

Bilko Privacy Notice (with Document Archive Sub-Processors §8.1)

△ **DRAFT** — pending final legal sign-off and translations (per Lexicon notes). MC #100045. 2026-05-08. Canonical-facts verified by John post-Lexicon (org.nr 932 516 136, Azure Sweden Central).

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1. Introduction and Data Controller

Bilko is a cloud-based accounting and invoicing platform for small and medium businesses (SMBs) operating in Serbia, Bosnia & Herzegovina, and Croatia. Bilko is developed and operated by **ALAI Holding AS** (org.nr 932 516 136), a company registered in Norway.

Data Protection Officer (DPO):

Field	Details
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DPO name	Alem Bašić
DPO contact	alem@alai.no
Phone	+47 40 47 42 51
Company	ALAI Holding AS (org.nr 932 516 136)
Role	Responsible for data protection compliance across all three jurisdictions
Appointed	2026-03-02

8. Data Sharing and Third-Party Processors

Bilko shares your data only with the following categories of third parties, all of whom are bound by Data Processing Agreements (DPAs):

8.1 Document Archive Sub-Processors

When you enable the **document archival feature** in Bilko, the following additional sub-processors are used:

Sub-Processor	Purpose	Data Categories	Location	Safeguards
Cloudflare R2 (Cloudflare, Inc., USA)	Temporary staging for archive pipeline	Contract PDFs, invoices, care plans, incident reports, onboarding documents	EU region (eu-west bucket)	Standard Contractual Clauses (SCCs)
ALAI Azure VM Paperless-ngx (ALAI Holding AS, org.nr 932 516 136, Norway)	Long-term document archive at archive.alai.no	Same categories as above	EU/EEA (Microsoft Azure Sweden Central region)	ALAI DPA + Azure SCCs

How document archival works:

- Upload:** When you mark a document for archival in Bilko (contracts, invoices, care plans, incident reports, onboarding documents), Bilko's backend writes the document to a Cloudflare R2 staging bucket in the EU region.
- Transfer:** Every 5 minutes, a Cloud Run worker retrieves documents from R2 and uploads them to Paperless-ngx, a document management system hosted on ALAI's Azure VM (archive.alai.no) located in the Azure Sweden Central region (EU/EEA).
- Retention:** Documents are retained in the archive according to the following schedule:

- **Financial documents** (invoices, contracts): **7 years** (Serbian Zakon o računovodstvu, BiH accounting law, Croatian Zakon o računovodstvu)
 - **Care-related documents** (care plans, incident reports): **25 years** (UK NHS retention standard; pending Balkan legal review for care organizations)
4. **Deletion:** Documents are automatically deleted from Cloudflare R2 after successful upload to Paperless-ngx (typically within 5 minutes). Documents remain in Paperless-ngx for the retention period specified above.

Your rights regarding sub-processors (GDPR Art. 28(4)):

- You will receive **30 days' advance notice** via email before Bilko adds or replaces any sub-processor.
- You have the right to **object** to a new sub-processor within the notice period.
- If you object and Bilko cannot offer an alternative, you may terminate your subscription without penalty.
- Contact **dpa@alai.no** to exercise this right.
- This disclosure complies with GDPR Article 28(4), Serbian ZZPL Art. 31(4), and BiH ZZLP equivalent provisions.

Company: ALAI Holding AS (org.nr 932 516 136)

Privacy Contact: privacy@bilko.io | DPO: alem@alai.no | DPA: dpa@alai.no

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