# Opco Kalipso UK Limited customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

## Contact details

### **Email**

contact@kalipso.ai

# What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery**:

- Names and contact details
- Account information
- Website user information (including user journeys and cookie tracking)
- Records of meetings and decisions
- Information relating to compliments or complaints

We collect or use the following information for the operation of customer accounts and guarantees:

- Names and contact details
- Account information, including registration details
- Information used for security purposes

Marketing preferences

We collect or use the following information to **prevent**, **detect**, **investigate or prosecute crimes**:

- Names and contact information
- Financial transaction information

We collect or use the following information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- IP addresses
- Website and app user journey information

We collect or use the following information to **comply with legal requirements**:

- Name
- Contact information

We collect or use the following personal information for **dealing with queries**, **complaints or claims**:

- Names and contact details
- Payment details
- Account information
- Customer or client accounts and records

## Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible <u>lawful bases</u> in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your
  personal information. You can request other information such as details
  about where we get personal information from and who we share
  personal information with. There are some exemptions which means you
  may not receive all the information you ask for. You can read more about
  this right here.
- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.
- Your right to erasure You have the right to ask us to delete your personal information. You can read more about this right here.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- Your right to object to processing You have the right to object to the processing of your personal data. You can read more about this right here.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide** services and goods are:

• Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our lawful bases for collecting or using personal information for **the operation of customer accounts and guarantees** are:

 Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our lawful bases for collecting or using personal information to **prevent, detect, investigate or prosecute crimes** are:

• Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

 Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our lawful bases for collecting or using personal information for **legal requirements** are:

Legitimate interests – we're collecting or using your information because
it benefits you, our organisation or someone else, without causing an
undue risk of harm to anyone. All of your data protection rights may
apply, except the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

Legitimate interests – we're collecting or using your information because
it benefits you, our organisation or someone else, without causing an
undue risk of harm to anyone. All of your data protection rights may
apply, except the right to portability.

# Our Legitimate Interests as a Data Controller

As a B2B SaaS provider, we process certain personal data as a data controller based on our legitimate interests in accordance with Article 6(1)(f) of the GDPR. This section explains our legitimate interests for processing personal data in contexts where we act as a controller (not when we act as a processor for our clients' data).

## **Business Operations and Service Provision**

We have a legitimate interest in processing personal data necessary to:

- Provide and maintain our services, including managing business customer accounts and contractual guarantees
- Facilitate business relationships with current and prospective business customers

- Conduct initial business outreach to potential business customers
- Process and fulfill business orders and transactions
- Ensure the proper functioning and security of our business platforms

This processing is necessary for us to conduct our business effectively and to fulfill our contractual obligations to our business customers. The processing is proportionate as we only collect and use business contact information necessary for these purposes.

### **Security and Fraud Prevention**

We have a legitimate interest in processing personal data to:

- Prevent, detect, investigate, and respond to security incidents
- Protect against fraudulent or illegal activity
- Verify identity and authenticate access to our services
- Maintain the integrity of our systems and services

This processing is necessary to maintain the security and integrity of our services and to protect the data we process. The interests of data subjects in maintaining the security of their information aligns with our interest in preventing fraud and maintaining system security.

## **Legal Compliance and Business Administration**

We have a legitimate interest in processing personal data to:

- Comply with applicable legal obligations and industry standards
- Respond to lawful requests from public authorities
- Maintain business records required by law
- Handle business-related queries, complaints, or claims
- Enforce our terms of service and other legal rights

This processing is necessary to ensure our compliance with legal obligations and to exercise our legal rights. We balance this necessity with data subjects' privacy by limiting the processing to what is required for these specific purposes.

### **Communications and Business Development**

We have a legitimate interest in processing personal data to:

- Communicate important service updates and notices
- Respond to business inquiries and provide customer support
- Conduct initial business outreach to potential business customers
- Manage our business relationships
- Improve our services and business operations

This processing is limited to business contact information and communications necessary for maintaining our business relationships. We do not process personal data for direct marketing purposes under legitimate interest (we obtain explicit consent for marketing communications).

## **Balancing Test Considerations**

In determining that legitimate interest is an appropriate legal basis, we have carefully balanced our interests against the rights and freedoms of data subjects by considering:

- 1. **Nature of the data**: We primarily process business contact information and limited professional details, not sensitive personal data.
- 2. **Reasonable expectations**: Business professionals can reasonably expect their business contact information to be processed in a B2B context for the purposes outlined above.
- 3. **Impact of processing**: Our processing has minimal privacy impact as it is limited to professional contexts and business relationships.
- 4. **Safeguards**: We implement appropriate data security measures, minimize data collection, and provide clear information about our processing activities.

# Where we get personal information from

- Directly from you
- Publicly available sources
- Market research organisations
- Providers of marketing lists and other personal information

# How long we keep information

We retain your personal data for as long as:

- It is necessary to provide services to you per our agreements; or
- In any other event, for as long as it is necessary for a maximum period of 2 years.

## Who we share information with

## Data processors

#### **Cloud Services Providers**

This data processor does the following activities for us: To run our technical infrastructure, manage our company data and information,

## Others we share personal information with

- Professional or legal advisors
- External auditors or inspectors
- Professional consultants
- Organisations we're legally obliged to share personal information with

# How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

#### The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: <a href="https://www.ico.org.uk/make-a-complaint">https://www.ico.org.uk/make-a-complaint</a>

# Last updated

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