



# PRIVACY POLICY

## EUROPEAN UNION – GDPR COMPLIANT

Effective Date: 1 January 2025 | Regulation (EU) 2016/679 (GDPR)

This Privacy Policy ("Policy") sets out how NHT Global ("we", "us" or "our") collects, uses, discloses, and otherwise processes personal data of users of its website and mobile application (collectively, the "Site") in accordance with Regulation (EU) 2016/679 ("GDPR") and applicable EU Member State data protection legislation.

For the purposes of this Policy, "NHT Global" includes nht-office.nhtglobal.com, [country].nhtglobal.com, nhtglobal.com.hk and the NHT Global mobile application.

By using our Site, you acknowledge that you have read and understood this Policy.

Where we are required by law to obtain your consent, we will do so separately from this Policy.

### 1. Data Controller

NHT Global is the data controller responsible for your personal data. Our contact details are:

<b>Company</b>	NHT Global Europe srl
<b>Address</b>	Via dei Tigli 6/D 20090 Opera (MI)
<b>Email</b>	support.eu@nhtglobal.com
<b>DPO Email</b>	michelle.glidewell@nhtglobal.com
<b>Website</b>	www.nhtglobal.com

Where required by applicable law, NHT Global has appointed a Data Protection Officer ("DPO"). You may contact the DPO directly at michelle.glidewell@nhtglobal.com.

## 2. Personal Data We Collect

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We collect personal data that you provide to us voluntarily and personal data collected automatically when you use our Site. The categories of personal data we process are:

### A. Data you provide to us directly:

- Identity data: first name, last name, username or similar identifier.
- Contact data: postal address, email address, telephone number.
- Financial data: payment card type and number (tokenised), billing address.
- Transaction data: details about purchases you make through our Site.
- Account data: login credentials (password stored in hashed form only).
- Communications data: your preferences in receiving communications from us and your communication preferences.

### B. Data collected automatically:

- Technical data: IP address, browser type and version, device identifiers, operating system, time zone setting, browser plug-in types.
- Usage data: information about how you use our Site (pages visited, links clicked, time spent).
- Cookie and tracking data: please see Section 8 (Cookies) below.

We do not collect or process special categories of personal data (as defined in Article 9 GDPR) unless you expressly provide such data and we have a valid legal basis to process it.

We do not knowingly collect personal data from children under the age of 16. Where Member State law sets a lower age of digital consent, we apply that lower age. If you are the parent or guardian of a child under the applicable age and believe we have collected their data, please contact us immediately.

## 3. Legal Bases for Processing

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We process your personal data only where we have a valid legal basis under Article 6 GDPR. The legal bases we rely on are:

<b>Contract (Art. 6(1)(b))</b>	Processing necessary to perform the contract with you or to take pre-contractual steps at your request (e.g. processing orders, managing your account).
<b>Legal Obligation (Art. 6(1)(c))</b>	Processing necessary for compliance with a legal obligation (e.g. accounting, tax records, responding to law enforcement requests).

<b>Legitimate Interests (Art. 6(1)(f))</b>	Processing necessary for our legitimate interests, where those interests are not overridden by your rights (e.g. fraud prevention, IT security, network administration, improving our products).
<b>Consent (Art. 6(1)(a))</b>	Processing based on your freely given, specific, informed, and unambiguous consent (e.g. marketing emails, non-essential cookies). You may withdraw consent at any time without affecting the lawfulness of prior processing.

## 4. How We Use Your Personal Data

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We use your personal data for the following purposes:

- To register you as a customer or distributor and manage your account.
- To process and fulfil orders, including processing payment and arranging delivery.
- To manage our contractual relationship with you, including notifying you of changes to our terms or policies.
- To provide customer support and respond to your enquiries.
- To send you marketing communications where you have opted in or where we rely on a legitimate interest and the law permits (you may opt out at any time).
- To administer and protect our business and Site, including troubleshooting, data analysis, testing, system maintenance, and security.
- To comply with legal and regulatory obligations.
- To prevent fraud and ensure the security of our services.
- To deliver relevant advertising content (only where permitted by applicable law and with your consent where required).

## 5. Sharing and Disclosure of Personal Data

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We do not sell your personal data. We may share your personal data with the following categories of recipients, in each case only to the extent necessary and subject to appropriate contractual safeguards:

### **Service Providers:**

We share your personal data with carefully selected third-party service providers who perform services on our behalf, including payment processors, delivery providers, IT hosting and maintenance providers, and marketing platform providers. These processors are contractually bound to process your data only on our instructions and in accordance with the GDPR (Article 28 Data Processing Agreement).

### **NHT Global Affiliates and Partners:**

We may share data within our corporate group and with commercial partners for the purpose of promoting products and services, where we have a valid legal basis to do so. We will

inform you at the time of collection if your data will be shared for promotional purposes with third parties.

#### **NHT Global Distributors or Preferred Customers:**

Certain reports shared within the NHT Global network may contain limited data (name, country/region, city, rank, positioning). This sharing is necessary for the operation of our direct-selling model and is governed by our Policies and Procedures.

#### **Legal Disclosure:**

We may disclose your personal data to law enforcement authorities, courts, regulators, or other public bodies where required or permitted by applicable EU or Member State law. We will notify you of such disclosures where we are legally permitted to do so.

#### **International Transfers:**

Where personal data is transferred to countries outside the European Economic Area (EEA) that do not benefit from an adequacy decision under Article 45 GDPR, we ensure appropriate safeguards are in place pursuant to Article 46 GDPR, such as Standard Contractual Clauses (SCCs) adopted by the European Commission. A copy of the relevant safeguards may be obtained by contacting [support.eu@nhtglobal.com](mailto:support.eu@nhtglobal.com).

## **6. Data Retention**

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We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process the data, whether we can achieve those purposes through other means, and applicable legal requirements.

In general:

- Account data: retained for the duration of your account plus 5 years.
- Transaction data: retained for 10 years for legal and tax compliance purposes.
- Marketing preferences: retained until you opt out or withdraw consent.

When your personal data is no longer required, we will securely delete, destroy, or anonymize it.

## **7. Your Rights Under the GDPR**

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As a data subject in the EU, you have the following rights under the GDPR:

<b>Right of Access (Art. 15)</b>	Right to obtain confirmation of whether we process your personal data and to receive a copy of that data.
<b>Right to Rectification (Art. 16)</b>	Right to have inaccurate personal data corrected, or incomplete data completed.
<b>Right to Erasure (Art. 17)</b>	Right to request deletion of your personal data where the processing is no longer necessary, where you withdraw consent, or where processing is unlawful.
<b>Right to Restrict Processing (Art. 18)</b>	Right to request that we restrict the processing of your personal data in certain circumstances.
<b>Right to Data Portability (Art. 20)</b>	Right to receive your personal data in a structured, commonly used, machine-readable format and to transmit it to another controller.
<b>Right to Object (Art. 21)</b>	Right to object to processing based on legitimate interests or for direct marketing purposes. Where you object to direct marketing, we will cease processing immediately.
<b>Rights re: Automated Decisions (Art. 22)</b>	Right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects.
<b>Right to Withdraw Consent</b>	Where processing is based on your consent, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing carried out before withdrawal.

To exercise any of the above rights, or to make any data-related enquiry, please contact us at:

- Email: support.eu@nhtglobal.com
- Postal address: NHT Global Europe srl, Via dei Tigli 6/D, 20090 Opera (MI), Attn: Data Privacy

We will respond to your request within 30 (thirty) calendar days of receipt. Where requests are complex or numerous, we may extend this period by a further 2 (two) months, informing you of the extension within the initial 30-day period.

You also have the right to lodge a complaint with your national supervisory authority (e.g. your Member State's Data Protection Authority). A list of EU supervisory authorities is available at: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

## 8. Cookies and Tracking Technologies

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We use cookies and similar tracking technologies (pixel tags, web beacons, browser fingerprinting) on our Site. In accordance with Directive 2002/58/EC (ePrivacy Directive) as implemented in national law, and with GDPR requirements:

- Strictly necessary cookies are placed without consent as they are essential for the Site to function.
- All other cookies (functional, analytical, marketing) are placed only with your prior, freely given, specific, informed, and unambiguous consent.

- You may withdraw or change your cookie consent at any time through our Cookie Preference Centre, accessible in the footer of our Site.
- Declining non-essential cookies will not prevent you from using core Site functionality.

For full details of the cookies we use, their purposes, duration, and the third parties who may set them, please refer to our Cookie Policy available on our Site (Footer part).

## 9. Email Communications

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We will only send you marketing emails where you have provided your consent or where we rely on a legitimate interest in accordance with applicable law. Each marketing email will contain an unsubscribe link allowing you to opt out at any time. To opt out or update your communication preferences, contact [support.eu@nhtglobal.com](mailto:support.eu@nhtglobal.com).

Please be aware that email is not a fully secure channel of communication. We recommend that you do not send sensitive personal data by email.

## 10. Third-Party Links

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Our Site may contain hyperlinks to third-party websites. This Policy applies only to personal data collected by NHT Global through our Site. We are not responsible for the privacy practices of third-party sites. We encourage you to read the privacy policy of any external site you visit.

## 11. Security of Personal Data

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We implement appropriate technical and organizational measures pursuant to Article 32 GDPR to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. These measures include encryption in transit and at rest, access controls, regular security assessments, and staff training.

However, no transmission over the Internet or electronic storage system is completely secure. In the event of a personal data breach that is likely to result in a high risk to your rights and freedoms, we will notify you without undue delay in accordance with Article 34 GDPR.

## 12. Account Information and Data Accuracy

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You may update your personal data at any time by logging into your NHT Office account and navigating to "Account". Alternatively, contact [support.eu@nhtglobal.com](mailto:support.eu@nhtglobal.com). Please keep your personal data up to date, as inaccurate data may affect our ability to provide services to you.

## 13. Public Postings

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Any personal data you voluntarily disclose in public areas of our Site (forums, comment sections) may be collected and used by third parties. NHT Global is not responsible for such third-party collection. We strongly recommend that you do not disclose personal data (including your name and email address) in any public areas of our Site.

## 14. Changes to This Privacy Policy

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We may update this Policy from time to time. Where changes are material, we will notify you by email (to the address registered on your account) and/or by displaying a prominent notice on our Site prior to the change becoming effective. We will update the effective date at the top of this Policy. Your continued use of our Site after the effective date constitutes acceptance of the updated Policy.

## 15. Contact and Complaints

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If you have any questions about this Policy, wish to exercise your rights, or have a complaint about how we handle your personal data, please contact us:

- Email: [support.eu@nhtglobal.com](mailto:support.eu@nhtglobal.com)
- Postal address: NHT Global Europe srl, Via dei Tigli 6/D, 20090 Opera (MI),  
Attn: Data Privacy

If you are not satisfied with our response, you have the right to lodge a complaint with the supervisory authority in your EU Member State of habitual residence, place of work, or place of the alleged infringement.