

DATA PRIVACY POLICY

At NovaX8, protecting your personal data is our top priority. This Privacy Policy outlines how we collect, process, and safeguard your personal information in compliance with the General Data Protection Regulation (GDPR) (EU Regulation 2016/679) and applicable local laws. Please read this document carefully to understand your rights and our responsibilities

1. Scope and Applicability

This Privacy Policy governs all interactions involving your role as a NovaX8 Marketer or Affiliate, as well as your use of our official websites, including <http://www.NovaX8.com> and related digital platforms. It applies regardless of the user's geographical location, recognizing that data collected from different jurisdictions may be subject to varying privacy regulations.

Our commitment is to transparency about data collection practices and to update this policy as necessary to reflect new legal, technical, or operational developments. Should we modify this policy, we will notify you through email, website notices, or other suitable means. Continued use of our services after notification signifies your acceptance of the updated terms. If you do not agree with the revised policy, you are advised to discontinue use immediately.

2. Types of Data We Collect

We may collect, record, and process various categories of personal data necessary to fulfill our contractual obligations, improve our services, and ensure legal compliance. These include :

- **Identification Data:** Your full name, membership ID, gender, date of birth, and national ID number (CRIC No.).
- **Contact Information:** Postal address, email addresses, and telephone or mobile numbers to facilitate communication.
- **Account Details:** Login credentials, usernames, and passwords necessary to access your secure account.
- **Financial Data:** Bank account numbers and details used for processing payments, commissions, or refunds.
- **Transaction and Purchase Data:** Details of your transactions such as date, time, location, purchase amount, payment method, product or service purchased, and purchase medium (online or offline).
- **Usage and Behavioral Data:** Information related to your interactions with our platform, including access times, browsing patterns, search queries, language preferences, and device type.
- **Marketing Preferences:** Your preferences regarding receiving promotional communications, participation in loyalty programs, or marketing surveys.
- **Additional Data:** Any other data voluntarily provided by you, including feedback and survey responses related to our services.

This data allows us to verify your identity, facilitate transactions, facilitate communication, analyze service usage, and customize your user experience.

2.1 Data Retention

Personal data is retained only as long as necessary for the purposes outlined in this policy, and no longer than required by applicable law. Retention periods vary depending on the nature of the data :

- Transactional and financial records: retained for 10 years
- User account data: retained for as long as the account is active and up to 2 years after account closure
- Marketing data: retained for 2 years after last contact or until consent is withdrawn

3. Cookies and Web Tracking Technologies

Our websites employ cookies and other tracking technologies to enhance usability, personalize content, and analyze traffic patterns.

- **Cookies:** Small text files stored on your device, which help us recognize your browser and remember your preferences during your visit.
- **Types of Cookies Used:**
 - **Session Cookies:** Temporary cookies that are deleted once you close your browser.
 - **Persistent Cookies:** Remain on your device for a set period, helping us recognize you on repeated visits.
- **Purpose of Cookies:**
 - Enabling login sessions
 - Tracking user behavior and site performance
 - Providing targeted advertising and remarketing
 - Collecting statistical data for site optimization
- **Web Analytics Tools:**
 - We use tools like Google Analytics to analyze website traffic and visitor behavior anonymously.
 - These tools collect data such as your IP address, browser type, device information, visit duration, and pages viewed.
- **Managing Cookies:**
 - You can configure your browser to accept, reject, or delete cookies. Disabling cookies may limit some functionalities and affect your user experience.
- **JavaScript Tracking:**
 - We use JavaScript to monitor how users interact with our website, including browser type, referral source, and session duration. You can disable JavaScript in your browser; however, doing so may reduce the website's functionality.

In compliance with Italian cookie laws and ePrivacy Directive, we request explicit consent before setting non-essential cookies. This is managed through our cookie consent banner.

4. Use of Social Media & Sharing Buttons

Our website may contain “Share” buttons for popular social media platforms (e.g., Twitter, Xing, LinkedIn, Facebook). Clicking these buttons:

- Creates a direct connection between your browser and the social media platform.
- May transmit data such as your IP address, device details, and activity when you engage with these buttons.

Important:

We do not have access to or control over the data collected or processed by these third-party platforms. For detailed information on how they handle data, please consult their respective privacy policies. Engaging with these buttons is at your discretion; we recommend reviewing the privacy policies of these social media services.

5. Purposes and Legal Basis for Processing Data

Your personal data is processed solely for legitimate, transparent purposes, including:

- **Providing Services:** To set up, manage, and maintain your account, verify your identity, and process transactions.
- **Customer Support:** To respond to your inquiries, troubleshoot issues, and provide assistance.
- **Communication:** To inform you about account updates, service changes, or legal notices.
- **Analysis & Improvement:** To monitor website usage patterns, identify areas for enhancement, and improve overall user experience.
- **Marketing & Promotions:** With your explicit consent, we may send you information on relevant offers, promotions, or news from our partners.
- **Legal Compliance:** To comply with applicable laws, regulations, or lawful requests from authorities.

All processing activities are carried out based on lawful grounds, including your consent, contractual necessity, compliance with legal obligations, or legitimate interests pursued by us or a third party.

6. Data Security and International Transfers

To protect your data from unauthorized access, alteration, or disclosure, we implement comprehensive security measures, such as:

- Secure socket layer (SSL) encryption for transmitting sensitive information
- Firewalls and intrusion detection systems
- Access controls and role-based permissions
- Regular security audits and staff training

Your data may be transferred to authorized service providers or group companies located within European union or internationally. When transferring data abroad, we ensure that adequate safeguards are in place, such as binding contractual obligations or compliance with recognized data transfer standards, to protect your rights.

Your rights regarding international data transfers include:

- The right to be informed about such transfers
- The right to withdraw consent at any time

To revoke consent or inquire about international data transfers, please contact us using the details provided below:

Email: service@NovaX8.com

Mail: 128 City Road, London, EC1V 2NX, England

6.1 Profiling and Automated Decisions

We may use automated systems to analyze user behavior, track spending patterns, or suggest rewards. These processes may influence personalized cashback offers or promotional content. No decisions with legal or significant effects are made solely by automated processing without human involvement. You may object to profiling at any time.

7. Your Rights & Managing Your Data

Under the Under the General Data Protection Regulation (EU) 2016/679 and Legislative Decree no. 196/2003 as amended other applicable local laws, you have the following rights:

- **Access:** To request a copy of the personal data we hold about you.
- **Correction:** To request correction of inaccurate or incomplete data.
- **Deletion or Restriction:** To request deletion or restriction of your data, subject to legal obligations.
- **Withdrawal of Consent:** To withdraw your consent for processing activities at any time, which may limit our ability to provide certain services.
- **Objection:** To object to certain processing activities, including direct marketing.

Consent is obtained via clear opt-in mechanisms, such as tick boxes or app-based prompts, which users must actively select. Consent is not pre-checked or assumed. You may withdraw your consent at any time via account settings or by contacting us.

To exercise these rights or to request updates, please contact us in writing:

Address:

128 City Road, London, EC1V 2NX, England

Email: service@NovaX8.com

We will process your requests promptly and keep you informed of the outcome.

8. Withdrawal of Consent and Contact Procedures

You may revoke your consent for the processing of your personal data at any time by submitting a written request. Once we receive your revocation, we will cease processing your data unless required to do so by law or for legitimate reasons.

To withdraw consent or make inquiries:

- Send a written request via email or postal mail to the contact details provided above.
- In your request, specify your name, contact details, and the nature of your request.

Note:

Withdrawing consent may affect our ability to provide certain services or features.

9. Situations When Consent Is Not Required

Your prior consent may not be necessary in the following scenarios:

- When disclosure of data is essential to ensure national security, public safety, or public order.
- When required by law, court order, or government authority.
- When personal data is collected from publicly available sources or has been legally disclosed in the public interest.

In such cases, we process data in compliance with applicable laws and regulations.

10. Language and Interpretations

This Privacy Policy has been drafted in English. In the event of any discrepancies or ambiguities between the English version and translations in other languages, the English version shall govern and prevail.

Final Statement

Your trust and privacy are vital to us. We are committed to protecting your personal information with the highest standards of data security and transparency. Should you have any questions about this policy or wish to exercise your data rights, please contact us at the provided addresses or email.