

# NordLayer

## Privacy Policy

*Last updated: 14/09/2021*

### **1. Why should I read this privacy policy?**

This privacy policy (“Policy“) explains the privacy rules applicable to information related to identifiable individuals collected by or submitted to Nord Security Inc. when you access or use the NordLayer services (“Service“) and visit our website. This is important to you, thus, please read this Policy carefully. This Policy may be amended from time to time. Please visit the website <https://nordlayer.com> for an up-to-date version of this Policy.

### **2. What Information do You Collect and For What Purposes?**

We collect and use the information for the following purposes:

- a) To provide our Service. We process information related to the use of our Service, such as basic organization information, e-mail, account registration and login information, subscription information, basic device information, application diagnostics, connection timestamps, IP addresses, other information as may be requested by you.
- b) Managing transactions and payments. If you have provided payment information to us, we process your personal information to verify that information and to collect payments to the extent that doing so is necessary to complete a transaction and perform our contract with you.
- c) For contract management. If we enter into contract with you or the entity you represent, we process your data (such as full name, position, business address, represented entity’s information, signature) for the agreement conclusion, administration, and termination purposes.
- d) Website support and security. Like many websites on the internet our website collects access logs (e.g. your IP address, operating system, browser information). This information is essential for fighting DDoS attacks, scanning

and similar hacking attempts. We also use this information to help us to better design our site, to help diagnose problems with our server and to administer our website.

- e) Analysing and improving our website and user experience. For this purpose, we use analytics service providers (e. g. Google Analytics, Hotjar). Aggregate information that they help us collect does not directly identify you, but provide us with various statistics, like which pages visitors visit the most and for how long they stay there. We may also see the following: your device's IP address, device type, browser information, geographic location (country only), preferred language, title of the page being viewed, screen size and resolution, outlinks, referrers, page and website speed. For collection of such information our service providers mostly use cookies.
- f) Offering our Service. We may contact you via email for this purpose, but we also encourage you to contact us via our online contact form to get the best VPN offer for your business. For us to be able to address your requests effectively, we may ask you to provide some information about you and your company. We will also use the provided information to contact you regarding any future offers that may be of interest to you.
- g) Communicating with users and customer support. We use user email address to: i) send important updates and announcements related to the use of our Service; ii) respond to user requests or inquiries. In addition to user email, we may process your basic inquiry and device information and other information that is provided by the user during the conversation.
- h) Providing the option to contact us via the chat-bot. If you contact us via the chat-bot on our website, we will process your contact information and information provided in your message. Our chat-bot provider may also be able to see your IP address and geo-location information. It also collects various cookie data that enables us to track the activities of our website visitors within our website. We use this information to understand how visitors interact with our website.
- i) To interact with you via social media. Where you interact with us via social media, we may process information available on your social media profile, also your inquiry or post information and other information you provide us with.
- j) Advertising. We may receive certain data about you, such as cookie id, mobile device id, your name, position or email address, and inferences about your interests and preferences from certain advertisers and advertising partners for advertising purposes. Our advertising partners help us deliver more relevant ads and promotional messages to you, which may include interest-based

advertising (also known as online behavioural advertising) and account-based advertising.

- k) Accounting, legal requirements and legal processes. We are subject to accounting, tax and other statutory requirements. We also may have to protect our legitimate interests and legal rights. In these cases, we are required to collect and store a limited amount of certain information, such as your full name, contact information, subscription information, transaction and payment information, legal documents.

Please note that depending on circumstances which are impossible to define in advance, categories of information we collect may vary.

### **3. Why are You Allowed to Collect the Information?**

We collect the information only for the purposes described in this Policy above and where at least one of the following is present:

- a) the information is required for the performance of a contract (for example, to provide Services and customer support). This is applicable to the information described under parts a), b), c) and g) in section 2;
- b) we are required to use your information by law (for example, legal requirements). This is applicable to the information described under part k) in section 2;
- c) we have a legitimate interest to process your information. This is applicable to the information described under parts d), e), f), h), i) and in some cases j) in section 2;
- d) you have given your consent. This may be in some cases applicable to the information described under parts e) and j) in section 2.

### **4. How Long Do You Keep the Information?**

We store limited personal information for as long as it is necessary for the original purpose of collection. We determine the appropriate retention period for personal information on the basis of the amount, nature, and sensitivity of the personal information being processed, the potential risk of harm from unauthorized use or disclosure of the personal information, if we can achieve the purposes of the processing through other means, and if the information is necessary for execution of our legal rights, obligations and fulfilment of our other duties (for example, record keeping). For more information on data retention periods, please contact us at [support@nordlayer.com](mailto:support@nordlayer.com).

## **5. Do You Collect the Information About Minors?**

Persons younger than 16 years old shall not use our Services and provide any personal data to us without the supervision of parents or guardians. We do not knowingly collect personal information from persons younger than 16. Based on the above, it is presumed that any person using the Services and supplying personal data to us is at least 16 years of age. If you learn that anyone younger than 16 has unlawfully provided us with personal data, please contact us and we will take steps to delete such personal information

## **6. Do you Share the Information with Third Parties?**

Only where permitted by applicable laws and for the purposes listed in this Policy we share, to the extent necessary, the information with: (i) our business partners that provide IT, servers, marketing, customer support, data storage, website customization, website analytics, accounting, legal, agency, and other services to us; (ii) affiliated companies within our corporate structure (iii) third-party tools to store the contacts, mailing lists, send communications to you or confirm your sign up to news subscriptions or waitlists and (iv) notaries, bailiffs, auditors, courts, law enforcement institutions, tax, regulatory and other public authorities only in cases where we are required, by way of a statutory provision or a binding legal order, to provide the information to such authorities.

## **7. International Transfers of Personal Information**

The personal information may be processed by us in the United States and by our affiliated companies and third party vendors that are based in other countries. As a result, your personal information may be processed outside your jurisdiction, and in countries that are not subject to an adequacy decision by the European Commission or your local laws or regulator, and that may not provide for the same level of data protection as your jurisdiction, such as the European Economic Area. We ensure that the recipient of your personal information offers an adequate level of protection and security, for instance, if required, by entering into the standard contractual clauses or an alternative mechanism for the transfer of data as approved by the European Commission or other applicable regulator.

## **8. What Rights do I Have Concerning My Information?**

Subject to conditions and limitations established by applicable law, you have a right (i) to receive a confirmation as to whether we collect the information related to you and to request access to that information; (ii) to correct inaccurate or incorrect information, or to supplement it when it is incomplete; (iii) to delete the information we have about

you in cases where it is not compliant with applicable laws; (iv) to restrict the use of your information where you challenge the accuracy of the information, object to the use of the information or need your information for legal purposes; (v) to object to the use of the information; (vi) to request your information in a structured, commonly used and machine-readable format; (vii) not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects on you; (viii) to revoke any consent given to us regarding the use of your information; (ix) to file a complaint with supervisory authorities; and (x) not to receive discriminatory treatment while exercising your rights.

## **9. What is My Right to Know about the Information Collected?**

You have the right to request that we disclose certain information to you about our collection and use of your information. Once we receive and verify your request we will disclose to you the categories of personal information we collected about you, the categories of sources for the personal information we collected about you, the categories of third parties with whom we share that personal information.

## **10. What is my Right to Request Deletion of the Information?**

You have a right to request the deletion of your information collected and maintained by us in case the information is not used in compliance with applicable laws. Once we receive and verify your request, we will delete your information from our records, unless applicable laws do not provide for deletion of the information in a particular case (for instance, provide a good Service to our customers, detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, comply with a legal obligation, make other internal and lawful uses of that information that are compatible with the context in which you provided it).

## **11. How Do I Submit a Request?**

If you would like to exercise your rights described above, please submit a request to us via e-mail at [support@nordlayer.com](mailto:support@nordlayer.com).

## **12. How will You Verify My Request?**

Your request must provide sufficient information that allows us to reasonably verify you are the person or an authorized representative of a person whose information we have collected, describe your request with sufficient detail that allows us to properly

understand, evaluate, and respond to it. We cannot respond to your request or provide you with the information if we cannot verify your identity or authority to make the request and confirm the information relating to you.

### **13. Can I Use an Authorized Agent?**

Sure. You may use an authorized agent to submit a request to implement your rights if you provide us with the authorized agent's written permission to do so. If this is the case, please provide us with a copy of the said permission. We may deny a request from an authorized agent that does not submit proof that they have been authorized by you to act on your behalf.

### **14. Do you use cookies?**

This website uses cookies. Some cookies are essential for our website to operate smoothly; others are used to improve website functionality or analyse aggregated usage statistics to improve website performance (as in the case of Google Analytics cookies). We use cookies to analyse our traffic and for advertisement purposes. Our website may include social media features, such as the Facebook Like button, to help you share our content easier. We also use affiliate cookies to identify the customers referred to the website by our partners so that we can grant the referrers their commission. You can check what cookies we use in the detailed Cookies Policy.

### **15. Third-party Links**

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies. We, therefore, have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our website and welcome any feedback about these sites. Our website may include social media features and widgets. These features may collect your Internet Protocol address, which page you are visiting on the website, and may set a cookie to enable the feature to function properly. Please note that your interactions with these features are governed by privacy statements of the companies that provide them.

### **16. Changes to this Policy**

This Policy may be modified and updated at any time, at our sole discretion, for any or no reason, and without liability, as indicated below. The amendment of Policy may be communicated to you by sending an email or by publishing the updated Policy on the Nord Website. We ask all users to ensure that they are familiar with the most current wording of the Policy.

## **17. How Can I Get More Information?**

If you have questions, requests, concerns, or complaints about our Policy or our data collection or processing practices, or if you want to report any security violations, please contact our Data Protection Officer by emailing [support@nordlayer.com](mailto:support@nordlayer.com) or by writing to us at the following address:

Nord Security Inc.  
16192 Coastal Highway, Lewes  
Delaware 19958,  
County of Sussex  
USA

*Older versions:*

*NordVPN Teams Privacy Policy as updated on 02/08/2021*

*NordVPN Teams Privacy Policy as updated on 05/12/2019*