NovaLink

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GDPR Addendum

EU GDPR and UK GDPR provisions supplementing the Privacy Policy

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Document ID: NL-GDPR-01

Version: 1.1 (revised 10 November 2026)

Status: Issued

Issuing entity: Group-wide policy — adopted by each NovaLink entity listed in the Corporate Structure & Entity Register (NL-ORG-01). Data controllers: Ntech Link Technologies Ltd (NovaLink Store and web properties) and Auralink Nova Technology L.L.C (applications and network)

Applies to: the NovaLink product, network and Nx1/Hx1 Home Stations, regardless of which Community Platform a participant joined through

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 relationship to the Privacy Policy

This addendum (the "GDPR Addendum") supplements the Company Privacy and Cookies Policy with provisions specific to the General Data Protection Regulation (EU) 2016/679 ("EU GDPR") and the UK General Data Protection Regulation ("UK GDPR", as it forms part of UK law by virtue of section 3 of the European Union (Withdrawal) Act 2018). Where this Addendum is in conflict with the Privacy and Cookies Policy, this Addendum prevails for data subjects in the European Economic Area or the United Kingdom.

2. Identity of the controller

Ntech Link Technologies Ltd, BVI Company Registration No. 2195904, is the data controller in respect of personal data of EEA and UK data subjects processed in connection with the NovaLink Platform.

EU representative (under Article 27 GDPR): to be appointed. Target appointment date: 31 July 2026. The appointed representative's details will be published on the NovaLink Transparency Portal.

UK representative (under Article 27 UK GDPR): to be appointed. Target appointment date: 31 July 2026.

Data Protection Officer / DPO: support@novalink.tech. DPO appointment is in progress; in the interim, all DPO functions are performed by the Company Compliance Officer.

3. Lawful bases for processing — consolidated table

The following consolidates the lawful-basis table in the Privacy Policy and clarifies application under the EU GDPR / UK GDPR:

Processing purpose	Lawful basis	Article
Account creation, authentication, providing the Platform	Performance of a contract	Art 6(1)(b)
Customer support, defence of legal claims	Legitimate interests	Art 6(1)(f)
Service-related transactional communications	Legal obligation / contract	Art 6(1)(b) / (c)
Marketing communications	Consent	Art 6(1)(a)
KYC / AML record-keeping	Legal obligation	Art 6(1)(c) (BVI AML Regulations 2008)
Cookies (essential)	ePrivacy strict-necessity exemption	ePrivacy Directive Art 5(3)
Cookies (analytical/marketing)	Consent	ePrivacy Art 5(3); GDPR Art 6(1)(a)
Operational telemetry from Nx1/Hx1 Home Station (no personal data of third parties)	Performance of contract with Node Operator	Art 6(1)(b)
Disclosure to law-enforcement	Legal obligation	Art 6(1)(c); Art 6(1)(f) where wider
International transfers to BVI and other non-EEA jurisdictions	Standard Contractual Clauses (Commission Decision 2021/914)	Chapter V GDPR

4. International transfers

Personal data of EEA and UK data subjects is transferred to the Company in the BVI and may be transferred to the Company subprocessors. The Company relies on the European Commission's Standard Contractual Clauses (Decision (EU) 2021/914), including the UK Addendum to those SCCs issued by the UK Information Commissioner, for those transfers. A Transfer Impact Assessment has been conducted in respect of the BVI as a destination and is available to supervisory authorities on request.

5. Subprocessors

The Company maintains a list of subprocessors, available on request from support@novalink.tech. The current list includes (illustrative; the live list is authoritative):

Subprocessor	Purpose	Country	Transfer mechanism
Third-party KYC vendor	Identity verification, AML	EEA, UK, USA	SCCs (where outside EEA)

(e.g., Sumsub, Onfido, Veriff — actual vendor as published)	screening		
Cloud infrastructure provider (Coordination Plane)	Hosting of the Company control servers	EEA, USA, Singapore	SCCs (where outside EEA)
OpenAI	AI Chatbot inference	USA	SCCs; OpenAI BAA / DPA
E-mail delivery vendor	Transactional and marketing email	EEA / USA	SCCs (where outside EEA)
Analytics provider	Product analytics	EEA	Within EEA

The Company notifies Users of a change in subprocessors with at least 30 days' prior notice via the Platform notification centre, and provides the right to object on legitimate grounds.

6. Data subject rights — process

Requests under Articles 15 (access), 16 (rectification), 17 (erasure), 18 (restriction), 20 (portability), and 21 (objection) of the GDPR may be submitted to support@novalink.tech or via the in-platform "Privacy Requests" form.

Step	Timing
Acknowledgement	Within 5 business days
Identity verification	Within 10 business days
Substantive response	Within 30 calendar days, or 45 days where the request is complex (within the extension permitted by Art 12(3))
Appeal route	Right to lodge a complaint with the supervisory authority of the data subject's habitual residence; UK data subjects: Information Commissioner's Office (ICO)

7. Article 22 — automated decision-making and profiling

The Company does not, as at the date of this Addendum, make decisions about individual data subjects that produce legal or similarly significant effects solely on the basis of automated processing. Sanctions screening produces a candidate "hit" which is reviewed by a human Compliance Officer before any action is taken (see the Sanctions & OFAC Compliance Policy).

8. Breach notification

A personal data breach within the meaning of Article 4(12) GDPR is reported to the relevant supervisory authority within 72 hours of the Company becoming aware of it, in accordance with Article 33, and to affected data subjects without undue delay in accordance with Article 34 where the breach is likely to result in a high risk to their rights and freedoms.

9. Records of processing (Article 30)

The Company maintains records of its processing activities and makes those records available to supervisory authorities on request.

10. Children

The Platform is not intended for, and not offered to, individuals under the age of 18, in line with Section 2.1 of the Terms and Conditions. Where the Company becomes aware that personal data of a child has been collected, it will be deleted promptly.

11. Changes to this Addendum

Material changes are notified by e-mail and posted on the NovaLink Transparency Portal.

12. Contact

Data subject requests: support@novalink.tech | Supervisory authority concerns: contact the supervisory authority of your habitual residence.

> *Status note. The Article 27 EU and UK representative appointments and the formal DPO appointment are in active commissioning. Target completion 31 July 2026. In the interim, the Company performs the substantive obligations through its Compliance Officer.*