DATA SUBJECT

In accordance with Law No. 124/2024 "On the Protection of Personal Data" and the General Data Protection Regulation (GDPR), you enjoy a range of rights regarding the processing of your personal data by Jet. These rights may be exercised at any time, in accordance with the conditions and limitations set out by applicable law.

In particular, you have the right to:

- **Access:** request confirmation whether your personal data is processed by Jet and, if so, obtain information on data categories, purposes of processing, and usage;
- **Rectification:** request updating or correction of inaccurate, incomplete, or outdated personal data;
- **Erasure ("right to be forgotten"):** request deletion of personal data when no longer necessary, upon withdrawal of consent, or when processing is unlawful, except where retention is legally required;
- **Restriction of processing:** request temporary suspension of personal data processing in certain circumstances, e.g., when accuracy or lawfulness is contested;
- **Objection:** object to the processing of personal data where processing is based on Jet's legitimate interests, including where applicable, marketing purposes;
- **Withdrawal of consent:** withdraw consent at any time for processing based on consent, without affecting the lawfulness of prior processing;
- **Lodge a complaint:** with the competent supervisory authority if you believe processing violates applicable law.

Jet is committed to handling every request transparently and within the legal timeframes provided by GDPR. To exercise these rights or for any questions regarding this Privacy Policy, you may contact us using the contact details published on the website.

8.CONTACT

For any questions, requests, or clarifications regarding this Privacy Policy, how Jet processes your personal data, or exercising your rights as a data subject in accordance with Law No. 124/2024 and GDPR, you may contact us at any time.

Jet has designated a dedicated contact point for personal data protection matters, responsible for handling privacy-related requests and ensuring compliance with applicable law.

All inquiries regarding personal data protection can be addressed to the following email address: dpo@jet-bank.com

Jet is committed to treating all such communications confidentially and responding within the legal deadlines provided by applicable legislation.