

# Privacy Policy

*This current consolidated Privacy Policy was published on 1 June 2026.*

## 1 INTRODUCTION

**1.1** This privacy notice provides you with details of how we collect and process your personal data through our application, the KUDO Platform.

**1.2** By providing us with your data, you warrant to us that you are over 18 years of age.

## 2 WHO WE ARE

**2.1** KUDO Energy Limited is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

**2.2** If you have any questions about this privacy policy or our privacy practices, please contact:

The Green House, Forrest Estate, St John's Town of Dalry, Castle Douglas, Dumfries & Galloway, DG7 3XS

support@kudosoftware.com

**2.3** It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us using our contact us form.

## 3 THE DATA WE COLLECT ABOUT YOU

**3.1** Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

**3.2** We may collect, use, store, and transfer different kinds of personal data about you which we have grouped together as follows:

**3.2.1** Contact Data includes business email address.

**3.2.2** Technical Data includes internet protocol (IP) address, your login data, time zone setting and location, operating system and platform, and other technology on the devices you use to access this application.

**3.2.3** Usage Data includes information about how you use our application.

**3.3** We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

**3.4** Where we are required to collect personal data by law, or under the terms of the contract between us, and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

## 4 HOW WE USE YOUR DATA

**4.1** We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

**4.1.1** Where we need to perform the contract we are about to enter into or have entered into with you.

**4.1.2** Where we need to comply with a legal obligation.

**4.1.3** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

**4.2** We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. If we need to use your details for an unrelated new purpose, we will let you know and explain the legal grounds for processing.

**4.3** We may process your personal data without your knowledge or consent where this is required or permitted by law.

**4.4** We do not carry out automated decision making or any type of automated profiling.

**4.5** We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

**4.6** Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose / Activity</b>	<b>Type of Data</b>	<b>Lawful Basis</b>
To oversee, manage and handle the data gathered by our application.	Technical; Usage	Performance of a contract with you
To manage our relationship with you, which may include notifying you about changes to our terms or privacy policy.	Technical; Contact	Performance of a contract with you. Necessary to comply with a legal obligation. Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).
To administer and protect our business and this application (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Technical; Usage	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). Necessary to comply with a legal obligation.
To use data analytics to improve our application, products/services and customer experience.	Technical; Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our application updated and relevant, and to develop our business).

## **5 HOW WE COLLECT YOUR PERSONAL DATA**

**5.1** We collect data about you when you provide the data directly to us (for example by using our application). We may automatically collect certain data from you as you use our application.

**5.2** We may receive data from third party service providers who support the hosting, infrastructure and operation of the KUDO Platform, including cloud hosting and identity management providers based in the UK and European Economic Area.

**5.3** We may also receive data from publicly available sources, such as Companies House, based in the UK.

## **6 DISCLOSURES OF YOUR PERSONAL DATA**

**6.1** We may have to share your personal data with external third parties set out below:

**6.1.1** Other companies who provide services & products to us i.e. your employer, site owners/technicians.

**6.1.2** Service providers who provide IT, cloud hosting and system administration services.

**6.1.3** Professional advisers including lawyers, bankers, auditors and insurers.

**6.1.4** Government bodies that require us to report processing activities.

**6.1.5** Third parties to whom we sell, transfer, or merge parts of our business or our assets.

**6.2** We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## **7 INTERNATIONAL TRANSFERS**

**7.1** Countries outside of the UK do not always offer the same levels of protection to your personal data, so UK law has prohibited transfers of personal data outside of the UK unless the transfer meets certain criteria.

**7.2** The KUDO Platform is hosted within the UK and European Economic Area. Where any of our service providers are based outside the UK, their processing of your personal data will involve a transfer of data outside the UK.

**7.3** Whenever we transfer your personal data out of the UK, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

**7.3.1** We will only transfer your personal data to countries that the UK Information Commissioner's Office have approved as providing an adequate level of protection for personal data; or

**7.3.2** Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the UK Information Commissioner's Office which give personal data the same protection it has in the United Kingdom.

**7.4** If neither of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

## **8 DATA SECURITY**

**8.1** We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions, and they must keep it confidential.

**8.2** We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

**8.3** Further detail on our technical and organisational security measures, including our ISO 27001 certification and independent security testing, is set out in our Information Security Addendum.

## **9 DATA RETENTION**

**9.1** We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

**9.2** When deciding what the correct time is to keep the data for, we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, and if these can be achieved by other means and legal requirements.

**9.3** In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **10 YOUR LEGAL RIGHTS**

**10.1** Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

**10.2** You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

**10.3** If you wish to exercise any of the rights set out above, please use the contact details set out at clause 2 (above).

**10.4** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. We may also refuse to comply with your request in these circumstances.

**10.5** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**10.6** We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

**10.7** If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first, if you do have a complaint, so that we can try to resolve it for you.

## **11 GLOSSARY**

### **LAWFUL BASES:**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Consent must be freely given to specific activities which we undertake, and we are required to maintain and manage consent provided by you. You may withdraw consent at any time where we are relying on consent to process your personal data. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.