NovaLink

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US State Privacy Addendum

(CCPA / CPRA and other US state laws)

California Consumer Privacy Act and equivalent state-law provisions

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Issuing entity: NodeLink USA, Inc. (Delaware C-Corporation; Delaware file no. 10606222) — US Distribution

Applies to: personal information of US residents collected in connection with US distribution and sales

The NovaLink entities: Ntech Link Technologies Ltd, Co. No. 2195904 (Store Operator) · Auralink Nova Technology L.L.C, Dubai, Reg. No. 1607764 (Technology Provider) · NodeLink USA, Inc., Delaware, File No. 10606222 (US Distribution)

Effective date: 22 May 2026

Contact: support@novalink.tech

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1. Purpose and the responsible US entity

This Addendum (the "US Addendum") supplements the Company Privacy and Cookies Policy with provisions required by the California Consumer Privacy Act of 2018 (Cal. Civ. Code § 1798.100 et seq.) as amended by the California Privacy Rights Act of 2020 ("CCPA/CPRA"), and with cross-references to similar laws of other US states (Virginia VCDPA, Colorado CPA, Connecticut CTDPA, Utah UCPA, Texas TDPSA, and the comprehensive privacy laws of Oregon, Montana, Indiana, Iowa, and Delaware). Where this Addendum is in conflict with the Privacy and Cookies Policy, this Addendum prevails for residents of the relevant US state.

Within The Link Group, the entity responsible for market entry, distribution and sales in the United States is the Company, a corporation incorporated in the State of Delaware (Delaware file no. 10606222), with its office at 169 Madison Ave, STE 92116, New York, NY 10016. For the purposes of the CCPA/CPRA and

the other US state privacy laws referenced in this Addendum, the Company is the "business" (and, where those terms are used, the "controller") in respect of the personal information of United States residents that it collects in connection with that activity. The NovaLink platform itself is operated by the Company (British Virgin Islands); where the personal information of a US resident is also processed by the platform, a US resident may exercise the rights set out in this Addendum against either entity through the contact channels in Section 10. The full group structure is described in the Corporate Structure & Entity Register (NL-ORG-01).

2. Categories of personal information collected

CCPA category (Cal. Civ. Code § 1798.140(v))	Examples in the Company	Sources
Identifiers (A)	Name, email, account ID, IP address, device IDs	You
Customer Records (B)	Address, phone, KYC documents	You
Characteristics of protected classifications (C)	Not collected	—
Commercial information (D)	Transaction history, subscriptions purchased, products linked	You; HMall
Biometric information (E)	Selfie / liveness for KYC	You
Internet activity (F)	Platform usage, dashboard interactions, chatbot transcripts	Your interaction
Geolocation (G)	IP-derived country of access; Nx1/Hx1 Home Station reported public IP	Your network
Sensory data (H)	Selfie image	You
Professional/employment (I)	Country Distributor / corporate role where applicable	You
Education (J)	Not collected	—
Inferences (K)	User segment for product improvement (limited)	The Company processing
Sensitive personal information (Cal. Civ. Code § 1798.140(ae))	Government IDs for KYC; precise geolocation not collected unless required for tax or sanctions screening; biometric (selfie) for liveness	You

3. Sale and sharing of personal information

The Company does not "sell" personal information as that term is defined in CCPA § 1798.140(ad), and does not "share" personal information for cross-context behavioural advertising as that term is defined in § 1798.140(ah). The Company does not offer a "Do Not Sell or Share My Personal Information" link because there is no such activity to opt out of; nevertheless, residents may still submit an opt-out request and the Company will record it.

4. Use of sensitive personal information

The Company uses sensitive personal information (KYC IDs and biometric selfies) only for the limited purposes set out in § 1798.121(a) — to perform the services requested, to detect security incidents, to resist malicious or fraudulent actions, to ensure physical safety, for short-term transient use, to perform services on behalf of the Company, and to verify quality. The Company will not use sensitive personal information for inferences about a consumer's characteristics.

5. Retention

See Section 5 of the Data Minimisation & Retention Policy and Section 1 of the Privacy and Cookies Policy. The maximum retention period is 5 years for KYC, AML, and transactional records. Sensitive personal information is retained only for the period necessary to verify identity and to comply with the BVI Anti-Money Laundering Regulations 2008.

6. Consumer rights

Right	Statutory basis	How to exercise
Right to know	§ 1798.110, § 1798.115	support@novalink.tech or in-platform Privacy Requests form
Right to delete	§ 1798.105	support@novalink.tech
Right to correct	§ 1798.106	In-platform self-service; or support@novalink.tech
Right to opt out of sale/sharing	§ 1798.120	Not applicable (see Section 3); request will be recorded if made
Right to limit use of sensitive PI	§ 1798.121	support@novalink.tech
Right to data portability	§ 1798.130	In-platform export
Right to non-discrimination	§ 1798.125	The Company does not retaliate against exercise of rights
Right to appeal a denial	Equivalent rights under VCDPA / CPA / CTDPA / UCPA	support@novalink.tech

7. Authorized agents

A consumer may use an authorized agent (CPRA Regulation § 7063) to submit a request on their behalf. The Company requires:

- Signed written permission from the consumer authorising the agent;
- Verification of the consumer's identity directly with the Company (KYC re-verification light);
- Agent's identification and a description of their authority.

8. Children

The Company does not knowingly sell or share the personal information of consumers under 16 years of age. The Terms (Section 2.1) require all Users to be 18 or older.

9. Other US states — operational position

State	Statute	The Company position
Virginia	Virginia Consumer Data Protection Act (VCDPA)	Honored: access, deletion, correction, portability, opt-out of targeted advertising/sale/profiling. The Company does not engage in targeted advertising or sale.
Colorado	Colorado Privacy Act (CPA)	Honored. Universal Opt-Out Mechanism (Global Privacy Control) recognised.
Connecticut	CTDPA	Honored.
Utah	UCPA	Honored.
Texas	TDPSA	Honored from effective date.
Oregon, Montana, Indiana, Iowa, Delaware	Comprehensive privacy laws (effective 2024–2025)	Honored.

10. Contact

Privacy requests: support@novalink.tech | Appeals: support@novalink.tech

Toll-free request line for California residents: a US toll-free number is to be activated by December 2027, in line with § 1798.130(a)(1) for businesses that operate exclusively online — currently the Company falls within the email-only exception under § 1798.130(a)(1)(A) but is choosing to provide additional channels.