



Kudo

PRIVACY POLICY

KUDO TRADE LIMITED

BUSINESS COMPANY NUMBER 2024-00239

Kudo is the trading name of Kudo Trade Limited, registered under the Saint Lucia Register of International Business.

Registered office: Ground Floor, The Sotheby Building, Rodney Bay, Gros-Islet, Saint Lucia.

Registration number 2024-00239

www.kudo.com



PRIVACY AND SECURITY POLICY

Kudo is committed to safeguarding the privacy and security of the personal information entrusted to it by its clients, prospective clients, website visitors, and business partners. We recognise the importance of protecting personal data and are dedicated to handling such information in a lawful, fair, transparent, and secure manner. This Privacy Policy explains how Kudo collects, uses, stores, discloses, and protects personal information obtained through the use of our website, products, and services.

Your privacy is of paramount importance to us. Kudo collects and processes personal data only to the extent necessary to provide services effectively, comply with applicable legal and regulatory obligations, improve user experience, and meet legitimate business and operational requirements. All personal information will be handled with strict confidentiality and in accordance with the applicable data protection and privacy laws of Saint Lucia.

1. DATA CONTROLLER

This Privacy Notice applies to the data processing activities carried out by Kudo Trade Ltd. who acts as a Data Controller of your personal information. Kudo Trade Ltd. ("we", "us", "Kudo") is an international company registered in Saint Lucia under registration number: 2024-00239.

If you have any questions about this notice or wish to exercise your rights about your Email: complaints@kudo.com

2. WHAT INFORMATION DOES KUDO OBTAIN?

The personal information collected by Kudo depends on the nature of your relationship and interactions with us, the services you use, and the products you apply for or enquire about. The categories of personal data we may collect include the following:

Identification and Contact Information: This includes your full name, residential or postal address, email address, telephone number, and other relevant contact details.

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Personal and Demographic Information: We may collect information such as your date of birth, place of birth, nationality, gender, country of residence, and language preferences.

Location Information: In certain circumstances, Kudo may collect approximate geographic location data derived from your IP address or device information when you access our website, platforms, or services.

Employment and Professional Information: We may collect information relating to your occupation, employer, employment status, professional background, and source of wealth or income.

Identification Documents: To comply with legal and regulatory obligations, Kudo may collect copies of government-issued identification documents, including passports, national identity cards, driving licenses, or other acceptable identification documents containing photographs.

Financial Information: We may collect financial details including income, bank account details, trading records, financial statements, and other information required for regulatory, compliance, and account verification purposes.

Trading and Transaction Information: Kudo maintains records relating to transactions, trading activity, investment preferences, and the performance of products and services accessed through our platforms.

Account Access and Security Information: We may collect login credentials, passwords, password recovery information, and other authentication-related details necessary for account security and access management.

Communications and Correspondence: Kudo may record, monitor, and retain communications between you and us, including telephone calls, emails, chat messages, instructions, and other electronic communications relating to enquiries, transactions, customer support, or trading activities. This may include communications intended to result in the placement or execution of orders, irrespective of whether such transactions are completed.

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We may also collect and retain documents, forms, correspondence, feedback, reviews, support requests, and other information voluntarily submitted by you through our website, client portal, email communications, or other communication channels.

Personal information is generally collected directly from you when you apply for an account, complete application forms, use our services, subscribe to updates, participate in promotions, contact customer support, or otherwise communicate with Kudo.

Kudo may also automatically collect certain information through your use of our website, applications, and online platforms, including cookies and similar tracking technologies. This may include information relating to device usage, browser type, IP address, browsing behaviour, and pages visited on our website. Cookies help enhance functionality, improve user experience, and support security and analytical functions. Further information regarding the use of cookies can be found in the Cookies section of this Privacy Policy.

You may choose not to provide certain personal information requested by Kudo. However, where such information is necessary for us to provide products or services, comply with legal obligations, or verify your identity, we may be unable to establish or maintain a business relationship with you or provide the requested services.

3. HOW WILL WE USE YOUR INFORMATION?

We may use such information for any one or more of the following purposes to:

- Provide the services that you have requested, including processing transactions.
- Confirm your identity.
- maintain your personal profile; to manage your account.
- Contact you when necessary or appropriate in relation to the services provided to you.
- Keep you updated whilst you are a customer in relation to matters such as contracts you have traded and activities of Kudo.
- Manage and administer the products and services provided to you.
- Provide you with information regarding the products and services offered by Kudo; to develop an understanding of the products and services that you may be interested in obtaining from Kudo.
- Provide you with information or opportunities that we believe may be relevant to you.
- tailor the website or other service we provide to you to your needs and interests;

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- create anonymized statistical data.

By agreeing to our Terms and Conditions, you consent to the collection, use, processing, and disclosure of your personal data as described in this Privacy Policy and in accordance with the applicable laws of Saint Lucia.

You also acknowledge that your personal data may be transferred outside Saint Lucia where necessary for service delivery or contractual obligations. In such cases, Kudo will ensure that appropriate safeguards are in place and that any third-party recipients maintain adequate levels of data protection in line with applicable legal requirements.

4. WHO MAY WE DISCLOSE YOUR INFORMATION TO?

Your personal data will be treated as strictly confidential. Where necessary and only to the extent required for the purposes set out in this Privacy Policy, we may share your personal information with:

- Other companies within the Kudo Group
- Third-party service providers, vendors, and professional advisers engaged by us to support our business operations, including services such as administration, technology support, outsourcing, compliance, legal, regulatory, financial, insurance, and other professional or operational functions, where access to personal data is necessary for the performance of such services
- Introducing brokers with whom we maintain a mutual contractual relationship
- Any person or entity authorised by you to receive such information
- We may also disclose personal data where it is strictly necessary and mandated under applicable law to:
- Courts, tribunals, law enforcement agencies, regulatory authorities, and other governmental or competent bodies, or in response to valid legal requests, legal obligations, or regulatory requirements, including for investigations, compliance, or reporting purposes.



5. RETENTION PERIOD OR CRITERIA USED TO DETERMINE THE RETENTION PERIOD

Kudo retains personal data for as long as necessary to provide you or the institution you represent with the products and services, and/or for other essential purposes for which data was collected, depending on the legal basis for which that data was obtained and whether we are under any additional legal or regulatory obligations to retain your personal information. Because these needs can vary different data types in the context of different legal and regulatory requirements, actual retention periods can vary.

6. DATA SUBJECT RIGHTS

You have the following rights, in certain circumstances, in relation to your personal information:

- Right to be informed about the data processing activities undertaken by us, this information is provided in this Privacy Notice.
- Right to access your personal information.
- Right to rectify your personal information.
- Right to request that your personal information is erased. Subject to any retention limits, we are required to comply with applicable laws and regulations.
- Right to restrict the use of your personal information.
- Right to data portability (in certain specific circumstances).
- Right to object to the processing of your personal information.
- Right to raise a complaint, if you have concerns or complaints about any aspects of our privacy practices, you can contact us by email at complaints@kudo.com
- If you have opted out of receiving any marketing communications from us, we will add you to a “do not contact” list to ensure we comply with your opt-out right and that your details will not be put back on the marketing list in later stages.



7. SECURITY

Kudo places great importance on security and adheres to industry best practices for information security to safeguard your personal data and prevent unauthorized access. These measures encompass encrypting data during transmission, implementing robust authentication methods, and ensuring secure access to machines and data.

8. LINKS

When you use this website or other service we provide to you, you may be able to link to other websites. This Privacy Policy does not apply to those sites. Kudo encourages you to read the privacy policies on such sites.

9. YOUR CONSENT

By accessing this website or other service we provide to you, you consent to Kudo collecting, maintaining, using and disclosing personal information about you and provided by you or by another person as described above.

10. AMENDMENTS TO THIS POLICY

Kudo reserves the right to amend, update, or modify this Privacy and Security Policy from time to time, as necessary to reflect changes in legal, regulatory, operational, or business requirements. Any revisions will be published on this website with an updated effective date. We encourage you to review this Policy periodically to stay informed of how we are protecting your personal information. Your continued use of our services following any updates constitutes your acknowledgment and acceptance of the revised Policy.