



PRIVACY POLICY

Kudo Funded (operated by Kudo Funded Ltd (Saint Lucia) and Kudo Tech Ltd (Cyprus)) respects your privacy and is dedicated to ensuring that consumers who access our website and/or use or access products or services offered by us ("you" or "your") are informed about the use of their personal data. This Privacy Statement governs the collection and usage of personal data by Kudo Funded, as well as our website kudofunded.com ("Site"), Kudo Funded affiliates, subsidiaries, parent companies, and any other related entities (hereinafter collectively referred to as "Kudo Funded", "we" or "us"). The Site and Kudo Funded are included in all references to Kudo Funded in this Privacy Policy Statement ("Statement"), unless otherwise specified. By accessing the Site, you acknowledge and agree to the data practices outlined in this Statement, as well as any subsequent revisions or amendments. To facilitate effective communication with individuals with disabilities, Kudo Funded offers support. To reach Kudo Funded, please visit our website and submit a message using the contact form or email us at contact@kudofunded.com.

Collection of your Personal Information

We collect information about you in a variety of ways depending on how you interact with us, the Site, and our services, including:

- (a) Directly from you when you provide it to us, such as when you register for an account, sign up to receive communications from us, start a service, or contact us by phone, email, or otherwise;
- (b) Automatically through the use of cookies, server logs, and other similar technologies when you interact with the Site, promotional material, advertisements and emails; and
- (c) From other sources, including, for example, our affiliates, business partners, service providers, online social media networks, and other third parties, or from publicly available sources. For example, if you submit a job application, or become an employee, we may conduct a background check.

In order to better provide you with products and services offered, we may collect personally identifiable information, such as the following, which sets forth the types of personal information we collect and how we use the information:

Context

Types of Data

Primary Purpose for Collection/Use of Data

1.	Account Registration	When you establish an account, we may accumulate your name, financial information, and contact information. We also gather data regarding the actions you take while signed into your account. We have a legitimate interest in preventing unlawful conduct and providing account-related functionalities to our users.
2.	Biometric Identifiers	We may collect certain biometric information about you, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as We are required to collect

		this information to meet our legal obligations and have a legitimate interest in doing so and preventing fraud. a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns, or rhythms, and sleep, health, or exercise data that contain identifying information.
3.	Client Information	We collect the names and contact information of our clients and their employees with whom we may interact. We have a legitimate interest in contacting our clients and communicating with them concerning normal business administration such as projects, services, and billing.
4.	Demographics	We collect personal information, such as your date of birth, race or location. We have a legitimate interest in ensuring our users are legitimate and to prevent fraudulent and illegal activity.
5.	Email Connectivity	If you receive email from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases. We have a legitimate interest in understanding how you interact with our communications to you.
6.	Employment	If you apply for a job posting, or become an employee, we collect information necessary to process your application or to retain you as an employee. This may include, among other things, your Social Security Number. Providing this information is required for employment. We use information about current employees to fulfil our obligations to employees. In some contexts, we are also required by law to collect information about employees or applicants. We also have a legitimate interest in using your information to have efficient staffing and work force operations
7.	Feedback/Support	If you provide us feedback or contact us for support, we will collect your name and email address, as well as any other content that you send to us, in order to reply. We have a legitimate interest in receiving, and acting upon, your feedback or issues.
8.	Mobile Devices	We collect information from your mobile device such as unique identifying information broadcast from your device when visiting our website or when visiting one of our stores. We have a legitimate interest in identifying unique visitors, and in understanding how users interact with us on their mobile devices.
9.	Branded Promotion	We collect information that you provide as part of a co-branded promotion with another company. We have a legitimate interest in fulfilling our promotions.

10. Surveys	When you participate in a survey, we collect information that you provide through the survey. If the survey is provided by a third-party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information. We have a legitimate interest in understanding your opinions and collecting information relevant to our organization.
11. Website Interactions	We use technology to monitor how you interact with our website. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser. We have a legitimate interest in understanding how you interact with our website to better improve it, and in understanding your preferences and interests to select offerings that you might find most useful. We also have a legitimate interest in detecting and preventing fraud.
12. Web Logs	We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors. We have a legitimate interest in monitoring our networks and the visitors to our websites. Among other things, it helps us understand which of our services is the most popular. We collect this data and provide it to third parties, as discussed below, if it is a necessary step in the user's account creation process, contributes to the ease of use, reliability, security, or functionality of our products. If you purchase Kudo Funded's products or services, we collect billing and credit card information. This information is used to complete the purchase transaction or issue payments to you. You may be required to provide certain personal information to us when you elect to use certain products or services. We also may gather additional personal or non-personal information in the future for the same purpose.

Use of Personal Information

We collect and use your personal information to:

- 1) Operate and deliver the products or services you have requested.
- 2) We may also use your personally identifiable information to inform you of other products or services available from Kudo Funded and its affiliates.
- 3) To identify you when you visit our Sites or use our products or services.
- 4) To improve our services and product offerings.
- 5) To conduct analytics.

- 6) To communicate with you, such as to respond to and/or follow-up on your requests, inquiries, issues, or feedback.
- 7) To detect and protect against malicious, deceptive, fraudulent, or illegal activity, including violations of our Terms of Service, other policies, security incidents, and harm to the rights, property, or safety of our company and our users, employees, or others.
- 8) To debug, identify and repair errors that impair existing intended functionality of our website and services.
- 9) To comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.
- 10) For internal administrative purposes, as well as to manage our relationships.
- 11) For such other purposes as you may consent (from time to time).

Although the sections above describe our primary purpose in collecting your information, in many situations, we have more than one purpose. As a result, our collection and processing of your information may be based in different contexts depending on your consent, our need to fulfill a contract, our obligations under the law, and/or our legitimate interest in conducting our business. You explicitly consent to share your data with Kudo Funded and/or our affiliates, simulated trading platforms, mentorship programs, mentors, or third parties for the purposes of detecting fraudulent, deceptive, malicious, or criminal behavior or any violations of our Terms or this Agreement.

Sharing information with Third-Parties

In addition to the above, we may disclose your personal information your personal information in the following situations:

- a) **Affiliates.** We may share information with our corporate affiliates (g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). The You acknowledges and agrees that Kudo Funded may share your personal data, including but not limited to contact details, account information, transaction history, and usage data, with its Affiliates, namely Kudo Funded Ltd (Saint Lucia) and Kudo Tech Ltd (Cyprus), for purposes that include but are not limited to service provision, technical support, compliance, analytics, and internal administrative functions. All such data sharing shall be carried out in accordance with applicable data protection laws and the terms of this Agreement.
- b) **Acquisitions.** If another company acquires, or plans to acquire, our company, business, or our assets, we will also share information with that company, including at the negotiation stage.
- c) **Other Disclosures without Your Consent.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the shipment of products to or the provision of services by a third-party intermediary.
- d) **Public.** Our website may provide the opportunity to post comments, or reviews, in a public forum. If you decide to submit information on these pages, that information may be publicly available.
- e) **Service Providers & Affiliates.** We may share your information with service providers and Affiliates. Among other things service providers may help us to administer our website, conduct surveys, provide technical support, process payments, and assist in the fulfillment of orders. Other simulated trading



platforms and mentors. We may share information with simulated trading platforms, mentorship programs, mentors, and/or related affiliates in order to detect and protect against malicious, deceptive, fraudulent, or illegal activity or violations of our Terms of Use, and other policies.

- f) **Other Disclosures with Your Consent.** We may disclose your information to other third parties when we have your consent or direction to do so.

Tracking User Behavior

Kudo Funded may track and record the websites and pages our users visit within Kudo Funded, in order to determine what Kudo Funded services are the most popular. This data is used to deliver customized content and advertising within Kudo Funded to customers whose behavior indicates that they are interested in a particular subject area.

Automatically Collected information

Kudo Funded may routinely gather information regarding your computer hardware and software. The following information may be included: your IP address, browser type, domain names, access times, and referring website addresses. This information is utilized to ensure the quality of the service, operate the service, and generate general statistics regarding the Site's usage.

Use of Cookies

The Site may employ "cookies" to facilitate the customization of your online experience. A web page server leaves a text file on your hard drive known as a cookie. Cookies are incapable of executing programs or transmitting viruses to your computer. Cookies are allotted to you in a unique manner and can only be accessed by a web server in the domain that issued the cookie to you. One of the primary functions of cookies is to offer a convenience feature that will save you time. The function of a cookie is to notify the web server that you have returned to a particular page.

For instance, a cookie assists the Site in recollecting your specific information during subsequent visits if you personalize pages or register with the Site or services. This streamlines the process of capturing your personal information, including shipping and billing addresses. The features that you customized can be readily accessed when you return to the Site, as the information you previously provided can be retrieved. You have the capacity to either accept or decline cookies. Most web browsers automatically allow cookies; however, you can typically adjust your browser settings to decline cookies if you prefer. You may not be able to completely experience the interactive features of the Site if you opt to decline cookies during your visit. Furthermore, the cookie banner on the Site may allow you to restrict the use of specific cookies, contingent upon your location.

Third Party Links

The website includes hyperlinks to other websites. Please be advised that we are not accountable for the privacy practices or content of external websites. We urge our users to be cognizant of the privacy policies of any other website that accumulates personally identifiable information and to be aware when they depart our Site.

Security & Retention of your Personal Information

We take reasonable security measures to protect against unauthorized access to or alteration of your personal information. Notwithstanding the foregoing, no data transmission over the Internet or any wireless



network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) security, integrity, and privacy of any and all information and data exchanged between you and us through the Site cannot be guaranteed. In the event that we are required by law to inform you of a breach to your personal information we may, at our discretion, notify you electronically, in writing, or by telephone, if permitted to do so by law.

Our Site permits you to create an account. If you create an account on the Site, you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account. We retain your personal information for only as long as necessary to fulfil the purposes outlined in this Privacy Policy, including for the purposes of satisfying any legal, accounting, or reporting requirements, unless a longer retention period is required or permitted by law. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the information, the purposes for which we obtained the information, and whether we can achieve those purposes through other means, as well as applicable legal requirements.

We process your personal data only when it is necessary and we have a valid legal basis to do so. These legal bases include your consent, our compliance with applicable laws, providing services, fulfilling contracts, protecting your rights, and serving our legitimate business interests, which are set out in our Terms of Service. Additionally, we also process your data in order to protect the Company against fraud.

This section applies to Users located in the European Union or the United Kingdom. The General Data Protection Regulation (GDPR) and the United Kingdom Data Protection Regulations (UK GDPR) The a law of the European Union (and set of rules some countries outside of the EU such as the UK mirror) that gives individuals in Europe (or mirroring countries) additional rights relating to the personal information collected about them and necessitates that we state the legal grounds for processing your personal data. Therefore, we process your information based on the following legal grounds:

Consent: We are legally entitled to process your information if you have granted us your explicit consent to employ your personal data for a specific purpose. You are able to revoke your consent at any time. To do this, please contact us through the contact form or email us at contact@kudofunded.com.

Legitimate Interest: We may use your information if it is necessary for our legitimate business interests, provided that these interests do not outweigh your interests or basic rights and freedoms, including those set forth in our Terms of Service and to safeguard the Company against fraud.

Legal Obligation: We may process your information to fulfill our legal obligations, such as cooperating with law enforcement or regulatory bodies, defending our legal rights, or using your information as evidence in pertinent legal proceedings. Additionally, we may process your information if it is essential to protect your vital interests or the vital interests of others, e.g. in emergency situations where safety is at stake.

Your rights under GDPR

The main additional rights under GDPR are as follows;



Right to Access. You have the right to request Kudo Funded to make copies of your personal data. You may be charged a small fee for this service.

Right to Rectification. You have the right to request Kudo Funded to correct any information you believe is inaccurate. You also have the right to request Kudo Funded to complete any information you believe is incomplete.

Right to Erasure. You have the right to request Kudo Funded to erase your personal data, with certain exceptions.

Right to Restrict Processing. You have the right to request Kudo Funded to restrict the processing of your personal data, with certain exceptions.

Right to Object to Processing. You have the right to object to Kudo Funded processing of your personal data, with certain exceptions.

Right to Data Portability. You have the right to request Kudo Funded to transfer the data that they have collected to another organization, or directly to you, with certain exceptions. These rights can be exercised by an individual in Europe or their designated agent such as an attorney or those in possession of a power of attorney.

Your Choices

Subject to certain exceptions, and only for those individuals who meet specific jurisdictional and legal requirements, you have the right to make the following requests:

1. **Access to Your Personal Information.** You may request access to your personal information or confirmation that we have information about you. In certain limited circumstances, you may also request to receive access to your data in a portable, machine- readable format.
2. **Modifications to Your Personal Information.** We depend on your ability to update and rectify your personal information. You will have the ability to edit or deactivate your account profile on our website. Please contact us at the address provided below to request that your information be modified if our Site does not allow you to amend or correct specific information. You have the option to request that we rectify information that is either inaccurate or incomplete. Please be advised that we are permitted to retain historical information in our backup files in accordance with the law.
3. **Deletion of Your Personal Information.** You may request that we delete your personal information. If required by law, we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for other business purposes.
4. **Opt-out of Selling or Sharing for Targeted Advertising.** You may opt out of online tracking-based targeted advertising (e.g., cookies) by clicking the “Reject” button in the “We value your privacy” window. Please note that if you change browsers or computers, or if you clear your browser’s cache, you may need to click the link again to apply your preference. You can also reject cookies on our cookie banner. Please note that not all sharing or disclosure of your personal information is a “sale” and not all sharing or disclosure is subject to the right to opt out.
5. **Objection to Certain Processing.** You may object to our use or disclosure of your personal information by contacting us at the address described below.
6. **Online Tracking.** We do not currently recognize the “Do Not Track” signal.



7. **Promotional Emails.** From time to time, KudoFunded may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication. If you would like to stop receiving marketing or promotional communications via email from KudoFunded, you may opt out of such communications by clicking on the “unsubscribe” button found at the bottom of each email.
8. **Revocation of Consent.** Where we process your personal information based upon consent, you may revoke consent. Please note, if you revoke your consent for the processing of personal information then we may no longer be able to provide you with the Services.

If you wish to exercise any of your rights, please visit our website at <https://www.kudofunded.com>. In certain situations, you may authorize an agent to exercise your rights by sending us a message on your behalf. In the event that you employ an agent to submit an opt-out request, you are required to furnish the agent with notarized written permission that confirms their authorization to act on your behalf. We may need additional information to verify the identity and authorization of you and your agent. Information regarding your most recent interaction with us, your identity, or the date of your most recent purchase from us will be requested in accordance with your request. Additionally, we may request that you submit a signed declaration that verifies your identity. We require a signed and notarized permission from you to confirm that the agent has the authority to act on your behalf if you are employing an agent. If we are unable to verify the requestor or the authorized agent, we will decline the request.

Changes to our Privacy Statement

Kudo Funded reserves the right to amend this Policy from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account, by placing a prominent notice on our website, and/or by updating any privacy information. Your continued use of our website and/or Services available after any such modifications will constitute your: (a) acknowledgment of the revised Policy; and (b) agreement to abide and be bound by such Policy as revised.

Contact Us

Kudo Funded welcomes your questions or comments regarding this Statement. If you have any questions or comments, please email us via our email address at contact@kudofunded.com.