

The NKD-Group, Inc. Privacy Policy

Effective date: August 7, 2026

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This Privacy Policy explains how The NKD Group, Inc. and its affiliated products and services collect, use, disclose, store, and otherwise process personal information in connection with websites, software, cloud services, customer support, research, events, and related business operations. It is designed for a modern software and AI-enabled environment and addresses data practices involving analytics, cloud collaboration, automated systems, service providers, and international data transfers.

This Policy applies to information collected through NKD Group websites and services, including product environments, support channels, sales and marketing interactions, events, and other business communications. It does not apply to third-party websites, platforms, or services that NKD Group does not control, even when those services are integrated with or linked from NKD Group offerings.

Information Collected

NKD Group may collect the following categories of personal information, depending on how a person interacts with the services:

- Contact and account information, such as name, business affiliation, email address, postal address, telephone number, username, and account credentials.
- Billing and transaction information, such as billing address, subscription details, invoice records, and limited payment-related information received from payment processors. NKD Group does not state that it stores full payment card numbers directly when third-party payment providers act as merchant of record.
- Customer content and uploaded materials, including files, documents, project content, comments, metadata, and collaboration inputs submitted through the services.

- Device, log, and usage information, such as IP address, browser type, operating system, session activity, diagnostic data, crash data, feature usage, and approximate location inferred from IP address.
- Communications and support data, such as emails, chat content, call records, support tickets, survey responses, and training or quality-assurance recordings where permitted by law.
- Professional and commercial information, such as information shared during conferences, trade shows, partnerships, procurement discussions, or job applications.
- Information about collaborators or team members that a customer chooses to upload or include in documents or workflows.
- NKD Group may also generate or infer information from the data above, such as service preferences, security signals, fraud indicators, support insights, and aggregated usage patterns derived from interactions with the services.

Sources of Information

NKD Group may collect information directly from users, automatically from devices and service interactions, from business partners, from payment processors and cloud providers, from event participation, and from third parties that support authentication, analytics, security, hosting, communication, or sales operations.

Purposes of Processing

- NKD Group may process personal information for the following purposes:
- To provide, maintain, secure, and improve the services.
- To create and administer accounts, authenticate users, process transactions, and deliver customer support.
- To communicate about service updates, administrative matters, security issues, newsletters, marketing, and product opportunities, subject to applicable consent and opt-out requirements.
- To conduct analytics, troubleshoot performance, detect bugs, monitor service health, and develop new features.

- To protect against fraud, abuse, unauthorized access, legal claims, and other harmful or unlawful activity.
- To comply with legal obligations, enforce agreements, respond to lawful requests, and exercise or defend legal rights.
- To manage recruiting, corporate transactions, strategic partnerships, and business operations.

AI and Automated Processing

NKD Group may use machine learning, generative AI, rules-based systems, and other automated tools to support product features, search, document processing, classification, summarization, quality monitoring, analytics, fraud prevention, and service improvement. These tools may process customer content, prompts, inputs, outputs, metadata, and related usage information for the purposes described in this Policy, including model operation, feature delivery, system monitoring, abuse prevention, and troubleshooting.

Where AI-enabled features are offered, NKD Group will describe in the relevant product documentation or supplemental notice whether customer content is used only to provide the requested service, also used to improve internal models or systems, or processed by third-party AI service providers on its behalf. If NKD Group offers settings that allow customers to limit model training, retention, or human review, those settings will control to the extent described in the product documentation.

NKD Group does not rely solely on automated processing to make decisions that produce legal or similarly significant effects about an individual unless permitted by applicable law and accompanied by required safeguards. Where required, affected individuals may request human review or contest a decision through the contact methods listed below.

Legal Bases

Where applicable data protection law requires a legal basis, NKD Group relies on one or more of the following: performance of a contract, legitimate interests, consent, compliance with legal obligations, and protection of vital interests. Examples in the prior policy include service delivery, product improvement, surveys and marketing where consent applies, and website customization based on behavior and preferences.

Disclosure of Information

NKD Group may disclose personal information to the following categories of recipients:

- Service providers and subprocessors that support hosting, cloud infrastructure, payments, analytics, communications, customer service, technical operations, security, and IT administration.
- Integration partners and third-party platforms that a customer chooses to connect to the services, subject to that third party's own terms and privacy practices.
- Professional advisors, auditors, insurers, and corporate affiliates under appropriate confidentiality and legal controls.
- Government authorities, regulators, courts, or other parties when required by law, legal process, or the protection of rights, safety, and property.
- Counterparties and participants in a merger, acquisition, financing, reorganization, bankruptcy, due diligence process, or asset sale involving all or part of the business.

NKD Group does not sell personal information for money. If applicable law defines certain targeted advertising, analytics, or data-sharing activities as a "sale" or "sharing," NKD Group will describe those activities in a jurisdiction-specific notice and provide any required opt-out rights.

Data Retention

NKD Group retains personal information only for as long as reasonably necessary for the purposes described in this Policy, including service delivery, account maintenance, security, legal compliance, dispute resolution, contract enforcement, and legitimate business recordkeeping. The prior policy states that retention periods depend on relevance, legal or regulatory requirements, limitation periods, contractual obligations, consent, and legitimate interests.

Retention may vary by data type and context. For example, account records may be retained while an account remains active and for a reasonable post-termination period; support logs may be retained to maintain service quality and security; and certain transaction, tax, audit, and legal records may be retained longer where required by law or operational necessity.

For AI-related processing, NKD Group will define specific retention periods or criteria for prompts, uploaded content, generated outputs, logs, and model-improvement datasets in product-specific notices where relevant.

International Transfers

NKD Group operates from the United States and may process information in the United States and other countries where it or its service providers operate. The prior policy states that data provided by EU users may be transferred to the United States.

Because transfer mechanisms have changed since the earlier policy referenced the now-obsolete Privacy Shield framework, NKD Group will rely on current lawful transfer mechanisms where required, such as adequacy decisions, standard contractual clauses, the EU-U.S. Data Privacy Framework where applicable, or other recognized safeguards, together with supplementary measures when appropriate.

Security

NKD Group uses administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, loss, misuse, alteration, and disclosure. The prior policy describes encryption in transit for sensitive submissions, access controls, secure environments, and internal restrictions on employee access based on job need.

No system can be guaranteed to be completely secure. Individuals will use strong passwords, safeguard credentials, and notify NKD Group promptly if they suspect unauthorized access to an account or personal information.

Individual Rights

- Depending on the user's location and applicable law, individuals may have rights to:
- Know what personal information NKD Group collects, uses, discloses, or retains.
- Access, correct, delete, or obtain a portable copy of certain personal information.
- Object to or restrict certain processing, including processing based on legitimate interests in some jurisdictions.

- Withdraw consent where processing depends on consent.
- Opt out of direct marketing and, where applicable, targeted advertising, profiling, sale, or sharing.
- Request human review of certain automated decisions where required by law.
- Appeal a denied privacy request where applicable law provides that right.

To exercise these rights, individuals may use the contact information in this Policy. NKD Group may need to verify identity before fulfilling a request and may deny or limit a request where permitted by law.

U.S. State Privacy Notice

Residents of certain U.S. states may have additional rights under applicable privacy laws, including rights to know, access, correction, deletion, portability, and opt-out of certain data uses. Because the prior policy references only the Delaware Consumer Privacy Act and predates many current state privacy laws, NKD Group will maintain a jurisdiction-specific notice or operational process covering applicable state laws, including any required categories of personal information, purposes, recipient disclosures, retention practices, and appeals procedures.

Cookies and Analytics

NKD Group may use cookies, SDKs, pixels, local storage, and similar technologies for authentication, security, preferences, analytics, performance, and service functionality. The prior policy identifies Google Analytics and other analytics providers and provides a Google Analytics opt-out link.

Where required by law, NKD Group will obtain consent before using non-essential cookies or similar technologies. It will provide a cookie banner or settings tool that allows users to manage their preferences. Browser settings and opt-out tools may also affect data collection.

Marketing Communications

Individuals may opt out of marketing emails by using the unsubscribe link in the message or by contacting NKD Group. The prior policy provides an

email-based unsubscribe process and distinguishes non-marketing notices such as security, account, and service communications.

NKD Group may continue to send transactional or service-related communications even where a person opts out of marketing.

Children

The prior policy states that the services are not directed to children under 13 and that NKD Group does not knowingly collect personal information from children under 13.

A modern policy will also state that where required by law, NKD Group does not knowingly process personal information from children under other applicable age thresholds without appropriate consent or authorization.

Third-Party Services

The services may link to or integrate with third-party websites, storage providers, identity providers, analytics vendors, payment providers, collaboration tools, and cloud environments. The prior policy notes that public or third-party interactive environments may be governed by those third parties' privacy policies rather than NKD Group's policy.

NKD Group is not responsible for the privacy or security practices of independent third parties except as required by law. Users will review the privacy notices of any third-party services they choose to use.

Policy Changes

NKD Group may update this Privacy Policy from time to time to reflect operational, legal, or technical changes. The prior policy reserves the right to change the policy and contemplates notice where uses materially differ from prior disclosures.

When required by law, NKD Group will provide notice of material changes and obtain consent where necessary.

Contact Information

Questions, requests, and privacy complaints may be directed to the contact channels listed in the current corporate notice, including the company's general privacy contact information and GDPR contact details identified in the prior policy.

To operationalize this revised policy, NKD Group will confirm and publish current contact details for:

- General privacy inquiries.
- Data subject rights requests.
- Security incident reporting.
- The responsible privacy or data protection contact.

Implementation Notes

This revised policy modernizes the uploaded document by:

- Replacing outdated references, including the prior reliance on the Privacy Shield framework, with current transfer-mechanism language.
- Adding explicit AI and automated processing language that is absent from the earlier policy.
- Expanding rights and disclosures to better align with current U.S. state privacy and global privacy expectations.
- Preserving core elements from the uploaded policy, including categories of collected information, service-provider disclosures, retention principles, user rights, security safeguards, and contact-based request mechanisms.

How to Contact Us

If you have any questions about our privacy practices or this Privacy Policy, please get in touch with us at:

Email: info@nkd-group.com

Mailing Address:

The NKD Group, Inc.
777 Smith Street
Providence, RI 02908

The data controller responsible for your personal information for GDPR compliance is:

Nina Kajiji
nina@nkd-group.com
777 Smith Street
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