NovaLink

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Law Enforcement Request Policy

How the Company responds to legal process and emergency requests

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Status: Issued

Issuing entity: Group-wide policy — adopted by each NovaLink entity listed in the Corporate Structure & Entity Register (NL-ORG-01); administered by Auralink Nova Technology L.L.C (Technology Provider), which holds the technical records

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. Introduction

The Company ("the Company") is a British Virgin Islands company that operates a global, distributed infrastructure network. The Company network connects Node Operators who host an Nx1/Hx1 Home Station ("Nx1/Hx1 Home Station") at their premises with Workload Publishers who consume compute, storage, or connectivity capacity scheduled to those devices.

The Company operates as a group of three entities (together, the "The Link Group"): the Company, incorporated in the British Virgin Islands , the platform operating entity that contracts with participants and operates the network; the Company, a Delaware corporation responsible for market entry, distribution and sales in the United States; and Auralink Nova Technology L.L.C, a Dubai (UAE) company that operates the group's technology platform under the Company brand and holds the group's technology intellectual property. In this Policy, "the Company" refers to the relevant The Link Group

entity according to context; Section 3 sets out which entity responds to which form of legal process. The full structure is described in the Corporate Structure & Entity Register (NL-ORG-01).

This Law Enforcement Request Policy (the "LE Policy") explains how the Company responds to legal process and other government requests for information, content suspension, or operational assistance. It complements the Company Privacy and Cookies Policy, the Acceptable Use Policy, and the Data Minimisation & Retention Policy.

2. Guiding principles

- Lawful basis. The Company will only respond to legal process that is valid, properly served, and binding on the Company in its capacity as a BVI-domiciled entity.
- Minimum necessary disclosure. The Company discloses only the categories of data that are responsive to the specific request.
- User notification. The Company notifies the affected User or Node Operator of a request for their data unless prohibited by law (including by a non-disclosure or "gag" order) or where notice would create a material risk to life or to a criminal investigation.
- Independent review. Every request is reviewed by the Company Compliance Officer or a member of the Company Legal Team prior to disclosure.
- Transparency reporting. The Company will publish a transparency report once per calendar year describing the volume and nature of requests received and responded to. Target first publication: Q1 2027 covering the period from incorporation to 31 December 2026.

3. Types of process the Company will accept

3.1 Process originating in or routed through the British Virgin Islands.

As a BVI-domiciled entity, the Company can be compelled to disclose user data by:

- A court order, warrant, summons, or production order issued by a court of the British Virgin Islands.
- A production notice issued by the BVI Financial Services Commission, the BVI Financial Investigation Agency, or the BVI International Tax Authority acting within statutory powers (including under the BVI VASP Act 2022, the BVI Proceeds of Criminal Conduct Act, and the Mutual Legal Assistance (United States of America) Act).
- A request received under the BVI Mutual Legal Assistance regime from a foreign authority where the BVI Attorney General has so directed.

3.2 Process originating outside the BVI.

The Company does not, as a matter of policy, voluntarily produce user data in response to foreign legal process that has not been routed through a recognised cross-border channel. Foreign authorities are asked to use:

- A Mutual Legal Assistance Treaty (MLAT) request via their central authority.
- A letter rogatory channelled through the BVI courts.
- For European Economic Area authorities, a request under the GDPR Chapter V framework, supported by an enforceable instrument under Article 48 GDPR.
- For United States authorities, legal process under the Stored Communications Act (18 U.S.C. § 2703) or other applicable United States law — see Section 3.3, which addresses the Company
- For Australian authorities, a request via the BVI–Australia mutual-assistance framework, supported as applicable by the Telecommunications (Interception and Access) Act 1979 (Cth) and the Crimes Act 1914 (Cth).

3.3 Process served on the Company

The Company is a corporation incorporated in the State of Delaware, United States (Delaware file no. 10606222), and forms part of The Link Group. As a United States entity it is directly subject to United States legal process. United States legal process — including a subpoena, court order, or warrant under the Stored Communications Act (18 U.S.C. § 2703) — that relates to information held by the Company, or to participants onboarded by the Company in the United States, may be served on the Company directly, and the Company will respond as required by United States law. Service may be effected through its Delaware registered agent, Legalinc Corporate Services Inc., 131 Continental Dr, Suite 305, Newark, DE 19713. The Company holds only the categories of data described in Section 6 that are necessary for its United States market, distribution and onboarding activity; data held by the platform operating entity, the Company, remains subject to Sections 3.1 and 3.2.

Where legal process is properly served on any other The Link Group entity, affiliate, distributor or representative incorporated in the relevant jurisdiction, the relevant entity will respond consistently with that process to the extent legally required.

4. Emergency disclosure

The Company may, in its sole discretion, disclose information without legal process where it has a good-faith belief that an emergency involving imminent risk of death or serious bodily injury to a person requires disclosure without delay. Emergency requests must be made by an identified law-enforcement officer at support@novalink.tech , must specify the nature of the emergency, and will be reviewed by the Company Compliance Officer before any disclosure is made.

5. How to make a request

5.1 Format.

Requests must be made in writing, on official agency letterhead, signed by an authorised representative, and submitted to support@novalink.tech with the subject line "Law Enforcement Request — [Agency / Case Number]". Postal service may be effected on the registered agent: [registered office of Ntech Link Technologies Ltd — to be confirmed].

5.2 Required content of the request.

- The legal basis for the request and a copy of the underlying instrument (warrant, court order, MLAT request, etc.).
- The specific account identifier(s), e-mail address(es), wallet address(es), Nx1/Hx1 Home Station serial number(s), or Workload Session ID(s) at issue.
- The categories of information sought and the time window of interest.
- A confirmation of whether a non-disclosure / gag order applies.
- A direct point of contact (name, agency, telephone, e-mail).

5.3 Service of process on Workload Publishers and Node Operators.

Where the request relates to traffic that exited an Nx1/Hx1 Home Station's public IP address, but the underlying activity was conducted by a third-party Workload Publisher pursuant to a Workload Session, the Company will identify the Workload Session, attribute it to the responsible Workload Publisher, and (subject to the legal process being valid in respect of that Publisher) redirect the request accordingly.

6. Categories of information the Company may have

The categories of information the Company may have available are limited to those listed in the Company Privacy and Cookies Policy and the Data Minimisation & Retention Policy. In summary:

Category	Typical retention	Notes
Account registration data (name, e-mail, phone)	5 years	GDPR Art 6(1)(b)/(f)
KYC documents (ID, proof of address, selfie)	5 years	GDPR Art 6(1)(c); BVI AML Regulations
Transaction ledger entries (USDN deposits, withdrawals)	5 years	Required for AML record-keeping
Nx1/Hx1 Home Station device telemetry (heartbeat, uptime, bandwidth used)	90 days rolling	Operational only
Workload Session ID + timing + attribution	180 days rolling	For abuse attribution; see Section 7

Category	Typical retention	Notes
Workload payload content (data routed through the Nx1/Hx1 Home Station)	Not retained	See Data Minimisation & Retention Policy

7. Traffic attribution

A central question for any law-enforcement agency investigating traffic that appears to have originated from an Nx1/Hx1 Home Station's residential IP address is whether the traffic represented (a) the personal activity of the Node Operator or (b) a third-party Workload routed through the device. The Company can in most cases answer this question by reference to its Workload Session ledger, provided the legal process is served on the Company and a sufficiently precise timestamp and source-port (where available) is supplied. The Company will:

1. Confirm whether a Workload Session was active on the relevant Nx1/Hx1 Home Station at the relevant time.
2. Identify the Workload Publisher responsible for the Workload Session, subject to any applicable confidentiality agreement.
3. Provide a sworn affidavit suitable for the requesting authority, where requested.

8. What the Company cannot provide

- The content of third-party traffic routed through the Nx1/Hx1 Home Station, where the Company has not retained that content (see the Data Minimisation & Retention Policy).
- Private keys, seed phrases, or signing credentials for any external wallet that a User connects to the Platform for withdrawals; those credentials remain in the User's sole control and are not held by the Company.
- Customer funds or crypto-assets held on a custodial basis. The NovaLink entities sell products (Nx1/Hx1 Home Station hardware) and provide technology. Community participation — including the internal USDN credit, Node Telemetry Licences and rewards, which participants withdraw to their own external wallets — is operated by the Community Operators on their own platforms. The Company is not a custodian, does not hold customer assets on the customer's behalf, and cannot freeze, seize, or produce assets held in a participant's external wallet.
- Information held by independent third-party processors except where required by valid process served on the Company and pertaining to data that the Company would itself hold.

9. Costs and fees

The Company reserves the right to seek reimbursement of reasonable costs incurred in responding to legal process, in accordance with applicable law. The Company does not charge for responding to emergency requests or for requests served by BVI authorities.

10. Transparency and accountability

The Company will publish, on an annual basis from 2027, a transparency report listing the number of legal-process requests received, broken down by the type of process, requesting jurisdiction, type of data sought, and disposition (complied, partial, denied, withdrawn). The Company reserves the right to omit any disclosure that, if made, would itself violate legal process or compromise an ongoing investigation.

11. Contact

Law-enforcement requests: support@novalink.tech | Emergency requests: support@novalink.tech | Postal: see Section 5.1.

Status note. The processes described in Sections 4 and 10 (emergency response and annual transparency reporting) are in the course of being formalised. Target operational date: 31 July

2026. The framework described is the framework the Company will publish and operate; any deviation prior to that date will be documented internally and disclosed to counsel.