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Privacy Policy

Covers nexgenio.com (apex site), nexgenio.com/self/ (course store), and nexgenio.com/blog/ (NexGenio Insights). Structured consistently with NexGenio's existing OntoVault privacy policy. Prepared as a working draft for lawyer review before publication.

[Download as PDF \(v0.1 draft\)](#)

1. Who We Are

NexGenio LTD (“we”, “us”, “our”) is the data controller for personal data processed through nexgenio.com and its subpages. Registered in Malta, company number C 88842, VAT MT25941925, registered address 36 St Dminika Street, Victoria (Gozo) VCT9030, Malta. Contact: toby@nexgenio.com.

2. What Data We Collect

- **Course purchases** (nexgenio.com/self/): name, email address, billing address, VAT identification number (if provided for reverse charge), and payment confirmation details from Stripe (we do not receive or store full card numbers).
- **Contact/enquiry forms** (if present on the apex site): name, email address, and message content.
- **Blog** (nexgenio.com/blog/): currently no newsletter/subscription data is collected — the native signup form has been disabled pending a proper CRM-integrated implementation.

- **Website analytics:** see Draft Flag below.

DRAFT FLAG

Analytics/cookie disclosure cannot be finalized until confirmed whether any tracking tool is actually in use across apex/self/blog. If none, state that explicitly rather than describing hypothetical tracking.

3. How We Use Your Data (Purposes and Legal Basis)

- **To process and fulfil course purchases** — legal basis: performance of a contract (Art. 6(1)(b) GDPR).
- **To comply with tax and accounting obligations** (VAT records, invoicing) — legal basis: legal obligation (Art. 6(1)(c) GDPR).
- **To respond to enquiries** submitted via contact forms — legal basis: legitimate interest in responding to business enquiries (Art. 6(1)(f) GDPR), or contract performance where the enquiry leads to a service agreement.

4. Payment Processing

Payments are processed by Stripe, Inc., acting as our payment processor. Stripe processes payment data under its own privacy policy and data processing agreement, available at stripe.com/privacy. Card details are entered directly into Stripe's secure checkout and are not received or stored by NexGenio.

5. Sharing Data with PECB

When you purchase a course, your name and email address are manually entered by our Director into the official PECB partner platform (myPECB) in order to provision your access to course materials and register you for the relevant certification examination. This is a manual process performed by a NexGenio staff member, not an automated data transfer. PECB acts as an independent data controller for this purpose — see [PECB's own privacy policy](#) for how they handle your data.

6. Data Retention

PLACEHOLDER — retention periods to be defined by Director/lawyer — typically: purchase/invoice records retained per Malta tax law requirements (usually a minimum of several years), enquiry data retained only as long as necessary to handle the enquiry.

7. Your Rights Under GDPR

As a data subject, you have the right to:

- Access the personal data we hold about you
- Request correction of inaccurate data
- Request erasure of your data, subject to our legal retention obligations (e.g. tax records)
- Restrict or object to certain processing
- Request data portability
- Lodge a complaint with the Office of the Information and Data Protection Commissioner (IDPC), Malta's supervisory authority, or your own EU member state's equivalent authority

To exercise any of these rights, contact toby@nexgenio.com.

8. International Data Transfers

Stripe and PECB may process data outside the EU/EEA in some circumstances. Where this occurs, appropriate safeguards (such as Standard Contractual Clauses) are relied upon by those processors under their own privacy policies.

PLACEHOLDER — confirm specifics with lawyer if this needs to be stated in more detail.

9. Security

PLACEHOLDER — describe actual technical/organizational security measures in place, e.g. HTTPS/TLS on all properties, access controls on infrastructure, to be confirmed with Director before finalizing.

10. Children's Data

Our services are directed at business professionals and are not intended for use by children. We do not knowingly collect personal data from anyone under the age of 16.

11. Changes to This Policy

We may update this policy from time to time. The date of the most recent update will be shown at the top of this page. Material changes will be communicated where appropriate.

12. Contact and Complaints

NexGenio LTD

36 St Dminika Street, Victoria (Gozo) VCT9030, Malta

Email: toby@nexgenio.com

You may also contact Malta's Information and Data Protection Commissioner (IDPC):
Floor 2, Airways House, High Street, Sliema, SLM 1549, Malta.



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