

# Privacy Policy

**Effective Date:** 2025-11-01

**Last Updated:** 2025-11-03

This Privacy Policy explains how **Nubo Native Platform (NNP)** from NUBONS TECH LLC, a WA LIMITED LIABILITY COMPANY, UBI Number 605 973 469, collects, uses, shares, and protects Personal Data when you visit our websites, create an account, or use our Services. It also describes your privacy rights and how to exercise them.

If you provide Personal Data to us as part of using the Services on behalf of an organization, we process that data under the direction of your organization. In such cases, your organization is the controller, and our **Data Processing Addendum (DPA)** governs how we process Personal Data in Customer Content.

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## 1. Who We Are (Controller)

For the purposes of this Privacy Policy, the controller of Personal Data for marketing, website, account, billing, and support interactions NUBONS TECH LLC, a WA LIMITED LIABILITY COMPANY, UBI Number 605 973 469, USA, **contact@nubons.com**. Where required by local law, we may appoint regional representatives or entities as joint controllers for localized billing or support.

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## 2. Scope

This Policy covers Personal Data we collect about **(a)** visitors to NNP websites; **(b)** account holders and administrative users; **(c)** individuals who interact with our support, sales, or events; and **(d)** telemetry/operational data we collect to provide and secure the Services. It does **not** cover Customer Content we process on your organization's behalf (see DPA).

## 3. Data We Collect

### 3.1 Data You Provide

- Account data (name, email, phone, company, billing address).
- Authentication data (passwords, MFA secrets—hashed/encrypted as applicable).
- Payment data (last four digits, tokenized card, bank details via our PCI-compliant processors).
- Support and feedback (tickets, call/chat recordings where permitted, survey responses).
- Contract and compliance documentation (e.g., tax IDs, sanctions screening information).

### 3.2 Data Collected Automatically

- Usage and telemetry (API calls, resource metrics, logs), tied to your tenant/account.
- Device and network data (IP address, user-agent, language, time zone, cookie IDs).
- Cookies/SDKs for session management, analytics, and fraud prevention (see Cookie Notice).

### 3.3 Data from Third Parties

- Partners and resellers, public sources, antifraud and KYC providers, and marketing platforms compliant with applicable law.

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## 4. How We Use Personal Data

We use Personal Data to -

1. Provide, maintain, and improve the Services and websites.
2. Authenticate users, prevent fraud/abuse, and ensure security.
3. Measure usage, plan capacity, and develop new features.
4. Provide support, trainings, and respond to inquiries.
5. Process payments, invoicing, and collections.
6. Send service communications; with your consent or as permitted by law, send marketing.
7. Comply with legal obligations (tax, accounting, export controls, sanctions screening).

Our legal bases (where applicable) include performance of a contract, legitimate interests, consent, and legal obligation.

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## 5. Sharing of Personal Data

We share Personal Data with: (a) Sub processors (cloud infrastructure, billing, support, communications) under contract; (b) partners/resellers to fulfill Orders; (c) professional advisors; (d) authorities when required by law; and (e) in corporate transactions. We do not sell Personal Data, and we do not share it for cross-context behavioral advertising without your opt-in where required.

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## 6. International Transfers

We may transfer Personal Data to the United States and other countries that may not offer the same level of data protection as your jurisdiction. We use appropriate safeguards (e.g., Standard Contractual Clauses, UK IDTA/Addendum, and other mechanisms) and implement supplementary measures as needed.

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## 7. Data Retention

We retain Personal Data for as long as necessary to provide the Services, comply with legal obligations, resolve disputes, and enforce agreements. Typical retention: account records for the life of the account plus 7 years; telemetry up to 13 months unless you select a longer retention in your plan.

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## 8. Security

We maintain a risk-based security program aligned to industry standards (e.g., SOC 2/ISO 27001, where applicable). Measures include encryption in transit and at rest, access controls, vulnerability management, logging/monitoring, and incident response.

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## 9. Your Rights

Depending on your location, you may have rights to access, correct, delete, port, or restrict processing of your Personal Data, and to object to certain processing. You may also withdraw consent at any time for processing based on consent. To exercise your rights, contact **contact@nubons.com**. You also have the right to lodge a complaint with your supervisory authority.

Residents of California (CPRA) have the following additional rights: to know categories of Personal Data collected/disclosed; to delete; to correct; to opt-out of sale/sharing; and to limit use of sensitive Personal Information. NNP does not use or disclose sensitive Personal Information for purposes requiring a right to limit under CPRA.

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## 10. Children's Privacy

The Services are not directed to children under 16 and we do not knowingly collect Personal Data from them.

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## 11. Marketing Preferences & Communications

You can manage marketing preferences via unsubscribe links or your account settings. We may still send transactional or service messages.

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## 12. Cookies & Similar Technologies

We use necessary cookies for authentication and security, and (with consent where required) analytics and performance cookies.

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## 13. Customer Content vs. Service Data

Customer Content is processed under your instructions as processor (see DPA). Service Data (e.g., telemetry, billing, security logs) is processed as controller for operating and securing the Services, and to meet legal obligations.

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## 14. Sub Processors

The current list of Sub processors is as follows.

Data Center Provider – Ctrl+S (ctrls.com)

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## 15. Data Residency Options

For dedicated or sovereign deployments (e.g., on-prem, single-region), residency is governed by the Order and technical configuration. Support metadata may still be processed in the U.S. unless otherwise agreed.

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## 16. Requests from Governments & Law Enforcement

NNP will only disclose data where legally required. We will challenge overbroad or unlawful requests and, where permitted, notify customers before disclosure.

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## 17. Changes to This Policy

We may update this, Policy. Material changes will be notified via email or console at least **30 days** before they take effect, unless immediate changes are required by law or for security.

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## 18. Contact Us

**NUBONS TECH LLC**

**UBI Number: 605 973 469**

3818 186<sup>th</sup> SE, BOTHELL, WA, USA

contact@nubons.com