

# PRIVACY POLICY

kilda.app | Effective: May 4, 2026 | Version 1.0

---

## 1. Data Controller

Kilda ("the Platform") is operated by an individual based in Sweden with project collaborators in Spain, Belgium, and the United Kingdom. For the purposes of Regulation (EU) 2016/679 ("GDPR"), the UK General Data Protection Regulation, and all applicable data-protection law, the operator acts as data controller. Contact: [hello@kilda.app](mailto:hello@kilda.app).

## 2. Scope

This policy describes what personal data the Platform processes, why, on what legal basis, and how you can exercise your rights. It applies to all visitors to **kilda.app**. The Platform's use of cookies is described separately in the Cookie Policy, accessible from the site footer.

## 3. Data We Process

The Platform is designed to operate without collecting personal data. You are not required to register, log in, or identify yourself. The Platform does not use analytics, advertising, or tracking technologies. However, limited personal data may be processed in the following circumstances.

**3.1 Voluntary correspondence.** If you contact the operator by email (for example, to suggest a topic or provide feedback), the operator will receive and process your email address, your name (if included), and the content of your message. This data is processed on the basis of your consent, given by initiating the correspondence (Art. 6(1)(a) GDPR). You may withdraw consent at any time by emailing [hello@kilda.app](mailto:hello@kilda.app) and requesting deletion of your correspondence. Emails are retained for a maximum of twelve (12) months from the date of receipt and then permanently deleted.

**3.2 Server-access logs.** The Platform's hosting provider may automatically generate server-access logs that record your IP address, the date and time of your request, the page requested, your browser type and operating system, and the referring URL. This data is processed on the basis of the operator's legitimate interest in maintaining the security, stability, and availability of the Platform (Art. 6(1)(f) GDPR). The operator will configure log retention to the shortest period offered by the hosting provider, and in any event no longer than thirty (30) days. Logs are not used for identification, profiling, or tracking.

## 4. Data We Do Not Process

The Platform does not process special-category data (Art. 9 GDPR), financial data about individual users, location data, device identifiers, or any data obtained through cookies requiring consent. The Platform does not engage in profiling or automated decision-making that produces legal or similarly significant effects on individuals (Art. 22 GDPR). All analytical outputs concern exchange-traded funds and financial instruments – not individual users.

## 5. Recipients and Third Parties

The operator does not sell, share, rent, or trade personal data. Personal data may be accessible to the following categories of recipients solely for the purposes described above.

**5.1 Email provider.** Email sent to [hello@kilda.app](mailto:hello@kilda.app) is routed through Squarespace's email forwarding service, operated by Squarespace Ireland Ltd. (or Squarespace, Inc. where applicable), which forwards incoming messages to a mailbox hosted by Google LLC (Gmail). Both providers act as data processors on behalf of the operator. Squarespace processes correspondence in transit solely for the purpose of delivery; Gmail receives and stores the correspondence in the operator's mailbox. Squarespace's processing is governed by its [Data Processing Addendum](#), available at [squarespace.com/terms](https://squarespace.com/terms); Google's processing is governed by Google's [Data Processing Amendment](#).

**5.2 Hosting and infrastructure providers.** The Platform's infrastructure is provided by the following data processors:

(a) *Backend and database hosting.* The Platform's backend application and database are hosted on a Virtual Private Server provided by Hetzner Online GmbH (Germany), with the server located in Hetzner's data center in Helsinki, Finland. Hetzner processes server-access logs and any data stored on the server on behalf of the operator. Hetzner's processing is governed by its Data Processing Agreement under Article 28 GDPR, available at [hetzner.com/legal](https://hetzner.com/legal).

(b) *Frontend hosting and content delivery.* The Platform's frontend is hosted and delivered by Vercel Inc. (United States) through its global edge network. In delivering the Platform, Vercel processes limited request metadata, including visitor IP addresses, request timestamps, and standard HTTP headers, for the purposes of content delivery, security, and platform reliability. Vercel's processing is governed by its Data Processing Addendum, available at [vercel.com/legal/dpa](https://vercel.com/legal/dpa).

No other third party receives personal data from the Platform