



Privacy Policy (DPF-Compliant)

Version: 3.3 (Final Submission Version)

DPF Certification Status: Pending / To Be Updated Upon Approval

1. Overview

NVT Group ("NVT") complies with the EU-U.S. Data Privacy Framework (DPF), UK Extension, Swiss-U.S. DPF, and GDPR. NVT adheres to DPF Principles including Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity, Access, and Recourse.

2. Scope of Processing

This policy applies to HR data, business contacts, and customer/vendor data. HR data is processed via Paycom and stored using Box Data Zones ensuring UK/EU data residency. No HR data is stored locally.

3. Data Transfers

Data transfers outside the EU/UK are conducted under DPF certification or Standard Contractual Clauses (SCCs) where applicable.

4. Onward Transfer Accountability

NVT ensures third-party processors (including Paycom and Box) maintain DPF-level protections. NVT remains liable for improper processing unless not responsible for the event.

5. Security Controls

NVT enforces encryption, access controls, endpoint detection/response, and secure cloud storage. Data is not retained on local systems.

6. Individual Rights

Individuals may access, correct, or request deletion of their personal data and may limit processing where applicable.

7. EU Data Protection Authority Cooperation (HR Data)

NVT agrees to cooperate and comply with the advice of EU Data Protection Authorities (DPAs) regarding HR data transferred under the DPF.

8. Recourse, Enforcement, and Arbitration

NVT commits to resolving complaints regarding personal data. Unresolved complaints may be referred to an independent recourse mechanism such as JAMS. NVT is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC). Under certain conditions, individuals may invoke binding arbitration.

9. Contact Information

Privacy Office: Rck.Herrera@nvtgroup.com (placeholder) Address: [3100 DE LA CRUZ BLVD, SUITE 101, SANTA CLARA, CA 95054

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Approved By:

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