

KEMBLE

Privacy Policy

Effective date: 1 June 2026

Last updated: 1 June 2026

Kemble is a life planning and financial clarity app designed to help you and your partner plan your future together with confidence. We take your privacy seriously. This Privacy Policy explains what information we collect, why we collect it, how we use it, and your rights in relation to it.

Please read this policy carefully. By using Kemble, you agree to the practices described here. If you do not agree, please do not use the app.

1. Who We Are

Kemble is operated by Eleks UK ("Kemble", "we", "us", "our"). We act as the data controller for personal information collected through the Kemble app and associated services.

If you have any questions about this policy or how we handle your data, please contact us at:

- Email: team@kembleapp.co.uk
- Post: Data Privacy, Kemble, 122 Leadenhall St, London EC3V 4AB

2. Information We Collect

We collect information you provide directly, information generated through your use of the app, and technical information about your device and connection.

2.1 Information You Provide

- Account information: your name, email address, password, and date of birth when you register
- Profile details: information about your household, your partner's name and email address, and any preferences you set
- Financial information: income figures, savings balances, debt amounts, and financial goals that you manually enter into the app
- Goal and planning content: the dreams, goals, priorities, and notes you create individually or share with your partner
- Communications: messages you send to us, including support requests or feedback

2.2 Information We Generate

- Usage data: features you interact with, goals you create, actions you complete, and how you navigate the app
- Preference signals: inferred preferences based on how you engage with planning tools and suggestions
- AI interaction data: inputs you provide to Kemble's AI features and the responses generated, used to improve the quality of personalised guidance

2.3 Technical Information

- Device information: device type, operating system, and app version
- Log data: IP address, access times, pages or screens viewed, and crash reports
- Cookies and similar technologies: see Section 9 for details

3. How We Use Your Information

We use the information we collect to:

- Provide, operate, and maintain the Kemble app and its features
- Personalise your experience and deliver AI-powered planning guidance
- Enable the household sharing features that allow you and your partner to plan together
- Send you service notifications, such as reminders about actions you have committed to
- Respond to your support requests and communications
- Improve and develop new features by understanding how the app is used
- Ensure the security and integrity of our platform
- Comply with our legal obligations

4. Legal Basis for Processing

We process your personal data on the following legal grounds under UK GDPR and applicable data protection law:

4.1 Contract Performance

We process your account information and the data necessary to deliver our core services because it is required to fulfil our contract with you.

4.2 Legitimate Interests

We process usage and technical data to improve the app, prevent fraud, and ensure security, where our interests do not override your rights.

4.3 Consent

Where we rely on consent — for example, for certain marketing communications or non-essential analytics — we will ask for it clearly and you may withdraw it at any time.

4.4 Legal Obligation

We process data where we are required to do so by law, including for record-keeping, fraud prevention, and regulatory compliance.

5. Sharing Your Information

We do not sell your personal data. We share your information only in the following circumstances:

5.1 With Your Partner

Kemble is designed for two. When you choose to share a goal or planning item with your partner, that information becomes visible on your shared Household Canvas. This sharing is always deliberate and initiated by you. Your Individual Canvas remains private at all times.

5.2 With Service Providers

We work with trusted third-party providers who help us operate the app, including cloud hosting, analytics, and customer support tools. These providers are contractually required to process your data only on our instructions and in accordance with this policy.

5.3 For Legal Reasons

We may disclose your information where required by law, court order, or regulatory authority, or where necessary to protect the rights, safety, or property of Kemble, our users, or others.

5.4 Business Transfers

If Kemble is involved in a merger, acquisition, or sale of assets, your data may be transferred as part of that transaction. We will notify you in advance of any change in data controller and give you the opportunity to object.

5.4 Beta Community Communications

During our beta programme, we may invite you to join a WhatsApp group with other beta participants. Participation is voluntary. If you join, your name and phone number will be visible to other group members. We will not add you to any group without your explicit consent.

6. Data Retention

We retain your personal data for as long as your account is active or as needed to provide you with our services. When you close your account, we will delete or anonymise your personal data within 90 days, except where we are required to retain it for legal, regulatory, or fraud-prevention purposes.

Anonymised or aggregated data that cannot identify you may be retained indefinitely for analytical and product improvement purposes.

7. Your Rights

You have the following rights in relation to your personal data under UK GDPR:

7.1 Right of Access

You can request a copy of the personal data we hold about you.

7.2 Right to Rectification

You can ask us to correct inaccurate or incomplete data.

7.3 Right to Erasure

You can request that we delete your personal data, subject to any legal obligations we have to retain it.

7.4 Right to Restriction

You can ask us to restrict how we process your data in certain circumstances.

7.5 Right to Data Portability

You can request a machine-readable copy of the data you have provided to us, which you may transfer to another service.

7.6 Right to Object

You can object to our processing of your data where we rely on legitimate interests as our legal basis.

7.7 Right to Withdraw Consent

Where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of prior processing.

To exercise any of these rights, please contact us at privacy@kemble.app. We will respond within one month. You also have the right to lodge a complaint with the UK Information Commissioner's Office (ICO) at ico.org.uk.

8. Security

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, disclosure, alteration, or destruction. These include encryption in transit and at rest, access controls, and regular security reviews.

While we take reasonable precautions, no system is entirely secure. You are responsible for keeping your account credentials confidential and for notifying us promptly if you suspect unauthorised access.

9. Cookies and Similar Technologies

We use cookies and similar tracking technologies in our app and any associated web properties to:

- Keep you signed in and maintain your session
- Remember your preferences and settings
- Understand how you use the app so we can improve it
- Diagnose technical issues and monitor performance

You can manage cookie preferences through your device settings or browser controls. Disabling certain cookies may affect the functionality of the app.

10. Children's Privacy

Kemble is not intended for use by anyone under the age of 18. We do not knowingly collect personal data from children. If we become aware that a child has provided us with personal information, we will take steps to delete it promptly. If you believe a child has registered with Kemble, please contact us at privacy@kemble.app.

11. International Data Transfers

Our services are primarily hosted and operated within the United Kingdom and the European Economic Area. Where we transfer personal data to countries outside these regions, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses approved by the relevant supervisory authority.

12. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. When we make material changes, we will notify you via the app or by email before the changes take effect. The updated policy will always be available within the app.

Your continued use of Kemble after changes take effect constitutes your acceptance of the updated policy.

13. Contact Us

If you have any questions, concerns, or requests relating to this Privacy Policy or how we handle your data, please contact our Privacy team:

- Email: team@kembleapp.co.uk
- Post: Data Privacy, Kemble, 122 Leadenhall St, London EC3V 4AB

We aim to respond to all enquiries within five working days.

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