

Data Processing and GDPR Clause

Effective Date: 18/03/2026

This Data Processing Clause forms part of the Terms of Service for Affluid, operated by **Nuvonia Media FZ LLC**.

1. Roles of the Parties

Due to the self-hosted nature of Affluid:

- The **Customer** (user of the software) acts as the **Data Controller**
- Affluid acts solely as a **Software Provider**

Affluid does **not** act as a Data Processor for end-user data processed within the Customer's infrastructure.

2. Scope of This Clause

This clause applies only to:

- Personal data collected through the Affluid website
- Account, billing, and support-related data

It does **not** apply to:

- Tracking data
 - End-user data
 - Any data processed within Customer-hosted environments
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3. Customer Responsibilities

The Customer is solely responsible for:

- Compliance with applicable data protection laws (including GDPR where applicable)
- Obtaining valid user consent for tracking and cookies

- Providing privacy notices to end users
 - Ensuring lawful processing of personal data
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4. Affluid Responsibilities

Affluid will:

- Process account-related personal data lawfully and transparently
 - Implement reasonable security measures
 - Not sell or misuse personal data
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5. Data Transfers

Data collected by Affluid may be processed in the **United Arab Emirates** or other jurisdictions where service providers operate.

By using Affluid, you consent to such transfers.

6. Data Subject Rights

Affluid supports data subject rights for data under its control, including:

- Access
- Correction
- Deletion

Requests can be made via: support@affluid.com

7. Data Retention

Affluid retains personal data only as long as necessary for:

- Service provision
- Legal compliance
- Legitimate business purposes

8. Security Measures

Affluid implements reasonable technical and organizational safeguards to protect personal data.

9. Limitation of Responsibility

Affluid is **not responsible** for:

- Data processed within Customer-hosted environments
 - Customer compliance with GDPR or other laws
 - Misuse of tracking technologies by Customers
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10. Updates

This clause may be updated from time to time and forms part of the Terms of Service.
