Nuclei Privacy Notice (EU)

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Version: 2.0
Last Updated: November 11, 2026

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This notice explains how Nuclei Technologies, Unipessoal Lda ("Nuclei", "we", "us"), also called "Nuclei Portugal", together with its affiliate Nuclei India (section 2), uses your personal data when you use our services in a partner's app, or visit our website, in the European Union or European Economic Area.

Terms we use

Term	Meaning
Nuclei, we, us	Nuclei Technologies, Unipessoal Lda (Nuclei Portugal), as in our Terms of Use. Nuclei India is named wherever it acts
Partner	A company that offers our services inside its own app, such as a telecom operator or a bank
Partner app	The partner's app in which you use our services
Our services	Gifting Services, Travel Services (such as hotel bookings), the Trip Planner and any other service we offer in a partner app
Independent Supplier / Supplier	Third-party providers whose products or services are available through our platform, such as gift card issuers and Travel Suppliers (for example hotels)
Service provider	A company that processes data on our behalf, for example for hosting or messaging

Part A – About us

1. Scope

This notice applies when you use our services, inside the app of one of our partners (a "partner app") in the EU or EEA.

It does not cover:

- the partner's own use of its app, which its own privacy notice covers;
- services a partner offers as its own, where Nuclei acts only on the partner's instructions. In that case, the partner's privacy notice applies;
- our website, gonuclei.com, except where Part E describes it.

Each of our partners uses this notice, and for most partners this notice alone applies. Where our arrangement with a partner needs extra information, such as activities we carry out jointly with it, Annex 3 adds a short section for that partner, which forms part of this notice. You can always find this notice, including Annex 3, through the privacy link in our services inside the partner's app.

2. Who we are

Nuclei Technologies, Unipessoal Lda, Rua Quinta da Lobita 65, 3A, 2775-621 Carcavelos, Lisbon, Portugal ("Nuclei Portugal"), provides our services in Europe. It is your main point of contact for anything relating to your personal data.

Nuclei Portugal is part of the Nuclei group. Our parent company, CDNA Technologies Pvt Ltd, F1-4141, Sobha Arena, The Park, Thalaghattapura PO, Kanakapura Main Road, Bangalore 560062, India ("Nuclei India"), builds and runs the technology platform behind our services. It also provides customer support, security and other operational services for the group, supported by other Nuclei group companies.

3. Who is responsible for your data

Nuclei Portugal and Nuclei India are jointly responsible for our services, including purchases, bookings, gift delivery, trip planning and customer support. Contact Nuclei Portugal for anything about them.

For some activities, Nuclei and the partner whose app you use are jointly responsible, as Annex 3 explains, and you can contact either of us about them. The partner alone is responsible for its own use of its app and of the data it receives.

Payment service providers (PSPs) process your payments on our behalf, and are themselves responsible for using them for their own fraud prevention and legal compliance (section 11).

How Nuclei Portugal and Nuclei India share responsibility. For the personal data described in this notice, Nuclei Portugal and Nuclei India are joint controllers. They decide together how and why your data is used. In summary:

- Nuclei Portugal is responsible for our relationship with you and our partners in Europe, for this notice, for handling your privacy requests and for dealing with data protection authorities.
- Nuclei India is responsible for operating and securing the platform, providing customer support, and carrying out the technical work needed to act on your requests.

To exercise your rights, contact Nuclei Portugal using the details in section 19. You can also exercise your rights against either company, and we will make sure your request is handled.

Nuclei India also uses limited technical data, such as security logs, IP addresses, device information and account identifiers, as a separate controller where necessary to protect our systems against security threats and fraud, to meet its legal obligations, or to establish or defend legal claims. For these purposes too, you can contact Nuclei Portugal, which will pass your request on.

4. Using our services through a partner's app

Our services are available inside our partners' apps. Two kinds of processing happen there:

- **Independent processing.** For most processing, Nuclei and the partner are each responsible for their own part. The partner is responsible for its app and for its own use of your data, under its own privacy notice. Nuclei is responsible for our services, as this notice describes.
- **Joint activities.** For some specific activities, Nuclei and the partner decide together how your data is used, and are joint controllers under Article 26 GDPR. Annex 3 lists these activities for each partner they apply to, what each of us is responsible for, and how to exercise your rights. You can exercise your rights with either of us.

Where Annex 3 says so, we share your orders and bookings with the partner so it can show them in its app, and the partner's helpdesk can see and raise

queries about a support request you make to us.

Part B – How we use your data

5. Where your data comes from

- **From you**, when you use our services.
- **From the partner whose app you use:** the identifiers needed to sign you in (a pseudonymous profile ID and device ID), your language, a token for sending you notifications and, for loyalty partners, your loyalty points balance. We don't receive your name or contact details from the partner.
- **From other people:** if someone sends you a gift, they give us your name and contact details. If someone books a hotel for you, they give us your name and contact details as the traveller.
- **From our providers:** for example, payment confirmations from the PSP and booking confirmations from the hotel supplier.

We do not collect personal data from publicly available sources.

6. Why we use your data, and our legal bases

We use your data for the purposes below. Each service in section 7 lists the data it uses and which of these purposes it serves.

Across all our services, we use the profile and device identifiers we receive from the partner, sign-in and notification tokens, your language, device and app information, your contact details, order and booking details, payment confirmations (such as transaction reference and payment method) and your messages to customer support.

Purpose	What it involves	Legal basis
Providing our services	Signing you in, taking orders and bookings, delivering gifts, planning trips, saving your items, showing hotels near you	Contract (Art. 6(1)(b)); legitimate interest (Art. 6(1)(f)) for the details of someone you buy or book for
Payments and refunds	Charging and refunding your purchases, and handling payment disputes and chargebacks	Contract; legitimate interest in handling payment disputes
Financial records	Invoices and records required by tax and accounting law	Legal obligation (Art. 6(1)(c))

Purpose	What it involves	Legal basis
Service messages	Order and booking confirmations, gift delivery, trip reminders and review requests	Contract
Loyalty points	Applying, reverting and crediting points, for loyalty partners only	Contract; see Annex 3
Customer support	Answering your questions and resolving issues	Contract; legitimate interest in improving our support
Content moderation	Checking photos, videos and messages before they are shown	Legitimate interest in keeping our services safe
Reviews	Collecting your reviews to improve the quality of our services. We don't currently show them to other users	Legitimate interest in improving our services
Usage analytics	Understanding how our services are used, to improve them (partner-specific arrangements are in Annex 3)	Consent (Art. 6(1)(a))
Security and fraud prevention	Protecting our services and you	Legitimate interest
Legal claims and requests	Establishing or defending legal claims, and responding to lawful requests	Legal obligation; legitimate interest

Where we rely on legitimate interest, we have weighed it against your rights, and you can object at any time (section 15).

Your payment details are entered directly with the PSP. They never reach Nuclei, and we never see or store them.

We send marketing messages only with your consent, or where the law allows. You can withdraw your consent at any time (section 15).

7. Our services

Each service below adds to sections 5 and 6 and describes, in general terms, the data it uses.

7.1 Gift Cards

You can buy gift cards for yourself or someone else, add a message, photo or video, and pay using the payment methods shown at checkout. We use your name and email address, the recipient's name and contact details when you

buy for someone else, the message, photo or video you add, and your order details, including the gift card code. Purposes: providing our services, payments and refunds, service messages and content moderation.

Gift card suppliers receive the product and amount details. The gift is delivered by secure link or by email. If you choose, our AI-generated gift greeting feature suggests a message for your gift card, which you can edit before sending (section 8).

7.2 Hotels

You can search for hotels, including near your current location, book and cancel a stay, and rate and review it afterwards. We use your search details (destination, dates and guests), your location if you use nearby search, the main traveller's name and contact details, your booking, payment and refund details, and any rating, review and photos you choose to give. Purposes: providing our services, payments and refunds, financial records, service messages, reviews and content moderation.

- For hotel booking, we collect details only for the main traveller, not for other guests.
- Your location is used only for that search and is not stored. Your ratings, reviews and photos are used to improve our services and are not currently shown to other users. Photos are checked by automated moderation. Please don't include personal details in your review text.
- Maps are provided by Google, which receives the information your device needs to display them.
- Some listings take you to a third-party booking site. We don't share your personal data with that site; its own terms and privacy notice apply once you are there.

7.3 Trip Planner and Video Discovery

You can get destination suggestions and day-by-day itineraries, save and download them, and watch and react to travel videos. We use your departure city and trip preferences (such as type of trip, who you travel with, dates, budget and destination), the text you type to create or change an itinerary, your saved itineraries and destinations, and the videos you like or dislike. Purposes: providing our services.

Trip Planner takes no payments and doesn't ask for your name, email address or phone number. If you book a hotel from the Trip Planner, section 7.2 applies.

8. AI-assisted features

We use AI services from a third-party provider, named in Annex 1, to:

- suggest destinations and create itineraries in Trip Planner;
- suggest a greeting message for your gift card;
- check photos, videos and messages for inappropriate content.

We don't send your name, contact details or account identifiers with these requests. Text you type is sent as you write it, so please don't include sensitive details such as health information or ID numbers. Our AI provider does not use your data to train its models.

We do not currently make decisions about you based solely on automated processing that have legal or similarly significant effects (Article 22 GDPR). Automated checks, such as content moderation, can lead to content being blocked; flagged content may be reviewed by a person, and we tell you if we take action.

9. If you give us someone else's details

When you send a gift or book a hotel for someone else, you give us their name and contact details. We use them only to deliver the gift or complete the booking. Please let them know you are sharing their details with us. We also tell them ourselves: gift emails and booking confirmations link to this notice. They have the same rights under this notice as you.

10. Data you must provide

Some details are needed to buy a gift card or book a hotel, such as the sender's or traveller's name and email address. These are marked as required, and without them we can't complete your order or booking. Everything else is optional: a gift message, photo or video, your location for nearby search and reviews.

Part C – Sharing, transfers and retention

11. Who receives your data

- **Nuclei group companies**, which run the platform and provide support, security and operations.
- **The partner whose app you use**, as described in section 4 and, where relevant, Annex 3.

- **Service providers acting on our behalf**, for hosting, payment processing, hotel bookings, messaging, analytics, AI and customer support. They use your data only on our instructions, under written contracts.
- **Independent controllers:** PSPs, such as Braintree and Stripe, for their own fraud prevention and legal compliance. Each uses your data under its own privacy notice.
- **Travel Suppliers,** such as hotels, through our hotel booking provider. They receive the traveller's name and the booking and payment status details needed to provide the service you booked, and use them under their own privacy notices.
- **Banks and card schemes**, when we handle a payment dispute or chargeback.
- **Gift recipients**, who see your name, message, photo or video.
- **Authorities, courts and professional advisers**, where the law requires it or to establish or defend legal claims.

Annex 1 names our providers and independent controllers. We do not sell your personal data.

12. International transfers

Your data is hosted in the EU. Authorised staff of Nuclei India access it remotely from India to operate, support and secure our services. Some of our service providers also process data outside Europe, as Annex 1 shows.

Where a country is not covered by an EU adequacy decision, as is the case for India, we protect these transfers with the European Commission's Standard Contractual Clauses. For providers in the United States, we rely instead on the EU-U.S. Data Privacy Framework where the provider is certified.

13. How long we keep your data

We keep your data only as long as needed for the purpose we collected it for, and then delete it or make it anonymous.

In practice, your account data and the items you save are kept while you use our services, and deleted or made anonymous once your account has been inactive for a set period, which we define internally based on how long customers typically return and on legal claim periods. Records of orders, bookings and payments are kept for as long as tax and accounting law requires. Details you give us only to complete a purchase or booking, such as gift messages and recipient or traveller details, are kept until the gift is

delivered and can no longer be redeemed, or the stay is over; after that, only as part of the transaction record. Support conversations, usage analytics and security logs are kept only for the limited period their purpose requires.

We don't keep your device location from a nearby search, or the text you type to plan a trip.

We keep data longer only where needed to establish or defend a legal claim, or to respond to a request from an authority.

14. Security

We protect your data with appropriate technical and organisational measures, including encryption in transit and at rest, role-based access controls, backup and disaster recovery, monitoring and regular security reviews. Our information security management is independently certified. We require our providers to apply equivalent safeguards.

If a personal data breach is likely to result in a risk to you, we will notify the competent data protection authority and, where required, you.

Protecting yourself. We never ask for your payment details by email, phone or message, or ask you to pay for a gift card or booking outside our services. Treat gift card codes like cash and share them only with the person you are gifting. If something looks suspicious, contact our support at help@gonuclei.com.

Part D – Your choices

15. Your rights

Under the GDPR, you have the right to:

- **access** the personal data we hold about you and get a copy;
- **correct** data that is inaccurate or incomplete;
- **delete** your data, where there is no longer a reason to keep it;
- **restrict** how we use your data, for example while we check a complaint;
- **receive your data** in a portable format, or have it sent to another organisation;
- **object** to our use of your data based on legitimate interest, on grounds relating to your situation;
- **withdraw your consent** at any time, without affecting what we did before you withdrew it;

- **not be subject** to decisions based solely on automated processing that have legal or similarly significant effects.

To exercise your rights, email privacy@gonuclei.com. For activities we share with a partner, you can also contact the partner. Please tell us which partner app you use our services in, so we can handle your request quickly. Where needed to protect your data, we ask you to confirm your identity first and validate that identity with the help of our partner.

We will respond within one month. If your request is complex, or we receive many requests, we can extend this by up to two further months, and we will tell you within the first month. Exercising your rights is free of charge.

16. Information stored on or read from your device

Our services store and read limited information on your device. Most of it is needed for our services to work: signing you in, sending you service notifications and keeping your settings. Anything else is used only with your consent, unless an annex covering a specific partner describes it as needed for a partner programme you have joined. Our services read your device's location only if you allow it, for nearby hotel search. Annex 2 lists each item.

17. Children

Our services are intended for people aged 18 or over. A gift recipient can be of any age; we use their contact details only to deliver the gift.

18. Changes to this notice

We update this notice when our services or the way we use your data change. Before changes that could significantly affect you take effect, we will inform you through the partner's app, in cooperation with the partner, and by email where we have your email address. The current version is always available through the privacy link in our services. The annexes are updated when our providers or the information stored on your device change.

19. Contact, Data Protection Officer and complaints

Nuclei Portugal: Nuclei Technologies, Unipessoal Lda, Rua Quinta da Lobita 65, 3A, 2775-621 Carcavelos, Lisbon, Portugal. Email: privacy@gonuclei.com. For customer support: help@gonuclei.com or +351 923 366 448.

Group Data Protection Officer: privacy@gonuclei.com, or by post to Nuclei Portugal's address, marked "Data Protection Officer".

Complaints: you can lodge a complaint with the Portuguese data protection authority, the Comissão Nacional de Proteção de Dados (CNPD), or with the data protection authority in the country where you live or work, or where you believe the infringement took place. We would appreciate the chance to address your concern first.

Part E – Our website

20. Visiting gonuclei.com

This section applies when you visit our website, gonuclei.com, or contact us through it. Our website is for information about Nuclei and for business enquiries; it does not provide our services. Website cookies are covered only here, not in section 16 or Annex 2. Sections 2, 12, 14, 15 and 19 also apply to the website.

The website is run by Nuclei India.

When you contact us through a form, we use your name, email address, company name, the requirement you describe and the page you sent it from to answer your enquiry, for example to schedule a demo, to discuss working together and to follow up on your request. We do this to take steps you ask for before a contract and in our legitimate interest in developing our business. To run the website securely and keep automated spam out of our forms, we use your IP address, browser and device information and the pages you visit, in our legitimate interest. Optional analytics, marketing and personalisation cookies, and embedded videos, are used only with your consent, given through the cookie banner.

Enquiries and business contacts are kept while we are in discussion or working together, and deleted after a period of inactivity. Your cookie choice is remembered for 12 months, after which we ask you again.

Strictly necessary cookies keep the website working and need no consent. Analytics, marketing and personalisation cookies are off until you switch them on in the cookie banner. You can change your choice at any time through the Preferences button at the bottom left of each page, which also shows the categories in use.

Annex 1 – Providers and recipients

Last updated: Oct 26, 2026

Service providers acting on our behalf

Provider	What it does for us	Contracted by	Where data is processed	Transfer safeguard
Amazon Web Services	Hosting and content moderation	Nuclei India	EU	Not needed (EU)
Twilio, including SendGrid	SMS and email delivery	Nuclei India	USA	EU-U.S. Data Privacy Framework (DPF)
CleverTap	Usage analytics	Nuclei India	USA, India, Singapore	Standard Contractual Clauses (SCC)
OpenAI	AI-assisted features	Nuclei India	United States	SCC
Freshworks (Freshdesk)	Customer support tickets	Nuclei India	USA	SCC
Braintree (PayPal)	Payments and refunds	Nuclei Portugal	EU, USA	DPF, SCC
Stripe	Payments and refunds	Nuclei Portugal	EU, USA	DPF, SCC
TBO	Hotel bookings	Nuclei Portugal	UAE, India	SCC

Independent controllers

Recipient	Why it receives your data	Its privacy notice
The partner whose app you use	As described in section 4 and, where relevant, Annex 3	Available in the partner app
Braintree (PayPal)	Its own fraud prevention and legal compliance, when processing your payment	https://www.paypal.com/us/legalhub/braintree/braintree-privacy-policy

Recipient	Why it receives your data	Its privacy notice
Stripe	Its own fraud prevention and legal compliance, when processing your payment	https://stripe.com/in/privacy

Nuclei India is not listed here because it is a joint controller with Nuclei Portugal (section 3). We update this annex before a new provider starts processing personal data.

Annex 2 – Information stored on or read from your device

Last updated: Oct 26, 2026

This annex covers our services inside partner apps. Website cookies are described in section 20, not here.

What	What it does
Sign-in tokens	Keep you signed in to our services
Profile and device identifiers	Sign you in to our services
Notification token	Send you service notifications
App and language settings	Make our services work on your device, in your language
Analytics identifier, device identifiers and event data	Measure how our services are used and, for partner programmes, support relevant offers (see Annex 3)
Device location	Find hotels near you

Annex 3 – Partner-specific arrangements

This annex applies only to the partners listed in it. For all other partners, this notice applies without additions.

Deutsche Telekom (Magenta Moments - Loyalty Programme)

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Partner. Deutsche Telekom AG, which runs the Magenta Moments loyalty programme, and the Deutsche Telekom group company that operates the app in which you use our services in your country (together "Telekom").

Joint activities. Nuclei and Telekom are joint controllers (Article 26 GDPR) for the activities below. Each of us is responsible for its own part, including its legal basis.

1. **Making our services available in the Telekom app**: integrating our services into the Telekom app and exchanging the technical data needed for you to use them, including sending you push notifications. This covers only the integration itself; what happens within our services and our own systems is Nuclei's sole responsibility.
2. **Administering Magenta Hearts** you earn, redeem or get back through our services.
3. **Analysing your use of our services and your purchase preferences**: we share events about how you use our services with Telekom in pseudonymous form, which Telekom uses within Magenta Moments to analyse, improve and suggest our gifting and travel offers.

Interaction events for Magenta Moments. In the Telekom app, our services are offered as part of Magenta Moments, Telekom's loyalty and lifestyle programme, which you joined. Under its terms, Magenta Moments learns your preferences from how you interact with the programme so it can offer you relevant benefits and services. To support this, our services record events about how you interact with them, such as which offers you view, tap, save, buy or book, and share them with Telekom in pseudonymous form (activity 3). As these events are needed for the Magenta Moments programme you asked for, we don't ask for separate consent for them in the Telekom app. We use them only for this purpose, not for advertising, and keep them only as long as needed for it.

Data exchanged. For these activities, we exchange: technical data for the integration (profile and user IDs, language, device ID and token, and consent settings); push notification data; your orders and bookings, such as reference numbers, dates, destination, number of guests, amount and status, so Telekom can show them in its app; your Magenta Hearts balance and transactions; and pseudonymous usage events. No special categories of personal data are shared.

Who does what. Telekom shows you this notice and our terms before you first use our services and keeps a record of your acceptance; we tell Telekom when they change. Each of us handles rights requests, security, service providers and data breaches for its own part of the processing. You can contact either of us (section 15), and we will pass on anything the other needs to handle.

Customer support. If you contact Telekom's helpdesk about our services, authorised Telekom staff can raise and view your support queries in our support tool, for Telekom's own customers only. Telekom and Nuclei each act as independent controllers for this.

Telekom's use of this data for its own purposes unrelated to our services, such as offers elsewhere in Magenta Moments, is its sole responsibility, under its own privacy notice.