

PRIVACY POLICY

MikeNetworks S.à r.l.-S. trading as NovaNode

Effective Date: January 1, 2026

Last Modified: January 1, 2026

1. INTRODUCTION

1.1 About This Privacy Policy

This Privacy Policy explains how MikeNetworks S.à r.l.-S., trading as NovaNode ("NovaNode", "we", "us", or "our"), collects, uses, stores, and protects your personal data when you use our services or visit our websites.

1.2 Company Information

- Company Name: MikeNetworks S.à r.l.-S. trading as NovaNode
- Registered Office: 2 Rue Jean Engling, L-1466 Luxembourg, Grand Duchy of Luxembourg
- RCS Number: B294237
- VAT Number: LU36424557
- Autorisation d'établissement Number: 10177299 / 0

1.3 Contact Information

For any questions regarding this Privacy Policy or to exercise your data protection rights:

- Email: privacy@novanode.eu
- Support Portal: my.novanode.eu
- Postal Address: 2 Rue Jean Engling, L-1466 Luxembourg

1.4 Legal Framework

This Privacy Policy complies with:

- General Data Protection Regulation (GDPR) (EU) 2016/679
- Luxembourg Data Protection Law (Loi du 1er août 2018 relative à la protection des personnes physiques à l'égard du traitement des données à caractère personnel)
- ePrivacy Directive 2002/58/EC as implemented in Luxembourg law

2. DEFINITIONS

2.1 Key Terms

Personal Data: Any information relating to an identified or identifiable natural person (data subject).

Processing: Any operation performed on personal data, including collection, recording, organization, storage, adaptation, retrieval, consultation, use, disclosure, erasure, or destruction.

Data Controller: The entity that determines the purposes and means of processing personal data. NovaNode acts as Data Controller for customer account information and billing data.

Data Processor: The entity that processes personal data on behalf of the Data Controller. NovaNode acts as Data Processor for customer content stored on our services (websites, emails, databases, files).

Data Subject: The natural person whose personal data is being processed.

EU/EEA: European Union and European Economic Area member states.

3. DATA CONTROLLER AND PROCESSOR ROLES

3.1 NovaNode as Data Controller

NovaNode acts as Data Controller for:

- Customer account registration information
- Billing and payment data
- Support ticket communications
- Website analytics and cookies on novanode.eu and my.novanode.eu
- Marketing communications (where consent provided)

3.2 NovaNode as Data Processor

NovaNode acts as Data Processor for:

- Content you store on web hosting services (website files, databases)
- Emails stored on email hosting services
- Files stored on VPS and cloud services
- Any personal data you process using NovaNode services

When NovaNode acts as Data Processor, you (the Customer) are the Data Controller and are responsible for:

- Ensuring GDPR compliance for data you process
- Obtaining necessary consents from your users/visitors
- Implementing appropriate security measures
- Providing privacy policies for your websites/applications
- Responding to data subject requests regarding your data

3.3 Data Processing Agreement (DPA)

A Data Processing Agreement is available upon request for customers who process personal data using NovaNode services. The DPA specifies:

- The subject matter, duration, nature, and purpose of processing
- The types of personal data and categories of data subjects
- Our obligations and your rights as Data Controller
- Technical and organizational security measures
- Sub-processor arrangements
- Data breach notification procedures
- Assistance with data subject requests

To request a DPA, contact privacy@novanode.eu or submit a support ticket through my.novanode.eu.

4. PERSONAL DATA WE COLLECT

4.1 Account Registration Data

When you create a NovaNode account, we collect:

- Full name (first and last name)
- Email address
- Physical address (street, city, postal code, country)
- Phone number (optional)
- Company name and VAT number (for business customers)
- Account password (stored encrypted)

Legal Basis: Contract performance (GDPR Article 6(1)(b)) and legal obligation for tax/accounting purposes (GDPR Article 6(1)(c)).

4.2 Billing and Payment Data

For payment processing, we collect:

- Billing address
- VAT number and tax identification (where applicable)
- Payment method information (credit card details, bank account information)
- Transaction history and proforma invoices
- Payment receipts and final invoices

Payment Processing: Credit card and payment information is processed by our payment service providers (Stripe, PayPal, or other approved processors). NovaNode does not store complete credit card numbers on our servers. We only retain:

- Last 4 digits of credit card
- Card expiration date
- Card brand (Visa, Mastercard, etc.)
- Payment transaction references

Legal Basis: Contract performance (GDPR Article 6(1)(b)), legal obligation for tax and accounting compliance (GDPR Article 6(1)(c)), and legitimate interests in fraud prevention (GDPR Article 6(1)(f)).

4.3 Domain Registration Data

For domain name registration, we collect and transfer to domain registries:

- Domain registrant name
- Domain registrant organization (if applicable)
- Domain registrant email address
- Domain registrant phone number
- Domain registrant physical address
- Administrative and technical contact information

WHOIS Publication: Domain registration data may be publicly available in WHOIS databases according to registry policies and ICANN requirements. Privacy protection services may be available for eligible domain extensions.

Legal Basis: Contract performance (GDPR Article 6(1)(b)) and legal obligation under ICANN policies and registry requirements (GDPR Article 6(1)(c)).

4.4 Technical and Service Data

When you use NovaNode services, we automatically collect:

- IP addresses (for account access, service usage, security monitoring)
- Browser type and version
- Operating system
- Access timestamps and session durations

- Service usage statistics (bandwidth, storage, CPU usage)
- Server logs (access logs, error logs, security logs)
- Email metadata (sender, recipient, timestamps - not email content)

Legal Basis: Contract performance (GDPR Article 6(1)(b)), legitimate interests in service optimization and security (GDPR Article 6(1)(f)), and legal obligation for security and fraud prevention (GDPR Article 6(1)(c)).

4.5 Support Communications

When you contact NovaNode support, we collect:

- Support ticket content and attachments
- Email correspondence
- Chat transcripts
- Any technical information you provide for troubleshooting

Legal Basis: Contract performance (GDPR Article 6(1)(b)) and legitimate interests in providing customer support (GDPR Article 6(1)(f)).

4.6 Marketing Communications (Optional)

With your explicit consent, we may collect:

- Email preferences for newsletters and promotional communications
- Communication preferences and interests
- Response and engagement data (email opens, link clicks)

Legal Basis: Consent (GDPR Article 6(1)(a)). You may withdraw consent at any time by clicking unsubscribe links in emails or contacting privacy@novanode.eu.

4.7 Cookies and Website Analytics

We use cookies and similar technologies on novanode.eu and my.novanode.eu. See Section 10 for detailed information about cookies.

5. HOW WE USE PERSONAL DATA

5.1 Service Provision and Account Management

We use your personal data to:

- Create and manage your NovaNode account
- Activate and provision requested services (web hosting, VPS, email, domains)
- Process payments and issue proforma invoices and receipts
- Authenticate your identity and prevent unauthorized access
- Provide customer support and respond to inquiries
- Communicate service-related information (activation, renewal, maintenance, security alerts)

Legal Basis: Contract performance (GDPR Article 6(1)(b)).

5.2 Billing and Accounting

We use your personal data to:

- Generate proforma invoices and final invoices
- Process payments and refunds
- Maintain accounting records
- Comply with Luxembourg tax and VAT regulations
- Verify VAT numbers and apply appropriate tax rates
- Handle payment disputes and chargebacks

Legal Basis: Contract performance (GDPR Article 6(1)(b)) and legal obligation for tax/accounting compliance (GDPR Article 6(1)(c)).

Retention: Financial records are retained for 10 years as required by Luxembourg accounting law.

5.3 Service Optimization and Monitoring

We use technical data to:

- Monitor service performance and uptime
- Identify and resolve technical issues
- Optimize server resources and network capacity
- Analyze service usage patterns
- Plan infrastructure improvements
- Enforce fair use policies

Legal Basis: Contract performance (GDPR Article 6(1)(b)) and legitimate interests in service quality (GDPR Article 6(1)(f)).

5.4 Security and Fraud Prevention

We use personal data to:

- Detect and prevent unauthorized access
- Monitor for suspicious activities, abuse, and terms violations
- Investigate security incidents and data breaches
- Prevent fraud, spam, malware, and illegal activities
- Respond to legal requests from law enforcement
- Protect NovaNode infrastructure and other customers

Legal Basis: Legal obligation (GDPR Article 6(1)(c)), legitimate interests in security (GDPR Article 6(1)(f)), and vital interests (GDPR Article 6(1)(d)) for critical security threats.

5.5 Legal Compliance

We use personal data to:

- Comply with Luxembourg and EU legal obligations
- Respond to court orders and lawful government requests
- Enforce our Terms of Service
- Establish, exercise, or defend legal claims
- Comply with ICANN and domain registry requirements

Legal Basis: Legal obligation (GDPR Article 6(1)(c)) and legitimate interests in legal compliance (GDPR Article 6(1)(f)).

5.6 Marketing Communications (With Consent)

With your explicit consent, we may use your email address to:

- Send newsletters about NovaNode services
- Inform you about new features and service offerings
- Provide promotional offers and discounts
- Share relevant industry news and updates

Legal Basis: Consent (GDPR Article 6(1)(a)).

Withdrawal: You may withdraw consent at any time by:

- Clicking unsubscribe links in emails
- Updating preferences in customer portal (my.novanode.eu)
- Contacting privacy@novanode.eu

Service-related communications (proforma invoices, security alerts, service status) are **not** marketing and cannot be unsubscribed as they are necessary for contract performance.

6. DATA SHARING AND DISCLOSURE

6.1 Third-Party Service Providers (Sub-Processors)

NovaNode shares personal data with trusted third-party service providers who assist us in operating our business:

Category	Purpose	Example Providers
Payment Processors	Process credit card and bank payments	Stripe, PayPal, Mollie
Domain Registries	Register and manage domain names	DNS Belgium, SIDN, DNS.LU, Afnic, ICANN registrars
Email Services	Send transactional and marketing emails	EU-based email service providers
Accounting Software	Process invoices and financial records	EU-based accounting platforms
Support Tools	Manage customer support tickets	EU-based helpdesk software
Security Services	DDoS protection and security monitoring	EU-based security providers

Table 1: Third-party service providers and sub-processors

Sub-Processor Requirements:

- All sub-processors are contractually bound to GDPR compliance
- Data Processing Agreements are in place with each sub-processor
- Sub-processors primarily located in EU/EEA
- Where non-EU processors are used, appropriate safeguards are implemented (Standard Contractual Clauses, adequacy decisions)

Sub-Processor List: A complete list of sub-processors is available upon request by contacting privacy@novanode.eu.

6.2 Domain Registries and WHOIS

Domain registration data is shared with:

- Domain registries (DNS Belgium, SIDN, [DNS.LU](https://www.dnslu.be/), Afnic, ICANN-accredited registrars)
- WHOIS databases (publicly accessible according to registry policies)

WHOIS Privacy: Some domain extensions offer privacy protection services to mask personal information in WHOIS databases. Contact support to inquire about availability for your domain.

6.3 Legal Obligations and Law Enforcement

NovaNode may disclose personal data when required by law or to:

- Comply with valid legal process (court orders, subpoenas, warrants)
- Respond to lawful requests from Luxembourg or EU law enforcement
- Protect NovaNode's legal rights and property
- Prevent fraud, security threats, or illegal activities
- Protect vital interests of individuals

Transparency: NovaNode will notify affected customers of legal requests unless:

- Legally prohibited from doing so (gag order)
- Notification would compromise an ongoing investigation
- Emergency circumstances exist

6.4 Business Transfers

In the event of merger, acquisition, sale of assets, or bankruptcy, personal data may be transferred to the acquiring entity. Customers will be notified of such transfers and any changes to data processing practices.

6.5 No Selling of Personal Data

NovaNode **does not** sell, rent, or trade your personal data to third parties for marketing purposes.

6.6 Data Transfers Outside EU/EEA

NovaNode primarily stores and processes data within the EU/EEA. If data is transferred outside the EU/EEA, we ensure appropriate safeguards:

- European Commission adequacy decisions (Article 45 GDPR)
- Standard Contractual Clauses approved by European Commission (Article 46 GDPR)
- Binding Corporate Rules (where applicable)
- Explicit consent for specific transfers (Article 49 GDPR)

Current Data Locations: Customer data is stored on servers located in EU member states. Specific data center locations are available upon request for security reasons.

7. DATA RETENTION

7.1 Active Services

Personal data is retained for the duration of your active service relationship with NovaNode.

7.2 Service Data After Termination

Data Type	Retention Period
Customer content (websites, emails, files)	7 days after service deactivation (retrieval period), then permanently deleted
Backup data	7-30 days (automatic rotation), then permanently deleted
Account information	30 days after service termination, then deleted (unless legal obligation applies)
Financial records (invoices, payments)	10 years (Luxembourg accounting law requirement)
Support tickets	3 years after ticket closure
Server logs	90 days (security monitoring), then deleted
Marketing consent records	Until consent withdrawn, then deleted within 30 days

Table 2: Data retention periods after service termination

7.3 Legal Retention Requirements

NovaNode retains certain data longer when required by law:

- Financial records: 10 years (Luxembourg accounting law - Loi du 19 décembre 2002 concernant le registre de commerce et des sociétés)
- Tax records: 10 years (Luxembourg tax law)
- Contract documentation: 10 years (Luxembourg civil code prescription periods)
- Security incident logs: May be retained longer if related to ongoing investigations

7.4 Data Deletion Process

When retention periods expire, NovaNode:

- Permanently deletes data from active servers
- Overwrites storage media to prevent data recovery
- Removes data from backup systems (within backup retention cycles)
- Anonymizes data that must be retained for statistical purposes

7.5 Early Deletion Requests

You may request early deletion of your personal data by exercising your right to erasure (Section 9.5). NovaNode will comply unless legal obligations require retention.

8. DATA SECURITY

8.1 Technical Security Measures

NovaNode implements industry-standard technical measures to protect personal data:

- Encryption in transit (TLS/SSL for all customer portal and website connections)
- Encryption at rest (encrypted storage for sensitive data including passwords)
- Firewall protection and network segmentation
- Intrusion detection and prevention systems
- DDoS protection and mitigation
- Regular security patches and software updates
- Secure data center facilities with physical access controls
- Redundant power and cooling systems
- Backup and disaster recovery systems

8.2 Organizational Security Measures

NovaNode implements organizational measures including:

- Access controls and role-based permissions (least privilege principle)
- Employee confidentiality agreements
- Security awareness training for staff
- Incident response procedures
- Regular security audits and vulnerability assessments
- Documented security policies and procedures
- Vendor security assessments for sub-processors

8.3 Customer Security Responsibilities

Customers are responsible for:

- Maintaining strong, unique passwords for their accounts
- Securing their login credentials and not sharing account access
- Enabling two-factor authentication (if available)
- Securing content uploaded to NovaNode services

- Implementing appropriate security for their websites/applications
- Maintaining their own backups of critical data
- Promptly reporting suspected security incidents

Account Security: NovaNode is not liable for unauthorized access resulting from compromised customer credentials, weak passwords, or customer security negligence.

8.4 Data Breach Notification

In the event of a personal data breach that risks the rights and freedoms of data subjects, NovaNode will:

- Notify the Luxembourg Commission nationale pour la protection des données (CNPD) within 72 hours of becoming aware (GDPR Article 33)
- Notify affected customers without undue delay if the breach is likely to result in high risk (GDPR Article 34)
- Document all data breaches including facts, effects, and remedial actions
- Assist customers (as Data Processor) in fulfilling their data breach notification obligations

Breach Notification Channels:

- Email notification to registered account email address
- Customer portal announcements (my.novanode.eu)
- Status page updates (if widespread incident)

8.5 No Absolute Security Guarantee

While NovaNode implements robust security measures, no system is completely secure. NovaNode cannot guarantee absolute security against all threats. Customers acknowledge and accept this limitation as outlined in our Terms of Service.

9. YOUR DATA PROTECTION RIGHTS

Under GDPR, you have the following rights regarding your personal data:

9.1 Right of Access (Article 15)

You have the right to obtain:

- Confirmation of whether we process your personal data
- A copy of your personal data
- Information about processing purposes, categories, recipients, and retention periods

How to Exercise: Submit a support ticket through my.novanode.eu or email privacy@novanode.eu. We will respond within 30 days.

9.2 Right to Rectification (Article 16)

You have the right to correct inaccurate or incomplete personal data.

How to Exercise: Update your information directly in the customer portal (my.novanode.eu) or contact support. We will correct inaccuracies within 30 days.

9.3 Right to Erasure / Right to be Forgotten (Article 17)

You have the right to request deletion of your personal data when:

- Data is no longer necessary for the purposes for which it was collected
- You withdraw consent (for consent-based processing)
- You object to processing and there are no overriding legitimate grounds
- Data has been unlawfully processed
- Legal obligation requires erasure

Limitations: We may retain data when required by:

- Legal obligations (e.g., 10-year financial record retention)
- Establishment, exercise, or defense of legal claims
- Archiving purposes in the public interest

How to Exercise: Close your account through customer portal or contact privacy@novanode.eu. Data will be deleted according to retention schedules (Section 7).

9.4 Right to Restriction of Processing (Article 18)

You have the right to restrict processing when:

- You contest the accuracy of personal data (restriction during verification)
- Processing is unlawful but you oppose erasure
- We no longer need the data but you need it for legal claims
- You have objected to processing pending verification of legitimate grounds

How to Exercise: Contact privacy@novanode.eu with your restriction request and reason.

9.5 Right to Data Portability (Article 20)

You have the right to receive your personal data in a structured, commonly used, machine-readable format and transmit it to another controller when:

- Processing is based on consent or contract
- Processing is carried out by automated means

Available Formats:

- Account data: JSON or CSV format

- Service data: Backup archives, FTP export, database dumps

How to Exercise: Contact privacy@novanode.eu or use customer portal export functions.

9.6 Right to Object (Article 21)

You have the right to object to processing based on:

- Legitimate interests (GDPR Article 6(1)(f)) - We will cease processing unless we demonstrate compelling legitimate grounds that override your interests
- Direct marketing - We will immediately cease processing for marketing purposes

How to Exercise:

- Marketing: Click unsubscribe in emails or update preferences in customer portal
- Other processing: Contact privacy@novanode.eu with objection details

9.7 Right Not to be Subject to Automated Decision-Making (Article 22)

NovaNode does not use fully automated decision-making or profiling that produces legal effects or similarly significant effects without human intervention.

Limited Automated Processing: We use automated systems for:

- Fraud detection and security monitoring (with human review for actions)
- Service resource allocation and fair use monitoring (with human review for enforcement)
- Spam filtering (with customer override capabilities)

These processes are necessary for contract performance and security, with human oversight for significant decisions.

9.8 Right to Withdraw Consent (Article 7(3))

For processing based on consent, you have the right to withdraw consent at any time without affecting the lawfulness of processing before withdrawal.

How to Exercise:

- Marketing emails: Click unsubscribe link
- Customer portal: Update communication preferences at my.novanode.eu
- Email: Contact privacy@novanode.eu

9.9 Right to Lodge a Complaint

You have the right to lodge a complaint with the Luxembourg data protection supervisory authority:

Commission nationale pour la protection des données (CNPD)

- Address: 15, Boulevard du Jazz, L-4370 Belvaux, Luxembourg
- Phone: (+352) 26 10 60 1
- Email: info@cnpd.lu
- Website: <https://cnpd.public.lu>

You may also contact the data protection authority in your country of residence if different from Luxembourg.

9.10 Response Time

NovaNode will respond to data subject requests within **one month** of receipt. In complex cases, we may extend this by two additional months and will inform you of the extension and reasons.

9.11 Identity Verification

To protect your privacy, we may require identity verification before fulfilling data subject requests. We may request:

- Verification of account ownership (email confirmation, security questions)
- Government-issued identification (for sensitive requests)
- Additional authentication (two-factor authentication if enabled)

9.12 No Fee (Generally)

Data subject requests are generally processed free of charge. We may charge a reasonable administrative fee or refuse the request if requests are manifestly unfounded, excessive, or repetitive.

10. COOKIES AND TRACKING TECHNOLOGIES

10.1 What Are Cookies?

Cookies are small text files stored on your device when you visit websites. They enable websites to remember your preferences, authenticate your identity, and analyze website usage.

10.2 Cookies We Use

NovaNode uses cookies on novanode.eu and my.novanode.eu:

Cookie Type	Purpose	Duration	Legal Basis
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Essential	Account authentication, session management, security	Session / 30 days	Legitimate interest (necessary for service)
Functional	Remember preferences (language, display settings)	1 year	Consent
Analytics	Website usage statistics, performance monitoring	2 years	Consent

Table 3: Cookie categories used by NovaNode

10.3 Essential Cookies (Always Active)

These cookies are necessary for website functionality and cannot be disabled:

- Session cookies for customer portal authentication (my.novanode.eu)
- Security cookies for CSRF protection and secure connections
- Load balancing cookies for server distribution

Legal Basis: Legitimate interest (GDPR Article 6(1)(f)) - essential cookies are necessary to provide requested services and maintain security.

10.4 Functional Cookies (Require Consent)

These cookies enhance user experience:

- Language preference cookies
- Display and interface preferences
- "Remember me" login functionality

Legal Basis: Consent (GDPR Article 6(1)(a) and ePrivacy Directive Article 5(3)).

10.5 Analytics Cookies (Require Consent)

We may use analytics cookies to understand how visitors use our website:

- Page views and navigation patterns
- Traffic sources and referrers
- Device and browser information
- Aggregated usage statistics

Analytics Tools: NovaNode uses privacy-respecting analytics tools that:

- Anonymize IP addresses
- Do not track users across websites
- Store data in EU/EEA
- Comply with GDPR requirements

Legal Basis: Consent (GDPR Article 6(1)(a)).

10.6 Third-Party Cookies

NovaNode does not use third-party advertising cookies or social media tracking pixels on our website.

External Links: Our website may link to third-party websites that use their own cookies. NovaNode is not responsible for third-party cookie practices.

10.7 Cookie Consent and Management

First Visit: When you first visit novanode.eu, you will see a cookie banner explaining our use of cookies and requesting consent for non-essential cookies.

Managing Cookies:

- Cookie banner: Accept all, reject non-essential, or customize preferences
- Browser settings: Configure browser to block or delete cookies
- Customer portal: Manage preferences at my.novanode.eu/privacy

Browser Controls:

- Google Chrome: Settings → Privacy and security → Cookies
- Mozilla Firefox: Settings → Privacy & Security → Cookies and Site Data
- Safari: Preferences → Privacy → Manage Website Data
- Microsoft Edge: Settings → Cookies and site permissions

Note: Blocking essential cookies may affect website functionality and prevent access to customer portal.

10.8 Do Not Track (DNT)

NovaNode respects browser Do Not Track signals. When DNT is enabled, we will not set non-essential cookies or analytics trackers.

11. CHILDREN'S PRIVACY

11.1 Age Restrictions

NovaNode services are not intended for children under 16 years of age (or the applicable age of digital consent in your country under GDPR Article 8).

11.2 No Knowing Collection

We do not knowingly collect personal data from children under 16. Our Terms of Service require users to be of legal age to enter contracts under Luxembourg law.

11.3 Parental Discovery

If we become aware that we have collected personal data from a child under 16 without parental consent, we will take steps to delete that information promptly.

Report Underage Accounts: If you believe a child under 16 has provided personal data to NovaNode, contact privacy@novanode.eu immediately.

12. INTERNATIONAL DATA TRANSFERS

12.1 Primary Data Storage

Customer data is primarily stored and processed within the European Union / European Economic Area on servers located in EU member states.

12.2 Transfers Outside EU/EEA

Limited transfers outside the EU/EEA may occur for:

- Payment processing (if using non-EU payment processors with adequate safeguards)
- Sub-processors providing specific services with Standard Contractual Clauses
- Customer-initiated transfers (e.g., customer accessing services from non-EU locations)

12.3 Safeguards for International Transfers

When data is transferred outside EU/EEA, NovaNode ensures appropriate safeguards:

- European Commission adequacy decisions (GDPR Article 45) for countries deemed to provide adequate protection
- Standard Contractual Clauses (SCCs) approved by European Commission (GDPR Article 46(2)(c))
- Binding Corporate Rules (where applicable for multinational sub-processors)
- Specific derogations for occasional transfers (GDPR Article 49)

12.4 Data Transfer Impact Assessments

NovaNode conducts Transfer Impact Assessments (TIAs) for transfers to third countries, evaluating:

- Legal frameworks in destination countries
- Access by government authorities
- Enforceability of data subject rights
- Additional safeguards required beyond SCCs

12.5 Requesting Transfer Information

For information about specific data transfers affecting your personal data, contact privacy@novanode.eu.

13. CHANGES TO THIS PRIVACY POLICY

13.1 Right to Modify

NovaNode reserves the right to modify this Privacy Policy at any time to reflect:

- Changes in our data processing practices
- New features or services
- Legal or regulatory requirements
- Industry best practices and standards

13.2 Notification of Changes

We will notify customers of material changes by:

- Email notification to registered account email address (minimum 30 days advance notice)
- Prominent notice on novanode.eu website
- Customer portal announcements (my.novanode.eu)
- Updated "Last Modified" date at the top of this policy

13.3 Effective Date

Changes become effective 30 days after notification unless a longer period is required by law.

13.4 Continued Use

Continued use of NovaNode services after the effective date constitutes acceptance of the updated Privacy Policy.

13.5 Objection to Changes

If you do not agree with changes to the Privacy Policy, you may:

- Object to the changes by contacting privacy@novanode.eu
- Terminate your services before the effective date
- Exercise your right to erasure (subject to legal retention requirements)

13.6 Version History

Previous versions of this Privacy Policy are available upon request for reference purposes.

14. ADDITIONAL INFORMATION

14.1 Data Protection Officer (DPO)

Due to NovaNode's size and data processing activities, we are not required to appoint a formal Data Protection Officer under GDPR Article 37. However, data protection matters are handled by our privacy team.

Privacy Contact: privacy@novanode.eu

14.2 Data Protection by Design and Default

NovaNode implements data protection principles throughout our services:

- Privacy-preserving architectures
- Data minimization (collecting only necessary data)
- Purpose limitation (using data only for stated purposes)
- Storage limitation (deleting data when no longer needed)
- Integrity and confidentiality (robust security measures)
- Transparency and accountability (clear policies and documentation)

14.3 Records of Processing Activities

NovaNode maintains records of processing activities as required by GDPR Article 30, documenting:

- Purposes of processing
- Categories of data subjects and personal data
- Categories of recipients
- International data transfers
- Retention periods
- Security measures

These records are available to the Luxembourg CNPD upon request.

14.4 Data Protection Impact Assessments (DPIA)

NovaNode conducts Data Protection Impact Assessments for processing activities that are likely to result in high risk to data subjects, as required by GDPR Article 35.

14.5 Links to Third-Party Websites

NovaNode websites may contain links to third-party websites. This Privacy Policy applies only to NovaNode services. We are not responsible for the privacy practices of third-party websites. We encourage you to review the privacy policies of any third-party sites you visit.

14.6 Business Customers Processing Employee Data

Business customers who provide employee or contractor information to NovaNode (for account access, billing contacts, technical contacts) should:

- Inform employees that their data will be shared with NovaNode
- Ensure lawful basis for sharing employee data
- Provide employees with this Privacy Policy
- Obtain necessary consents or rely on legitimate interests

14.7 Emergency Access to Customer Data

NovaNode acts as Data Processor for customer content and generally does not access customer data. However, we may access customer data in emergency situations:

- Security incidents requiring immediate remediation
- Suspected illegal activities or Terms of Service violations
- Technical support requests requiring data access (with customer authorization)
- Legal obligations requiring disclosure to authorities

Access is limited to authorized personnel, logged, and conducted according to strict internal procedures.

15. CONTACT INFORMATION

15.1 Privacy Inquiries

For questions about this Privacy Policy or our data processing practices:

- Email: privacy@novanode.eu
- Support Portal: my.novanode.eu (submit ticket)
- Postal Address: MikeNetworks S.à r.l.-S., 2 Rue Jean Engling, L-1466 Luxembourg

15.2 Data Subject Requests

To exercise your data protection rights (access, rectification, erasure, etc.):

- Email: privacy@novanode.eu with subject line "Data Subject Request"
- Customer Portal: my.novanode.eu (submit ticket selecting "Privacy Request" category)
- Written Request: Mail to registered office address

Required Information: Include your full name, account email address, and specific request details. We may require identity verification before processing requests.

15.3 Data Breach Reports

To report a suspected data breach or security incident:

- Email: privacy@novanode.eu (monitored 24/7)
- Emergency Support: Submit urgent support ticket at my.novanode.eu

15.4 Business Information

- Company: MikeNetworks S.à r.l.-S. trading as NovaNode
- Address: 2 Rue Jean Engling, L-1466 Luxembourg
- RCS: B294237
- VAT: LU36424557
- General Contact: info@novanode.eu
- Website: <https://novanode.eu>

15.5 Supervisory Authority

For complaints regarding our data processing practices:

Commission nationale pour la protection des données (CNPD)

- Address: 15, Boulevard du Jazz, L-4370 Belvaux, Luxembourg
- Phone: (+352) 26 10 60 1
- Email: info@cnpd.lu
- Website: <https://cnpd.public.lu>

MikeNetworks S.à r.l.-S. trading as NovaNode

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Related Documents:

- Terms of Service: <https://novanode.eu/legal/tos.pdf>
- Data Processing Agreement (DPA): Available upon request
- Cookie Policy: Incorporated in Section 10 of this Privacy Policy

Accessibility: This Privacy Policy is available at <https://novanode.eu/legal/privacy.pdf> and can be provided in alternative formats upon request.
