

# INDEPENDENT DISTRIBUTOR PRIVACY POLICY

**Effective Date:** 5/5/2026 9:57 AM

We are committed to providing you with excellent service while protecting your privacy and personal information. This Privacy Policy outlines how we handle your data and your rights regarding that information as an Independent Distributor. Please read it carefully to understand our practices. NURISE Software Design L.L.C., a company incorporated in Dubai, United Arab Emirates, acts as the data controller for the personal information described in this Privacy Policy unless otherwise specified.

This Privacy Policy describes how NURISE Software Design L.L.C. and its subsidiaries and affiliated companies (“NURISE,” “we,” or “us”) collect, use, disclose, and protect personal information about you as an Independent Distributor. It applies to the data we collect when you use your back office on our websites, or interact with us in other ways as described below. By accessing or using our services as an Independent Distributor, you agree that NURISE may collect, use, and disclose your personal information as described in this Privacy Policy.

## 1. Introduction

At NURISE, we are committed to providing exceptional service to our Independent Distributors by ensuring a private and secure browsing experience. This Privacy Policy, along with our Terms of Use, Legal Disclaimer, Operational Rules, Independent Distributor Agreement, and any related documents, outlines the basis on which we process any personal information we collect from you or that you provide to us. Please read this document carefully to understand our practices regarding your personal data and how we handle it.

## 2. Changes to This Privacy Policy

We may update this Privacy Policy periodically to reflect changes in our practices or for other operational, legal, or regulatory reasons. We will notify you of any significant changes by updating the “Effective Date” at the top of this policy and, if necessary, by additional means such as email notifications. We encourage you to review the Privacy Policy whenever you access the Site or otherwise interact with us to stay informed about our information practices and how you can help protect your privacy. Your continued use of the Site after any changes indicates your acceptance of the updated Privacy Policy.

## 3. Information We Collect

### 3.1 Personal Information

We collect personally identifiable information (“Personal Information”). Personal Information is any information about an identifiable individual but does not include the name, title, business address, or telephone number of an employee of an organization. When you access or use your back office on our Site, transact business with us, or otherwise interact with us as an Independent Distributor, this information may include, but is not limited to:

- **Contact Information:** Name, mailing address, email address, and phone/fax numbers.
- **Account Information:** Back office Access ID/password, company affiliations.
- **Personal Details:** Date of birth, tax identification number.

- **Payment Information:** Bank account details for commissions, billing address.
- **Other Information:** Any other information you voluntarily submit to us, such as inquiries, feedback, or requests.

### **How do we collect personal information?**

We collect personal information only by lawful and fair means and only collect personal information reasonably necessary for the legitimate purposes identified and for which consent has been obtained.

### **Information You Provide To Us**

The Website provides various places for users to provide information. We collect information that users provide by filling out forms on the Website, communicating with us via contact forms, responding to surveys, search queries on our search feature, providing comments or other feedback, and providing information when ordering a product or service via the Website.

We use the information you provide to us to deliver the requested product and/or service, to improve our overall performance, and to provide you with offers, promotions, and information.

### **Information We Collect Through Automatic Tracking Technology**

As you navigate through our Website, we may use automatic data collection technologies, including Google Analytics, Google Tag Manager, and Active Campaign, to collect certain information about your equipment, browsing actions, and patterns. This will generally include information about your location, your traffic pattern through our Website, and any communications between your computer and our Website.

The information we collect automatically is used for statistical data and will not include personal information. We use this data to improve our Website and our service offerings.

### **Use of Cookies And Pixels**

Similar to other commercial websites, our Website utilizes a standard technology called “cookies” and server logs to collect information about how our site is used. Information gathered through cookies and server logs may include the date and time of visits, the pages viewed, time spent at our site, websites visited just before and after our own, and your IP address.

We use cookies and similar technologies to analyze website usage, improve performance, and personalize user experience. Where required by law, we obtain your consent before placing non-essential cookies on your device.

### **Third-Party Use Of Cookies**

Some content or applications, including advertisements, on the Website are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website.

### **Email Information**

If you choose to correspond with us through email, we may retain the content of your email messages together with your email address and our responses. We provide the same protections for these electronic communications that we employ to maintain information received online, by mail, and by telephone.

## Email Policies

We are committed to keeping your email address confidential. We do not sell, rent, or lease our subscription lists to third parties and will not disclose your email address to any third parties except as required by law. All emails sent by us will comply with applicable anti-spam legislation, including clearly stating who the email is from and providing clear information on how to contact the sender. Users who no longer wish to receive our newsletter or promotional materials may opt out of receiving these communications by clicking the unsubscribe link in the email.

## 4.2 Usage Information

We may collect information about your usage of your back office on our Site, including the pages you visit, the links you click, and other actions you take in connection with the Site.

## 5. How We Use Your Information

We may use the information we collect for various purposes, including to:

- **Provide Services:** Fulfill your requests for information and process your transactions as an Independent Distributor.
- **Account Management:** Create and maintain your Independent Distributor account and authenticate your access.
- **Improve Services:** Provide, maintain, and improve our services.
- **Process Payments:** Process your commissions and manage payments.
- **Communications:** We will communicate with you about products, services, offers, promotions, and events relevant to Independent Distributors.
- **Compliance:** Enforce our Terms of Use, Legal Disclaimer, Operational Rules, Independent Distributor Agreement, and any other related documents.
- **Legal Obligations:** Comply with legal obligations and protect our legal rights.
- **Analysis:** Monitor and analyze trends, usage, and activities in connection with our services.
- **Customization:** Personalize and improve the Site and provide content or features that match your profile or interests as an Independent Distributor.

## 6. Legal Basis for Processing

We will process your Personal Information only when we have a legal basis to do so, such as:

- **Consent:** When you have given your explicit consent.
- **Contractual Necessity:** To fulfill the Independent Distributor Agreement with you or to take steps at your request before entering a contract.
- **Legal Obligation:** To comply with a legal obligation.
- **Legitimate Interests:** For our legitimate interests, such as improving our services for Independent Distributors, provided that your rights do not override these.

## 7. Consent

By using the Site and our services as an Independent Distributor, you consent to the collection, use, and disclosure of your Personal Information as described in this Privacy Policy. You can withdraw your consent at any time by contacting us at [support@leganovo.com](mailto:support@leganovo.com). Please note that withdrawing consent may affect your ability to use certain services as an Independent Distributor.

## 8. Disclosure of Personal Information

We may share your Personal Information with third parties under the following circumstances:

- **Service Providers:** With vendors, consultants, and other service providers who need access to such information to carry out work on our behalf (e.g., payment processors for commission payments, email delivery services).
- **Legal Compliance:** To comply with laws, regulations, legal processes, or governmental requests.
- **Protection of Rights:** To enforce our agreements, policies, and terms of use or to protect the rights, property, or safety of NURISE, our Independent Distributors, or others.
- **Business Transfers:** In connection with a merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.
- **Consent:** With your consent or at your direction.

We do not sell or rent your Personal Information to third parties for their marketing purposes without your explicit consent.

## 9. Your Choices and Rights

Depending on your location, you may have certain rights regarding your Personal Information, including:

- **Access:** You can request access to your Personal Information.
- **Correction:** You can request that we correct any inaccuracies in your Personal Information.
- **Deletion:** You can request that we delete your Personal Information.
- **Objection:** You can object to the processing of your Personal Information.
- **Restriction:** You can request that we restrict the processing of your Personal Information.
- **Data Portability:** You can request a copy of your Personal Information in a structured, commonly used, and machine-readable format.

You may also have the right to lodge a complaint with a data protection authority in your jurisdiction.

To exercise these rights, please contact us at [support@leganovo.com](mailto:support@leganovo.com). We will respond to your request in accordance with applicable data protection laws.

## 10. Cookies and Similar Technologies

We use cookies and similar technologies to:

- **Recognize You:** Identify you and your device(s).
- **Enhance Experience:** Provide a personalized browsing experience.
- **Analyze Usage:** Monitor Site performance and usage.

- **Provide Features:** Enable social media features and content.

You can control cookies through your browser settings and other tools. If you reject cookies, you may not be able to access certain site features.

## 11. Security

Personal information is protected using industry-standard security measures, including encryption in transit, restricted access controls, and secure infrastructure practices. These measures include:

- **Encryption:** Using SSL encryption for sensitive data transfers.
- **Access Controls:** Restricting access to Personal Information to authorized personnel.
- **Security Protocols:** Regularly updating our security practices to enhance the safety of your data.

However, please understand that no security measures are perfect or impenetrable, and we cannot guarantee absolute security.

## 12. International Data Transfers

Your Personal Information may be transferred to and processed in countries other than your residence. These countries may have data protection laws that differ from those of your country. We ensure that appropriate safeguards are in place to protect your Personal Information when transferred internationally, such as standard contractual clauses approved by relevant authorities.

## 13. Retention of Personal Information

Personal information related to distributor accounts is retained for the duration of the contractual relationship and for a reasonable period thereafter to comply with legal obligations, resolve disputes, and enforce agreements.

## 14. Third-Party Links

Our Site may contain links to third-party websites or services. We are not responsible for the privacy practices or content of these third-party sites. We encourage you to read the privacy policies of any third-party site you visit.

## 15. Underage Privacy

Our services are NOT directed to individuals under 18, and we do not knowingly collect Personal Information from them. If we become aware that a person under 18 has provided us with Personal Information, we will take steps to delete such information.

## 16. Do Not Track Signals

Some web browsers may transmit “Do Not Track” signals. We currently do not respond to these signals.

## 17. Governing Law

All matters relating to the Site and this Privacy Policy and any dispute or claim arising therefrom shall be governed by the laws of the United Arab Emirates, without giving effect to any choice or conflict of law provision or rule.

Any legal suit, action, or proceeding arising out of, or related to, this Privacy Policy or the Site shall be instituted exclusively in the courts of the United Arab Emirates. However, we retain the right to bring any suit, action, or proceeding against you for breach of this Privacy Policy in your country of residence or any other relevant country. You waive all objections to exercising jurisdiction over you by such courts and venue in such courts.

*[EU/GDPR Addition – April 2026]*

Notwithstanding the foregoing, where mandatory provisions of the law of a Member State of the European Union apply to the processing of your personal data as an Independent Distributor, those mandatory provisions -- including the provisions of Regulation (EU) 2016/679 (the General Data Protection Regulation, “GDPR”) and applicable national data protection legislation -- shall apply in addition to and shall not be displaced by the UAE governing law provisions above. Nothing in this Privacy Policy shall be construed as a waiver of any right that cannot be excluded or limited under mandatory applicable EU or national data protection law.

## **18. Acceptance of This Privacy Policy**

By submitting an onboarding request and accessing or using our Site or services as an Independent Distributor, you acknowledge that you have read, understood, and agreed to all terms and conditions of this Privacy Policy and agree to be bound by it.

## **19. Contact Us**

If you have any questions or concerns about this Privacy Policy or our data practices, please get in touch with us at:

- **Email:** [support@leganovo.com](mailto:support@leganovo.com)

## **20. Scope of This Privacy Policy**

This Privacy Policy applies exclusively to the personal information collected from Independent Distributors who register and engage with NURISE’s services designated for Independent Distributors. It does not apply to:

- General Users and Website Visitors: Individuals who visit or use our public website ([www.leganovo.com](http://www.leganovo.com)) without registering as Independent Distributors.
- Users of Other Services: Individuals who use any other web services, applications, or platforms provided by NURISE that are intended for the general public.

Please be aware that these other services have their own privacy policies. We encourage you to review the specific privacy policy applicable to each service you use. These policies are available within the applications themselves.

## 21. European Union Representative

NURISE Software Design L.L.C. is a company incorporated in Dubai, United Arab Emirates. As a non-EU established controller directing services at Independent Distributors located in the European Union, the Company is required under Article 27 of Regulation (EU) 2016/679 (GDPR) to designate a representative in the European Union.

**EU Representative Designation.** The Company shall designate an EU representative prior to onboarding Independent Distributors resident in EU Member States. The identity and contact details of the EU representative will be communicated to affected Independent Distributors upon designation and will be made available through the back-office platform and on the Company's website.

**Contact for EU Data Protection Matters.** EU-resident Independent Distributors may contact the Company directly at [support@leganovo.com](mailto:support@leganovo.com) for any data protection queries, to exercise rights under Section 9, or to raise concerns about the processing of their personal data. The Company will respond within one month of receipt of a valid request, subject to any extension permitted by applicable law.

**Supervisory Authority.** EU-resident Independent Distributors have the right to lodge a complaint with the competent national data protection supervisory authority in the EU Member State where they reside, work, or where the alleged infringement of GDPR occurred, without prejudice to any other administrative or judicial remedy.

## 22. Copyright Notice

© Copyright LEGANOVO is a product developed and distributed by NURISE Software Design L.L.C. This website, software application, and its content are protected under the applicable international copyright laws and treaties. Unauthorized reproduction, distribution, modification, or use of this software or any part of its content without express written permission from NURISE is strictly prohibited.

NURISE retains full ownership of the software, including all intellectual property rights. Independent Distributors are granted a limited, non-exclusive, non-transferable license to access and use the software in accordance with the Terms of Service, Independent Distributor Agreement, and any applicable user agreements. Unauthorized distribution, publication, offering for sale, licensing, sublicensing, giving, or disclosing this content to any third party in any medium is illegal and strictly prohibited. All violators will be prosecuted to the fullest extent of the law.

*Thank you for choosing NURISE. We are dedicated to protecting your privacy and providing a secure experience.*