

Privacy and Cookies Policy

Published notice — status, accuracy and right to amend. This document is published by the Company in good faith for general information and transparency. It is current only as of its stated date and is provided “as is,” without warranty of completeness or accuracy; it may contain errors or omissions and does not constitute legal, financial, tax, or investment advice, an offer or solicitation, or any guarantee. The Company may revise, correct, update, supplement, or withdraw this document at any time without prior notice, and the version published on the NovaLink Transparency Portal is the controlling current version and supersedes any earlier copy. Where this document conflicts with a signed agreement between you and the Company, or with applicable law, that signed agreement or applicable law prevails. If you believe anything here is inaccurate or out of date, please contact support@novalink.tech so we can review it and, where appropriate, correct it. To the maximum extent permitted by law, the Company accepts no liability for any reliance placed on this document.

Introduction

For the purposes of this Policy, the data controllers are Ntech Link Technologies Ltd, Company No. 2195904 (Store Operator — the NovaLink Store, checkout and web properties, including this Transparency Portal) and Auralink Nova Technology L.L.C, Dubai, Reg. No. 1607764 (Technology Provider — the Nx1/Hx1 Home Station operating environment and the Auralink applications) (together, the "Company"). Each Community Operator publishes its own privacy policy for community accounts on its own platform.

The Company is committed to protecting your privacy. This Privacy Policy outlines the types of personal information we collect from our users when you access the NovaLink Platform (hereinafter “Platform”), how we use it, and the steps we take to ensure it remains secure. By using the Platform, you agree to the terms of this Privacy Policy.

Last Updated: May 2026

1. Personal Data we collect and how we use it

Types of personal data	Purposes of processing	Legal basis	How long the data is stored
First name, last name, email address, phone number, and any information in your communications, support correspondence, or AI Chatbot transcripts.	Creating an account for the user. Contacting the user in case this is necessary for account-related issues. Providing automated customer support and maintaining records for the defense of potential legal claims.	Art 6(1)(b) and Art 6(1)(f) in the GDPR	5 Years
First name, last name, email address.	To communicate with you regarding account-related updates.	Art 6(1)(c) in the GDPR.	5 Years
First name, last name, email address.	To communicate with you regarding promotional offers.	Art 6(1)(a) in the GDPR.	Until consent withdrawal
Your username, password, other authentication credentials.	Allowing the user the access to their account to use the service offered by the Company.	Art 6(1)(b) in the GDPR	5 Years

Information related to your transactions on the Platform, such as token conversions, deposits and withdrawals.	Providing the service to the user.	Art 6(1)(b) in the GDPR	5 Years
Information about your interactions with the Company, including browsing activity, preferences, and AI Chatbot metadata.	To analyse the user's behavior on the Platform and the usage of its features, in order to make modifications to the Platform and improve user experience.	Art 6(1)(f) – the legitimate interest of the Company to improve user experience on the Platform.	5 Years
Data related to KYC & AML verification: your address, date of birth, ID number, proof of address, business name, registration number.	To ensure compliance with regulatory authorities' instructions and international legislation.	Art 6(1)(c) – the legitimate interest of the Company to ensure compliance with AML and KYC related legal obligations.	5 Years
Email address, internal account identifier (NID), and account readiness status	To facilitate Single Sign-On (SSO) integration, synchronize account registration bidirectionally, to enable seamless order processing and VP crediting between the Company and External Applications (e.g., Living By Design, Paylink, etc.).	Art 6(1)(b) in the GDPR – necessary for the performance of a contract (facilitating fiat payments), and Art 6(1)(f) – legitimate interest in ensuring operational continuity and database alignment across integrated platforms.	5 Years

2. Information Sharing

2.1 We may share your personal information with third parties under the following circumstances:

2.1.1 With service providers: to assist in the operation of the Company and provide services on our behalf and ensure KYC/AML verification, payment and wallet management services, analytics and customer support. The legal basis for the processing of your personal data in this case is either Art 6(1)(b) or legitimate interest under Art 6(1)(f) in the GDPR.

2.1.2 We utilize third-party AI processors (such as OpenAI) to facilitate our chatbot functionality. These providers process data in accordance with their own privacy policies and terms of service.

2.1.3 With affiliates: for business purposes, including but not limited to marketing and advertising. The legal basis for disclosing your personal data in this case is either Art 6(1)(a) or Art 6(1)(f) in the GDPR.

2.1.4 With legal authorities: in response to legal requests, court orders, or as required by applicable law. The legal basis for disclosing your personal data in this case is the legitimate interest of the Company to process personal data for the establishment, exercise or defence of legal claims under Art 6(1)(f) in the GDPR.

2.1.5 With integrated External Applications, such as Paylink: To ensure seamless service delivery and order attribution, we perform automated, bidirectional data synchronization.

2.1.6 With external CRM and training platform providers (including Living By Design (LBD)): for the purpose of enabling Single Sign-On (SSO) access and bidirectional data synchronization through sharing of internal account identifiers (NID-based only), as well as enabling sales-leader users to view aggregated team performance metrics, plan training events and monitor network growth.

2.2 In cases where the third parties are in the role of a data processor pursuant to the GDPR, we share your personal data with third parties only if the Company has signed a data processing agreement with the third party, according to Art 28(3) in the GDPR.

2.3 We may also access your personal data related to KYC/AML verification, previously collected by another company (the original controller) and shared with us, solely for the regulatory compliance, AML, fraud prevention and compliance with other legal obligations. Such access is limited to data necessary to perform these compliance activities and is conducted under a formal data sharing agreement, or similar arrangement, with the original data controller.

2.4 International Data Transfers: As the Company operates globally, your personal data may be transferred to, and processed in, countries outside of the European Economic Area (EEA), including the British Virgin Islands. Where personal data is transferred outside the EEA to a jurisdiction that is not subject to an adequacy decision by the European Commission, such transfers are strictly protected via the implementation of Standard Contractual Clauses (SCCs) approved by the European Commission, or other equivalent statutory safeguards in accordance with Chapter V of the GDPR.

3. Data Security

3.1 We implement appropriate technical and organizational measures to safeguard your personal information against unauthorized access, disclosure, alteration, or destruction.

3.2 Sensitive data is encrypted during transmission and storage, access to your information is restricted to authorized personnel only, and regular security audits and assessments are conducted to maintain high security standards.

4. Your rights

4.1 You have the following rights regarding your personal information:

4.1.1 to request access to and obtain a copy of your personal information;

4.1.2 to request the correction of inaccurate or incomplete personal information;

4.1.3 to request the deletion of your personal information under certain circumstances;

4.1.4 to request that the Company restricts personal data processing pursuant to Art 18(1) in the GDPR;

4.1.5 to object to the processing of your personal information for specific purposes;

4.1.6 to request the transfer of your personal information to another data controller;

4.1.7 to access and update your personal information;

4.1.8 to file a complaint with the relevant data protection supervisory authority.

4.2 Please note that the data subject can exercise his or her rights, taking into account relevant restrictions in the GDPR and other applicable data protection related legal acts.

5. Third-Party Links

5.1 The Platform may contain links to third-party or featured websites or services or integrate third-party tools, including those accessed via Single-Sign On (SSO). We are not responsible for the privacy practices or content of these third parties. Please review the privacy policies of these websites or services before providing any personal information.

6. Cookies

6.1 The Platform uses cookies and similar tracking technologies to ensure essential functionality, analyze user traffic, and improve your overall experience.

6.2 We utilize essential cookies that are necessary for the Platform to operate securely, as well as analytical and functional cookies to understand user behavior and remember your preferences.

6.3 You can control or delete cookies through your internet browser settings. Please note that disabling essential cookies may impact the functionality and performance of the Platform.

7. Changes to This Policy

7.1 We reserve the right to update or modify this Privacy & Cookies Policy at any time. Any updates or modifications will be posted on the website and continued use of the Platform constitutes acceptance of the updated or modified Privacy & Cookies Policy.

7.2 An up-to-date version of the Privacy & Cookies Policy will always be available on the Platform.

8. Contact information

If you have any questions or concerns regarding this Privacy & Cookies Policy, please contact us at support@novalink.tech and our support team will take care of you.

Privacy contact — Australia: the Australian-facing privacy contact is support@novalink.tech (subject line "Privacy — Australia"). You may use this address to ask how your personal information is handled or to complain about a breach of the Australian Privacy Principles; if your complaint is not resolved, you may escalate it to the Office of the Australian Information Commissioner (OAIC, www.oaic.gov.au).

Unsolicited personal information (APP 4): if we receive personal information we did not solicit and determine that we could not lawfully have collected it, we destroy or de-identify that information as soon as practicable, unless we are required by law to retain it.

Entity: Ntech Link Technologies Ltd (Company No. 2195904) and Auralink Nova Technology L.L.C (Reg. No. 1607764), as joint controllers

Email: support@novalink.tech

Address: Ntech Link Technologies Ltd (Company No. 2195904), British Virgin Islands.
