

CONFIDENTIAL POLICY DOCUMENT — PUBLIC-FACING

Data Privacy Policy

& GDPR Compliance Terms

Nexa Technologies B.V.

Cloud collaboration software for regulated industries

Version	Effective date	Document owner	Review cycle
4.2	1 March 2026	Data Protection Officer	Annual, or upon material change

Introduction

Nexa Technologies B.V. (“Nexa”, “we”, “us”, or “our”) provides web-based document collaboration and workflow software to organisations across the European Economic Area (EEA), the United Kingdom, and beyond. This Data Privacy Policy & GDPR Compliance Terms document (the “**Policy**”) explains, in plain language backed by precise legal references, how we collect, use, disclose, retain, and protect personal data when you visit [www.nexatech.example](#), use the Nexa application, or otherwise interact with us as a customer, prospective customer, website visitor, or employee of a customer organisation.

This Policy is issued in accordance with Regulation (EU) 2016/679 (the **General Data Protection Regulation**, “GDPR”), the UK GDPR as retained in domestic law, and applicable member-state implementing legislation. Where Nexa acts as a **data processor** on behalf of a customer (for example, processing content your organisation uploads to the platform), the terms of the separate Data Processing Addendum (DPA) govern that processing; this Policy addresses Nexa’s role as a **data controller** for account, billing, marketing, and website-visitor data.

At a glance

- We are the **data controller** for account, billing, and marketing data, and a **data processor** for customer content stored in the platform.
- Our lead supervisory authority is the **Dutch Data Protection Authority** (Autoriteit Persoonsgegevens), as our main establishment is in Amsterdam.
- You may exercise your GDPR rights at any time by contacting our Data Protection Officer at dpo@nexatech.example.

1 Data Controller Information

Legal entity	Nexa Technologies B.V.
Registered address	Herengracht 182, 1016 BR Amsterdam, The Netherlands
Trade register	Kamer van Koophandel, No. 78341205
Data Protection Officer	Elena Vos — dpo@nexatech.example
EU representative (UK entities)	Nexa UK Compliance Services Ltd, 20 Farringdon Street, London EC4A 4AB
Lead supervisory authority	Autoriteit Persoonsgegevens (Dutch DPA)

2 Definitions

Term	Meaning
Personal data	Any information relating to an identified or identifiable natural person (Art. 4(1) GDPR).
Processing	Any operation performed on personal data, including collection, storage, use, disclosure, or erasure.
Data subject	The individual to whom personal data relates — e.g. a Nexa account holder.
Controller	The entity that determines the purposes and means of processing.
Processor	The entity that processes personal data on behalf of a controller.
Sub-processor	A third party engaged by Nexa to assist in processing customer content.
Special category data	Data revealing racial or ethnic origin, health, sexual orientation, religious belief, or similar (Art. 9 GDPR); Nexa does not intentionally collect this data.

3 What Personal Data We Collect

We collect the minimum personal data necessary to provide, secure, and improve the Nexa platform. The table below summarises the categories, examples, and source of collection.

Category	Examples	Source
Account data	Full name, work email, password hash, organisation name, role	Provided by user
Billing data	Billing address, VAT number, invoice history, tokenised card reference	Provided by user / payment processor
Usage data	Login timestamps, feature interactions, document open/edit events, IP address	Collected automatically
Device data	Browser type, operating system, screen resolution, device identifiers	Collected automatically
Support data	Ticket contents, chat transcripts, screen-recording attachments	Provided by user
Marketing data	Newsletter subscription status, campaign engagement, event registrations	Provided by user
Cookies & tracking	Session identifiers, analytics identifiers, consent preferences	Collected automatically (see §10)

⚠ We do not knowingly collect special category data (Art. 9 GDPR) such as health information, biometric data, or political opinions. Please do not upload such data into free-text fields (e.g. document titles, support tickets) unless it forms part of customer content governed by our DPA.

4 Legal Basis for Processing

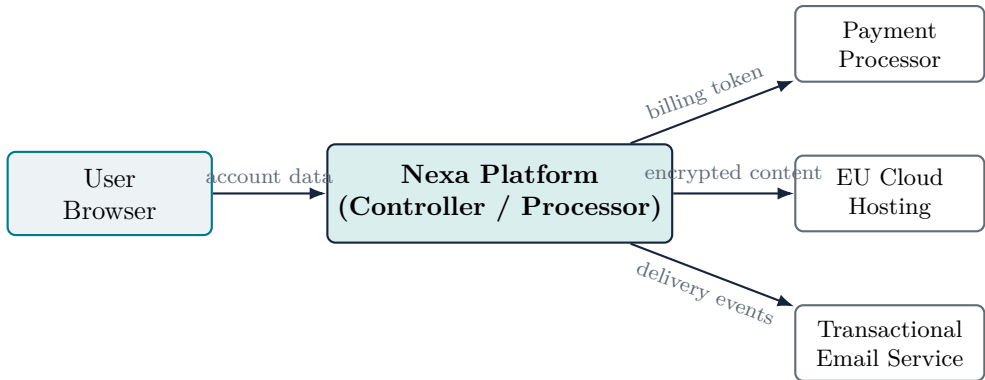
Every processing activity we carry out relies on one of the six lawful bases set out in Article 6(1) GDPR. The table below maps our principal purposes to their legal basis.

Purpose	Legal basis	Article
Creating and administering your account	Performance of a contract	Art. 6(1)(b)
Processing subscription payments	Performance of a contract	Art. 6(1)(b)
Complying with tax and accounting law	Legal obligation	Art. 6(1)(c)
Detecting fraud and platform abuse	Legitimate interest	Art. 6(1)(f)
Improving product features via usage analytics	Legitimate interest	Art. 6(1)(f)
Sending the monthly product newsletter	Consent	Art. 6(1)(a)
Responding to a legal request from an authority	Legal obligation	Art. 6(1)(c)

Where processing relies on **legitimate interest**, we have conducted a Legitimate Interest Assessment (LIA) balancing our interests against your rights and freedoms; a summary is available on request from the DPO. Where processing relies on **consent**, you may withdraw consent at any time without affecting the lawfulness of processing carried out before withdrawal.

5 Data Flow Overview

The diagram below illustrates, at a high level, how personal and content data moves between you, the Nexa platform, and the limited set of sub-processors engaged to deliver the service.



All sub-processors are bound by Art. 28 GDPR data-processing agreements and are listed in full at [nexatech.example/subprocessors](#).

6 International Data Transfers

Nexa’s primary infrastructure is hosted within the European Economic Area. Where a transfer of personal data outside the EEA is necessary — for example, to a sub-processor providing customer support tooling with servers in the United States — we ensure an adequate level of protection through one or more of the following safeguards:

- **Standard Contractual Clauses (SCCs)** adopted by the European Commission (Implementing Decision (EU) 2021/914), incorporated into every applicable sub-processor agreement;
- **Adequacy decisions**, where the destination country is recognised by the European Commission as providing adequate protection;
- **Supplementary technical measures**, including encryption in transit and at rest, and pseudonymisation of analytics identifiers.

A current, version-controlled list of sub-processors, their processing location, and applicable transfer mechanism is published at nexatech.example/subprocessors and updated at least 30 days before any new sub-processor is engaged, in accordance with our DPA notification obligations.

7 Data Retention

We retain personal data only for as long as necessary to fulfil the purposes described in this Policy, after which it is deleted or irreversibly anonymised. The table below sets out our standard retention schedule.

Data category	Retention period	Trigger for deletion
Active account data	Duration of account + 30 days	Account closure or deletion request
Billing & invoice records	7 years	Statutory accounting requirement (NL Civil Code)
Support tickets & chat logs	24 months	Rolling deletion from ticket close date
Usage & analytics logs	14 months	Rolling deletion, aggregated data retained indefinitely
Marketing consent records	Until consent withdrawn + 3 years	Withdrawal or unsubscribe
Document version history	50 versions per document, per product retention policy	Superseded by newer versions
Deleted project backups	30 days	Automatic purge job

8 Your Rights Under GDPR

As a data subject in the EEA or UK, you have the following rights in respect of your personal data. We respond to verified requests within **one calendar month**, extendable by a further two months for complex requests, as permitted by Art. 12(3) GDPR.

Right	Article	What it means
 Access	15	Obtain confirmation of, and access to, the personal data we hold about you.
 Rectification	16	Request correction of inaccurate or incomplete personal data.
 Erasure	17	Request deletion of your data where no overriding legal ground exists.
 Restrict processing	18	Limit how we use your data while a dispute is resolved.
 Data portability	20	Receive your data in a structured, machine-readable format.
 Object	21	Object to processing based on legitimate interest or for direct marketing.
 Automated decisions	22	Not be subject to a decision based solely on automated processing with legal effect.
 Lodge a complaint	—	File a complaint with your local supervisory authority at any time.

To exercise any of these rights, email dpo@nexatech.example or use the in-app *Privacy Centre*

under *Account Settings* → *Privacy*. We may request proof of identity before actioning a request involving disclosure or erasure.

9 Security Measures

We apply technical and organisational measures proportionate to the risk, in line with Art. 32 GDPR. Key controls include:

Control	Implementation
Encryption in transit	TLS 1.2+ enforced on all client and inter-service connections
Encryption at rest	AES-256 for stored documents, backups, and database volumes
Access control	Role-based access control, mandatory MFA for staff with production access
Network isolation	Private subnets, security-group segmentation between application tiers
Audit logging	Immutable access logs retained for 14 months, reviewed for anomalies
Vulnerability management	Quarterly penetration testing, continuous dependency scanning
Employee training	Mandatory annual data-protection training for all staff and contractors
Incident response	Documented playbook with a 72-hour regulator notification target

10 Cookies & Tracking Technologies

The Nexa website and application use cookies and similar technologies to operate core functionality, remember preferences, and understand aggregate usage. We categorise cookies as follows, consistent with the ePrivacy Directive and GDPR consent requirements.

Category	Purpose	Consent required
Strictly necessary	Session authentication, load balancing, CSRF protection	No
Preference	Remembering language, theme, and editor layout	No
Analytics	Aggregate feature usage and performance monitoring	Yes
Marketing	Attribution for acquisition campaigns on the marketing site	Yes

You can manage cookie preferences at any time via the *Cookie Settings* link in the site footer, or through your browser controls. Disabling strictly necessary cookies will prevent the application from functioning correctly.

11 Children’s Data

The Nexa platform is intended for business and professional use and is not directed at individuals under the age of 16. We do not knowingly collect personal data from children. If we become aware that a child’s personal data has been collected without appropriate consent, we will delete it promptly.

12 Data Breach Notification

In the event of a personal data breach likely to result in a risk to your rights and freedoms, Nexa will:

1. Notify the Autoriteit Persoonsgegevens without undue delay, and in any event within **72 hours** of becoming aware of the breach, as required by Art. 33 GDPR;
2. Notify affected data subjects directly, without undue delay, where the breach is likely to result in a *high* risk to their rights and freedoms (Art. 34 GDPR);

3. Document the breach, its effects, and remedial action taken in our internal breach register, made available to supervisory authorities upon request.

13 Changes to This Policy

We may update this Policy to reflect changes in our practices, technology, legal requirements, or for other operational reasons. Material changes will be communicated to registered users by email and an in-app notice at least **14 days** before taking effect. The “Effective date” at the top of this document reflects the most recent revision. Prior versions are archived and available on request.

14 Contact & Data Protection Officer

Data Protection Officer	Supervisory authority
Elena Vos	Autoriteit Persoonsgegevens
✉ dpo@nexatech.example	Bezuidenhoutseweg 30
☎ +31 20 555 0142	2594 AV The Hague, NL
📍 Herengracht 182, 1016 BR Amsterdam	autoriteitpersoonsgegevens.nl

This document forms part of the Nexa Technologies B.V. Terms of Service and is incorporated by reference into the Data Processing Addendum executed with customer organisations. Nothing in this Policy limits the rights afforded to data subjects under applicable law.

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