

#NEWIR PRIVACY POLICY

Effective Date: August 9, 2026

#NEWIR LLC ("NEWIR," "we," "us," or "our") respects your privacy. This Privacy Policy explains how we may collect, use, disclose, retain, and protect information when you visit our website, contact us, subscribe to communications, submit a form, or otherwise interact with NEWIR. By using the website, you acknowledge the practices described in this policy.

1. Information We May Collect

We may collect information you voluntarily provide, including your name, email address, telephone number, company, job title, business information, project or service interests, messages, form submissions, and other information you choose to provide. We may also collect technical and usage information automatically, such as IP address, browser type, device information, referring pages, pages viewed, approximate location, interaction data, and website performance information through cookies, pixels, analytics tools, and similar technologies.

2. How We Use Information

We may use information to respond to inquiries; provide, improve, personalize, and evaluate our services and website; understand visitor interests and website usage; develop business and marketing insights; communicate about NEWIR services, capabilities, perspectives, events, offers, or other information that may be relevant; administer subscriptions; conduct analytics and measurement; improve advertising and marketing effectiveness; maintain security; prevent misuse; comply with legal obligations; and support ordinary business operations.

3. Marketing Communications

If you provide contact information or otherwise interact with NEWIR, we may use that information to communicate with you about our business, services, content, and relevant marketing. You may opt out of promotional email communications at any time by using the unsubscribe mechanism provided in the message or by contacting us. Opting out of marketing does not prevent us from sending transactional, administrative, or service-related communications when appropriate.

4. We Do Not Sell Personal Information

NEWIR does not sell personal information for monetary consideration. We may share limited information with service providers, technology platforms, analytics providers, advertising or marketing partners, professional advisers, contractors, or other vendors when reasonably necessary to operate our website, conduct marketing, analyze performance, provide services, or support our business. These parties may process information on our behalf or under their own applicable privacy terms.

5. Cookies, Analytics and Similar Technologies

Our website may use cookies and similar technologies to remember preferences, understand website traffic, measure engagement, improve functionality, analyze visitor behavior, and support marketing and advertising activities. Third-party services used on the website may also place or access cookies or similar technologies. Browser settings and, where available, website consent tools may allow you to limit certain technologies, although doing so may affect website functionality.

6. Third-Party Websites and Services

The website may contain links to third-party websites, platforms, social networks, or services. #NEWIR is not responsible for the privacy, security, content, or practices of third parties. Information you provide directly to a third party is governed by that party's policies and terms.

7. Data Retention

We may retain information for as long as reasonably necessary for the purposes described in this policy, including to maintain business records, manage relationships and inquiries, conduct analysis, fulfill contractual or legal obligations, resolve disputes, and enforce agreements. Retention periods may vary depending on the type of information and the reason it was collected.

8. Data Security

We use reasonable administrative, technical, and organizational measures intended to protect information under our control. No website, network, transmission, or storage system can be guaranteed to be completely secure, and we cannot guarantee absolute security of information transmitted to or stored by us.

9. Your Privacy Choices and Rights

Depending on where you live and applicable law, you may have rights concerning your personal information, which may include requesting access, correction, deletion, or information about certain processing activities. You may also have the right to opt out of certain uses. We may need to verify your identity before fulfilling a request. Some information may be retained where permitted or required by law.

10. Children's Privacy

The #NEWIR website and services are intended for businesses and adults and are not directed to children. We do not knowingly seek to collect personal information from children through the website.

11. Business Transfers

If #NEWIR is involved in a merger, acquisition, financing, reorganization, sale of assets, or similar business transaction, information may be transferred as part of that transaction, subject to applicable law.

12. Legal Disclosures

We may disclose information when reasonably necessary to comply with law, regulation, legal process, or governmental request; protect the rights, property, security, or safety of #NEWIR, our clients, website visitors, or others; investigate suspected fraud, misuse, or security incidents; or establish, exercise, or defend legal claims.

13. Changes to This Privacy Policy

We may update this Privacy Policy periodically to reflect changes in our practices, technology, services, or legal requirements. The effective date shown at the top of the policy indicates when the current version became effective. Continued use of the website after an update constitutes acknowledgment of the revised policy to the extent permitted by law.

14. Contact Us

For privacy questions, requests, or concerns, contact #NEWIR using the contact information provided on the #NEWIR website. Please include enough information for us to understand and respond to your request.

General Notice: This policy is intended as a general website privacy policy and should be reviewed periodically for the specific technologies, advertising platforms, analytics tools, jurisdictions, and data practices actually used by #NEWIR.