



## Kuratech General Terms and Conditions

This Privacy Policy explains how Kuratech ehf., incorporated and registered in Iceland with registration number 490124-1010, whose registered office is at Háaleitisbraut 68, 103 Reykjavík, Iceland, (“**Kuratech**”, “**we**”, “**us**”) processes personal data when you visit our websites, communicate with us, or use our software-as-a-service platform (the “**Service**”).

This Privacy Policy should be read together with our Terms and Conditions (the “**Terms**”) and, if applicable, the Customer Service Agreement (the “**Customer Agreement**”). Where the Service involves us processing personal data on behalf of a Customer, the Customer is the controller and Kuratech acts as a processor, as further described below.

Kuratech processes personal data in accordance with applicable data protection law, including the EU General Data Protection Regulation (GDPR) as implemented in Icelandic law (including Act No. 90/2018).

### 1. When we are Controller vs. Processor

#### 1.1. Kuratech as Controller

Kuratech is the controller for personal data processed for:

- website operation, security, and analytics;
- sales and marketing (where permitted);
- customer relationship management (contracts, billing, account administration);
- support, product communications, and incident handling; and
- compliance with legal obligations.

#### 1.2. Kuratech as Processor

When a Customer uses the Service to register and administer Estates, Kuratech generally processes data on the Customer’s documented instructions. In those circumstances the Customer is the controller of “Estate Data” and related personal data uploaded to or created in the Service and Kuratech is a processor and processes that data only as described in the Terms/Customer Agreement and any data processing terms (DPA) incorporated therein. If there is any conflict, the processor terms in the Terms/DPA control for processor processing.

### 2. What personal data we collect (as Controller)

Depending on how you interact with us, we may process:

#### Contact and account data

Name, work email, phone number, title, employer/firm, login and authentication details, user role, and account settings.

#### Customer relationship and billing data

Company name, invoicing address, VAT number, invoice history, payment status, and communications about subscriptions/fees.

#### Communications and support

Support tickets, chat/email content, call notes, attachments you send us, and technical troubleshooting information.

#### Website and device data

IP address, device identifiers, browser type, operating system, approximate location (derived from IP), pages viewed, and logs for security and performance.

#### Product usage telemetry (if enabled/used)

Event logs and usage statistics (e.g., feature usage, performance metrics), typically aggregated and minimized.

We do not intend to collect special category data as controller. Any special category data that appears in support communications is handled with heightened care and minimization.

### 3. Purposes and legal bases (as Controller)

We process personal data only where we have a lawful basis, including:

- Provide and administer the Service and customer relationship (contract; legitimate interests).
- Billing, payment administration, and fee collection (contract; legal obligation).
- Support, incident management, and service communications (contract; legitimate interests).
- Security, fraud prevention, and misuse detection (legitimate interests; legal obligation where applicable).
- Improve and develop the Service (legitimate interests; and/or consent)

where required for certain cookies/analytics).

- Marketing to business contacts (legitimate interests and/or consent, depending on channel and applicable rules).
- Compliance with law and responding to lawful requests (legal obligation).

#### **4. Cookies and similar technologies**

Our websites may use cookies and similar technologies for:

- strictly necessary functionality and security;
- analytics to understand website performance; and
- marketing (if used).

Where required, we will request consent before placing non-essential cookies. You can manage cookie preferences via our cookie banner or your browser settings.

#### **5. Sharing of personal data (as Controller)**

We may share personal data with:

- Service providers (processors) such as hosting, infrastructure, analytics, customer support tools, and email delivery providers, acting under our instructions and subject to appropriate safeguards.
- Professional advisors (legal, accounting, auditors) where necessary.
- Authorities where required by law or to protect rights, safety, and security.
- Corporate transactions (e.g., merger/acquisition) subject to confidentiality and lawful processing.

Sub-processors for Estate Data: Where Kuratech acts as processor, any sub-processing is governed by the DPA/Terms. Maintain a current sub-processor list (or link) and describe notice/objection mechanism if your Terms provide one.

#### **6. International Transfers**

If personal data is transferred outside the EEA, we will use appropriate safeguards such as EU

Standard Contractual Clauses and supplementary measures where required.

#### **7. Data Retention**

We keep personal data only as long as necessary for the purposes described above, including to meet legal, accounting, and security requirements.

Typical retention approach (customize):

- Account and billing records: retained for statutory accounting/tax periods.
- Support records: retained for a reasonable period to resolve issues and improve service.
- Website logs: retained for security and troubleshooting, then deleted or anonymized.
- Marketing contacts: retained until you opt out or we no longer have a lawful basis.

Estate Data: retained and deleted/returned in accordance with the Terms/DPA and Customer instructions.

#### **8. Security**

We implement technical and organizational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. Measures may include access controls, encryption in transit, logging/monitoring, least-privilege permissions, and vendor security reviews.

#### **9. Your Rights**

Depending on your circumstances, you may have rights including:

- access to your personal data;
- Rectification;
- erasure;
- restriction;
- portability;
- objection (including to certain marketing); and
- withdrawal of consent (where processing is based on consent).

To exercise rights, contact [kuratech@kuratech.is](mailto:kuratech@kuratech.is)

#### **10. Complaints**

If you have concerns, please contact us first so we can try to resolve the issue. You also have the right to lodge a complaint with the competent supervisory authority.

#### **11. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. The updated version will be effective when published, and we will provide additional notice where required.

#### **12. Contact**

Questions about this Privacy Policy or our data practices, contact [kuratech@kuratech.is](mailto:kuratech@kuratech.is)

This Privacy Policy is effective as of 28 January 2026 and will remain in effect until updated or replaced by a newer version.