

Privacy Policy

Last Updated: April 1, 2026

This Privacy Policy describes how NomadCTS LLC (“Nomad,” “we,” “us,” or “our”) collects, uses, discloses, and protects information about you when you use our website (nomadcts.com) or any of our software platforms and services. We are committed to handling your data with transparency, integrity, and care. Please read this policy carefully. By using our services, you agree to the practices described herein.

Our corporate website (nomadcts.com) is a commercial informational site only. It does not store personal data and is designed solely for companies to learn about our services and make inquiries. Our software platform services are distributed across multiple URLs and servers as described below.

1. About NomadCTS LLC

NomadCTS LLC is a consulting and software services company. We are not a money transmitter, e-money service provider, or financial institution. We do not hold or control funds on behalf of other companies or individuals. Our services are provided exclusively to business clients and service partners under formal contractual agreements.

2. Information We Collect

We collect only the information that is necessary and essential to operate our platform and deliver our services effectively. This may include:

- Identity information (name, business name, government-issued ID where required)
- Contact information (email address, phone number, mailing address)
- Account and transaction information necessary to operate the platform
- Information required to verify your identity and eligibility under applicable law
- Information shared by your payor company or service partners to facilitate transactions

We do not sell your personal information to third parties. All data collected is used solely for legitimate business purposes in connection with the services you have requested.

3. How We Use Your Information

We use the information we collect to:

- Operate, maintain, and improve our platform and services
- Verify your identity and eligibility to participate in our services
- Facilitate transactions and fulfill contractual obligations
- Comply with applicable laws, regulations, and government requirements
- Conduct internal audits, troubleshooting, and transaction tracing
- Send service-related announcements and notifications
- Compare your information against government and industry sanctions and watchlists as required by law

By using our services, you authorize us to perform the activities above, including periodic identity and eligibility reviews as required by applicable regulations.

4. How We Share Your Information

We may share your information in the following circumstances:

- With authorized third-party service providers and vendors who help us operate our platform, subject to confidentiality obligations
- With your financial institution, as necessary to complete transactions you have requested
- With clients and service partners, to the extent necessary to fulfill our contractual obligations
- With government agencies, regulators, or law enforcement, where required by applicable law or regulation, or in response to a valid legal process
- In connection with a merger, acquisition, or sale of all or substantially all of our assets, subject to standard confidentiality protections

Third-party providers we work with have their own privacy policies, which we encourage you to review. We require all third parties to handle your data responsibly and in accordance with applicable law.

5. Your Rights and Choices

You have the following rights with respect to your personal information:

- Access: You may request a copy of the personal information we hold about you
- Correction: You may request that we correct inaccurate or incomplete information
- Deletion: You may request deletion of your personal information, subject to our legal and contractual obligations to retain certain data

- **Withdrawal of Consent:** You may withdraw your consent and discontinue use of our services at any time. Note that withdrawal may prevent us from providing certain services, and we reserve the right to remove you from our platform accordingly
- **Opt-Out of Communications:** You may opt out of non-essential communications at any time by contacting us at info@nomadcts.com

To exercise any of these rights, please contact us using the information in Section 10 below.

6. Data Security

We implement commercially reasonable technical and organizational security measures to protect your personal information against unauthorized access, disclosure, alteration, or destruction. These measures include:

- Encryption of data in transit and at rest where applicable
- Access controls limiting data access to authorized personnel only
- Regular security reviews and fraud prevention protocols
- Vendor security requirements for all authorized third-party partners

While we take data security seriously, no system is completely impenetrable. In the unlikely event of a data breach that affects your rights, we will notify you as required by applicable law.

7. California Residents — CCPA Rights

If you are a California resident, you have specific rights under the California Consumer Privacy Act (CCPA), including the right to know what personal information we collect and how it is used, the right to request deletion of your information, and the right to non-discrimination for exercising your privacy rights. As noted above, NomadCTS LLC does not sell personal information. To exercise your CCPA rights, please contact us at info@nomadcts.com.

8. International Users — GDPR

For users located in the European Economic Area (EEA) or United Kingdom, we process your personal data in accordance with the General Data Protection Regulation (GDPR) and applicable local data protection laws. Our legal bases for processing include contractual necessity, legitimate interests, compliance with legal obligations, and, where applicable, your explicit consent.

EEA and UK users have the right to access, rectify, erase, restrict, or object to the processing of their personal data, and the right to data portability. You also have the right to lodge a complaint with your local supervisory authority. To exercise these rights, contact us at info@nomadcts.com.

9. Children's Privacy

Our services are not directed to individuals under the age of 13. We do not knowingly collect personal information from children under 13. If we become aware that we have inadvertently collected information from a child under 13, we will promptly delete that information from our records. If you believe we may have collected information from a child under 13, please contact us immediately at info@nomadcts.com.

10. Policy Updates

We update this Privacy Policy from time to time as our services evolve or as required by law. We will post the updated policy on our website with a revised "Last Updated" date. Your continued use of our services after any update constitutes your acceptance of the revised policy. We encourage you to review this policy periodically.

11. Third-Party Links

Our platform or website may contain links to third-party websites, institutions, or vendors. We are not responsible for the privacy practices of those third parties. We encourage you to review their privacy policies before sharing any personal information with them.

12. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

NomadCTS LLC

Email: info@nomadcts.com

Website: nomadcts.com

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