



## PRIVACY POLICY

Effective date: November 14, 2022

Next Security LLC (hereinafter, “we,” “us,” and/or “our,”) is committed to safeguarding your privacy. This Privacy Policy (this “Policy”) describes how we may collect, use, share, and keep information about you and what choices you have. This Policy applies to our websites, services, or online offerings (collectively, the “Site”), and will be available by link on all sites and offerings which it covers. You should review the applicable privacy policy available. **By using or accessing the Site in any manner, you acknowledge that you accept the practices and policies outlined in this Policy, and you hereby consent that we will collect, use, and share your information in accordance with this Policy.**

Your continued use of our Site is at all times subject to the Terms and Conditions, which incorporate this Policy. Any terms not defined in this Policy shall have the same definitions given to them in the Terms and Conditions.

We reevaluate this Policy on an ongoing basis and reserve the right to change this Policy at any time in our sole discretion. All changes to the terms of this Policy shall be effective as of the date on which they are posted on the Site. It is your responsibility to check this page periodically for any such changes or updates. Your continued use of or access to the Site or our services following the posting of any changes, modifications, or updates constitutes your express acceptance thereof.

### 1. PRIVACY POLICY COVERAGE

This Policy covers our treatment of personally identifiable information ("Personal Information") that we gather when you are accessing or using our Site. We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information internally in connection with our Site, including to enhance and personalize your experience with us, to contact you, to fulfill your orders, and to analyze how you use the Site. We may also share some Personal Information with third parties, but only as described below.

Our Site and offerings are directed to individuals 18 years of age or older. They are not intended for children under 13 years of age. We do not knowingly solicit data online from, or market online to, children under the age of 13. In addition, children under the age of 13 are not permitted to submit any personal information to the Site. If we learn that we have collected personal information from a child under the age of 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us at [info@nextsecuritycorp.com](mailto:info@nextsecuritycorp.com).

### 2. INFORMATION COLLECTED AND USE OF INFORMATION

We may gather date, time, information about a user’s browser and system or device configuration and capabilities, navigation history, and IP address for all visitors to the Site to monitor and track Site use and traffic patterns in order to provide a more personalized experience on the Site. We may use this information for its internal security audit log, for trend analysis and system administration, and to gather broad information about its audiences. However, we do not routinely link IP addresses to anything that identifies you as an individual.





We may also use cookies and other commonly used data collection technologies on the Site and in its online marketing and e-mails to collect information on both an aggregate and individual basis.

In addition to the above, we may use the following technologies to automatically collect information about your activities on our Site: cookies, flash cookies, web beacons, clear pixels, or pixel tags, web server logs, and geo-location technologies.

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the Site to:

1. Administer sweepstakes, promotions, and contests;
2. Assist law enforcement and respond to subpoena;
3. Compile anonymous statistical data and analysis for use internally or with third parties;
4. Create and manage your account;
5. Place a product or service order;
6. Email you regarding your purchase or account;
7. Generate a personal profile about you to make future visits to the Site more personalized;
8. Increase the efficiency and operation of the Site;
9. Monitor and analyze usage and trends to improve your experience with the Site;
10. Notify you of updates to the Site;
11. Offer new products, services, mobile applications, and/or recommendations to you;
12. Perform other business activities as needed;
13. Prevent fraudulent transactions, monitor against theft, and protect against criminal activity;
14. Process payments and refunds;
15. Request feedback and contact you about your use of the Site;
16. Resolve disputes and troubleshoot problems;
17. Respond to product and customer service requests;
18. Send you an email or newsletter;
19. Solicit support for the Site;

“Personal Information” shall refer to information which you provide to us which personally identifies you, and includes, but is not limited to, your name, email address, mailing and/or physical address, mobile device number, telephone number, date of birth, and other information or data that identifies you, which is collected and maintained by us, and may otherwise be collected by us through your use and access of the Site or if you otherwise directly provide such information to us. “Personal Information” may also include information you provide in connection with a payment or banking service offered to you in association with the Site services, whereby you may provide and maintain your credit card or bank account information with us in connection with your purchase order or account. Such information may also include, depending on whether it can be reasonably linked to your other Personal Information or used to identify you, your IP address, MAC address, device-specific information (including hardware information about any device you are using to access or use the Site, such as your UDID or hardware model information), device type, unique device identifiers, advertising identifiers, serial numbers, mobile network information, file names and versions, preferred languages, operating system information (including your operating system version), browser type, location information, user preferences, dates and times of use of the Site, browsing activity and browsing history, and features you have used. Personal Information may also include certain combinations of such information that meets





the applicable statutory or other legal definition of “Personal Information” for purposes of breach notification (such information, “Statutory PII”).

Information You Provide to Us: We receive and store any information you knowingly provide to us. We may use any information you provide to us for our business purposes. Also, we may receive a confirmation when you open an email from us. This confirmation helps us make our communications with you more interesting and improve our services. If you provide us your phone number, you may also receive messages that we send you via SMS as part of the normal business operation of your use of the Site. If you do not want to receive communications from us, please indicate your preference by emailing [info@nextsecuritycorp.com](mailto:info@nextsecuritycorp.com).

Information Collected Automatically: Whenever you interact with our Site, we automatically receive and record information on our server logs from your browser or device, which may include your IP address, geolocation data, device identification, “cookie” information, web beacons, the type of browser and/or device you’re using to access our Site, and the page or feature you requested. “Cookies” are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Site are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device’s acceptance of cookies, but this may prevent you from taking advantage of some of our features. A “web beacon” is an object that is embedded in a page or email and is usually invisible to the user but allows checking whether a user has viewed the page or email.

We may use this data to customize content for you that we think you might like, based on your usage patterns. We may also use it to improve the Site as such data can provide us with how often users use a particular feature of the Site, and we can use that knowledge to make the Site interesting to as many users as possible.

If you click on a link to a third-party website or service, a third party may also transmit cookies to you. This Policy does not cover the use of cookies by any third parties, and we shall not be responsible for third parties’ privacy policies and practices. We do not access or control these third-party cookies or web beacons; however, we may have access to data generated from their use, such as when we view analytics reports provided by such third-party tools and services. Please note that cookies placed by third parties may continue to track your activities online even after you have left our Site, and those third parties may not honor the “Do Not Track” requests you have set using your browser or device.

E-mail Announcements and Newsletters: We use e-mail to send announcements regarding services, and/or promotions, discounts, and informational and marketing content and newsletters. Announcements via email are on an opt-in basis only. By providing us with your contact information, you are opting in to receiving these e-mail announcements. You can choose to unsubscribe from our e-mails at any time by sending an email to [info@nextsecuritycorp.com](mailto:info@nextsecuritycorp.com) or by following the detailed unsubscribe instructions at the bottom of each e-mail. We may also send replies to users’ e-mail via e-mail. Finally, if you have sent a request to us about which we need to communicate with you, we may do so by e-mail.

Information Collected from Third-Party Websites and Do Not Track Policy: Through cookies we place on your browser or device, we may collect information about your online activity after you leave our Site. Just like any other usage information we collect, this information allows us to improve the Site and customize your online experience, and otherwise as described in this Policy. Your browser may

offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications





and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Site does not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using the Site and after you leave our Site.

**Calls and Text Messages:** Next Security LLC and its partners and affiliates may contact you at any telephone number(s) you provide in connection with your use of the Site. By providing your contact information, you consent to receive communications (including communications containing an artificial voice or prerecorded message or made using an automatic telephone dialing system) from us, our affiliates and partners, including your wireless number, even if that number is registered on a corporate, state, or national do-not-call registry.

## 1. PERSONAL INFORMATION RECEIVED

We do not rent or sell your Personal Information in personally identifiable form to anyone, provided certain Personal Information may be transferred in connection with business transfers, as described below. We may share your Personal Information with third parties as described in this section:

**Information that's been de-identified:** We may de-identify your Personal Information so that you are not identified as an individual and provide that information to our partners. We may also provide aggregate usage information to our partners (or allow partners to collect that information from you), who may use such information to understand how often and in what ways people use our Site, so that they, too, can provide you with an optimal online experience. However, we never disclose aggregate usage or de-identified information to a partner (or allow a partner to collect such information) in a manner that would identify you as an individual person.

**Affiliated Businesses:** In certain situations, businesses or third-party websites that we are affiliated with may sell or provide products or services to you through or in connection with the Site (either alone or jointly with us). You can recognize when an affiliated business is associated with such a transaction or service, and we will share your Personal Information with that affiliated business only to the extent that it is related to such transaction or service. We have no control over the policies and practices of third-party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, please review all such business' or websites' policies.

**Agents:** We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you; for example, we may use a payment processing company, such as Apple Pay, Google Pay, Paypal, Meta Pay, Shop Pay, Amazon Pay, and Venmo to receive and process your credit or debit card transactions for us. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us. Note that an "agent" may also be considered a "partner" in certain circumstances and would be subject to the terms of the **"Information that's been de-identified"** section in that regard.

**Business Transfers:** We may choose to buy or sell assets and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information





could be one of the assets transferred to or acquired by a third party.

Protection of Us and Others: We may use or disclose personally identifying information if we have a good- faith belief that the disclosure is reasonably necessary (a) to satisfy applicable law, regulation, legal process, or enforceable governmental request, (b) to enforce agreements we have with you, (c) to address fraud or security issues, or (d) to protect against harm to the rights, property, or safety of the users, or our contractors and employees.

## 1. SECURITY

We use reasonable administrative, technical, and physical security measures to protect your information. Because of the constitution of the Internet, however, no security measures or transmissions over the internet can be 100% guaranteed to protect your information, and the rules of data protection and the security measures mentioned above may not be observed by other persons or institutions beyond our control. Especially unencrypted data - even if sent via e-mail - can be read by third parties. We have no technical influence to avoid this.

Your account is protected by a password for your privacy and security. You have the responsibility to protect the information you provide, especially username and passwords, from misuse, whether by encryption or other means. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account. We will never ask you for credit card information or personal information by email.

## 2. CONSENT TO PROCESSING AND TRANSFER OF INFORMATION

The Site is governed by and operated in, and in accordance with the laws of, the United States, and is intended for the enjoyment of residents of the United States. We make no representation that the Site is governed by or operated in accordance with the laws of any other nation. Given that we are an international business, our use of your information necessarily involves the transmission of data on an international basis. If you are located in the European Union, Canada or elsewhere outside of the United States of America, please be aware that information we collect may be transferred to and processed in the United States. By using the Site, or providing us with any information, you (a) acknowledge that the Site is subject to the laws of the United States, (b) consent to the collection, processing, maintenance and transfer of such information in and to the United States and other applicable territories in which the privacy laws may not be as comprehensive as or equivalent to those in the country where you reside and/or are a citizen, and (c) waive any claims that may arise under those laws.

## 1. CALIFORNIA RESIDENTS







This section provides details about rights afforded to California residents under the California Consumer Privacy Act (or "CCPA"), and supplemental details about the Personal Information we collect about California residents.

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Information to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at [info@nextsecuritycorp.com](mailto:info@nextsecuritycorp.com). California residents are entitled to ask us for a notice identifying the categories of Personal Information which we share with our affiliates and/or third parties for marketing purposes and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to: [info@nextsecuritycorp.com](mailto:info@nextsecuritycorp.com).

Subject to certain limitations, the CCPA provides California residents the right to request to access to details about the categories or specific pieces of Personal Information we have collected in the last 12 months (including about information we disclosed for a business purpose), to request to delete their

Personal Information, to opt out of any sales that may be occurring, and to not be discriminated against for exercising these rights.

California residents may make request access or deletion requests by submitting their requests at [info@nextsecuritycorp.com](mailto:info@nextsecuritycorp.com). We will verify your request by asking you to provide information that matches information we have on file about you. You can also designate an authorized agent to exercise these rights on their behalf, but we will require proof that the person is authorized to act on your behalf and may also still ask you to verify your identity with us directly.

## 1. EU GENERAL DATA PROTECTION REGULATION

GDPR Jurisdictions means the countries composed of the European Economic Area, Switzerland, and Japan which, having received an "adequacy decision" from the European Commission, adheres to the material terms of the GDPR.

If we are using personal information you provided to us in order to enable us to send you materials, such as newsletters or product/services alerts via text or email, and you decide you don't want to receive such materials, you may opt out by following the opt-out instructions in the email or other communication, or by contacting us using the contact information below. When we receive your request, we will take reasonable steps to remove your name from our distribution lists. You need to understand it may take a period of time to remove your name from our lists after your request and due to such latency, you may still receive materials for a period of time after you opt out. In addition to opting out, you have the ability to access, amend, and delete your personal information as mentioned above.

If we transfer personal information from the GDPR Jurisdictions to a location that has not been deemed by the European Commission to have adequate privacy protections, we do so in the manner the GDPR permits.

While we attempt to allow all users of our Platform to exercise a degree of control over their personal information, under the GDPR we have a legal obligation to do so for you. More specifically, with respect to personal information collected from you while you were in a GDPR Jurisdiction, you have these rights: transparency, access, correction and deletion, portability, who, what, why and where, and





restriction/objection. If you would like to exercise any of these rights, please contact us at [info@nextsecuritycorp.com](mailto:info@nextsecuritycorp.com). We will respond to all requests without undue delay, and in accordance with the time frames, if any, prescribed by the GDPR. If you are not satisfied with how we use your personal information or respond to your requests, you have the right to complain to your data protection regulator. Contact information for the EU data protection regulators can be found [here](#).

**Your Rights.** In accordance with the regulations, you have the following rights regarding your data:

- Right of access to your data, including the right to request a copy, and to the information provided in this Policy (Art. 15 GDPR). Where the legal basis for the processing of data is the legitimate interest of the data controller, you have the possibility to request information on the justification of this legitimate interest.
- Right to rectification (art. 16 GDPR) and updating of your data.  
Right to erasure of your data (Art. 17 GDPR) when the data is no longer necessary, you have withdrawn your consent to its processing (if it was based on our consent) or you object to the processing based on our legitimate interest or to the processing carried out for canvassing purposes or for profiling related to canvassing.
- Right to withdraw your consent at any time (Art. 13 (2)(c) GDPR) for all data processing based on the legal basis of your consent.
- Right to limitation of data processing, which, unless there are compelling reasons, can only be implemented with your consent (Art. 18 GDPR):
  - When you dispute the accuracy of the data, for the time necessary to verify.
  - If the data processing is unlawful but you object to the deletion of the data and choose instead the limitation of the processing.
  - When we no longer has any reason to keep the data but they are still necessary for you to establish, exercise, or defend your legal rights.
  - When you have objected to the processing based on our legitimate interest, for the time necessary to balance the interests involved.
- Right to the portability of data directly provided by the data subject when they are subject to automated processing based on your consent or a contract (Art. 20 GDPR) i.e., the possibility to request the communication of such data in a structured, commonly used, and machine-readable format so that they can be communicated to another data controller.
- Right to object (Art. 21 GDPR) to the processing of your data when such processing is legally based on legitimate interest.
- Right to define the fate of your data after your death and possibly choose a trusted third-party to whom we should entrust them.

In addition, with respect to commercial prospecting, you have the option of unsubscribing from our mailing lists at any time by clicking on the unsubscribe link in our communications or contacting us to stop receiving solicitations. Any data subject may request details from us regarding these safeguards applicable to data transfers outside of the European Union relating to them.

Any request to exercise these rights must be made by email to [info@nextsecuritycorp.com](mailto:info@nextsecuritycorp.com) or by registered letter with acknowledgement of receipt to the head office.





## 1. RETENTION PERIOD

Personal Information shall be processed and stored for as long as required by the purpose they have been collected for. We may be allowed to retain Personal Information for a longer period whenever you have given consent to such processing and for as long as such consent is not withdrawn. Furthermore, we may be obliged to retain Personal Information for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority. Once the retention period expires, Personal Information shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification, and the right to data portability cannot be enforced after expiration of the retention period.

## 2. CONTACT

For questions or concerns regarding this Policy, practices of the Site, or any other transaction issue, please send an e-mail to [info@nextsecuritycorp.com](mailto:info@nextsecuritycorp.com). If you feel that we are not following this stated Privacy Policy, please contact us through the above e-mail link.

