

Privacy Policy

Kyper Energy Ltd — Onyx Platform · Version 1.1 · August 2026

We appreciate your decision to use our website and to trust us with your valuable personal information. In this document, we seek to explain in the clearest terms possible our privacy practices. We strongly encourage you to read this document (and any other related documents) carefully before using the website. If there are any terms or conditions in this document that you do not agree with, please do not use the website, or in case you are already using it, please discontinue the use immediately. By using the website, you are accepting and consenting to the practices described in this Privacy Policy.

1. Who We Are

Kyper Energy Ltd (company number 16494437, registered office 15 Ackers Lane, Stockton Heath, WA4 2BZ) is the data controller for the personal data described in this policy in respect of your use of the Onyx platform. Our nominated contact for data protection matters is Christofer Fisher, Christofer.fisher@kyperenergy.co.uk.

1.1 Which Data Protection Law Applies

Kyper Energy is established in the United Kingdom and processes personal data in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018 ("UK GDPR").

Where we offer the Services to, or monitor the behaviour of, individuals located in the European Union — including customers with sites in the Republic of Ireland — Regulation (EU) 2016/679 ("EU GDPR") also applies to that processing. In this policy, references to your rights and to our obligations should be read as referring to the UK GDPR, the EU GDPR, or both, according to which applies to you.

Where the EU GDPR applies and we are required to designate a representative in the European Union under Article 27 EU GDPR, details of that representative are available on request from hello@kyper.energy.

2. What Data We Collect

2.1 Account data

Name, business email address, job title, company name, and password (stored as a securely hashed value — Kyper Energy never sees or stores your plaintext password).

2.2 Site and metering data

Half-hourly (or similar interval) energy consumption or generation data, site postcode or Eircode, tariff details, network tariff group, connection capacity, and related technical information you upload for analysis. This data relates to a site or business, and only rarely

to an identifiable individual — however, we treat it with the same care as personal data throughout this policy.

2.3 Billing data

Billing name and address, and where applicable your VAT identification number. Card and payment details are collected and processed directly by our payment processor, Stripe; Kyper Energy does not store full card numbers.

2.4 Usage data

Log data such as IP address, browser type, pages visited, and audit submission history, collected automatically to operate and improve the Services.

2.5 Uploaded bill documents

Where you use the optional bill-scanning feature, the uploaded document is processed to extract tariff information and is not retained after processing. See Clause 6.

3. Legal Basis for Processing

- Performance of a contract — to provide the Services you have signed up for.
- Legitimate interests — to improve the Services, prevent fraud, and communicate with you about your account, balanced against your rights.
- Consent — for marketing communications, which you may withdraw at any time.
- Legal obligation — where processing is required to comply with the law (e.g. tax records).

4. How We Use Your Data

- To create and administer your account.
- To run the Onyx analytical engine against the site data you submit and generate reports.
- To process payments via Stripe.
- To send service communications (account, billing, security) and, with consent, marketing updates.
- To monitor, secure, and improve the Services, including diagnosing and fixing faults.

5. Who We Share Data With

We share data with the following categories of processor, each engaged under a data processing agreement:

- Supabase — database hosting and user authentication.
- Render — hosting of the Onyx analytical engine.
- Stripe — payment processing.
- Anthropic (Claude API) — used in limited, specific circumstances: (i) to interpret the structure of an uploaded spreadsheet that our automated parser cannot read, and (ii)

where the optional bill-scanning feature is used, to extract tariff figures from an uploaded utility bill. In both cases only the minimum necessary data is sent, and Kyper Energy's own systems apply the results — this processing does not use your data to train any third-party model.

We do not sell personal data. We do not share Customer Data or metering data with Recommended Partners or any third party for their own marketing purposes.

6. Bill-Scanning Feature

If you choose to upload a photograph or PDF of a utility bill to auto-fill your tariff information, the document is sent securely to our AI provider for one-time extraction of the tariff figures. The document itself is not stored after processing. We do not extract or retain your account number, MPAN, MPRN, or payment details from the bill.

7. International Transfers

Our processors may process data outside the UK and the European Economic Area. Where this occurs, we ensure appropriate safeguards are in place, such as the UK International Data Transfer Addendum to the EU Standard Contractual Clauses, the EU Standard Contractual Clauses, or reliance on an adequacy decision or adequacy regulation.

Where personal data is transferred from the European Economic Area to the United Kingdom, that transfer is made in reliance on the European Commission's adequacy decision in respect of the United Kingdom, renewed in December 2025 and currently in force. Should that decision cease to apply, we will put alternative safeguards in place, such as the EU Standard Contractual Clauses.

8. Data Retention

We retain account and site data for as long as your account is active, and for a reasonable period afterwards to comply with legal, accounting, and reporting obligations, or to resolve disputes. Uploaded bill documents are not retained (see Clause 6). You may request earlier deletion — see Clause 9.

9. Your Rights

Under the UK GDPR and, where applicable, the EU GDPR, you have the right to: access the personal data we hold about you; request correction of inaccurate data; request erasure; restrict or object to processing; request data portability; and withdraw consent at any time where processing is based on consent. To exercise any of these rights, contact hello@kyper.energy.

You also have the right to lodge a complaint with a supervisory authority:

- **United Kingdom:** the Information Commissioner's Office (ICO) at ico.org.uk.
- **Republic of Ireland:** the Data Protection Commission (DPC) at dataprotection.ie.
- **Elsewhere in the European Union:** the supervisory authority in your member state of residence, place of work, or place of the alleged infringement.

10. Security

We apply technical and organisational measures appropriate to the risk, including encryption in transit, row-level access controls on our database, restricted access to production systems, and regular review of third-party processor security. No system is completely secure, and we cannot guarantee absolute security of information transmitted to us.

11. Cookies

We use essential cookies necessary for the Services to function (such as maintaining your logged-in session) and, where you consent, analytics cookies to understand how the Services are used. You can control cookies through your browser settings.

12. Children

The Services are intended for business use by adults and are not directed at, or knowingly used to collect data from, children.

13. Changes to This Policy

We may update this policy from time to time. Material changes will be notified to registered users by email.

14. Contact

For any questions about this policy or how your data is handled, contact hello@kyper.energy.