

# PRIVACY NOTICE

Last updated: June 2026

## 1. Introduction

This Privacy Notice (the "**Notice**") explains how Kudo Funded, together with its relevant affiliates and operating entities involved in the provision, administration, support, monitoring and enforcement of the Services ("**Kudo Funded**", "**we**", "**us**" or "**our**"), collects, uses, stores, discloses, transfers and otherwise processes Personal Data relating to individuals who access or use our website, client area, dashboards, applications, communication channels, evaluation programmes, simulated trading environment, payout infrastructure, partnership channels and related products or services (together, the "**Services**").

Kudo Funded is committed to processing Personal Data lawfully, fairly and transparently, and to implementing appropriate technical, organisational and contractual safeguards designed to protect such data and to preserve the integrity, security and lawful operation of the Services.

This Notice applies to Personal Data processed in connection with the Services, including where you:

- visit or interact with our website or any digital interface operated or made available by us;
- create, access or use an account;
- purchase, enrol in, participate in or otherwise use any evaluation, challenge, account, programme, offer or feature made available by us;
- interact with our simulated trading environment, systems, dashboards or performance tracking tools;
- complete identity verification, onboarding, due diligence, compliance screening or payout verification procedures;
- make payments, request withdrawals, receive rewards, request refunds, initiate or become involved in a payment dispute or chargeback process;
- contact us for support, compliance review, investigations, disputes, complaints or other enquiries;
- engage with us as an affiliate, introducer, partner, service provider, applicant, contractor or other commercial counterparty; or
- otherwise interact with us in a commercial, contractual, technical, security, compliance or regulatory context.

This Notice should be read together with our Terms and Conditions, Cookie Notice, Challenge Rules and any other legal notices or policies that may apply to your relationship with us.

Where required or permitted by applicable law, jurisdiction-specific provisions may supplement, modify or prevail over certain parts of this Notice.

## 2. Data Controller

For the purposes of applicable data protection law, including the EU General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR") and the UK GDPR, the data controller of Personal Data processed under this Notice is:

Kudo Funded Ltd

Registered in Saint Lucia

Email: [contact@kudofunded.com](mailto:contact@kudofunded.com)

Kudo Funded may operate through or with the support of affiliated or related entities within its group structure for operational, technical, compliance, finance, fraud prevention, legal, customer support, marketing, business administration and enforcement purposes. Kudo Funded Ltd (Saint Lucia) is the data controller responsible for the Services. Kudo Tech Ltd (Cyprus) acts as the payment facilitator in connection with payment processing, transaction management and related financial operations, and processes Personal Data in that capacity as a separate controller or processor, as applicable under the relevant arrangement.

### **3. Categories of Personal Data We Process**

We may collect and process the following categories of Personal Data, depending on the nature of your relationship with us, the Services used, the jurisdiction involved and the operational, legal or compliance requirements applicable to the relevant processing.

#### **3.1 Identity and Verification Data**

This may include your full name, date of birth, nationality, citizenship, country of residence, residential status, photograph, signature, government-issued identification details, passport details, national identity card details, tax identification details, selfie images and other information required for identity verification, KYC, AML, sanctions, fraud prevention or validation purposes.

#### **3.2 Contact Data**

This may include your email address, telephone number, messaging handle, residential address, billing address, postal address and other contact details.

#### **3.3 Account and Profile Data**

This may include account credentials, usernames, passwords, authentication details, security questions, device association records, account settings, profile information, support history, onboarding status, programme participation records, internal account flags, administrative notes and records relating to account creation, maintenance, suspension, restriction or closure.

#### **3.4 Financial, Payment and Payout Data**

This may include payment method details, bank account details, card-related details, e-wallet details, billing information, payment history, deposits, refunds, withdrawals, payout records, transaction references, payment verification data, chargeback-related information, records concerning disputed or reversed transactions, and other financial data relevant to your use of the Services or your financial interactions with us.

### 3.5 Compliance and Due Diligence Data

This may include source-of-funds information, source-of-wealth information, sanctions screening results, politically exposed person status, adverse media results, fraud screening results, watchlist results, compliance review outcomes, document verification results, risk scoring, account review records, payout eligibility review records, and records collected for legal, regulatory, contractual or financial crime compliance purposes.

### 3.6 Programme, Performance and Simulated Trading Data

This may include challenge participation data, account type, programme metrics, simulated trading activity, order history, position history, open and closed trades, account balances, drawdown data, profit and loss data, platform activity, strategy-related indicators, reward eligibility metrics, account performance records, evaluation outcomes, payout-related performance records, and other data generated through or connected with your use of the Services.

### 3.7 Technical, Device and Network Data

This may include IP address, browser type and version, operating system, device identifiers, mobile device data, device fingerprints, session logs, timestamps, geolocation indicators, network data, browser settings, cookies, SDKs, pixels, tags and similar technologies, and other technical information generated by or associated with your access to or use of the Services.

### 3.8 Behavioural, Monitoring and Risk Intelligence Data

This may include device-linkage indicators, behavioural patterns, platform interaction patterns, clickstream data, account linkage indicators, network relationship indicators, access anomalies, suspicious usage patterns, prohibited practice indicators, behavioural scoring, fraud signals, system integrity alerts, chargeback risk indicators, abnormal payment behaviour, and other information used to detect, investigate, assess or prevent abuse, misconduct, unauthorised use, payment abuse, platform manipulation or breaches of our contractual and operational rules.

### 3.9 Communications Data

This may include emails, chat logs, support tickets, complaint files, call recordings, voicemail records, compliance correspondence, dispute-related correspondence, investigation communications, social media messages, records of interactions with our staff or service teams, and other communications between you and Kudo Funded.

### 3.10 Marketing and Preferences Data

This may include your preferences regarding communications, your subscription choices, opt-in and opt-out records, campaign interaction data, referral data, promotional engagement data, event participation records and records concerning your interaction with our advertising, communications or marketing content.

### 3.11 Partner, Affiliate and Business Relationship Data

Where relevant, this may include business contact information, referral and attribution data, payment details, performance records, contractual records, verification records, compliance checks and communications relating to affiliate, partnership or commercial relationships.

## 4. Special Categories of Personal Data

We do not intentionally process special categories of Personal Data unless such processing is strictly necessary, proportionate and lawful.

Where identity verification, fraud prevention, security or compliance procedures involve identity verification checks, such processing shall be carried out only where permitted by applicable law and subject to appropriate safeguards.

We ask that you do not provide special categories of Personal Data unless specifically requested by us and unless such disclosure is necessary for a lawful and legitimate purpose connected with the Services.

## 5. Sources of Personal Data

### 5.1 Directly from You

We collect Personal Data directly from you when you complete forms, create an account, upload documents, use the Services, make payments, request payouts, contact us, submit information during onboarding or compliance procedures, communicate with us, apply to work with us, participate in a campaign, or otherwise provide information to us.

### 5.2 Automatically Through Your Use of the Services

We collect certain technical, device, usage, behavioural, monitoring and activity data automatically when you access or use our website, systems, platform environment, dashboards, portals, communications interfaces or other parts of the Services.

### 5.3 From Third Parties

We may receive Personal Data from third-party service providers and counterparties, including identity verification providers, payment processors, banks, anti-fraud providers, chargeback management providers, sanctions and screening providers, analytics providers, hosting providers, marketing providers, affiliates, business partners, advisers, group entities, public sources and other service providers engaged in connection with the Services.

### 5.4 From Publicly Available Sources

We may collect Personal Data from public registers, sanctions lists, watchlists, company registries, court records, adverse media sources, social media content lawfully available to us, and other publicly accessible databases where necessary for compliance, due diligence, fraud prevention, dispute management, legal enforcement or security purposes.

## 6. Purposes for Processing

We process Personal Data for the purposes set out below and, where applicable, on one or more of the corresponding legal bases.

### 6.1 Account Opening, Onboarding and Administration

We process Personal Data to create, verify, administer, maintain, secure and support accounts, to authenticate users, to configure account access, to manage account preferences and to administer your participation in the Services.

### 6.2 Provision and Operation of the Services

We process Personal Data to operate, deliver, maintain and support the Services, including the website, user interface, challenge infrastructure, simulated trading environment, dashboards, payout systems, support functions and related operational systems.

### 6.3 KYC, AML, Sanctions, Fraud and Compliance Controls

We process Personal Data to conduct know-your-customer, anti-money laundering, sanctions, anti-fraud, source-of-funds, source-of-wealth, politically exposed person, adverse media, payout validation, transaction verification and other compliance or integrity checks, including enhanced due diligence where appropriate.

### 6.4 Platform Integrity, Security and Enforcement

We process Personal Data to protect the integrity, security, reliability and lawful operation of the Services, including to detect, investigate and respond to prohibited conduct, suspicious behaviour, linked-account activity, unauthorised access, system abuse, unfair exploitation of the Services, technical abuse, suspicious strategy execution, reward abuse, policy violations and breaches of our Terms and Conditions or related policies.

### 6.5 Behavioural Monitoring, Profiling and Risk Assessment

We process Personal Data to analyse account activity, user behaviour, technical patterns, payment signals, device-linkage indicators, platform usage and other relevant information for the purposes of fraud detection, security, payout validation, operational risk assessment, dispute handling, account review, suspicious activity escalation, prohibited practice detection and enforcement of contractual and operational controls.

### 6.6 Programme Administration, Evaluation and Reward Eligibility

We process Personal Data to administer evaluation programmes and related features, determine eligibility for benefits, rewards or account status, validate activity, review compliance with

applicable programme rules, manage account outcomes and apply contractual consequences where relevant.

#### 6.7 Payments, Refunds, Withdrawals and Financial Administration

We process Personal Data to receive payments, validate payment methods, process withdrawals, administer refunds, manage billing records, prevent chargebacks and payment abuse, verify payout entitlement, perform financial reconciliation, maintain accounting records and support payment dispute responses or financial investigations.

#### 6.8 Customer Support, Complaints and Dispute Management

We process Personal Data to respond to enquiries, provide support, manage complaints, investigate disputes, assess claims, address platform issues, respond to payout or account challenges, and maintain service and communications records.

#### 6.9 Legal, Regulatory and Contractual Obligations

We process Personal Data to comply with applicable laws, regulations, lawful requests, court orders, audit obligations, tax obligations, financial crime controls, recordkeeping requirements, regulatory inquiries and other legal or contractual obligations applicable to us.

#### 6.10 Communications, Updates and Service Notices

We process Personal Data to send service-related communications, account notices, legal notices, operational alerts, security messages, compliance-related requests and other communications necessary for the administration or protection of the Services and our relationship with you.

#### 6.11 Marketing and Promotional Communications

Where permitted by applicable law, we may process Personal Data to send you marketing communications, promotional content, programme updates, offers, invitations, campaigns or related communications. Where required by applicable law, we will do so on the basis of your consent.

#### 6.12 Analytics, Service Improvement and Business Intelligence

We process Personal Data to analyse how the Services are used, improve functionality, measure engagement, optimise operational performance, develop products, improve service design, refine internal controls, strengthen platform security and support internal reporting or decision-making.

### **7. KYC, AML, Sanctions and Identity Verification**

Kudo Funded may process Personal Data for identity verification, anti-money laundering, counter-terrorist financing, sanctions compliance, anti-fraud, payout validation, account security and related compliance purposes.

Such processing may include:

- review of identity documents and supporting records;
- selfie checks, facial comparison or liveness detection, where used by verification providers;
- source-of-funds and source-of-wealth checks;
- politically exposed person screening;
- sanctions, watchlist and adverse media screening;
- transaction and payout monitoring;
- fraud detection and prevention;
- enhanced due diligence; and
- re-verification where required by law, policy, operational risk criteria or account review triggers.

Kudo Funded may use specialised third-party verification, screening and compliance providers for these purposes, subject to appropriate contractual safeguards and applicable law.

Where verification, screening or compliance checks indicate elevated risk, inconsistencies, potential fraud, potential sanctions issues, identity concerns, linked-account concerns, payment concerns or other risk indicators, Kudo Funded may request additional information, suspend processing of a request, apply restrictions, decline a payout, restrict access, suspend or terminate an account, or take other action consistent with our contractual and legal rights.

## **8. Platform Activity, Monitoring and Integrity Controls**

As part of providing and protecting the Services, Kudo Funded may collect and process information relating to your use of the platform environment, challenge structure, technical access channels, programme activity and simulated trading behaviour, including:

- account access, session and device logs;
- order and transaction history;
- open and closed positions;
- profit and loss data and drawdown metrics;
- account balances, performance data and evaluation milestones;
- timing patterns, behavioural indicators and usage signals;
- device, network, location and access correlations;
- linked-account indicators and relationship markers; and
- suspicious, irregular, prohibited or escalated activity signals.
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We process such data for purposes including:

- administration and operation of the Services;
- review of compliance with programme rules, payout rules and contractual terms;
- detection and investigation of abusive, unfair, manipulative or prohibited conduct;
- prevention of fraud, reward abuse, technical abuse, payment abuse and policy circumvention;
- management of operational, contractual, commercial and reputational risk; and
- enforcement of our Terms and Conditions, programme rules and related policies.

For the avoidance of doubt, Kudo Funded may analyse account activity, behavioural patterns, technical signals, device associations and related data to detect direct or indirect attempts to misuse

the Services, circumvent our rules, exploit the platform environment unfairly, obtain benefits improperly or interfere with the lawful and intended operation of the Services.

## **9. Automated Processing, Profiling and Significant Decisions**

Kudo Funded may use automated systems, rule-based models, behavioural monitoring tools, scoring tools, pattern-recognition methods, linkage analysis, fraud detection systems, suspicious activity indicators, payment risk tools and profiling techniques for purposes including account security, fraud detection, chargeback prevention, suspicious activity identification, payout review, prohibited practice detection, operational risk assessment, compliance and platform integrity.

Such processing may include profiling based on technical, behavioural, transactional, usage, verification, payout, account-linkage or payment-related signals.

Where such processing leads, contributes or may lead to account review, account restriction, delayed processing, additional verification requests, rejection of a payout request, withholding of a reward, suspension, limitation or termination of an account, or other action affecting the user, Kudo Funded may rely on automated systems together with human review, or on human review informed by automated outputs, as permitted by applicable law and our contractual framework.

Where applicable data protection law grants you rights in relation to decisions based solely on automated processing that produce legal or similarly significant effects, Kudo Funded will implement such safeguards as are required by law, which may include review procedures and, where applicable, the opportunity to request human intervention.

## **10. Disclosure of Personal Data**

Kudo Funded may disclose Personal Data to third parties where such disclosure is necessary or appropriate for the provision of the Services, compliance with legal or regulatory obligations, fraud prevention, account verification, payment administration, platform security, customer support, internal administration, legal enforcement, dispute management or the protection of Kudo Funded's legitimate interests.

### **10.1 Affiliates and Group Entities**

Kudo Funded Ltd may disclose Personal Data to Kudo Tech Ltd (Cyprus), which acts as payment facilitator in connection with payment processing, transaction management and related financial operations, where necessary for payment administration, compliance, fraud prevention, financial reconciliation, dispute handling, legal review, security and enforcement. Kudo Tech Ltd processes such Personal Data in its capacity as payment facilitator and, where applicable, as a separate data controller for payment-related processing.

### **10.2 Service Providers and Processors**

Kudo Funded may disclose Personal Data to third-party service providers and data processors engaged to support the operation, delivery, security or administration of the Services, including providers of:

- website hosting, cloud infrastructure and data storage;
- platform technology, dashboards and account administration systems;
- payment processing, banking support and transaction verification;
- identity verification, liveness detection, KYC, AML, sanctions screening and anti-fraud services;
- security, monitoring, logging, device intelligence and access-control services;
- support, communications, customer relationship and ticketing systems;
- analytics, service improvement, campaign measurement and business intelligence tools; and
- professional, operational, technical and administrative support services.

Kudo Funded requires such providers to process Personal Data only on documented instructions, subject to appropriate confidentiality, security and data protection obligations.

### **10.3 Financial Institutions and Payment Partners**

Kudo Funded may disclose Personal Data to banks, payment service providers, card processors, acquirers, gateway providers, e-wallet providers, transaction screening providers, payout partners, fraud prevention partners, dispute management providers, chargeback management providers and other participants in the payment, refund, withdrawal or verification chain where necessary to process payments, withdrawals, refunds, chargebacks, payment disputes, source-of-funds reviews, transaction verification, financial investigations or payment-risk controls. Personal Data disclosed to Kudo Tech Ltd in connection with payment processing is shared in its capacity as payment facilitator.

### **10.4 Regulatory and Law Enforcement Disclosures**

Kudo Funded may disclose Personal Data to regulators, supervisory bodies, governmental authorities, tax authorities, financial intelligence units, law enforcement authorities, courts, tribunals, arbitral bodies or other competent authorities where such disclosure is required, permitted or reasonably considered necessary under applicable law, regulation, audit requirement, court order, lawful request, investigation or compliance obligation.

### **10.5 Legal and Professional Advisers**

Kudo Funded may disclose Personal Data to legal advisers, auditors, accountants, consultants, insurers, investigators, forensic specialists and other professional advisers where reasonably necessary for legal advice, dispute handling, audit, regulatory compliance, fraud response, evidence preservation, debt recovery, insurance matters, internal review or the protection and enforcement of Kudo Funded's rights and interests.

### **10.6 Corporate Transactions**

Kudo Funded may disclose Personal Data in connection with any proposed or actual merger, acquisition, financing, restructuring, insolvency process, sale of assets, transfer of business,

internal reorganisation, strategic transaction or similar corporate event, provided that appropriate safeguards are implemented where required by applicable law.

## 10.7 Protection of Rights, Security and Platform Integrity

Kudo Funded may disclose Personal Data where reasonably necessary to detect, investigate, prevent or respond to fraud, payment abuse, chargeback abuse, prohibited trading practices, reward abuse, technical abuse, security incidents, linked-account misuse, account compromise, unlawful conduct, breaches of contract or threats to the security, lawful operation or integrity of the Services.

## 11. International Transfers

Due to the international nature of our operations, infrastructure, support structure and service provider relationships, Personal Data may be transferred to and processed in jurisdictions outside your country of residence, including jurisdictions that may not provide the same level of data protection as your home jurisdiction.

Where required by applicable law, Kudo Funded will implement appropriate safeguards for such transfers, which may include:

- Standard Contractual Clauses approved by the European Commission;
- the UK International Data Transfer Agreement or relevant addendum;
- transfers to jurisdictions recognised as providing an adequate level of protection; or
- other lawful transfer mechanisms recognised under applicable law.

By using the Services, you acknowledge that your Personal Data may be processed in multiple jurisdictions for the purposes described in this Notice, subject always to applicable law and appropriate safeguards where required.

## 12. Data Retention

Kudo Funded retains Personal Data only for as long as necessary for the purposes for which it was collected and processed, including for contractual, operational, security, legal, regulatory, accounting, tax, compliance, anti-fraud, chargeback-management, risk-management, audit, dispute-resolution, enforcement and recordkeeping purposes.

Retention periods may vary depending on the nature of the Personal Data, the purpose of processing, the type of Services involved, the risk profile of the account or transaction, the outcome of any verification or investigation, and the legal, regulatory or evidential obligations applicable to Kudo Funded.

In determining the appropriate retention period, Kudo Funded may take into account, without limitation:

- the duration of the customer or business relationship;
- the continued provision or administration of the Services;

- applicable legal, regulatory, tax, accounting and recordkeeping requirements, including anti-money laundering obligations under EU Directive 2015/849 (as amended by Directive 2018/843) as implemented in Cyprus;
- the need to maintain records relating to identity verification, account activity, simulated trading activity, performance data, payments, withdrawals, refunds, chargebacks, complaints, disputes, escalations, investigations and enforcement actions;
- the need to preserve evidence and protect Kudo Funded's contractual, legal and commercial position;
- the sensitivity, nature and volume of the Personal Data concerned; and
- whether the relevant data is associated with suspicious activity, a chargeback event, a compliance review, a dispute, an investigation, a legal hold or another elevated-risk scenario.

As a general guide, most account, verification, transaction and payout records are retained for a minimum of five (5) years following the end of the customer relationship, in accordance with applicable anti-money laundering, accounting and regulatory obligations. Marketing and consent records are retained until you withdraw your consent or opt out, subject to a maximum of three (3) years from your last interaction with us.

Where Personal Data is no longer required, Kudo Funded will delete, anonymise or securely dispose of such data in accordance with applicable law and internal retention procedures. Longer retention periods may apply where required by a court order, regulatory direction or ongoing legal proceedings.

### **13. Security Measures**

Kudo Funded implements appropriate technical and organisational measures designed to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, misuse or other unlawful forms of processing.

Such measures may include:

- role-based access controls and access segregation based on business need;
- authentication controls, credential management and, where appropriate, multi-factor authentication;
- encryption in transit and, where appropriate, at rest;
- monitoring, logging, audit trails and access traceability measures;
- network, infrastructure, application and endpoint security controls;
- staff confidentiality obligations and training on data protection and information security;
- due diligence and oversight measures relating to vendors and service providers; and
- backup, recovery, resilience and business continuity measures, where appropriate.

Although Kudo Funded takes reasonable and proportionate measures to protect Personal Data, no method of transmission, storage or processing can be guaranteed to be entirely secure. You remain

responsible for maintaining the confidentiality of your credentials and for taking appropriate measures to protect your devices and account access.

### 13.1 Personal Data Breaches

In the event of a personal data breach or security incident, Kudo Funded shall take appropriate steps to identify, contain, assess, investigate and remediate the incident in accordance with its internal procedures and applicable law. Where required by applicable law, Kudo Funded shall notify the competent supervisory authority within 72 hours and, where applicable, notify affected individuals without undue delay.

## 14. Your Rights

Depending on your jurisdiction and the law applicable to the relevant processing, you may have one or more of the following rights in relation to your Personal Data:

- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restriction of processing;
- the right to data portability;
- the right to object to processing;
- the right to withdraw consent where processing is based on consent;
- the right to request human review of certain automated decisions, where applicable law so provides; and
- the right to lodge a complaint with a competent supervisory authority.

These rights are not absolute and may be subject to legal, regulatory, contractual, evidential, fraud-prevention, security or other lawful limitations. Kudo Funded may request additional information to verify your identity before acting on a request, and may decline, defer, limit or condition a response where permitted or required by applicable law.

Requests may be submitted to: [contact@kudofunded.com](mailto:contact@kudofunded.com) or via the contact form at [www.kudofunded.com](http://www.kudofunded.com).

## 15. Cookies and Similar Technologies

Kudo Funded may use cookies, pixels, tags, SDKs, local storage objects and similar technologies to operate the website and Services, improve functionality, analyse usage, measure performance, support security, identify suspicious activity, maintain session integrity and, where permitted, support marketing, attribution or advertising activities.

Some such technologies are strictly necessary for the operation, security and administration of the Services. Others may be used only with your consent where required by applicable law. Further information is set out in our Cookie Notice or available through our cookie management interface on the website.

## 16. Children's Data

The Services are intended only for individuals who are at least 18 years old, or the legal age required under applicable law, whichever is higher. Kudo Funded does not knowingly offer the Services to minors and does not knowingly collect Personal Data from minors. If we become aware that Personal Data has been collected from a minor, we will take appropriate steps to delete such data, suspend the relevant account and restrict access to the Services.

## **17. External Links and Third-Party Services**

Our website, communications or Services may contain links to third-party websites, applications, payment channels, verification tools, social media pages or other services that are not operated by Kudo Funded. Kudo Funded is not responsible for the privacy practices, security posture, availability, content or policies of third parties. You should review the privacy notices and terms of any third-party service that you access or use.

## **18. Changes to This Notice**

Kudo Funded may amend, update, replace or supplement this Notice from time to time to reflect changes in legal requirements, regulatory expectations, operational practices, fraud patterns, business structure, service provider arrangements, product features or the Services generally. Any updated version will be made available through the website, client area or other appropriate channels. Where required by applicable law or where changes are material, we will take reasonable steps to notify you by email or by prominent notice on the website at least 14 days before the changes take effect. Your continued use of the Services after the effective date of any amendment constitutes your acknowledgment of the updated Notice.

## **19. Contact Us**

If you have any questions, concerns or requests regarding this Notice or the processing of your Personal Data, please contact us:

Kudo Funded Ltd

Email: [contact@kudofunded.com](mailto:contact@kudofunded.com)

Website: [www.kudofunded.com](http://www.kudofunded.com)

## **EU / EEA / UK ADDENDUM**

This Addendum applies to individuals in the European Economic Area and the United Kingdom to the extent that the GDPR or UK GDPR applies to the processing of their Personal Data.

### **A.1 Lawful Bases**

Where the GDPR or UK GDPR applies, Kudo Funded processes Personal Data on one or more of the following lawful bases:

- performance of a contract;
- compliance with a legal obligation;

- legitimate interests pursued by Kudo Funded or a third party, except where overridden by the interests or fundamental rights and freedoms of the data subject;
- consent, where required;
- establishment, exercise or defence of legal claims; and
- any other lawful basis recognised by applicable law.

### **A.3 International Transfers**

Where Personal Data is transferred outside the EEA or the UK, Kudo Funded will apply an appropriate transfer mechanism in accordance with Chapter V GDPR and the UK GDPR framework, as applicable, including Standard Contractual Clauses or the UK International Data Transfer Agreement where required.

### **A.4 Supervisory Authority and Complaints**

If you are located in the EEA, you have the right to lodge a complaint with the data protection authority in your country of residence. For matters concerning data processing by Kudo Tech Ltd (Cyprus) in its capacity as payment facilitator, the competent authority is: Office of the Commissioner for Personal Data Protection (Cyprus), Website: [www.dataprotection.gov.cy](http://www.dataprotection.gov.cy), Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

If you are located in the United Kingdom, you may lodge a complaint with the Information Commissioner's Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk)

### **A.5 Legitimate Interests**

Where Kudo Funded relies on legitimate interests as a lawful basis, such interests may include, without limitation, the lawful and secure operation of the Services, fraud prevention, account and payment security, platform integrity, payout control, contractual enforcement, dispute management, legal defence, operational analytics, business administration and the protection of our systems, users, staff and commercial interests.