

***Effective January 1, 2023***

This Privacy Policy ("**Privacy Policy**") explains how NX2U collects, uses, shares or otherwise processes information about you when you sign up for, access, and use NX2U application ("**App**") or when you otherwise interact with us.

By using our App, you agree to the collection, use, and sharing of your information as described in this Privacy Policy. If you do not agree with our policies and practices, do not use the App.

We may change our Privacy Policy from time to time. We will post any Privacy Policy changes on this page and, if the changes are significant, we will provide a more prominent notice (for example, via in-app notification). We encourage you to review our Privacy Policy whenever you access the App to stay informed about our information practices and the choices available to you.

## **INFORMATION WE COLLECT**

We collect information about you when you use the App.

### **Information you provide to us**

When you create an account, you provide us with at least your LinkedIn avatar, first name, and last name.

When you complete your profile, you can share with us additional information, such as details on your industry name, company name, job role, name of a country you are based in, travel frequency, and hashtags.

When you use the App and interact with other people, we also process your chats with other App users which may include, your WhatsApp number and other personal information.

### **Information we collect automatically when you use the App**

When you use the App, this generates technical data about which features you've used, how you've used them, and the devices you use to access the App. See below for more details.

**Usage Information.** Using the App generates data about your activity on the App, for example, how you use it (e.g., when you logged in, features you've been using, actions taken, the information shown to you) and your interactions with other App users (e.g., users you connect and interact with when you exchanged with them, number of messages you send and receive, etc.).

**Device information.** We collect information from and about the device(s) you use to access the App, including hardware and software information such as IP address, device ID and type, App settings, App crashes, and similar.

**Other information based on your consent.** If you give us permission, we may also collect your precise geolocation (latitude and longitude). The collection of your geolocation may occur in the background even when you aren't using the App if the permission you gave us expressly permits this. If you decline permission for us to collect your precise geolocation, we will not collect it (please note, that in this case, the Nx2Me feature will not work).

## **USE OF INFORMATION**

The main reason we use your information is to operate, maintain, and improve the App. We may also process your information for security and other reasons. We will normally collect personal data from you only where (i) we need your information to perform an Agreement with you, (ii) where the processing is in our legitimate interests, and (iii) where we have your consent to do so. Below please find a more detailed explanation.

When you create an account, we process your data to provide you access to the App and administer your account. We also process data of App users to communicate and provide customer support. The legal basis for such data processing is to perform and fulfill our contract (i.e., Terms of Use).

We also may process data when we have a legitimate interest to do so, for example, to improve the App and to prevent, detect and fight fraud and other illegal or unauthorized activities.

From time to time, we may ask for your consent to collect specific information such as your precise geolocation, or use your information for certain specific reasons. In some cases, you may withdraw your consent by adapting your settings (for instance in relation to the collection of our precise geolocation) or by deleting your content (for instance where you entered information in your profile). In any case, you may withdraw your consent at any time by contacting us at the address provided at the end of this Privacy Policy.

Also, we may process data to ensure compliance with applicable laws and regulations.

## **SHARING YOUR INFORMATION**

We do not share your personal data with third parties except as described in this Privacy Policy.

**With our service providers and partners.** We use third parties to help us operate and improve the App. Therefore, we may share your information with third-party service providers and partners who perform services on our behalf, such as hosting and maintenance, customer service, marketing, analytics, etc.

**For corporate transactions.** We may transfer your information if we are involved, whether in whole or in part, in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, or other change of ownership or control.

**In response to legal requests.** We may disclose your information if reasonably necessary to comply with legal requests, such as subpoenas, court orders, government/law enforcement investigations, or other legal requirements.

**Cross-border transfers.** We may store, access, and transfer personal data from around the world. These locations may not guarantee the same level of protection of personal data as the one in which you reside. We assess the circumstances involving all cross-border data transfers and have suitable safeguards in place to require that your personal data will remain protected in accordance with this Privacy Policy. For example, in case your personal data is transferred to countries outside the EEA, we make sure there is an adequacy decision from the European Commission with regards to the recipient country or we use standard contractual clauses approved by the European Commission for such transfer of your personal data.

## **YOUR RIGHTS**

Please note that there are various data protection laws across different jurisdictions that provide privacy rights to you as a data subject. Subject to those applicable data protection laws, among others, you may have the following rights:

**Access:** to know and access personal data NX2U has collected and process about you.

**Rectify:** to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. All the data that you have actively provided us with on the App can also be amended by you yourself at any time in your NX2U account (except sent messages).

**Object:** to object to the processing of your personal data which is done on the basis of NX2U's legitimate interests.

**Delete:** to request NX2U to erase your personal data when (i) it is no longer necessary in relation to the purposes for which it was collected or otherwise processed, (ii) you withdraw consent to consent-based processing and there are no other legal basis to process data, (iii) you object to the processing under certain rules of applicable data protection laws, or (iv) the personal data have been unlawfully processed.

Please note that there are exclusions of the right to erasure. Such exclusions include when processing is necessary for exercising the right of freedom of expression and information, compliance with our legal obligation, or for the establishment, exercise, or defense of legal claims.

**Portability:** to request NX2U to provide you with a copy of your personal data in a structured, commonly used and machine-readable format or to transmit (if technically feasible) your personal data to another controller (only where our processing is based on your consent and carried out by automated means).

**Restrict:** to restrict the processing of your personal data when (i) you want us to investigate whether it is accurate, (ii) processing is unlawful but you oppose erasure, (iii) we no longer need the information, but you want us to continue holding it for you in connection with a legal claim, or (iv) you have objected to us using your personal data (see above), but we need to check whether we have an overriding reason to use it.

**Withdraw consent:** to withdraw your consent where processing is based on the consent you have previously provided. Note that withdrawal will not affect the lawfulness of processing before the withdrawal.

**Lodge a complaint:** to exercise your rights by contacting NX2U directly or, if all else fails, by lodging a complaint with a supervisory authority.

If you'd like to exercise your rights, you may submit a request to us by sending an email to [support@nx2u.app](mailto:support@nx2u.app).

## ACCOUNT DELETION

Additionally, to initiate deletion of your NX2U account please follow these steps:

Open the NX2U App and log in to your account, click the "Menu" icon at the top left of the window, open the profile drop down arrow (next to your avatar image), hit the 3 dots button, then choose the "Delete Profile" menu item.

Confirm the action by pressing the "Yes" button in the confirmation form.

This action will immediately delete your profile and personal information from NX2U systems.

## **INFORMATION RETENTION AND DELETION**

NX2U will keep your personal data only as long as necessary to provide you with the App, or for as long as we have another legitimate ground to do so, but not longer than permitted or required by law. When we no longer have a legal ground to keep your personal data, it will either be securely disposed of, or de-identified through appropriate anonymization means.

## **CHILDREN'S PRIVACY**

The App is restricted to individuals who are 16 years of age or older. If you are under 16, please do not use the App and do not attempt to send any personal data about yourself to us. If we acknowledge that we have collected and processed personal data from a child under the age of 16, we will delete that data as quickly as possible.

## **FOR USERS IN CALIFORNIA**

If you are a California resident, you can exercise your rights as provided in the California Consumer Privacy Act ("**CCPA**") by contacting us at [support@nx2u.app](mailto:support@nx2u.app). As per definitions in the CCPA, please note that NX2U does not sell, share, lease, or rent your personal information.

## **CONTACT US**

If you have questions, requests, concerns, or complaints about this Privacy Policy or our personal data processing practices, please contact us at [support@nx2u.app](mailto:support@nx2u.app).