



PRIVACY POLICY

DEPARTEMENT	COMPLIANCE
CREATION DATE	23 MARCH 2025
VERSION	3
LAST UPDATE	JUNE 2026
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VALIDATED BY	EXECUTIVE COMMITTEE

WHY THIS PRIVACY POLICY

At Kaiko, we are committed to protecting your personal data and ensuring compliance with applicable data protections regulations, including:

- The General Data Protection Regulation (GDPR), which governs the collection, processing, and protection of personal data within the European Economic Area (EEA);

This section applies to you regardless of your place of residence, including if you are located outside the European Economic Area. Please read it carefully to understand your rights in relation to your personal data.

- The California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA), which grant California residents specific rights regarding their personal information;

If you are a California resident, you should consult the “General Privacy Statement” for information on how and why we collect and use personal information, and the “California Business Privacy Statement” section of this Privacy Policy for additional information regarding your privacy rights in connection with your business-related personal information.

- The Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial laws, which regulate the handling of personal information in Canada.

If you are a Canadian resident, you should consult the “General Privacy Statement” for information on how and why we collect and use personal information, and the “Canadian Business Privacy Statement” section of this Privacy Policy for additional information regarding your privacy rights in connection with your business-related personal information.

This Privacy Policy applies to all users of Kaiko’s websites, including but not limited to kaiko.com and kaiko-research.com, as well as any Kaiko Application Programming Interfaces (“APIs”) and other services offered by Kaiko (collectively, the ‘Services’).

If you have any questions about this Privacy Policy or if you want to raise a concern about how we collect, process and protect your data, and regardless of your geographic location, you can contact us at: dpo@kaiko.com.

MORE ABOUT US



Kaiko ('Kaiko', 'We', 'Us') is a group of entities fully owned by Challenger Deep Kaiko Inc., a company headquartered at 115 West 30th Street, Suite 801, New York, NY, 10001.

For the purposes of the applicable data protection law mentioned herein, the data controller is Challenger Deep Kaiko Inc.

GENERAL PRIVACY STATEMENT

This General Privacy Statement ("Statement") governs the collection, use, and processing of your personal data and applies to all individuals interacting with our services, irrespective of their country of residence.

It has been prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "General Data Protection Regulation" or "GDPR").

If you are a resident of California or Canada acting in a business capacity, please refer to our "California Business Privacy" Statement" and "Canadian Business Privacy Statement" respectively, set out in the sections below, for information concerning the specific rights applicable to business-related personal data.

1.WHAT INFORMATION WE COLLECT

We may collect and process personal and business-related data from clients, business contacts, and visitors to our services. This includes:

1.1 INFORMATION YOU PROVIDE US

Information you provide to us when you:

- Register for an account or subscribe to our Services;
- Engage with us in contractual or commercial discussions;
- Communicate with us through email, phone, or online chats;
- Use our platform, website, or APIs;
- Register on our website;
- Subscribe to our reports;
- Attend our events.

This may include:

- Name, address, email address, phone number, job title, company information (including web links and addresses), username, password, and any other details you choose to provide;

- Technical and usage data, automatically collected when you use our website or interact with us online, including;
- IP address, browser type and version, time zone settings, and website visit details;
- Aggregated data, such as statistical or demographic data, which does not directly identify you but may be derived from your personal data;
- Cookies and tracking technologies, which help us understand website usage and improve user experience;
- API calls, user activity logs and any interactions with our Services;
- Other business-related personal data provided voluntarily in the context of our professional relationship.

1.2 INFORMATION WE COLLECT BY AUTOMATED MEANS

When you or your company representatives interact with our services, we collect certain data automatically using cookies, web server logs, and other tracking technologies. This helps us analyze usage trends, optimize performance, and enhance security.

The data collected through automated means may include:

- Device and browser details, such as IP address, browser type, and device identifiers.
- Platform and API usage data: including request logs, time-stamped activity, and authentication details;
- Technical performance data: including system logs, error reports, and security-related events.

1.3 INFORMATION YOU MAKE AVAILABLE TO OTHERS

By using the Services you may make certain of your personal information available to others. For example, if you register to an event, your name, job title, company name and business contact details may be visible by other attendees, sponsors, or exhibitors through event materials such as attendee lists, networking platforms, or name badges. Additionally, if you choose to participate in event related activities such as: panel discussions, Q&A sessions, or networking forums, your interactions may be visible to others.

Please note that any information you share in publicly accessible areas of the event (e.g., during live sessions, chat discussions, or on event apps) may be accessible to other attendees and Kaiko is not responsible for how others use that information.

2. HOW WE USE YOUR PERSONAL INFORMATION

We process your personal information for the following purposes:

- Providing and managing our Services, including fulfilling contractual obligations and enabling secure access to our platform and ensuring seamless service delivery;
- Communicating with you, responding to inquiries, and delivering updates about our products and services;
- Performing analytics, improving service functionality, and measuring performance;
- Ensuring security and fraud prevention, including preventing unauthorized access or misuse;
- Complying with legal obligations, including applicable data protection and regulatory requirements.

We may also process your information for other purposes, in which case we will provide specific notice at the time of collection and obtain consent when required by law.

3. HOW LONG WE RETAIN YOUR PERSONAL DATA

We keep your personal data to enable your continued use of our Services, for as long as it is required in order to fulfill the purposes described in this Privacy Policy, and as may be required by law as for tax accounting purposes, compliance with Anti-Money Laundering (AML) laws, or to resolve dispute and/or legal claims or as otherwise communicate to you.

4. INFORMATION SHARING

When Required, we may share your information with third-party providers, such as cloud hosting services, marketing partners, or analytics providers.

We may share your information with our affiliates and subsidiaries as necessary to operate our Services. Additionally, we may share information with:

- Business partners and merchants from whom you or your organization have purchased a product or a service to support contract execution and service administration.
- Insurance providers and financial institutions involved in offering, underwriting, or administering protection plans or related services.

We may transfer your personal data to recipients located outside the European Economic Area, including in the United States. Where such transfers occur to countries that do not benefit from an adequacy decision of the European Commission, they are carried out on the basis of appropriate safeguards, such as the European Commission's Standard Contractual Clauses.

4.1 THIRD-PARTY ANALYTICS SERVICES

We use third-party analytics providers, such as Google Analytics, to monitor and enhance the performance of our Services. These analytics services collect information through cookies and other tracking mechanisms to help us analyse how our platform is used.

For more information on Google Analytics and how to opt out, please visit [Google Analytics Privacy & Terms](#).

Our site does not currently respond to “Do Not Track” signals from web browsers.

4.2 SERVICE PROVIDERS AND THIRD-PARTY VENDORS

We engage third-party service providers to perform essential functions on our behalf, such as:

- Cloud hosting and database management to securely store and process data;
- Platform maintenance and IT support to ensure seamless service operation;
- Analytics and business intelligence services to improve our offerings;
- Marketing, communications, and customer engagement to manage business outreach.

These providers are contractually obligated to process data only as necessary to perform services for Kaiko and in compliance with applicable legal and regulatory requirements.

4.3 OTHER ONLINE SERVICES AND THIRD-PARTY FEATURES

For your convenience and information, our Services may contain links to other online services and may include third-party features such as apps, tools, widgets, and plug-ins. Our services also may allow others to send you such links.

These online services and third-party features may be owned and operated by third-party that are independent of us. A link to a third party’s online service or feature does not mean that we endorse it or that we are affiliated with it.

The information practices of the relevant third parties, including information they may collect about you, are subject to the privacy notices of these parties, which we strongly suggest you review.

We are not responsible for the content or privacy practices of any websites, apps or services that are not owned or controlled by Kaiko.

4.4 COMPLIANCE AND LEGAL DISCLOSURES

We may disclose personal information when required or permitted by law, including:

- To comply with legal obligations, subpoenas, or court orders;
- In response to lawful requests by regulatory or governmental authorities, such as law enforcement;
- To establish, exercise, or defend legal claims or enforce contractual agreements;
- To prevent fraud, financial loss, security threats, or to protect the rights, property, or safety of Kaiko, our clients, or third parties;
- As part of an investigation into suspected unlawful activities.

4.5 BUSINESS TRANSFERS

If Kaiko undergoes a merger, acquisition, divestiture, reorganization, or similar business transaction, we reserve the right to transfer relevant business-related personal information as part of the transaction.

We will ensure that any recipient processes the personal data in accordance with applicable data protection laws and provides an equivalent level of protection. Where required, we will inform you of any such change, including if a new data controller becomes responsible for your personal data.

4.6 CONSENT BASED SHARING

In certain cases, we may share information for other purposes, but only with your prior consent and in accordance with applicable laws.

5. MARKETING AND INFORMATION PREFERENCES

You can opt out of receiving marketing emails from us at any time by clicking the 'Unsubscribe' link included in the relevant email.

6. HOW WE PROTECT PERSONAL INFORMATION

We maintain administrative, technical and physical safeguards designed to protect personal information we obtain through the Services against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

We use 'best practices' to secure your personal data during transmission and while stored by using encryption, protocols and software.

We maintain physical, electronic and procedural safeguards connection with the collection, storage, and disclosure of your personal data. In addition, we limit access to

you personal data to those employees, agents, contractors and other third parties who have a business need to know.

7. YOUR PRIVACY RIGHTS

7.1 MORE ABOUT YOUR RIGHTS

Because Kaiko is GDPR compliant, you have the right to:

- Access: obtain confirmation that your personal data are processed and to obtain a copy of your personal information;
- Rectify: you can request the rectification of your personal data which are inaccurate;
- Delete: you can, in some cases, ask for the deletion of your personal data. This right is subject to applicable law and it's not absolute.
- Object/Restrict processing: you can, in certain cases, object or restrict us from processing your personal data. You can opt-out of receiving marketing communications from us by clicking on the unsubscribe link at the bottom of our emails;
- Withdraw consent: for processing requiring your consent, you can withdraw your consent at any time. Note that this decision will not affect the lawfulness of the processing based on your prior given consent.
- Complain: even if we are doing everything we can to process your information in the most professional manner you can, if you have unresolved concerns, complain to the data protection authority in the location in which you live.

If you are a California or a Canadian resident, please refer to the relevant sections below for additional information on how we collect, manage and process your business-related personal information.

7.2 HOW TO MAKE A REQUEST AND EXERCISE YOUR RIGHTS

For questions about this Statement or to exercise your privacy rights, please contact us at: dpo@kaiko.com

8. PRIVACY POLICY CHANGES

We may update this Privacy Policy from time to time to reflect changes in our personal information practices.

Where required by applicable law, we will notify you of any material changes, including by posting a prominent notice on our website or by contacting you directly where

appropriate. We encourage you to review this Privacy Policy periodically. The date of the latest update will be indicated at the top of this Privacy Policy

Unless stated otherwise, our most recent Privacy Policy applies to all information that we have about you and your account.

CALIFORNIA BUSINESS PRIVACY STATEMENT

This California Business Privacy Statement (“Statement”) supplements the Kaiko Privacy Policy and applies solely to individuals in California who interact with us in a business capacity (such as representatives of our clients, partners, vendors, and service providers).

This Statement does not apply to Kaiko personnel or job applicants.

This California Statement uses certain terms as defined in the California Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act (CRPA), and its implementing regulations.

1. NOTICE OF COLLECTION OF BUSINESS-RELATED PERSONAL INFORMATION

We collect (and have collected during the preceding 12 months) the following categories of business-related personal information:

- Identifiers: Name, business title, company name, business email address, business phone number, IP address, online identifiers (such as cookies, beacons, pixel tags, and similar technology).
- Commercial Information: Business transaction records, details of products or services purchased or considered, and other professional or commercial interactions with Kaiko.
- Online Activity: Information about your use of our Services, such as website visits, API usage, browsing history, and interactions with our communications.
- Professional or Employment-Related Information: Business affiliations, professional credentials, and job titles.
- Inferences: Business interests, preferences, and interaction history with Kaiko.

1.1 BUSINESS PURPOSES FOR COLLECTION AND USE

We may use (and may have used during the 12-month period prior to the effective date of this Statement) your business-related information for the purposes described in Section 2 of our General Privacy Statement and for the following business purposes permitted under the CCPA/CRPA:

- Providing and managing our services, including account setup, authentication, and contractual administration;
- Facilitating communications, such as responding to inquiries, providing customer support, and sending updates regarding Kaiko’s products and services;
- Performing analytics and research, including evaluating service usage, website performance, and market insights;
- Detecting and preventing fraud and security incidents to maintain data integrity and protect against malicious activity;

- Complying with legal obligations, industry standards and regulatory requirements;
- Auditing and internal business operations, including quality control, security monitoring, and compliance verification.

We do not use your information for targeted advertisement based on personal consumer behavior.

2. SOURCES OF BUSINESS-RELATED PERSONAL INFORMATION

During the 12-month period prior to the effective date of this Statement, we may have obtained business-related personal information from:

- Directly from you, such as when you register for an event, sign a contract, or communicate with us;
- Your employer or your organization, if you are engaging with Kaiko on its behalf;
- Business partners, service providers, and vendors that facilitate professional interactions or services delivery;
- Publicly available sources, such as LinkedIn, professional directories, or regulatory filings;
- Technology platforms, including website analytics providers and online networking tools.

3. SHARING OF BUSINESS-RELATED PERSONAL INFORMATION

During the preceding 12 months of this Statement, we may have shared business-related personal information as detailed:

Category of personal information	Categories of third parties
Identifiers	Affiliates, business partners, service providers, and professional advisors (such as law firms and auditors).
Commercial information	Affiliates, service providers, payment processors, and business intelligence platforms.
Online activity	Analytics providers, security service providers, and IT infrastructure vendors.
Professional information	Business partners, affiliates, and event organizers (for professional networking purposes).
Inferences	Internal teams for business strategy and

We do not sell business-related personal information in exchange for monetary consideration.

However, we may share limited business contact details with marketing and analytics partners to improve our Services. You may opt-out of this sharing, as detailed below.

4. CALIFORNIA BUSINESS PRIVACY RIGHTS

4.1 DETAILS ABOUT YOUR PRIVACY RIGHTS

If you are a California resident engaging with Kaiko in a business capacity, you have certain privacy rights under the CCPA/CPRA, including :

- Right to access: Request disclosure of the business-related personal information we have collected, used or disclosed in the past 12 months;
- Right to deletion: Request deletion of personal information, subject to legal and business retention obligations;
- Right to opt-out of data sharing: opt out of Kaiko sharing business contact details for marketing analytics.

4.2 HOW TO SUBMIT A REQUEST

To submit an access, deletion, or opt-out request, please email us at dpo@kaiko.com

We will verify requests before processing them. If you do have an account with us, we may ask for business-related details such as your name, business email, job title, company affiliation, or past interactions with Kaiko.

4.3 ADDITIONAL INFORMATION

- Non-discrimination: You will not receive discriminatory treatment for exercising your rights under the CCPA/CRPA;
- Retention policy: We retain business-related personal information only as long as necessary to fulfill contractual and legal obligations;
- Updates: We may update this Statement to reflect changes in applicable laws or our business practices.

CANADIAN BUSINESS PRIVACY STATEMENT

This Canadian Business Privacy Statement (“Statement”) supplements the Kaiko Privacy Policy and applies solely to individuals in Canada who interact with us in a business capacity (such as representatives or our clients, partners, vendors, and service providers).

This Statement is intended to comply with the Personal Information Protection and Electronic Document Act (PIPEDA) and substantially similar provincial laws (collectively, “Canadian Privacy Laws”).

1. BUSINESS-RELATED PERSONAL INFORMATION

Under Canadian Privacy Laws, personal information refers to any information about an

identifiable individual, including professional details collected in a business context.

This may include:

- Business contact information (e.g., name, business title, company name, business email, and business phone number);
- Professional affiliations and job-related information (e.g., industry, role, and business transactions);
- Records of interactions (e.g., contract discussions, inquiries, and participation in Kaiko’s events);
- Technical and usage data related to our platform, website, and API interactions.

2. CONSENT AND BUSINESS COMMUNICATIONS

By engaging with Kaiko (e.g., as a business client, partner, or vendor), you consent to the

collection, use, disclosure, and retention of your business-related personal information as

described in this Statement and in the General Privacy Statement of our Privacy Policy.

You have the right to withdraw your consent at any time, subject to reasonable prior notice and legal or contractual obligations. However, if you withdraw consent for certain business-related information, we may be unable to provide our services or

fulfill contractual obligations.

If you request to withdraw consent regarding information previously shared with third parties we will notify them as required under Canadian Privacy Laws.

3. YOUR PRIVACY RIGHTS

3.1 DETAILS ABOUT YOUR PRIVACY RIGHTS

Under Canadian Privacy Laws, business representatives have certain rights regarding their business-related personal information, including the right to:

- Be informed about the personal information we hold about you;
- Access the business-related personal information we maintain about you;
- Receive an accounting of third parties with whom we have shared your information;
- Request corrections or updates if your business-related information is inaccurate or incomplete;
- To request that corrections be transmitted to third parties who have previously received your information (where appropriate).

3.2 HOW TO EXERCISE YOUR RIGHTS

To exercise your privacy rights, please contact us at: dpo@kaiko.com.

We will take steps to verify your identity and/or authority to act on behalf of a business entity before processing your request. Requests will be processed within a reasonable timeframe (typically within 30 days, or as otherwise permitted under Canadian Privacy Laws).

Please note that your right to access or correct information is not absolute and, under certain circumstances, we may decline your request in accordance with Canadian Privacy Laws. If we do so, we will provide you with an explanation.

4. DATA RETENTION AND ANONYMIZATION

We retain business-related personal information only for as long as necessary to fulfill the purposes for which it was collected, including to manage business relationships, comply with legal, accounting and regulatory obligations, and ensure security, fraud prevention and risk management. Retention periods are determined based on the nature of the information and applicable legal requirements.

When personal information is no longer required, it is securely deleted or irreversibly anonymized.

Where permitted under applicable Canadian privacy laws, we may use information that

has been irreversibly anonymized (such that it can no longer be associated with an identifiable individual) for legitimate business purposes without further notice or consent

5. CONTACTING US

For questions about this Statement or to exercise your privacy rights, please contact us at: dpo@kaiko.com