

Privacy policy

Last updated: March 23, 2023

Version number: 2.0

Note: [The previous version \(1.0\)](#) of the Privacy Policy applies until (but not including) the date indicated above as "Last updated". The new version (2.0) of this Privacy Policy applies on or after the date indicated above as "Last updated".

This document ("**Privacy Policy**") explains the privacy rules applicable to personal data and other information collected or submitted when you access this website ("**Website**") regardless of the device (computer, mobile phone, tablet, etc.) you use.

The data controller of your personal data, as described in this Privacy Policy, is NordSec B.V. (address: Fred. Roeskestraat 115, 1076 EE Amsterdam, the Netherlands; email: privacy@nordaccount.com) ("**Nord**", "**we**", "**us**", or "**our**").

By visiting/accessing the Website or by submitting your personal data to us, you confirm that you have read this Privacy Policy and agree to be bound by it. If you do not agree with this Privacy Policy or any provisions hereof, please do not visit/access the Website.

Product-specific Privacy Notices/Policies. As Nord products cater to different user needs, Nord group companies may process different personal data points during their services performance. The following links provide further information on:

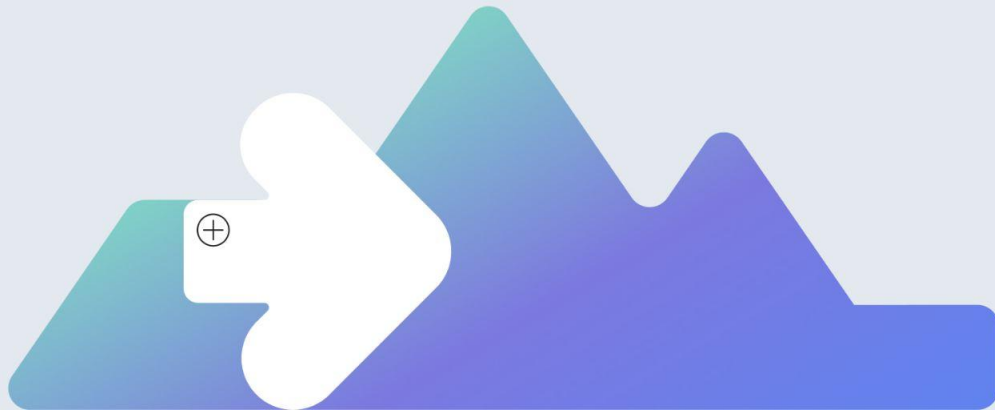
- [NordVPN Privacy Notice \(additional terms\)](#)
- [NordPass Privacy Notice \(additional terms\)](#)
- [NordLocker Privacy Notice \(additional terms\)](#)
- [NordLayer Privacy Policy \(for business\)](#)
- [NordPass and NordLocker Privacy Policy \(for business\)](#)

Additional information on your personal data may also be indicated in contractual terms, supplemental privacy statements, or notices.

PROCESSING OF YOUR PERSONAL DATA

Communication data:

Contact information. If you use our Contact Form on the Website or send us an email with a general inquiry, we will process the name and email address you have provided. Such processing is based on our legitimate interest to get in touch with you.



Contact information for business inquiries. When you contact us to inquire about Nord's services/products, we process your full name, email address, entity's information you contact on behalf of, your job title and/or other information you provide us with.

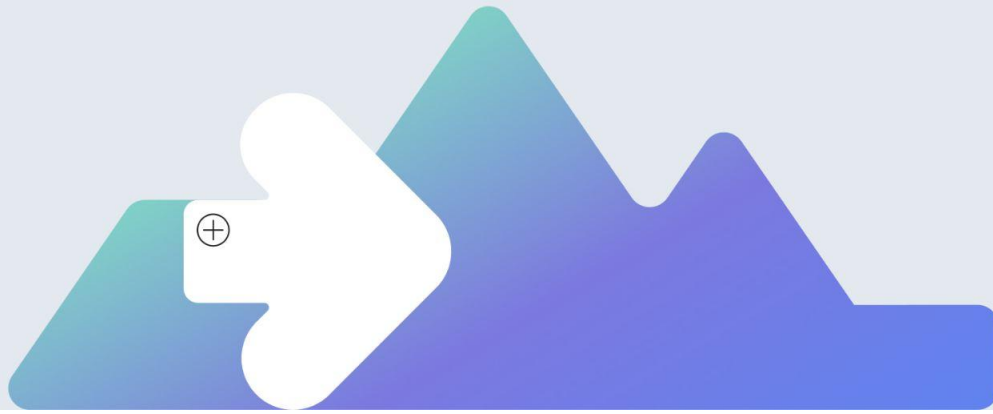
Information collected on our Website:

Access logs. As most websites on the internet, our Website collects access logs (such as IP address, browser type, operating system) to make sure you have a secure, reliable, and robust experience while browsing. This information is also essential for fighting against DDoS attacks, scanning, and similar hacking attempts.

Cookies. Cookies, pixels, and other similar technologies are usually small text or image files that are placed on your device when you visit our Website. This is a standard practice on the Internet. Some cookies are essential for our Website to operate smoothly; others are used to improve Website's functionality, analyze aggregated usage statistics to improve Website's performance, and for advertising. We also use affiliate cookies to identify the customers referred to our Website by our partners so that we can grant the referrers their commission. All major browsers allow users to choose their cookie settings. You can choose whether to accept or block cookies, and whether to delete cookies already stored on your device. The Website uses the following cookies:

- **Essential cookies.** These cookies are essential for user navigation on our Website. This category of cookies cannot be disabled.
- **Functionality cookies.** These cookies remember the information you have entered or choices you've made (such as language selection) on the Website, so that you don't have to repeat it the next time you visit.
- **Analytics cookies.** These cookies collect information about how visitors use our Website, letting us make improvements and monitor our performance.
- **Advertising cookies.** These cookies are placed by third-party advertising platforms or networks to deliver ads and track ad performance. Sometimes they let advertising networks deliver ads that may be relevant to you based upon your activities on the Website and/or other websites (in which case the choice of ad may be based on automated decision-making).

Cookie name	Purpose / description	Expiration	Category
_cfduid	Used by CloudFlare to identify trusted web traffic. The cookie does not store any personally identifiable information.	29 days	Essential



Cookie name	Purpose / description	Expiration	Category
_ga	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years	Analytics
_gat	Used by Google Analytics to throttle request rate.	1 day	Analytics
_gid	Registers a unique ID to generate statistical data on how the visitor uses the website.	1 day	Analytics
ads/ga-audiences	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on their online behavior.	Session	Advertising

GROUNDS FOR PROCESSING OF PERSONAL DATA

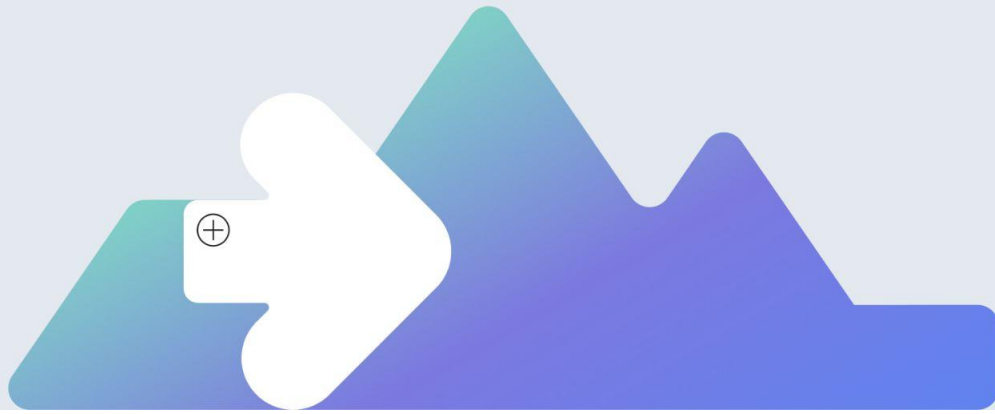
Your personal data may be processed:

- **Where it is necessary to fulfill our contract with you at your request** (e.g., to ensure the secure, reliable, and robust performance of our Website).
- **When we have a legal obligation to process certain personal data collected from you.**
- **Where you have provided your consent to us** (e.g., to send marketing communication unless applicable law permits us to contact you without your prior consent).
- We sometimes may process your personal data **under the legal basis of our or third parties' legitimate interest** (e.g., to properly administer business communication with you; to detect, prevent, or otherwise address fraud, abuse, security, or technical issues with our Website; to receive knowledge of how our Website is being used).

PERSONAL DATA SHARING AND TRANSFERS

We share personal data globally, both internally within the companies representing the Nord Security brand, and externally with our third-party partners/service providers:

- **Other Nord group companies.** Companies representing the Nord Security brand share infrastructure, systems, web hosting, and technology to ensure efficiency, business continuity, and security, as permitted by applicable law, and in accordance with this Privacy Policy. For example, Nord group companies may collaborate



globally to manage your requests and/or inquiries regarding Nord's services/products.

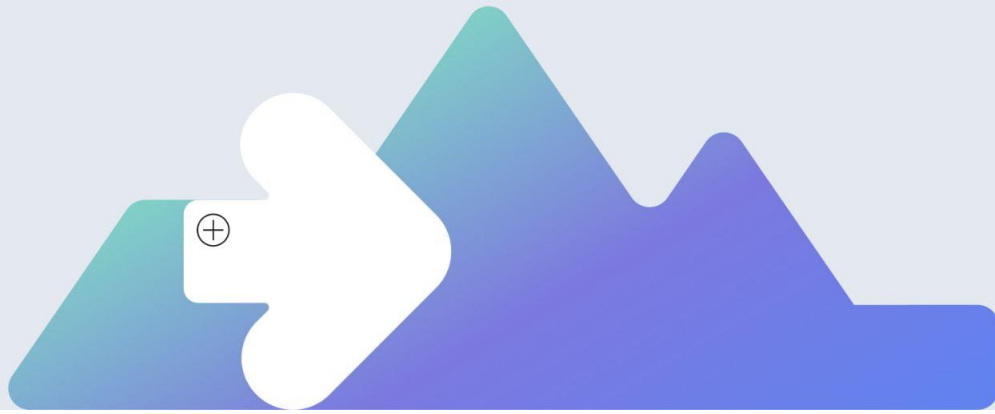
- **Service providers.** We use third-party service providers to help us with various operations, such as email automation, Website diagnostics, analytics, and other. As a result, some of these service providers may process your personal data.
- **Courts and/or governmental/law enforcement authorities.** We may disclose personal data to establish or exercise our legal rights or defend against any legal claims or other complaints. We can also respond to legal requests when we have a belief that the response is required by law in that jurisdiction.

We require the above-mentioned third parties to protect the personal data they receive with appropriate security measures and prohibit them from using the personal data for their own purposes or outside what is necessary to provide the service. Please note that sometimes your personal information may be processed in countries where these providers are based, including locations that may not guarantee the same level of protection of personal data as the one in which you reside. We assess the circumstances involving all cross-border data transfers and have suitable safeguards in place to require that your personal data will remain protected in accordance with this Privacy Policy. For example, in case your personal data is transferred to countries outside the EEA, we make sure there is an adequacy decision from the European Commission with regards to the recipient country or we use standard contractual clauses approved by the European Commission for such transfer of your personal data.

YOUR RIGHTS IN CONNECTION WITH PERSONAL DATA

Please note that there are various data protection laws across different jurisdictions that provide privacy rights to you as a data subject. Subject to those applicable data protection laws, among others, you may have the following rights:

- **Delete:** request us to erase your personal data.
- **Access:** know and access personal data Nord has collected about you.
- **Rectify:** rectify, correct, update, or complement inaccurate/incomplete personal data Nord has about you.
- **Object:** object to the processing of your personal data which is done on the basis of our (or others) legitimate interests.
- **Transfer:** request us to provide you with a copy of your personal data in a structured, commonly used, and machine-readable format or to transmit (if technically feasible) your personal data to another controller (only where our processing is based on your consent and carried out by automated means).
- **Restrict:** restrict the processing of your personal data (when there is a legal basis for that).



- **Withdraw consent:** withdraw your consent where processing is based on consent you have previously provided.
- **Lodge a complaint:** exercise your rights by contacting us directly or, if all else fails, by lodging a complaint with a supervisory authority.

If you want to exercise your rights (or have any questions/comments), you can always reach out to us at privacy@nordaccount.com.

PERSONAL DATA RETENTION AND DELETION

Nord will store your personal data for the periods mentioned above in this Privacy Policy (Section “Processing of your Personal Data”) if longer terms are not required in order to comply with our legal obligations and/or to resolve disputes. If you become Nord’s services/products client, Nord group companies will save your information under their personal data processing policies (Section “Product-specific Privacy Notices/Policies”).

When we no longer have a legal ground to keep your personal data, it will either be securely disposed of, or de-identified through appropriate anonymization means.

OTHER TERMS

Our Website may include links to pages whose privacy practices differ from ours. If you submit personal information to any of those sites, your information will be governed by their privacy policies. Please review such third-party websites’ privacy policies, terms of use, and other policies carefully and make sure you understand them before you engage in any transaction.

We may update this Privacy Policy in the future to reflect any changes in the law, best practices, or our services. Any alterations will come into effect upon posting the revised Privacy Policy, so please check here regularly.