



2025  
Dover, Delaware  
United States of America

**NSN Global Services LLC**  
**Annual Data Privacy and Protection Statement 2025**  
**Version 1.0**

**Introduction**

NSN Global Services, registered in Dover, Delaware, United States, is a global provider of technological solutions dedicated to enhancing education through digital infrastructure, development, and deployment services. Our operations span the United States, United Kingdom, European Union, Australia, India, Africa, and the Middle East, where we support educational institutions, governments, businesses, and individuals with innovative tools aimed at improving access to learning and workforce development.

This Annual Data Privacy and Protection Statement for 2025 details our approach to handling personal data during the reporting period. As an edutech company dealing with sensitive educational information, including student data, we prioritize robust privacy practices. We guarantee full compliance with applicable data privacy and protection laws across all jurisdictions, conducting regular assessments to ensure adherence. This statement makes no forward-looking commitments but guarantees our implementation of required measures under relevant regulations, such as the EU General Data Protection Regulation (GDPR) and the U.S. Children's Online Privacy Protection Act (COPPA). It is published for transparency and aligns with international standards to build trust among users and stakeholders.

**Compliance with Data Privacy Regulations**

NSN Global Services guarantees adherence to a wide range of data privacy laws in our operating regions, reflecting the diverse regulatory landscape. In the United States, we comply with state-level laws such as the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA), Virginia Consumer Data Protection Act (VCDPA), Colorado Privacy Act (CPA), and other emerging state statutes, alongside federal requirements like COPPA for services involving children's data and the Family Educational Rights and Privacy Act (FERPA) where applicable to educational records.

In the European Union, we guarantee compliance with the GDPR, including its provisions on data minimization, lawful processing, and cross-border transfers. For the United Kingdom, adherence to the UK GDPR and Data Protection Act 2018 is maintained, ensuring equivalent protections post-Brexit. In Australia, our practices align with the Privacy Act 1988 and its Australian Privacy Principles (APPs), incorporating 2024 amendments on breach notifications and children's privacy.

In India, we guarantee compliance with the Digital Personal Data Protection Act (DPDPA) 2023, including the Digital Personal Data Protection Rules 2025, which mandate encryption, access controls, and breach reporting within 72 hours. Across African jurisdictions, such as South Africa's Protection of Personal Information Act (POPIA), we ensure alignment with local data protection frameworks, including those in emerging laws like Gambia's data protection regime. In the Middle East, compliance with laws such as the UAE Federal Decree-Law No. 45/2021 on Personal Data Protection, Saudi Arabia's Personal Data Protection Law (PDPL), and similar regulations in other states is guaranteed, focusing on data localization and security.

Internationally, we align with guidelines like the OECD Privacy Principles and UNESCO's ethics on AI data use, where they influence our edutech services.

**Data Collection and Processing Practices**

We guarantee that personal data collection is limited to what is necessary for providing our educational technology services, such as user registration details, learning progress metrics, and device information. Processing activities, including analysis for personalized learning recommendations, are conducted on lawful bases like consent, contractual necessity, or legitimate interests, in strict compliance with applicable laws.

For sensitive data categories—such as children's information or special category data under GDPR—we guarantee enhanced protections, including parental consent under COPPA and explicit consent where required. Data is not collected for unrelated purposes, and we maintain accurate records of processing activities as mandated by regulations like GDPR Article 30.

**Data Security Measures**

NSN Global Services guarantees the implementation of appropriate technical and organizational measures to protect personal data against unauthorized access, loss, or breaches. This includes encryption of data in transit and at rest, multi-factor authentication, regular vulnerability assessments, and access controls based on the principle of least privilege.

Our security protocols comply with standards such as those outlined in NIST frameworks (U.S.), ISO 27001 (international), and specific requirements under DPDPA for mandatory encryption and tokenization. Third-party vendors handling data on our behalf are vetted through data processing agreements (DPAs) that guarantee equivalent security levels, in line with GDPR Chapter V and similar cross-border safeguards.

#### **User Rights and Transparency**

We guarantee that individuals can exercise their data privacy rights as provided under relevant laws, such as access, rectification, deletion, objection, and portability. Requests are processed within statutory timelines—e.g., one month under GDPR/CPRA, with extensions where permitted.

Transparency is ensured through clear privacy notices provided at data collection points, detailing purposes, recipients, retention periods, and rights. For educational users, including minors, we guarantee age-appropriate communications and parental involvement as required by COPPA and Australian children's privacy rules.

#### **Data Sharing, Transfers, and Retention**

Personal data sharing is limited to authorized third parties, such as service providers or educational partners, under strict contractual terms guaranteeing compliance. International data transfers are safeguarded using mechanisms like EU Standard Contractual Clauses (SCCs), UK International Data Transfer Agreements (IDTAs), or adequacy decisions where available.

We guarantee data retention only for as long as necessary to fulfil purposes or meet legal obligations, with secure deletion thereafter. For instance, under DPDPA, activity logs are retained for one year, and under POPIA, data is not kept indefinitely.

#### **Incident Response and Breach Notification**

In the event of a data breach, we guarantee prompt internal response through established incident management protocols, including containment, assessment, and remediation. Notifications are made to affected individuals and authorities as required—e.g., within 72 hours to supervisory authorities under GDPR/UK GDPR/DPDPA, and without undue delay to users where risks exist, per CCPA and Australian amendments.

Breach reporting includes detailed information on nature, consequences, and mitigation steps, ensuring full legal compliance.

#### **Monitoring, Training, and Accountability**

Data privacy performance is monitored through internal audits, privacy impact assessments (PIAs) for high-risk processing, and employee training programs on privacy obligations. We guarantee the appointment of data protection officers or responsible personnel where required, such as under GDPR for public authority-facing services.

Accountability is demonstrated via documentation and cooperation with regulators during inquiries.

#### **Conclusion**

Throughout 2025, NSN Global Services upheld stringent data privacy and protection standards across our global operations, guaranteeing compliance with all applicable laws while delivering secure educational technology solutions. This statement reflects our dedication to safeguarding user data and is published on our website for stakeholder access. For privacy-related inquiries or to exercise your rights, please contact us via the channels listed on [www.nsnglobalservices.com](http://www.nsnglobalservices.com).

#### **NSN Global Services LLC**

**Dover, Delaware, United States**

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