Kaduu Privacy Policy

Last updated: March 09, 2024

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Kaduu Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

This Policy shall also ensure that all Staff at all times comply with data protection requirements regarding the Processing of Personal Data.

1 Interpretation and Definitions

1.1 Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

1.2 Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique account created for You to access our Service or parts of our Service.
- **Affiliate** means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.
- **Application** refers to Kaduu, the software program provided by the Company.
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Kaduu AG, Chamerstrasse 172.
- **Country** refers to: Switzerland
- **Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service** refers to the Application.
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit) or API usage https://wiki.kaduu.ch/doku/doku.php?id=api
- **You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

2 ROLES AND RESPONSIBILITIES: Data Protection Contacts (DPC)

Kaduu appoints the Data Protection Officer (DPO) gdpr@kaduu.io as a contact. Responsible is Oliver Muenchow.

3 Types of Data Collected

3.1 Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

Email address
First name and last name
Phone number
Address, State, Province, ZIP/Postal code, City
Usage Data

3.2 Usage Data

Usage Data is collected automatically when using the Kaduu Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit and other diagnostic data like the Kaduu REST API usage.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

4 Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service.
- **To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.

- **To manage Your requests:** To attend and manage Your requests to Us.
- **For business transfers:** We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.
- **For other purposes**: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We never share Your personal information except with Your consent: We may disclose Your personal information for any other purpose with Your consent.

5 Handling of Data from Public Sources (Data Leaks) within Kaduu

We recognize the importance of protecting personal and sensitive information. Our platformKaduu, collects data from various public sources, including leaks published in deep web and darknet environments. This data, often replicated across the internet, may include personally identifiable information (PII) or sensitive data related to individuals and companies.

5.1 Data Collection and Purpose

We collect this data to provide our users with comprehensive insights and to enhance security measures by identifying potential threats and vulnerabilities. The nature of this data, given its widespread availability and replication across unauthorized and uncontrolled environments, poses unique challenges for data management and protection.

5.2 GDPR Compliance and Data Subject Rights

Under the General Data Protection Regulation (GDPR), individuals have rights concerning their personal data. These rights include, but are not limited to, the right to access, rectify, erase, restrict processing, object to processing, and portability of their data. [Your Company Name] is committed to upholding these rights, with particular consideration given to the complexities involved in handling data sourced from public leaks.

5.3 Given the nature and origin of this data:

Access and Rectification: Data subjects have the right to access and rectify their data. When requests are made concerning data obtained from public leaks, [Your Company Name] will make reasonable efforts to identify and address the data subject's concerns, within the constraints posed by the data's nature and dissemination.

Erasure and Restriction of Processing: While we understand the concerns data subjects may have regarding their information being found in our product, the erasure and restriction of processing pose significant challenges. Data collected from public leaks is, by its nature, already disseminated across the internet, making it technically unfeasible for your organization or any entity to control or eliminate. Our policy reflects this limitation, acknowledging that while we cannot erase data from its original, widespread sources, we are committed to not further disseminating or processing such data in a manner that exacerbates its exposure.

We continuously review our data handling practices and privacy policies to align with legal requirements and ethical standards. This section of our Privacy Policy is designed to provide clarity on our approach to handling data from public sources, particularly in relation to GDPR rights and the unique challenges presented by such data. For further inquiries or to exercise your data protection rights, please contact our Data Protection Officer at gdpr@kaduu.io.

6 Technical and Legal Background on Data Collection from Public Sources

6.1 Lawful Basis for Collection

Kaduu AG engages in the collection of data from publicly accessible sources, including forums and sites within the deep web and darknet. This activity is conducted under the lawful basis of legitimate interest, as defined under the General Data Protection Regulation (GDPR) Article 6(1)(f). This provision allows for the processing of personal data when it is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

Our legitimate interest lies in providing cybersecurity services, including threat intelligence and data breach analysis, to protect our clients and the broader digital community from potential harm. By analyzing data from public leaks, Kaduu AG can identify vulnerabilities, inform affected parties, and contribute to the enhancement of overall internet security.

6.2 Collection Process

The collection process involves the systematic monitoring and downloading of data from public forums known for hosting data leaks. These sources are not owned or controlled by Kaduu AG, and the data available on them is considered public due to its widespread dissemination across the internet without any form of access control or authorization.

6.3 Data Scale and Nature

The data collected comprises billions of records, including, but not limited to, usernames, passwords, email addresses, and other personal identifiers. This data is often part of large-scale data breaches affecting various online platforms and services. The sheer volume and sensitivity of the data necessitate robust data management practices to ensure that Kaduu AG's use of the data aligns with legal and ethical standards.

6.4 Ethical Considerations and Data Use

Kaduu AG is acutely aware of the ethical implications of handling leaked data. The company employs strict data governance protocols to ensure that the data is used solely for the purpose of enhancing cybersecurity measures, such as:

- Identifying and alerting affected entities and individuals, where feasible, to potential threats.
- Conducting research and analysis to improve security products and services.
- Sharing insights with the cybersecurity community to foster awareness and resilience against digital threats.
- Kaduu AG does not use the data for any form of commercial exploitation unrelated to its core mission of improving cybersecurity.

6.5 Compliance Measures

Kaduu AG is committed to GDPR compliance and has implemented measures to ensure that the collection and use of data from public sources are conducted responsibly and ethically. These measures include:

- Conducting regular assessments to balance the legitimate interests of data collection with the rights and freedoms of data subjects.
- Providing transparency to stakeholders through clear communication of data collection practices and purposes.
- Establishing channels for data subjects to inquire about and exercise their GDPR rights in relation to the data held by Kaduu AG.

Kaduu AG remains dedicated to advancing cybersecurity while respecting privacy and data protection principles. The company continuously evaluates its data collection and handling practices to adapt to evolving regulations, threats, and technologies.

7 Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. This relates only to data collected from the business relationship and not leaks.

We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

8 Purpose and Legal Basis for Processing:

The processing of your PII is based on your consent, given by voluntarily submitting your information through our contact form or email. The primary purpose of collecting this information is to enable us to effectively respond to your queries and provide the information or services you have requested.

9 Storage and Retention:

We store your personal data securely and take appropriate measures to protect it from unauthorized access, disclosure, alteration, or destruction. Your information is retained only for as long as necessary to fulfill the purposes for which it was collected or as required by law. This period may vary depending on the nature of your inquiry and any applicable legal requirements. Once the retention period expires, your personal data is securely deleted from our systems.

10 Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

11 Delete Your Personal Data

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You. This relates only to data collected through our business relationship and not to data within leaks (see section “Handling of Data from Public Sources (Data Leaks) within Kaduu”).

Our Service may give You the ability to delete certain information about You from within the Service.

You may update, amend, or delete Your information at any time by signing in to Your Account, if you have one, and visiting the account settings section that allows you to manage Your personal information. You may also contact Us to request access to, correct, or delete any personal information that You have provided to Us.

Please note, however, that We may need to retain certain information when we have a legal obligation or lawful basis to do so.

12 Exercising Your Rights Under GDPR (Information Request)

At Kaduu, we are committed to protecting your privacy and ensuring you have full control over your personal data. In accordance with the General Data Protection Regulation (GDPR), individuals have the right to access, rectify, erase, restrict processing, object to processing, and the right to data portability concerning their personal data.

If you wish to inquire about any personal data we may hold about you or if you aim to exercise any of your rights under the GDPR, please feel free to contact us in one of the following ways:

- Contact Form: You can reach us via our contact form available at https://kaduu.io/contact/. Please fill in the necessary details and mention your request related to GDPR or your personal data.
- Email: Alternatively, you can directly email us at gdpr@kaduu.io with your request. Whether you seek to access your data, request a correction, or any other GDPR related query, our dedicated team is ready to assist you.
- When submitting your request, please provide sufficient information to allow us to identify any data we might hold about you and to ensure we're addressing your request accurately. Depending on the nature of your request, we may require further verification of your identity to protect your data and privacy.

We aim to respond to all requests from individuals exercising their data protection rights in accordance with GDPR requirements and within the time frames specified by the regulation.

Disclosure of Your Personal Data

12.1 Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

12.2 Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

12.3 Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

13 Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

14 Children's Privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

15 Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

16 Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

17 Contact Us

If you have any questions about this Privacy Policy, You can contact us:

By email: gdpr@kaduu.ch
By visiting this page on our website: https://kaduu.io/contact/
By phone number: +41 (0)26 543 41 08
By mail: Chamerstrasse 172, 6300 Zug, Switzerland

When you reach out to us via our contact form available at https://kaduu.io/contact/ or directly through email at gdpr@kaduu.io, we may collect personal data about you. This data typically includes your name, email address, and any other information you choose to provide in your message. We collect this information solely for the purpose of responding to your inquiries, providing you with the requested information, and offering assistance related to our services.