

# Privacy Policy

**Company:** Nuvanta Technology Limited

**Jurisdiction:** Republic of Seychelles

**Effective Date:** March 2026

**Version:** 1.0

Nuvanta Technology Limited ("we", "us", or "our") is committed to safeguarding the privacy of those who interact with our website at <https://www.nutatech.com/> (the "Site"). This Privacy Policy explains how we collect, use, share, and protect personal information obtained through the Site or in connection with our services. Please read this policy carefully before submitting any personal information to us.

This Privacy Policy was last updated in March 2026.

## 1. Who We Are

Nuvanta Technology Limited is incorporated in the Republic of Seychelles under the International Business Companies Act 1994. We are the data controller responsible for personal information collected through this Site. We provide IT infrastructure consulting, information systems advisory, technology project management, IT security advisory, and digital transformation consulting to corporate clients and organisations globally.

## 2. Information We Collect

### 2.1 Information you provide

When you contact us or enquire about our services through the Site, we may collect:

- your name, job title, and professional designation;
- your business email address, telephone number, company name, and address;
- details of your service enquiry, including your industry and jurisdiction;
- records of correspondence between us; and
- registration details for any events, webinars, or training programmes we may host.

### 2.2 Information collected automatically

When you visit the Site, certain technical information is collected automatically, including:

- your IP address, browser type, and version;
- pages visited, time spent on each page, and navigation paths;
- your device type and operating system.

### **2.3 Information from other sources**

We may also receive information about you from publicly available sources, professional directories, and referral contacts, where this is relevant to our services.

### **3. How We Use Your Information**

We use personal information for the following purposes:

- to respond to your enquiries and assess your service requirements;
- to conduct client acceptance and due diligence procedures;
- to deliver agreed services and manage our ongoing client relationships;
- to maintain, improve, and secure the Site;
- to analyse Site usage in order to enhance performance and content;
- to send industry insights, updates, and information about our services that we consider relevant to you, you may opt out at any time using the unsubscribe link in any such communication; and
- to fulfil record-keeping and reporting obligations under applicable law.

### **4. Legal Basis for Processing**

We process personal information in accordance with the Seychelles Data Protection Act, 2003. The grounds on which we rely are:

- We process personal information in accordance with the Seychelles Data Protection Act, 2003. The grounds on which Performance of a contract: processing is necessary to enter into or carry out a services agreement with you, including taking steps at your request prior to signing;
- Legal obligation: we are required by law or regulation to process certain personal information, for example to meet statutory record-keeping requirements;
- Legitimate interests: we process personal information where doing so is reasonably necessary for our business operations, such as improving the Site, upholding professional standards, or developing our services, provided our interests do not override your rights; and
- Consent: where you have agreed to a specific use of your personal information. You are free to withdraw that consent at any time by writing to us at [finance@nutatech.com](mailto:finance@nutatech.com). Withdrawal will not affect anything we have done in reliance on your consent before that point.

Examples of activities conducted on the basis of legitimate interests include:

- improving the functionality and user experience of the Site;
- preventing unauthorised access, fraud, and other harmful activity;
- communicating information about our services to prospective clients; and

- meeting our professional and corporate responsibility obligations.

## **5. Sharing Your Information**

We do not sell, rent, or trade your personal information. We may share it in the following limited circumstances:

- with service providers who process data on our behalf, subject to confidentiality obligations and, where required, data processing agreements;
- with professional advisors, including legal counsel and auditors, under appropriate confidentiality undertakings;
- with regulatory authorities, law enforcement agencies, or government bodies where disclosure is required or permitted by applicable law; and
- with a successor entity in the event of a corporate restructuring, merger, or acquisition, subject to equivalent privacy protections.

## **6. Cookies**

We do not use cookies or similar tracking technologies on this Site. Certain technical information is collected automatically when you visit the Site as described in Section 2.2 above, but this does not involve the placement of cookies on your device.

## **7. International Data Transfers**

We operate internationally and your personal information may be transferred to, processed in, or stored in jurisdictions outside your country of residence. Where such transfers occur, we take reasonable steps to ensure that your personal information receives appropriate protection, which may include reliance on standard contractual clauses or other legally recognised transfer mechanisms.

## **8. How Long We Keep Your Information**

We retain personal information for as long as necessary to fulfil the purposes set out in this Privacy Policy, or as required by applicable law. Our general approach is:

- client engagement records:
  - [to be confirmed with business — e.g. 5 years from end of engagement, aligned with Seychelles record-keeping requirements]
- Site analytics data: up to 24 months;
- marketing preferences: until you withdraw consent or opt out; and
- general correspondence:
  - [to be confirmed with business — e.g. 2–3 years from date of last contact]

Retention periods may be extended where required by legal proceedings, regulatory investigations, or other applicable requirements.

## **9. Your Rights**

Subject to applicable law, you may have the right to:

- access the personal information we hold about you;
- request correction of inaccurate or incomplete information;
- request deletion of your personal information, subject to applicable legal retention obligations;
- object to processing where we are not entitled to continue using your information; and
- withdraw consent at any time where processing is based on consent.

To exercise any of these rights, please contact us at [finance@nutatech.com](mailto:finance@nutatech.com). We will acknowledge your request within 14 days and aim to respond fully within 40 days of receipt. We may require verification of your identity before processing your request.

## **10. Security**

We maintain reasonable technical and organisational safeguards to protect personal information against unauthorised access, loss, misuse, alteration, or destruction. Access to personal information is limited to those with a genuine need to know, and all such individuals are required to maintain its confidentiality. While we endeavour to protect your information, no transmission over the internet or electronic storage system can be guaranteed to be completely secure.

The Seychelles Data Protection Act, 2003 does not impose a mandatory breach notification requirement. However, where a personal data breach occurs that poses a material risk of harm to any individual, we will notify affected individuals and, where appropriate, relevant authorities as a matter of good practice.

## **11. Links to Other Sites**

This Site may contain links to external websites not operated by us. We have no control over the content or privacy practices of those sites and accept no responsibility for them. We encourage you to review the privacy policy of any external site before providing personal information.

## **12. Children**

Our Site and services are directed exclusively at business professionals and organisations. We do not knowingly collect personal information from individuals under the age of 18. If we become aware that we have inadvertently collected such information, we will take prompt steps to delete it.

## **13. Regulatory Disclaimer**

Nuvanta Technology Limited is a professional technology advisory firm. We are not a licensed financial institution, investment adviser, securities firm, or legal practice. Nothing on this Site constitutes regulated financial, investment, or legal advice.

#### **14. Changes to This Policy**

We may update this Privacy Policy from time to time to reflect changes in our practices, services, or applicable law. When we do so, we will revise the "last updated" date at the top of this page. Where changes materially affect the way we process your information, we will take appropriate steps to notify you.

#### **15. Contact**

If you have any questions or concerns about this Privacy Policy or our handling of your personal information, please contact us:

**Website:** <https://www.nutatech.com/>