NovaLink

Privacy and Cookies Policy

Last updated: October 2026

Website operator: NTECH LINK TECHNOLOGIES LTD, BVI Company No. 2195904.

Website: novalink.technology

Contact: support@novalink.technology

This Privacy and Cookies Policy applies to the public website at https://novalink.technology/ , including the Transparency Portal and related public pages, operated by NTECH LINK TECHNOLOGIES LTD, BVI Company No. 2195904 ("the Company", "we", "us").

This Policy covers only the personal data processed when you visit the public website, use website cookies, or contact us through the Website. The public website is primarily informational: it describes NovaLink's hardware, technology, transparency materials and partner ecosystem. It is not an account portal, community dashboard, rewards programme, wallet, exchange, payment service or investment platform.

This Policy does not govern the processing of personal data by any store, community platform, partner service or other separate service, except where this Policy expressly states otherwise.

Capitalised terms not defined in this Policy (the "Policy") have the meaning given in the Website Terms of Use.

1. Who we are

The Website is operated by:

Ntech Link Technologies Ltd

BVI Company No. 2195904

British Virgin Islands

Email: support@novalink.technology

For personal data processed through the public website, the Company is the controller.

2. What personal data the Website may process

2.1. The Website is designed to collect limited personal data. We may process:

(a) technical website data, such as IP address, browser type, device type, operating system, pages viewed, referring page, time of visit, error logs and security logs;

(b) cookie data, where cookies or similar technologies are used;

(c) contact data, only if you choose to contact us, such as your name, email address and the contents of your message.

2.2. The Website is not directed at children, and we do not knowingly collect personal data from children under 18 through the Website.

3. How we use this data

3.1. We use website-related personal data to:

(a) operate, maintain and secure the Website;

(b) understand basic website traffic and performance;

(c) fix errors and improve website content;

(d) respond to messages sent to us;

(e) keep reasonable records for legal, security or administrative purposes.

3.2. Where applicable data protection law requires a legal basis, we rely on:

(a) our legitimate interests in operating, securing and improving the Website, for purposes (a) to (c) in Section 3.1;

(b) your consent, for preference cookies and any other non-essential cookies we may introduce in future;

(c) steps taken at your request, or our legitimate interest in responding to enquiries, for purpose (d); and

(d) legal obligation or our legitimate interests in protecting our legal position, for purpose (e).

4. Cookies

4.1 The Website uses cookies and similar technologies in the following categories:

(a) strictly necessary: required for the Website to function, including security, routing and remembering your cookie choices. These cannot be disabled;

(b) preferences: to remember choices such as language or display settings.

4.2 We do not currently use performance, analytics or advertising cookies. If we introduce performance or analytics cookies in future, we will only set them with your prior consent, and we will update this Policy before doing so.

4.3 Cookies in category (b) are only set with your consent, which you can give or refuse through the cookie banner when you first visit the Website. You can withdraw your consent at any time by deleting cookies through your browser settings, after which the cookie banner will be shown again on your next visit. You can also block cookies through your browser settings. Blocking cookies may affect how the Website works.

5. NovaLink Store

If you are looking for information about how your personal data is processed in connection with a purchase, order, payment, checkout, shipping, return, warranty, hardware support or any other Store-related matter, please refer to the terms and privacy policy of the NovaLink Store. The NovaLink Store is also operated by the Company, but personal data processed through the Store is covered by the separate NovaLink Store privacy policy.

6. Community Platforms

If you are looking for information about how your personal data is processed in connection with a Community Platform account, participation, onboarding, rewards, eligibility, KYC or communications, please refer to the privacy policy of the relevant platform. Community Platforms are operated by separate legal entities within the same corporate group (The Link Group).

7. Other separate services

The Website may link to services operated by other group entities, partners or third parties. If you leave the NovaLink website or use a service operated by another entity, that service's own terms and privacy policy apply. We are not responsible for the privacy practices of third-party services.

8. Sharing

We may share limited website-related personal data with:

(a) service providers that host, secure, maintain or analyse the Website, including our hosting provider and the provider of the Transparency Portal;

(b) professional advisers, where needed;

(c) authorities, courts or regulators, where required by law;

(d) group entities, where reasonably necessary for website operation, legal, security or administrative purposes.

We do not sell personal data collected through the public website.

9. International processing

The Website and its service providers may operate internationally, so limited website-related personal data may be processed in countries other than your own. Where applicable law requires transfer safeguards, we will use appropriate safeguards such as contractual protections or other lawful transfer mechanisms.

These countries may include the British Virgin Islands, where the Company is established. You can request details of the safeguards we use by contacting us.

10. Security and retention

10.1. We use reasonable technical and organisational measures to protect website-related personal data.

10.2. We keep personal data only for as long as needed for the purposes described in this Policy:

(a) Technical and security logs: up to 12 months, or longer where necessary to investigate a security incident or to establish, exercise or defend legal claims, in which case until the matter is resolved. Server logs generated by our hosting provider and by the provider of the Transparency Portal are retained in accordance with those providers' own retention policies.

(b) Cookies: strictly necessary cookies for the duration of your session or up to 13 months; preference cookies up to 13 months; your cookie consent choices up to 6 months, after which we may ask you again. Should we implement performance or analytics cookies in future, such cookies will be retained for up to 13 months and analytics data collected through them for up to 14 months.

(c) Communications with us, including partner and distributor enquiries: up to 24 months after our last exchange, or for the duration of any resulting business relationship, or longer where necessary to establish, exercise or defend legal claims.

11. Your rights

11.1. Depending on your location, you may have rights to access, correct, delete, restrict or object to the processing of your personal data, or to withdraw consent where processing is based on consent. You may also have the right to complain to a data protection authority.

11.2. If your request relates to the NovaLink Store, a Community Platform or other separate service described in Sections 5 to 7, contact that service directly using the contact details in its privacy policy.

11.3. To make a privacy request about the public NovaLink Website, contact: support@novalink.technology

11.4. We do not use Website personal data for automated decision-making, including profiling, that produces legal or similarly significant effects for you.

12. Changes to this Policy

We may update this Policy from time to time. The current version will be published on the Website or Transparency Portal with its "last updated" date.

13. Contact

Ntech Link Technologies Ltd

BVI Company No. 2195904

Address: Aleman, Cordero, Galindo & Lee Trust (BVI) Limited, 4th Floor, Omar Hodge building, Road Town, Tortola, VG 1110, British Virgin Islands

Email: support@novalink.technology