Business Account Privacy Notice

Kleos Ireland SR Limited
Company number 800152
The Black Church, St. Mary's Place,
Dublin 7, Ireland, D07 P4AX.
Website: https://kleos.money

Updated as of 29 September 2026

This Privacy Notice explains how Kleos Ireland SR Limited ("Kleos", "we" or "us") collects and processes personal data in connection with applications for, access to, and use of Kleos business accounts and related services through our website or application (the "Services"). It is provided under Regulation (EU) 2016/679 (the "GDPR").

It applies to individuals connected with a business customer or applicant (the "Business Customer"), including directors, legal representatives, beneficial owners, persons exercising control, authorised signatories, account administrators, employees and other authorised users. It also covers sole traders and individual professionals where eligible for the Services, and individuals whose personal data is included in payment or supporting documentation.

References to "you" mean the individual whose personal data is processed. Information about a legal entity is covered by this Notice insofar as it identifies or relates to an identifiable individual. This Notice should be read together with the applicable business terms and the privacy notices of the regulated providers whose services you use.

1. Who is the data controller

Kleos Ireland SR Limited, with registered office at The Black Church, St. Mary's Place, Dublin 7, Ireland D07 P4AX, operating under the brand name Kleos, is the controller where it determines the purposes and means of processing personal data for the Services, including the operation of the Kleos application, administration of user access, customer support, security and its own business communications.

Where Kleos processes personal data solely on behalf of and upon the documented instructions of Lightspark Payments Europe AS, Kleos acts as a processor for that processing. The responsible provider determines the purposes, applicable legal bases and retention requirements for those activities. Processing carried out in that capacity is governed by the relevant processing agreement and the provider's privacy notice.

Lightspark Payments Europe AS acts as a separate controller for processing for which it determines the purposes and means, including its own regulatory compliance activities. The parties' roles depend on the particular processing activity and their actual responsibilities. Further information appears in Section 7.

2. How do we obtain your personal data

We obtain personal data directly from you when you register, provide information or documents, use the Services or contact us. We also collect technical and access information through your interaction with the website and application.

In the business account context, we may receive your personal data from the Business Customer, its representatives or account administrators, including when they appoint authorised users or provide information necessary to establish or administer access to the Kleos Services. We may also receive personal data from Lightspark Payments Europe AS and from service providers or other third parties where necessary for the purposes for which Kleos acts as controller, as described in this Notice.

If you provide another individual's personal data, you must have a lawful basis for doing so, provide accurate and relevant information, and make this Notice available to that individual. This does not replace our own transparency obligations. Where we obtain personal data indirectly as controller, we provide the information required by Article 14 GDPR within the applicable time limits, unless a lawful exception applies. You may contact us to ask about the source of your data.

3. What personal data do we process and why?

Where Kleos acts as controller, we process personal data only where we determine the purposes and means of that processing. The categories of personal data we process, and the purposes for which we use them, include:

Identity and contact data

This may include your name, business contact details, position or role within the Business Customer and information necessary to identify you as a representative or authorised user.

We process this information to establish and administer our relationship with the Business Customer, communicate with you, create and manage user access and provide the Kleos Services.

Representation and authority data

This may include your position, employer or associated business, signing authority, mandate, permissions and information provided to demonstrate that you are authorised to act for the Business Customer.

We process this information to verify and record authority to act, administer authorised users and permissions and maintain appropriate access controls.

Account and activity data

This may include user identifiers, roles, permissions, authentication information, instructions submitted through the Kleos application and records of activity within the Services.

We process this information to administer the Business Account, provide the functionality made available by Kleos, maintain appropriate records and protect the integrity and security of the Services.

Technical and security data

This may include IP address, device and browser information, operating system, access logs, diagnostic information and security-related events.

We process this information to operate, maintain and secure the Services, prevent and investigate unauthorised access, diagnose technical issues and improve reliability.

Support and communications data

This includes communications with Kleos, support requests, complaints, correspondence and any information or attachments you choose to provide to us.

We process this information to provide support, respond to enquiries and complaints, maintain records of our relationship and establish, exercise or defend legal claims where necessary.

Marketing and communication preference data

This may include your email address, marketing preferences, consent or objection records and information relating to your interactions with communications sent by Kleos.

We process this information to send marketing or business communications where permitted by law, manage your preferences and assess the effectiveness of our communications.

Legal bases for processing

Depending on the relevant activity, Kleos relies on one or more of the following legal bases:

Contractual necessity - Article 6(1)(b) GDPR: where processing is necessary to take steps at your request before entering into a contract with you personally or to perform a contract with you, including where you are an eligible sole trader or individual professional.

Legal obligation - Article 6(1)(c) GDPR: where processing is necessary to comply with a legal obligation that applies directly to Kleos.

Legitimate interests - Article 6(1)(f) GDPR: where processing is necessary for Kleos's legitimate interests, including establishing and administering business relationships, verifying authority to act, managing users and access, operating and securing the Services, providing support, preventing misuse and establishing, exercising or defending legal claims, provided that those interests are not overridden by your rights and freedoms.

Consent - Article 6(1)(a) GDPR: where we rely on consent for optional marketing, tracking or another activity for which consent is required. You may withdraw consent at any time without affecting the lawfulness of processing carried out before withdrawal.

Processing undertaken independently by Lightspark Payments Europe AS or another regulated provider, including regulatory verification, screening and compliance processing for which that provider determines the purposes and means, is governed by that provider's own privacy notice.

4. Is providing personal data mandatory?

Certain personal data is necessary for Kleos to establish and administer its relationship with the Business Customer, verify that individuals are authorised to act on its behalf, create and manage user access, provide support and maintain the security of the Services.

If information required for those purposes is not provided, Kleos may be unable to register or maintain the relevant user, confirm their authority, provide the affected Kleos functionality or respond appropriately to a request.

Information required independently by Lightspark Payments Europe AS or another regulated provider for its own services is subject to that provider's requirements and privacy notice.

Marketing communications are optional. Refusing or withdrawing consent to marketing does not affect access to the core Kleos Services.

5. How do we process and retain personal data?

Kleos uses appropriate technical and organisational measures to protect personal data against unauthorised access, loss, alteration and unlawful use. Access to personal data is limited to personnel and service providers who require it for the relevant purpose.

Where Kleos acts as controller, we retain personal data only for as long as necessary for the purposes for which it was collected, taking into account the duration of our relationship with the Business Customer, the period for which an individual remains authorised to act or use the Services, applicable legal and regulatory requirements, limitation periods and any actual or anticipated dispute, investigation or legal claim.

Records relating to user access, authority, instructions and the administration of the Business Account are retained for as long as necessary to manage the relationship and, where appropriate, afterwards for record-keeping, evidential and legal purposes.

Technical, security and support records are retained for as long as reasonably necessary for operational, security, complaint-handling and legal purposes.

Personal data used for consent-based marketing is retained until consent is withdrawn or for twelve months following the last interaction with a marketing communication, whichever occurs first. We may retain limited records of consent, withdrawal or objections where necessary to demonstrate compliance and respect your preferences.

At the end of the applicable retention period, personal data is deleted or irreversibly anonymised unless continued retention is required or permitted by law. You may contact our Data Protection Officer for further information about the retention period or criteria applicable to a particular category of personal data.

6. Will the personal data be disclosed to third parties?

Personal data processed by Kleos as controller may be shared, where necessary for the relevant purpose, with group companies supporting the Services; Lightspark Payments Europe AS; hosting, security and other IT service providers; professional advisers, auditors and lawyers; and competent regulators, tax authorities, courts or law enforcement where legally required or otherwise lawfully justified.

Visibility within the business account

Business account administrators and other persons authorised by the Business Customer may access personal data necessary to administer the Business Account within their assigned permissions. Depending on the enabled functions, this may include your name, role, permissions and records of your activity within the Kleos Services..

7. Third party data controllers

Lightspark Payments Europe AS, registry code 16298772, Pärnu mnt 110, 11313 Tallinn, Estonia, processes personal data as a separate controller for activities under its responsibility, including its applicable regulatory checks and regulated services. Its privacy notice is available through the Privacy Policy link at https://eu.lightspark.com/. Its data protection contact is dpo.eu@lightspark.com.

ther regulated providers may also act as separate controllers for their services. Their identity and applicable privacy notices are made available in connection with the relevant product or onboarding process. Please consult those notices for their purposes, legal bases, recipients, retention and rights procedures.

Where you access external websites or social media services such as Instagram, LinkedIn or Facebook through links in the Services, those providers process data under their own notices. This Notice does not govern their independent processing.

8. Will the personal data be transferred outside the European Economic Area?

Personal data is generally processed within the European Economic Area (EEA). Depending on the Services and providers used, data may be transferred to, or accessed by, group companies or service providers outside the EEA, including in the United Kingdom or United States.

Where Kleos is responsible for a transfer, it relies on an applicable European Commission adequacy decision under Article 45 GDPR or appropriate safeguards under Article 46, such as the Commission's Standard Contractual Clauses, with an assessment and supplementary measures where necessary.

Reliance on the EU–US Data Privacy Framework is limited to recipients with an applicable active certification covering the transfer. Reliance on any adequacy decision is subject to that decision remaining valid and covering the recipient and processing. Where it does not apply, another lawful transfer mechanism is required.

Transfers made by regulated providers as separate controllers are explained in their privacy notices. You may contact our DPO to obtain further information on Kleos's transfers and a copy of the relevant safeguards, subject to appropriate protection of confidential information.

9. What are your rights in relation to us processing your data?

The following rights belong to the individuals whose personal data is processed, including representatives, beneficial owners and authorised users. They apply subject to the conditions and limitations in the GDPR.

Access. You may obtain confirmation of processing, access to your personal data and a copy, together with the required information about the processing.

Rectification. You may request correction of inaccurate data and completion of incomplete data.

Erasure. You may request deletion where the conditions in Article 17 apply, including where data is no longer necessary or has been unlawfully processed. Legal retention requirements and other statutory exceptions may prevent deletion.

Restriction. You may request restriction in the circumstances in Article 18, including while accuracy or an objection is assessed, or where you need records for legal claims that we no longer need.

Portability. Where automated processing is based on consent or a contract with you, you may receive the personal data you provided in a structured, commonly used, machine-readable format and request transmission to another controller where technically feasible.

Objection. You may object, on grounds relating to your particular situation, to processing based on legitimate interests. We will stop unless there are overriding compelling legitimate grounds or the processing is needed for legal claims. You may object to direct marketing at any time, including associated profiling, and that processing will stop.

Withdrawal of consent. You may withdraw consent at any time without affecting the lawfulness of processing before withdrawal. Use an unsubscribe link where provided or contact us.

Complaint. You may complain to a competent supervisory authority, including in the Member State where you live or work or where an alleged infringement occurred. You may contact the Irish Data Protection Commission at https://www.dataprotection.ie/. You also have the right to seek a judicial remedy.

10 How can you exercise your rights

Contact dpo@kleos-capital.com or write to Kleos Ireland SR Limited, The Black Church, St. Mary's Place, Dublin 7, Ireland D07 P4AX, for the attention of the Data Protection Officer. Please identify the relevant business account and your relationship to it so that we can locate the records. We may request proportionate information to verify your identity or authority to act for another person.

We respond without undue delay and normally within one month of receiving a request. Where permitted, this may be extended by up to two additional months because of complexity or the number of requests; we will explain the extension within the first month. Requests are normally free of charge, subject to the GDPR exceptions for manifestly unfounded or excessive requests.

For processing controlled independently by Lightspark or another provider, contact that provider using its privacy notice. The Business Customer's account administrator is not the sole channel through which an individual may exercise privacy rights.

11 The Data Protection Officer

Kleos has appointed a Data Protection Officer, who can be contacted at dpo@kleos-capital.com for questions about this Notice, our processing or your rights.