



# Kaiko

smart data

## PRIVACY POLICY

Department	KAIKO - COMPLIANCE	
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At Kaiko, we are committed to protecting your personal data and ensuring compliance with applicable data protection regulations, including:

- The General Data Protection Regulation (GDPR), which governs the collection, processing, and protection of personal data within the European Economic Area (EEA).
- The California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA), which grant California residents specific rights regarding their personal information.
- The Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial laws, which regulate the handling of personal information in Canada.

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").

## **Who We Are**

Kaiko is a group of entities fully owned by Challenger Deep SAS (SIREN 807388376), a company headquartered at 128 rue La Boétie, 75008 Paris, France ("Kaiko", "we", "our", "us"). For the purposes of the GDPR and applicable data protection laws, the data controller is Challenger Deep SAS.

## **What Information We Collect**

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

- Information you provide to us, such as when you register on our website, communicate with us, subscribe to reports or 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 personal data.
- Cookies and tracking technologies, which help us understand website usage and improve user experience.

## **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.
- 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.

Where required, we may share your information with third-party service providers, such as cloud hosting services, marketing partners, or analytics providers. If this involves transferring personal data outside the EEA, we implement appropriate safeguards (e.g., Standard Contractual Clauses).

## **Your Privacy Rights**

Depending on your location, you may have specific rights under applicable privacy laws, including:

- **GDPR Rights (EEA residents):** Right to access, correct, delete, restrict processing, object to certain uses, and data portability.
- **CCPA/CPRA Rights (California residents):** Right to know what personal information we collect, request deletion, opt out of data sales/sharing, and non-discrimination in exercising rights.

- PIPEDA Rights (Canadian residents): Right to access and correct personal information, withdraw consent, and challenge our compliance with privacy laws.

To exercise your rights or inquire about our privacy practices, please contact us at:

 [dpo@kaiko.com](mailto:dpo@kaiko.com)

We retain personal data only as long as necessary for the relevant purposes. Under certain circumstances, we may anonymize your data, ensuring it is no longer linked to you.

## **CALIFORNIA CONSUMER PRIVACY STATEMENT**

### **1. Managing Your 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.

If you have any questions regarding this Privacy Policy, please contact us at [dpo@kaiko.com](mailto:dpo@kaiko.com).

- California Residents: If you are a California resident, please refer to the “California Consumer Privacy Statement” section of this Privacy Policy for more information about your privacy rights.
- Canadian Residents: If you are a Canadian resident, please refer to the “Canadian Consumer Privacy Statement” section of this Privacy Policy for details on your privacy rights.

### **2. Information We Obtain**

#### **Information You Provide to Us**

In the course of providing our Services, we may obtain certain business-related personal information from you or your company representatives. This includes information shared 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 application programming interfaces (APIs).

The personal information we collect may include:

- Business contact details: such as your name, job title, company name, business email address, postal address, and phone number.
- Service usage data: such as API calls, user activity logs, and interactions with our services.
- Contractual and support information: including inquiries, support requests, and communications regarding agreements or transactions with us.
- Other business-related personal data: provided voluntarily in the context of our professional relationship.

#### **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.
- Website interaction data: such as visited pages, session duration, and interaction metrics.
- Technical performance data: including system logs, error reports, and security-related events.

We use this information to:

1. Improve the functionality and security of our Services.
2. Understand user behavior and optimize the user experience.
3. Monitor and manage service performance.
4. Ensure compliance with contractual agreements.
5. Detect and prevent fraudulent activity or misuse of our Services.

You can manage or disable cookies through your browser settings; however, doing so may impact certain features of our Services.

### **Third-Party Analytics Services**

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

### **3. How We Use the Information We Obtain**

We process the personal and business-related information we collect for the following purposes:

- Providing and managing our Services: This includes facilitating access to our platform, managing user accounts, and ensuring seamless service delivery.
- Authenticating and identifying users: To establish and manage your account, verify your identity, and enable secure access to our Services.
- Fulfilling contractual obligations: Processing transactions, executing agreements, and managing claims, orders, or service requests.
- Enhancing user experience: Customizing interactions with our Services to improve usability, functionality, and personalization.
- Ensuring security and fraud prevention: Detecting, preventing, and responding to unauthorized access, fraudulent activities, and other security threats.
- Communicating with you: Providing updates, responding to inquiries, sending administrative notifications, and delivering service-related communications.
- Supporting customer and technical service: Offering assistance, troubleshooting issues, and improving overall user satisfaction.
- Facilitating business development and partnerships: Engaging with prospective and existing business clients, partners, and service providers.
- Conducting research and analytics: Evaluating usage trends, measuring service performance, and refining our platform through data-driven insights.
- Managing career opportunities: Processing applications, evaluating candidates, and facilitating recruitment efforts at Kaiko.
- Complying with legal and regulatory obligations: Ensuring adherence to applicable laws, industry standards, and contractual requirements.
- Protecting legal rights and interests: Enforcing policies, investigating potential violations, and managing risks associated with legal claims or liabilities.

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 where required by law.

#### **4. Information We Share**

We share the information we collect in a business context to facilitate our Services, maintain compliance, and enhance operational efficiency. We do so under strict confidentiality and in accordance with applicable data protection regulations.

##### **1. Affiliates and Business Partners**

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

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

## **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.

## **3. 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.
- When necessary to prevent fraud, financial loss, or 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 activity.

## **4. 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.

## **5. 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. Personal 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 for an event, your name, job title, company name, and business contact details may be visible to 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.

## **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.

## **7. 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 parties 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.

## **8. Data Transfers**

We may transfer the personal information we obtain about you to the United States or other countries which may not have the same data protection laws as the country in which you initially provided the information.

## **9. Privacy Policy Changes**

We may update this Privacy Policy from time to time and without prior notice to you to reflect changes in our personal information practices. We will indicate at the top of this Privacy Policy when it was most recently updated.

## **10. Contact Us**

If you have any questions or comments about this Privacy Policy, you may contact us at [dpo@kaiko.com](mailto:dpo@kaiko.com)

## **CALIFORNIA CONSUMER PRIVACY STATEMENT**

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

### **1. Notice of Collection and Use of Business-Related Personal Information**

We may collect (and may have collected during the 12-month period prior to the effective date of this Statement) 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.

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 personal information for the purposes described in our Privacy Policy and for the following business purposes permitted under the CCPA/CPRA:

- 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 advertising 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 organization, if you are engaging with Kaiko on its behalf.
- Business partners, service providers, and vendors that facilitate professional interactions or service 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 12-month period prior to the effective date of this Statement, we may have shared business-related personal information with:

<b>Category of Personal Information</b>	<b>Categories of Third Parties</b>
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 customer engagement analysis.

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**

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.

#### **How to Submit a Request**

To submit an access, deletion, or opt-out request, please email us at [dpo@kaiko.com](mailto:dpo@kaiko.com)

We will verify requests before processing them. If you do not 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.

#### **5. Additional Information**

- Non-Discrimination: You will not receive discriminatory treatment for exercising your rights under the CCPA/CPRA.
- 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.

For any questions or concerns, please refer to the Kaiko Privacy Policy or contact us at [dpo@kaiko.com](mailto:dpo@kaiko.com)

## **CANADIAN CONSUMER 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 of our clients, partners, vendors, and service providers).

This Statement is intended to comply with the Personal Information Protection and Electronic Documents Act (PIPEDA) and substantially similar provincial privacy 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 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 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**

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

To exercise your privacy rights, please contact us at [Company email address].

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, we will provide an explanation.

#### **4. Data Retention and Anonymization**

We retain business-related personal information only for as long as necessary to fulfill contractual and legal obligations, including:

- Providing and managing business relationships.
- Complying with legal, accounting, or regulatory requirements.
- Ensuring security, fraud prevention, and risk management.

Where permitted under Canadian Privacy Laws, we may anonymize your business-related personal information so it can no longer be linked to you. We reserve the right to use anonymized data for legitimate business purposes without further notice or consent.

#### **5. Contacting Us**

For questions about this Canadian Business Privacy Statement or to exercise your privacy rights, please contact us at:

 dpo@kaiko.com

We take privacy seriously and will consider and respond to requests in accordance with Canadian Privacy Laws.