

WHO WE ARE

and how to contact us

Kadmos Technologies GmbH

Rosenthaler Straße 36

10178 Berlin

<http://www.kadmos.io>

contact@kadmos.io

(hereinafter referred to as “**Kadmos**”, “**us**”, “**we**” or “**Controller**”) operates an electronic platform through which we and third parties with whom we partner provide certain services to our Individual Users (“**You**”).

We collaborate with partners, including banks and payment institutions, (“**Partners**”) to provide payment services. For the handling of Your data, where Kadmos and our Partner work together as Joint Controller, we’ve established an agreement under Article 26 of the GDPR. This agreement outlines the management of tasks and responsibilities for processing personal data, ensuring data security, informing individuals about their data, addressing any issues that arise, and adhering to reporting requirements. If You have any questions about Your data, You can contact Kadmos. We’ll work with our Partners to address Your needs and protect Your rights. For further information, please refer to the “[Summary of the essentials of the JCA](#)” between Kadmos and the Institutions.

If You feel the information provided below is insufficient or difficult to understand, or If You have questions concerning matters related to the processing of Your data, please contact our data protection officer (DPO):

Kadmos Technologies GmbH

Rosenthaler Straße 36

10178 Berlin

E-Mail: privacy@kadmos.io

If You are of the opinion that the processing of personal data concerning You by us violates applicable data protection law, You may lodge a complaint with the competent supervisory authority (Art. 77 GDPR in conjunction with Sec. 19 BDSG). This also applies if You are not satisfied with our response to Your concern. The supervisory authority competent for the Controller is:

Berliner Beauftragte für Datenschutz und Informationsfreiheit

Alt-Moabit 59-61

10555 Berlin

Tel.: +49 30 13889-0

Fax: +49 30 2155050

E-Mail: mailbox@datenschutz-berlin.de

Website: www.datenschutz-berlin.de.

You also have these rights regarding recipients to whom we transfer Your data and who are not merely our processors. The authority also offers a [complaint form](#).

GENERAL PRINCIPLES

for data processing

1. Scope of the processing of personal data

We collect and process Your personal data to operate and provide our services. In this context, the processing of Your data takes place either

- with Your prior consent, or
- if the processing is required to arrange a contract or to fulfil contractual obligations, or
- if we are legally obliged to do so, e.g., to comply with a statutory right to information, or
- if the processing of Your data is required to protect our legitimate interests unless Your interests or fundamental rights and freedoms prevail and require the protection of Your personal data.

Additionally, exceptions apply in such cases where we are unable to obtain Your prior consent for factual reasons or where the processing of personal data is permitted or required by law.

2. Legal bases

If we ask for Your **CONSENT** to the processing of Your personal data, Art. 6 par. 1 sentence 1 lit. a GDPR serves as the legal basis for the processing of personal data.

For the processing of personal data required for the performance, implementation of pre-contractual measures, or for the initiation of a **CONTRACT**, such as the agreement under which our services are provided to the Company Client, the legal basis is Art. 6 para 1 sentence 1 lit. b GDPR. Sometimes we may help the You to arrange and enter into a contract with a third party, such as the contract with our Partners under which the eWallet is provided. We may also collect and transfer certain personal data needed by a potential contractual partner of Yours if they need this information for their compliance with legal obligations, such as anti-money laundering (AML) or know-Your-customer (KYC) procedures. In such cases, the legal basis is also Art. 6 para 1 sentence 1 lit. b GDPR.

If the processing of personal data is necessary for our own **COMPLIANCE WITH A LEGAL OBLIGATION**, the legal basis is Art. 6 para 1 sentence 1 lit. c GDPR.

If the processing is required to protect our or a third parties' **LEGITIMATE INTEREST**, and if Your interests, fundamental rights, and freedoms, which each require the protection of Your personal data, do not outweigh such legitimate interests, the legal basis is Art. 6 para 1 sentence 1 lit. f GDPR.

3. Consent, right to withdraw consent, right to object the processing

As a general rule, we obtain Your consent electronically. Typically, we will ask You to express Your consent by ticking a checkbox or clicking on a button to document Your consent. Your declaration of consent is recorded electronically. You can contact us at any time to request documentation on the declaration of consent You have submitted at the relevant time.

In some cases, we may use the so-called “double opt-in procedure” once we have obtained Your consent in order to verify that it is actually You who has given the consent in question. In these cases, we will usually ask You to click on a link in an email we send You, although we may use other methods in the future. In these cases, Your consent will only become effective once You have confirmed that You have given Your consent. The click on the link or any other declaration we ask You to make in order to verify the consent will be recorded electronically, and also the circumstances of obtaining the confirmation (e.g., email that was sent, link, IP address, time, date) will be recorded.

To request documentation of the declaration(s) of consent, which You priorly submitted, You can contact us at any time.

You can withdraw Your consent at any time with effect for the future, in whole or in part. In cases where another legal basis applies to the processing of Your data, You can object to the processing of Your data at any time. There is no form requirement for Your statement of withdrawal or objection, but any such declaration is best addressed electronically or sent via the other contact options made available on our website. The lawfulness of processing that took place on the basis of on consent until receipt of Your withdrawal, or You general objection to processing, remains unaffected by this.

In the event of a withdrawal of Your consent, we may no longer be able to provide those parts or functionalities of of the Kadmos Services which require consent, and in the event You generally object to the processing of Your data, the same applies to the entire Kadmos Services. In these cases, we may suspend Your account in part or entirely and inform the Company about the withdrawal or objection.

4. Recipients of personal data

Kadmos is part of a group of companies. We share the data internally with our group company KDMS Payments Ltd., 10 Finsbury Square, 5th Floor, C/O Fox Williams Llp, London, England, EC2A 1AF in order to provide and enhance the service.

We sometimes use third parties which provide services on our behalf and in accordance with our instructions (so-called “**Processors**”). These Processors may receive or get in contact with personal data as part of providing their services. We have contractually ensured that our processors provide sufficient guarantees for having suitable technical and organisational measures in place, that the processing is carried out in compliance with the requirements of the GDPR and that the protection of the rights of the affected data subject is guaranteed.

If personal data is transferred to a third party which is not a processor i.e., another Controller including public authorities, we provide that this is only done in accordance with the requirements of the GDPR and only if there is legal basis for the transfer.

Please do not hesitate to contact us for further information on the processors we use.

5. Data processing in so-called third countries

Your personal data will generally be processed within the EU or the European Economic Area (EEA), and the processing will be governed by the GDPR. Please note that this is also the case if You are located in a country outside of the EU or the EEA.

Depending on the services You use, it is possible that information is transferred to so-called “third countries”. “Third countries” are countries outside the territory of the EU and/or the EEA, where an adequate level of data protection comparable with the standards applicable within the EU/EEA cannot be readily assumed.

If the information transferred also includes personal data, we provide that, prior to any such transfer, there are guarantees for an appropriate level of data protection in the respective third country or at the relevant recipient in the third country. This may be assumed from a so-called “adequacy decision” of the European Commission, or by using the so-called “EU standard contractual clauses”. For example, there is an adequacy decision for the United Kingdom. Upon request, we will be happy to provide You with further information on the suitable and appropriate guarantees that we require in order to ensure an adequate level of data protection.

6. Deletion of data and period of storage

We delete personal data as soon as the purpose of the processing has expired. Thereafter, we will only retain personal data

- if required for the performance of an agreement between You and us,
- if required by a competent European or national legislator under EU regulations, or if required by law or other legal provisions to which we are subject, e.g., for the fulfilment of statutory document and data retention requirements and/or
- in the event of a justified interest in the storage of the data, e.g., during limitation periods for the purpose of legal defence against any claims, or during an ongoing legal dispute.

In these cases, the data will be deleted if the reason to retain the data or the applicable retention period have expired.

7. Rights of affected persons

As a Data Subject within the meaning of Art. 4 no. 1 GDPR, the GDPR provides You with certain rights. If You would like to make use of one or more of these rights, You can contact us at any time.

YOUR RIGHTS *on one page*



You have the right to **REQUEST INFORMATION** about your data



You have the right to **REQUEST A COPY** about your data



You can ask us to **SUPPLEMENT OR CORRECT** wrong or incomplete data



You can request us to **DELETE YOUR DATA**, unless the data is necessary to exercise rights and obligations



You can ask us to **RESTRICT THE USE** of your data



You have the right to **OBJECT TO THE PROCESSING** of your data.



You can **RECEIVE YOUR DATA** you provided **IN A COMMON FORMAT** and transmit it to another controller



You can **REVOKE YOUR CONSENT** at any time

YOUR DATA JOURNEY *with us*

1. We collect some data from Your employer

To provide our services, Your employer can use and input Your data into our platform which is hosted on [Google Cloud Platform](#). They can manage employee records, execute transactions such as salary or salary advances, and review their transaction history within our platform. In order to facilitate these services, Your employer will share information like Your name, address, email, language, nationality, country of residence, and the currency in which Your payments are made. Additional details, such as Your employee reference, associated vessel, rank, or assigned tags, may also be provided. Each record is connected with an user id. After creating the records on our platform, they can choose to invite You to use our Kadmos Mobile Application, also called KMA. We use [SendGrid](#) to enable Your employer to send the invitations.

For processing transactions, we handle Transaction and Payout Data associated with You, including Date of Transaction, Reference, Transaction amount and type, Transaction id, payment provider's transaction id, Payout status, Payout Method, Currency, FX Rate, Fees, Payout Description, Vessel association, Payout Country, Bank Account Number, time stamps, and payout status. To provide the services we use [Google Cloud Platform](#).

To ensure You stay informed about payouts made to You, Your employer may choose to notify You that a payout has been initiated and is currently being processed by us and our payment provider. We use [SendGrid](#) to send those notifications. To provide this service to Your employer we process Your name, email address, and associated employer and the data about the payment made to You, which includes Your IBAN, bank details, and payout information such as amount and payout description.

Legal Basis [Contract, Legitimate Interest](#)

2. Register with us

Once You downloaded KMA You need to accept our Terms and Conditions and set up Your account. You are entering into a contract with our Partners, too, so we will collect the acceptance of the contract for and share it with them in order to facilitate the contract between You and our Partners.

When You accepted our Terms and Conditions You need to choose a password, which will be stored safe and secure with us. Additionally, we collect You phone number in order to send You necessary notifications, for processes like "[Prepare and authorize payments](#)". We also use data already collected from Your employer to make it easier for You to join KMA. This includes Your name and email. You can always change Your password and phone number in the app, but if You want to make changes to Your name, email or address, please contact "[Support](#)". Any changes to Your name, email or address will also be shared with Your employer.

We will use Your user id to manage the features You can use with [LaunchDarkly](#).

Legal Basis [Contract](#)

3. Validate

Once You accepted the Terms and Conditions, our Partners conduct the KYC (Know Your Customer) process as mandated by law. Currently, our collaboration includes [Rapyd](#). We'll collect the data for them via KMA. This includes the name, marital status, Your birthday and a copy of Your identification documents. A photo of Your face is also necessary to start the process of KYC.

Throughout this process, we may assist our Partner by conveying information to You if they have queries and relaying Your responses, including any required documents, back to them.

For further details on how our partner handles the collection and processing of data during this process, please refer to their privacy policy at <https://www.rapyd.net/security-compliance/privacy-policy/>.

During this process we act as a so-called processor for our Partner in assisting in the KYC process. Our Partners are the controller of the data collected and we only process and store the data on behalf of them.

4. Account access as a user on our platform

Once everything is setup, You can access the KMA. KMA is hosted on [Google Cloud Platform](#). During this process we collect the username, account email address and password. The user account is connected to the user id we created when "*We collect some data from Your employer*" to manage access permissions to the information You can see through our system. You can upload a photo, if You want. When You register and each time You login to KMA, we record the circumstances of registration or login, which are the log data at the time of registration or login.

Legal Basis [Contract, Legitimate interest, Consent for the photo](#)

5. Activate and use Your debit card

Your employer can order a card for You. They can do this with our platform. When they create a new card order we will process Your name Your employer provided us with and the user id. We then ship the cards to Your employer. Once the employer handed You Your card, we facilitate the activation of the card in KMA by providing You with an easy access to the interface of our Partners. The activation itself is done by our Partners. We only process Your name, user id, the last four digits of Your debit card and the expiration date of the card, as well as the card activation status and a card token, which we get from our Partners in order to show You the card and card settings. Once You use the card the associated transactions (see also "*Review Transactions*") connected to the card are also shown to You.

Legal Basis [Contract](#)

6. Create recipients

In KMA, You can create records for Your recipients. We only process the data You provide us with to create these records. This data includes the names and banking details. The banking details depend on the country the money is sent to, but in general we collect the address, city, state, postal code and account number.

In case of restricted countries, a verification of the recipients might be necessary. In this case we also ask You to provide the birthday. Once the recipient is created, we will provide You with a link, which You can share with the recipients to complete the verification. This data is shared with our Partners, who will perform this verification.

Legal Basis **Contract**

7. Prepare and authorize payments

When You created a recipient, You can send money to them. During this process Kadmos and our Partner, together as Joint Controllers, collect the data You provided when creating the records for the recipients by accessing the data in our system. We process this data together with the payment information, like description, references, and payment amount. When everything is collected we send You a code, using **SendGrid**, to Your account email address or to Your phone number via WhatsApp in order to collect the payment authorization. After You authorized the payment, we send the data to our Partner to "*Execute payments*".

Legal Basis **Contract**

8. Execute payments

Our Partners execute the transaction. Kadmos does not handle Your funds. Currently, our collaboration just includes **Rapyd**. For further details on how our partner handles the collection and processing of data during this process, please refer to their privacy policy at <https://www.rapyd.net/security-compliance/privacy-policy/>.

9. Review Transactions

In KMA, You can check the balance or review transactions made with Your account, download an account statement, and review the status of Your payouts. In order to provide those service to You, we process the data You provided when You created recipients (see "*Create recipients*"), the transaction data from the processes "*Prepare and authorize payments*" and "*Execute payments*", including meta data about the transaction, like type, status and time stamps our system or the systems of our Partners generate. We process this data as Joint Controllers with our Partners.

Legal Basis **Contract, Legal obligation**

10. Support

In case of questions, You can contact our support via different channels, typical via email, which is stored with our email provider [Google Mail](#), or through the [Intercom](#) integration in KMA. If You do so, we will collect and process Your email and content data. To solve Your request, we may access data You provided us with in KMA, Your transaction data or data we get from our Partners in case the inquiry affects them, too. If You request support for matters concerning regulated matters, we act as a so-called processor for our Partners. To help us solve Your request, we will use [Concentrix](#), our first level support provider. To coordinate the support process internally we process pseudonymized data in [Slack](#) and [Jira](#). If You need to sign documents, we will use [DocuSign](#).

Legal Basis [Contract, Legitimate Interest](#)

11. Feedback

We love to hear Your thoughts and feedback. There are several ways how process feedback. If You let us know via email and [Intercom](#), we will collect them via those channels and store the key take aways in our knowledge database [Notion](#) or in project specific workflows with [Jira](#). Sometimes this data will be stored with Your name or id to know where the request came from.

Another way how we might collect feedback are integrated is through user interviews. We conduct those interviews typically with [Google Meet](#). If we have Your consent to record the meeting, we will utilise [Otter.ai](#) to record and transcribe the meeting in order to analyze the interview at a later point. The key take aways are also stored in [Notion](#) or [Jira](#).

Legal Basis [Consent, Legitimate Interest](#)

12. Hosting and cloud services

We use [Google Cloud Platform](#) to host our systems, including KMA and to store and process the data generated by Your use of KMA, including Your IP address. Cloud service providers typically process usage and metadata of the users of their services in order to secure their servers and to optimise their services. Insofar as You access KMA and the data that we make available to You, or You upload data, or cause data to be pulled from third-party sources into KMA, the respective cloud service provider may analyse Your usage behaviour or browser settings.

Legal Basis [Contract, Legitimate Interest](#)

13. Logging

In order to secure our systems and KMA, we need to monitor the events and actions performed during its use. Events occurring on [Google Cloud Platform](#) will be logged for the purposes of debugging, security management, and error handling. Data involved in the logging process include time stamps, ids, IP addresses, device, operating system and browser information, protocols, type of log and data about actions performed, like clicks.

These logs will be stored using the services provided by [Google Cloud Platform](#) as well as [Rollbar](#).

Legal Basis [Legitimate Interest](#)

14. Use of Google Analytics, Amplitude and cookies

We utilize [Google Analytics](#) and [Amplitude](#) to analyse user experience and ensure smooth operations. This is done by utilizing analytics cookies set by [Google Analytics](#) and [Amplitude](#) to collect data about events and actions performed by You in KMA, like clicking the “Send”-button on the 29th of February in 2024 at 06:30am on a Samsung Galaxy. Cookies store information on Your device uniquely identifying the device. Besides analytics cookies we also use other types of cookies for various purposes outlined in our "[General privacy policy for the Kadmos Website](#)" The consent for setting the cookies is stored with [CookieBot](#). We utilize this data to improve user interface design, optimize performance, detect, and prevent abuse or attacks on our IT systems, and maintain a secure operation of KMA.

Legal Basis [Consent, Legitimate Interest for necessary cookies](#)

15. Email Analytics

When we send emails using [SendGrid](#), we gather information about how recipients interact with those emails. This helps us understand the effectiveness of our communication and ensures that our messages are successfully delivered. The data we collect includes whether the email was delivered, opened, or if any links within the email were clicked, including the unsubscribe button. We also track if the message was marked as spam.

In some cases, this data is combined with user ids. This allows us to perform further "[Product Analytics](#)", gaining deeper insights into how our users engage with our products and services.

Legal Basis [Legitimate Interest](#)

16. Product Analytics

We prioritize optimizing KMA to ensure it's appealing and user-friendly for You. To achieve this, we need to understand which parts of KMA, especially its user interface, are well-received and which may cause issues or lead to interruptions.

To gather this information, we analyze the data we've collected from You during the whole data journey with us. We take steps to protect Your privacy by pseudonymizing or aggregating the data. Additionally, if You've allowed us to collect data from cookies or provided feedback, we may combine this information with the data we have.

This data helps us understand the user journey and how our product is used. Furthermore, we use this data to test our product's functionalities and address any bugs that may arise during deployment. By doing so, we ensure a smooth and reliable user experience for You.

Legal Basis [Legitimate Interest](#)

OUR THRID PARTY TOOLS

and where the data is transferred

1. What and Who we use to **PROVIDE OUR SERVICES**

Google Cloud Platform



Hosting Provider



USA



Google Cloud EMEA Limited
70 Sir John Rogerson's Quay,
Dublin, Ireland

Launch Darkly



Feature Management



USA



Catamorphic Co.
1999 Harrison St., Suite 1100,
Oakland, CA 94612 USA

SendGrid



Communication Service



USA



Twilio Ireland Limited
3 Dublin Landings, North Wall Quay,
D01C4E0 Dublin, Ireland

2. What and Who we use to COMMUNICATE

Google Mail



Email provider



USA



Google Cloud EMEA Limited
70 Sir John Rogerson's Quay,
Dublin, Ireland

Intercom



Communication System



USA



Intercom R&D Unlimited Company
2nd Floor, Stephen Court, 18-21 St.
Stephen's Green, Dublin, Ireland

Google Meet



Video communication
provider



USA



Google Cloud EMEA Limited
70 Sir John Rogerson's Quay,
Dublin, Ireland

Concentrix



Frist level support



No transfer outside of EU
or EEA



Concentrix International Europe
B.V., Kabelweg 43, 1014 BA
Amsterdam, Netherlands

What and Who we use to **SUPPORT OUR SERVICES**

DocuSign



Contract Management



USA



DocuSign Germany GmbH, c/o Bird & Bird LLP, Maximiliansplatz 22, 80333 München, Germany

Notion



Knowledge database and CRM Tool



USA



Notion Labs Inc.
San Francisco, 2300 Harrison St.,
United States

Jira



Ticket system



Australia



Atlassian Pty Ltd, Level 6, 341 George Street, 2000 Sydney, New South Wales, Australia

Slack



Communication System



USA



Slack Technologies Limited,
Salesforce Tower, 60 R801, North Dock, Dublin, Ireland

Google Analytics



Analytics software



USA



Google Ireland Limited
Gordon House, Barrow Street
Dublin, Ireland

Amplitude



Analytics software



USA



Amplitude, Inc
201 3rd Street, Suite 200, San Francisco, CA 94103, USA

Cookiebot


 Cookie Management


 No transfer outside of EU or EEA




Usercentrics A/S
Havnegade 39, 1058 Copenhagen,
Denmark

Otter.ai

 AI transcription software

 USA



Notion Labs Inc.
800 W El Camino Real, Suite 170,
Mountain View, CA 94040, USA

Rollbar

 Logging software

 USA



Rollbar, Inc.
510 Federal Street Suite 401, San
Francisco, CA 94107, USA