

PRIVACY POLICY

Effective date: 25 September 2026

1. PURPOSE AND SCOPE

1.1 At Smartnova, we respect your privacy and data protection rights and recognise the importance of protecting the personal data we collect and process. This Privacy Policy explains what personal data we collect, how and why we use it, with whom we may share it, how long we retain it, and the rights available to you.

1.2 When we refer to “Smartnova”, “we”, “us” or “our”, we mean Smartnova Limited, a company incorporated in Cyprus.

1.3 This Privacy Policy applies when you:

- visit or interact with Smartnova’s websites, including www.smartnova.world and www.novataalks.ai, or our social media pages (collectively, the “Sites”);
- register for, use or administer Smartnova’s communication, messaging and related products and services (collectively, the “Smartnova Services”);
- contact us, request information, a trial or a demonstration;
- are a prospective business customer or a representative of an organisation that may be interested in our products or services; or
- receive sales or marketing communications from Smartnova.

1.4 For the purposes of Regulation (EU) 2016/679 (the “GDPR”), Smartnova acts as a controller where we determine the purposes and means of processing personal data, including in relation to our Sites, business contacts, marketing activities and administration of our customer relationships.

Where Smartnova processes personal data contained in Customer Data through the Smartnova Services solely on behalf of a customer, Smartnova generally acts as a processor and the customer acts as the controller. Such processing is governed by the applicable agreement and Smartnova’s Data Processing Addendum.

2. PERSONAL DATA WE COLLECT

2.1 Information you provide to us

Depending on how you interact with us, we may collect:

- your first and last name;
- business email address;
- telephone number;
- company or organisation name;
- job title, role or department;
- country or location;
- billing and transaction information;
- information provided through registration, contact, trial or demo forms; and
- information you provide when communicating with us.

2.2 Technical and website usage information

When you visit or interact with our Sites, we may collect technical and usage information such as:

- IP address;
- browser type and version;
- operating system and device type;
- language settings;
- approximate geographic location derived from an IP address;
- referring website or traffic source;
- campaign or UTM information;
- pages viewed and links clicked;
- date and time of visits;
- navigation paths and session duration; and
- cookie, session or device identifiers where applicable.

Some of this information is collected automatically through cookies, tags, scripts and similar technologies.

2.3 Information from third-party and public sources

We may obtain business-related information from lawful third-party and publicly available sources, including:

- business directories and company websites;
- professional and social networking services;
- contact enrichment and lead generation providers;
- B2B databases;
- advertising and analytics providers; and
- B2B website visitor identification providers.

This information may include a person's name, employer, professional position, business contact details and information about the relevant organisation.

Where required by applicable law, we will provide the relevant privacy information when we first communicate with a person whose information was obtained indirectly or otherwise within the period required by applicable law.

3. COOKIES AND SIMILAR TECHNOLOGIES

Our Sites use cookies and similar technologies, including browser storage, tags and scripts.

Some technologies are strictly necessary for the operation, security or functionality of the Sites. Others may be used for analytics, website optimisation, advertising, marketing or B2B website visitor identification.

Where the storage of information on, or access to information stored on, a user's device requires consent under applicable law, such technologies will only be activated after the required consent has been obtained.

You can accept, reject or manage non-essential technologies through the cookie consent tool available on our Sites and may change or withdraw your preferences at any time.

Consent is not required for technologies that are strictly necessary for the transmission of a communication or for providing a service expressly requested by the user.

Rejecting non-essential technologies will not prevent you from accessing the core functionality of our Sites.

Further information about the technologies used, their purposes, providers and retention periods is available through our cookie consent tool and/or Cookie Policy.

4. B2B WEBSITE VISITOR IDENTIFICATION

We use B2B website visitor identification technologies to better understand which organisations visit our Sites, assess the quality and relevance of our website traffic and identify potential business interest in Smartnova and NovaTalks products and services.

For these purposes, technical and website usage information, which may include an IP address, traffic source, pages visited, date and time of a visit and related session information, may be processed and compared with business information in order to determine whether a visit can be associated with a particular company or organisation.

The purpose of this processing is primarily to identify companies and organisations rather than to identify an individual website visitor solely from their website activity.

Where an organisation is identified as potentially relevant to our business, we may separately use business contact information obtained from lawful public or third-party sources to identify appropriate representatives of that organisation for B2B sales and business development purposes.

We currently use or test B2B website visitor identification services provided by:

- Leadfeeder / Dealfront; and
- Snitcher B.V.

Where website traffic data is processed without storing or accessing non-essential information on a visitor's device, we may rely on our legitimate interests under Article 6(1)(f) GDPR in understanding our business audience, assessing the effectiveness of our sales and marketing activities, improving our Sites and identifying potential B2B business opportunities.

Where cookies, browser storage or similar technologies are used and applicable law requires consent, such technologies are activated only after the required consent has been obtained.

Where we obtain personal data about a business contact from a third-party or publicly available source, we process such information in accordance with applicable data protection law and provide the information required under Articles 13 or 14 GDPR, as applicable.

You have the right to object to processing based on our legitimate interests as described in Section 9 below.

5. HOW AND WHY WE USE PERSONAL DATA

5.1 Providing and administering our Services

We process personal data to create and administer accounts, provide trials, demonstrations, products and services, fulfil our contractual obligations and manage our customer relationships. The legal

basis may be performance of a contract, steps taken before entering into a contract, or our legitimate interests in operating our business.

5.2 Communications and customer support

We process personal data to respond to enquiries, provide support and send necessary technical, security, service or administrative communications.

5.3 Improving our Sites and Services

We process technical and usage information to understand how our Sites and Services are used, monitor performance and traffic patterns, troubleshoot issues and improve our products, functionality, content and user experience. Where legally required for cookies or similar technologies, we rely on your consent.

5.4 B2B sales and business development

We may process company information and professional contact information to identify organisations that may be interested in our products or services, assess potential business opportunities and identify appropriate business representatives.

Where personal data is processed for these purposes, we may rely on our legitimate interests in conducting B2B sales, business development and marketing, subject to an assessment of our interests against the rights and freedoms of the individuals concerned.

This legal basis for processing personal data does not itself override any separate consent or other requirements applicable to the sending of electronic marketing communications.

5.5 Marketing communications

We may use business contact information to communicate about Smartnova or NovaTalks products, services, events and business opportunities where such communications are permitted by applicable law.

Electronic direct marketing communications, including marketing emails and similar electronic messages, are sent only where the requirements of applicable electronic communications and direct marketing laws have been satisfied.

Where prior consent is required, we will send such communications only after obtaining the required consent.

Where applicable law permits marketing to existing customers without obtaining separate prior consent, we may use contact details obtained in connection with a sale or customer relationship to promote our own similar products or services, provided that the recipient was given an appropriate opportunity to object and can opt out easily and free of charge at any time.

You may unsubscribe from or object to direct marketing at any time. We may retain limited information on a suppression list to ensure that an opt-out request continues to be respected.

5.6 Security and prevention of misuse

We process personal data where reasonably necessary to protect our Sites, Services, customers and systems, including detecting unauthorised access, security incidents, fraud or misuse.

5.7 Legal and business administration

We may process information where necessary to comply with legal obligations and for legitimate business purposes including accounting, invoicing, auditing, corporate governance, business planning, establishing or defending legal claims, and managing suppliers and professional advisers.

6. SHARING PERSONAL DATA

6.1 Service providers

We may share personal data with providers that support our business, including hosting, cloud infrastructure, CRM, analytics, communications, cybersecurity, payment processing, lead generation, contact enrichment and B2B website visitor identification providers.

Where such providers process personal data on our behalf, appropriate contractual and data protection safeguards are used.

6.2 Professional advisers

We may share personal data with lawyers, accountants, auditors, insurers, consultants and other professional advisers where reasonably necessary for the services they provide to us.

6.3 Authorities and other parties where legally required

We may disclose information where reasonably necessary to comply with applicable law, respond to lawful requests by competent authorities, protect our legal rights, or investigate fraudulent, harmful or unlawful activity.

6.4 Corporate transactions

Personal data may be disclosed in connection with a merger, acquisition, financing, restructuring, sale of assets or similar corporate transaction, subject to appropriate confidentiality and data protection safeguards.

6.5 Aggregated or anonymised data

We may use and disclose information that has been aggregated or anonymised so that it no longer identifies an individual. If information remains personal data under applicable law, we will continue to treat it as such.

7. INTERNATIONAL TRANSFERS

Smartnova is established in Cyprus and may use service providers and business partners located in different countries. As a result, personal data may be processed in countries other than the country in which you are located.

Where personal data protected by the GDPR is transferred outside the European Economic Area to a country that has not been recognised by the European Commission as providing an adequate level of protection, we use an appropriate transfer mechanism where required, such as European Commission Standard Contractual Clauses or another lawful transfer mechanism. Where appropriate, supplementary technical, contractual or organisational safeguards may also be applied.

8. RETENTION AND SECURITY

8.1 Retention

We retain personal data only for as long as reasonably necessary for the purposes for which it was collected and to comply with applicable legal, contractual, accounting or regulatory requirements.

When determining retention periods, we take into account the nature and sensitivity of the data, the purposes of processing, the duration of the relevant business relationship, legal retention requirements, objections or withdrawal of consent, and potential legal claims.

Marketing and business prospect information is periodically reviewed and may be deleted or suppressed where it is no longer relevant or where a person objects to processing.

Website analytics and B2B visitor identification data is retained only for as long as necessary for the relevant analytics, marketing and business development purposes, taking into account the retention settings and contractual arrangements applicable to the relevant provider.

Where a person opts out of marketing, we may retain limited information on a suppression list in order to ensure that the opt-out continues to be respected.

8.2 Security

We implement appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, access or other unlawful processing.

These measures take into account the nature, scope, context and purposes of processing, available technology and the risks to the rights and freedoms of individuals. However, no internet transmission, information system or storage technology can be guaranteed to be completely secure.

9. YOUR PRIVACY RIGHTS AND CHOICES

Depending on applicable law, you may have the right to:

- request access to personal data we hold about you;
- request correction of inaccurate or incomplete personal data;
- request deletion of your personal data;
- request restriction of processing;
- object to processing based on legitimate interests;
- object at any time to processing for direct marketing purposes;
- request data portability where applicable;
- withdraw consent at any time where processing is based on consent; and
- lodge a complaint with a competent data protection supervisory authority.

Withdrawing consent does not affect the lawfulness of processing carried out before withdrawal.

Direct marketing

You have the right to object at any time to the processing of your personal data for direct marketing purposes. Where you object to direct marketing, we will cease processing your personal data for that purpose.

You may use the unsubscribe mechanism contained in our marketing communications or contact us at support@novataalks.ai.

We may retain limited information necessary to ensure that your marketing preference continues to be respected.

Legitimate interests

Where processing is based on our legitimate interests, you may object based on your particular situation.

We will cease the relevant processing unless we demonstrate compelling legitimate grounds for continuing the processing which override your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims.

This balancing exception does not apply to direct marketing: where you object to processing for direct marketing purposes, your personal data will no longer be processed for that purpose.

Exercising your rights

Requests concerning personal data or the exercise of privacy rights may be sent to support@novataalks.ai.

We may request information reasonably necessary to verify your identity before acting on a request.

You have the right to lodge a complaint with the competent supervisory authority. As Smartnova Limited is established in Cyprus, the relevant supervisory authority is the Office of the Commissioner for Personal Data Protection of Cyprus.

10. CHILDREN'S PRIVACY

Our Sites and Services are intended for business use and are not directed to children under the age of 16.

We do not knowingly collect personal data directly from children under 16 through our Sites for sales or marketing purposes. If we become aware that such information has been collected unlawfully, we will take appropriate steps to delete or otherwise appropriately address it.

11. THIRD-PARTY WEBSITES

Our Sites may contain links to websites or services operated by third parties. This Privacy Policy does not apply to independent third-party websites and Smartnova is not responsible for their privacy practices. We recommend reviewing the privacy information of any third-party website before providing personal data.

12. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our business, technology, Services, applicable law or data processing practices.

Where changes are material, we will take reasonable steps to provide appropriate notice. The effective date shown at the beginning of this Privacy Policy indicates when it was last materially updated.

13. CONTACT US

If you have questions about this Privacy Policy, our processing of personal data or wish to exercise your privacy rights, please contact:

Smartnova Limited

Email: support@novatalks.ai

Archived Versions

1. [Privacy Policy 25 May 2023](#)