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Dover, Delaware
United States of America

NSN Global Services LLC
Annual Data Privacy and Protection Statement 2026
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 2026 details our planned approach to handling personal data for the upcoming reporting period. As an edutech company dealing with sensitive educational information, including student data, we prioritize robust privacy practices. We intend to maintain full compliance with applicable data privacy and protection laws across all jurisdictions, conducting regular assessments to ensure alignment. This statement outlines aspirational goals without creating binding commitments, intending to align with international standards to build trust among users and stakeholders.

Compliance with Data Privacy Regulations

NSN Global Services plans to adhere to a wide range of data privacy laws in our operating regions, reflecting the diverse regulatory landscape. In the United States, we aim to 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 intend to comply 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 planned, ensuring equivalent protections post-Brexit. In Australia, our practices aim to align with the Privacy Act 1988 and its Australian Privacy Principles (APPs), incorporating amendments on breach notifications and children's privacy.

In India, we plan to comply with the Digital Personal Data Protection Act (DPDPA) 2023, including the Digital Personal Data Protection Rules, 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 intend to align 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 aimed for, focusing on data localization and security.

Internationally, we plan to 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 intend to limit personal data collection 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, plan to be conducted on lawful bases like consent, contractual necessity, or legitimate interests, in strict alignment with applicable laws.

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

Data Security Measures

NSN Global Services plans to implement 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 aim to 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 plan to be vetted through data processing agreements (DPAs) that ensure equivalent security levels, in line with GDPR Chapter V and similar cross-border safeguards.

User Rights and Transparency

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

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

Data Sharing, Transfers, and Retention

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

We aim to retain data only for as long as necessary to fulfil purposes or meet legal obligations, with secure deletion thereafter. For instance, under DPDPA, activity logs plan to be retained for one year, and under POPIA, data intends to not be kept indefinitely.

Incident Response and Breach Notification

In the event of a data breach, we plan to implement prompt internal response through established incident management protocols, including containment, assessment, and remediation. Notifications aim to be 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 plans to include detailed information on nature, consequences, and mitigation steps, ensuring full legal alignment.

Monitoring, Training, and Accountability

Data privacy performance plans to be monitored through internal audits, privacy impact assessments (PIAs) for high-risk processing, and employee training programs on privacy obligations. We intend to appoint data protection officers or responsible personnel where required, such as under GDPR for public authority-facing services. Accountability aims to be demonstrated via documentation and cooperation with regulators during inquiries.

Conclusion

Throughout 2026, NSN Global Services plans to uphold stringent data privacy and protection standards across our global operations, intending to comply with all applicable laws while delivering secure educational technology solutions. This statement reflects our planned 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.

NSN Global Services LLC

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