

PRIVACY POLICY

Effective Date: April 21, 2025 **Entity:** NextGE Pty Ltd (ACN: 687 806 453)

NextGE Pty Ltd (“NextGE,” “we,” “us,” or “our”) is committed to protecting your privacy. This policy outlines how we handle personal information in accordance with the **Australian Privacy Principles (APPs)**, the **UK Data Protection Act**, and other applicable global data protection regulations.

1. Information We Collect

We collect information necessary to provide high-end architectural and security services.

- **Personal Information:** Name, enterprise email address, professional title, phone number, and LinkedIn profile/CV data (for talent services).
- **Technical Data:** IP addresses, browser fingerprinting, device identifiers, and session metadata.
- **Consultation Data:** Technical hurdle descriptions, architecture diagrams, or project parameters shared during the intake process.

2. Legal Basis for Processing

We process data under the following legal frameworks:

- **Contractual Necessity:** To deliver services defined in a Statement of Work.
- **Consent:** Where you have explicitly opted-in (e.g., marketing or newsletters).
- **Legitimate Interests:** To secure our infrastructure, prevent fraud, and optimize our service delivery.
- **Legal Obligation:** To comply with Australian or international law.

3. Cross-Border Data Transfers

NextGE operates a global delivery model across **Australia, the United Kingdom, and India.**

- **Global Corridors:** Data may be accessed or stored by our strategic leads in these regions.
- **Safeguards:** We implement Standard Contractual Clauses (SCCs) and ensure that all international hubs maintain security standards equivalent to the Australian Privacy Principles. We do not store client data in jurisdictions with inadequate data protection laws.

4. Security Architecture & Data Protection

As cybersecurity specialists, we apply a **Zero Trust** approach to data:

- **Encryption:** All sensitive data is encrypted using Industry-standard encryption.
- **Access Control:** We utilize Multi-Factor Authentication (MFA) and Principle of Least Privilege (PoLP) for all internal systems.
- **Sanitization:** All inbound web traffic is sanitized via DOMPurify and validated against strict Zod schemas to prevent injection attacks.

5. Information Sharing and Disclosure

NextGE does not sell, rent, or trade your personal data. Disclosure only occurs:

- **With Service Providers:** Trusted partners (e.g., Resend for email, AWS/Azure for hosting) who are contractually bound to our security standards.
- **For Project Rescue/Talent:** Sharing redacted project requirements with vetted engineering leads.
- **Legal Requirements:** When compelled by a court order or regulatory body (e.g., OAIC).

6. Your Rights & Data Sovereignty

Regardless of your location, NextGE honors the following rights:

- **Access & Rectification:** The right to request a copy of your data or correct inaccuracies.
- **Erasure:** The right to request deletion of personal data when no longer required for legal or contractual purposes.
- **Data Portability:** The right to receive your data in a structured format.
- **Withdrawal of Consent:** You may opt-out of communications at any time via the provided "Unsubscribe" links.

7. Cookies and Telemetry

We use essential cookies to maintain session integrity and analytical cookies to monitor site performance. We do not use intrusive third-party tracking pixels (e.g., Meta Pixel) that harvest data for external advertising profiles.

8. Internal Inquiry & Dispute Resolution

If you have a concern regarding the handling of your information:

1. **Submission:** All inquiries must be submitted in writing to info@nextge.com.au.
2. **Review Period:** We will acknowledge your inquiry within 48 hours and provide a formal response within 30 business days following a technical internal audit.
3. **Resolution:** We are committed to working with you to resolve any concerns regarding data privacy internally and professionally.

9. Corporate Identity & Contact

NextGE Pty Ltd ACN: 687 806 453 **Privacy Officer:** info@nextge.com.au **HQ:** Melbourne, Victoria, Australia

