

PRIMER

Privacy Policy

Last updated: 6 May 2026

This Privacy Policy explains how Kernel AI Ltd, trading as Primer ("Primer", "we", "us" or "our"), collects, uses and protects personal data in connection with our website at primerapp.com, our application (including studio.primerapp.com), and related services (together, the "Services").

Primer is a business-to-business AI platform that supports equity research and financial-analysis workflows. Our Services are made available to businesses, organisations and other legal entities and are not intended for consumers acting in a personal, family or household capacity.

If you have any questions about this Privacy Policy or how we handle personal data, please contact us at hello@primerapp.com or by post at 128 City Road, London EC1V 2NX, United Kingdom.

1. Who we are

Kernel AI Ltd (trading as Primer) is a company registered in England and Wales (company number 15117085) with its registered office at 128 City Road, London EC1V 2NX. We are the controller of the personal data described in this Privacy Policy, except where stated otherwise.

You can contact us at:

- Email: hello@primerapp.com
 - Post: Kernel AI Ltd, 128 City Road, London EC1V 2NX, United Kingdom
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2. Scope of this Privacy Policy

Primer processes personal data in two different capacities, and this Privacy Policy only covers one of them.

Where we are the controller (this Privacy Policy applies)

This Privacy Policy applies where Primer determines how and why personal data is processed, including in relation to:

- visitors to our website at primerapp.com;
- individuals who join our waitlist or sign up to receive communications from us;
- prospective customers and business contacts (for example, individuals we engage with about our Services);
- individuals at our customers who administer accounts, are billing contacts, or use the Services as authorised users (in respect of their account-level data);
- individuals who contact us for support or other enquiries;
- attendees of webinars or events we host; and
- candidates who apply for roles with us.

Where we are a processor (this Privacy Policy does not apply)

When our customers use the Services, they may submit content (including prompts, files, documents and other materials) that contains personal data. In relation to that content, Primer acts as a processor on behalf of the customer, and the customer is the controller. Our processing in this capacity is governed by our Data Processing Agreement, not this Privacy Policy.

If you are an individual whose personal data has been submitted to the Services by one of our customers and you wish to exercise your rights, please contact that customer directly. We will support our customer in responding to your request as required by our Data Processing Agreement and applicable law.

3. Personal data we collect

The personal data we collect depends on how you interact with us. The categories below describe what we typically collect for each type of individual.

3.1 Website visitors

When you visit primerapp.com, we (and our service providers) may automatically collect:

- IP address and approximate location derived from it;
- device and browser information (such as user agent, operating system and screen size);
- pages viewed, referring URL, and information about your interactions with the website; and
- information set by strictly necessary cookies (see Section 10).

We do not currently run analytics or advertising trackers on our marketing website. We plan to introduce them and will obtain consent through a cookie banner before non-essential cookies are set.

3.2 Waitlist sign-ups

When you join our waitlist, we collect your name and email address.

3.3 Prospective customers and marketing contacts

When we engage with prospective customers, we may collect business contact information including name, business email, employer, job title and (where provided) phone number. Some of this information may be sourced from publicly available business sources such as LinkedIn or through manual research about the relevant individual's professional role.

Where we send marketing communications, you can unsubscribe at any time using the link in any marketing email or by contacting us.

3.4 Customer users (administrators, billing contacts and authorised users)

When an individual at one of our customers accesses the Services, we collect:

- account information (name, business email and a hashed password);
- authentication data (where you sign in via Google Workspace single sign-on, profile information made available to us by Google as part of that sign-in);
- billing-contact information (such as name and business email used for invoicing); we do not store payment-card numbers ourselves;
- service telemetry, including features used, frequency of use, login times, IP address used to access the Services, and the credits consumed by an account; and
- content of prompts and AI-generated outputs processed through the Services.

Prompt and output content is processed to deliver the Service to the customer. We may also retain logs of this content to provide support, debugging and security functions. We do not use this content to train or improve our own or any third party's AI models, and we do not use it for product improvement beyond the customer's own use of the Service.

3.5 Individuals who contact us for support

When you email hello@primerapp.com or otherwise contact us, we collect your contact details and the content of your communications with us, together with any attachments you choose to share.

3.6 Webinar and event attendees

Where we host webinars or events, we collect registration data such as name, business email, employer and job title, and information about your attendance.

3.7 Job applicants

If you apply for a role with us (directly or via LinkedIn), we collect your CV, contact details, cover letter and similar materials, together with notes from any interviews and submissions you make as part of any take-home tests.

3.8 Third-party data sources within the Services

The Services draw on third-party data sources such as financial data feeds, public filings, transcripts, presentations and news (including from providers such as Finnhub, Quartr, EODHD, Visible Alpha, Snowflake and Datastream). These sources may incidentally include personal data about individuals named in their professional capacity (for example, the names of company executives in public filings or transcripts). Our use of these sources in providing the Services is governed by our Terms of Use and our Data Processing Agreement, not this Privacy Policy.

4. Where we obtain personal data

We obtain personal data from:

- you directly, when you submit it through our website, the Services, our forms, by email, or in person at events;
 - automatically, through cookies and similar technologies, server logs and product telemetry when you use our Services;
 - your employer or the customer that has provided you with access to the Services; and
 - publicly available business sources, such as LinkedIn, where we are conducting business research about prospective customers in their professional capacity.
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5. How and why we use personal data

We process personal data for the purposes set out below. Each purpose has a legal basis under the UK GDPR and, where relevant, the EU GDPR.

Purpose	Legal basis
Providing the Services to authorised users and customers	Performance of a contract; legitimate interests (for individuals who are not the contracting party but use the Services on behalf of a customer)
Account creation, authentication, account management and billing	Performance of a contract; legal obligation (for tax and accounting records); legitimate interests

Responding to support enquiries and other communications	Performance of a contract; legitimate interests
Service telemetry, including measuring credit usage and operating the Services	Performance of a contract; legitimate interests
Debugging, troubleshooting, security monitoring and abuse prevention (including the retention of prompt and output logs for these purposes)	Legitimate interests in operating a secure and reliable service
Managing waitlist sign-ups and contacting waitlist members about the launch of the Services	Consent
Sending product updates, feature announcements and similar communications to individuals at our existing customers (with an unsubscribe option in every email)	Legitimate interests (subject to PECR soft opt-in for B2B corporate subscribers)
Marketing to prospective business customers, including outreach to individuals identified through LinkedIn and manual research	Legitimate interests
Newsletter sign-ups (when made available)	Consent
Webinar and event registration and follow-up communications	Consent (registration); legitimate interests (follow-up)
Recruitment and assessment of job applicants	Legitimate interests; consent (where applicable, for retaining your details beyond the role you applied for)
Complying with legal, regulatory and tax obligations	Legal obligation
Establishing, exercising or defending legal claims	Legitimate interests
Corporate transactions (such as a merger, acquisition or restructuring)	Legitimate interests

Where we rely on legitimate interests, we have considered the impact on individuals and concluded that the processing is reasonable, expected and not outweighed by individuals' rights and freedoms. You can ask us for more information about this assessment using the contact details in Section 1.

6. Who we share personal data with

We share personal data with the following categories of recipient. We do not sell personal data.

6.1 Service providers and subprocessors

We use a number of trusted service providers to help us deliver the Services. These include:

- hosting and infrastructure providers (Render, Amazon Web Services and Supabase), which host the application, data pipeline and databases;
- AI and machine-learning providers (Anthropic, OpenAI, Google and xAI, accessed directly and via OpenRouter), which process prompts and generate outputs through the Services. We have agreements in place with these providers under which content is not used to train their models;
- AI evaluation and observability tooling (Braintrust), which processes prompt and output content to support evaluation, debugging and quality of the Services;
- error monitoring (Sentry) and operational logging tools (Render and AWS CloudWatch), which help us monitor the security and performance of the Services;
- email and communications tools (Resend for transactional email; Google Workspace for our business email and productivity tools);
- customer support and customer relationship management tools (HubSpot for our shared inbox over hello@primerapp.com; Pipedrive for our customer relationship management and, in due course, newsletter communications);
- workflow automation (n8n) and team-notification tools (Slack); and
- professional advisers (such as legal, accounting, audit and insurance advisers) where we need to obtain advice or where it is necessary to establish, exercise or defend legal claims.

A current list of our subprocessors and the locations in which they process personal data is available to customers on request, in accordance with our Data Processing Agreement.

6.2 Other recipients

We may also share personal data with:

- competent authorities, regulators, courts and law-enforcement agencies, where we are required to do so by law or where disclosure is necessary to establish, exercise or defend legal claims; and
- counterparties, advisers and successor entities in the context of an actual or proposed merger, acquisition, financing, sale of assets or other corporate transaction, in which case we will take steps to ensure personal data continues to be protected.

7. International transfers

Our core customer-facing infrastructure is located in the United Kingdom and the European Economic Area:

- our application is hosted in the EU (Frankfurt);
- our authentication, primary database and file storage are hosted in the EU; and
- our data pipeline and document storage are hosted in the United Kingdom (London).

Some of the supporting service providers we use process personal data outside the United Kingdom and the European Economic Area, including in the United States. These transfers relate primarily to:

- AI processing (LLM providers and our AI evaluation and observability tooling);
- transactional email and operational notifications;
- error monitoring and product analytics within our application; and
- certain CRM and productivity tools.

Where we transfer personal data to a country that is not subject to a UK or EU adequacy decision, we put in place appropriate safeguards under the UK GDPR and EU GDPR, including:

- the UK International Data Transfer Addendum to the EU Standard Contractual Clauses, or the UK International Data Transfer Agreement, for transfers from the United Kingdom;
- the European Commission's Standard Contractual Clauses for transfers from the European Economic Area; and
- where applicable, reliance on the UK Extension to the EU-US Data Privacy Framework where the recipient is certified.

You can request a copy of the safeguards we use for a particular transfer by contacting us at hello@primerapp.com.

8. How long we keep personal data

We keep personal data only for as long as we need it for the purposes set out in this Privacy Policy, unless a longer period is required or permitted by law. The table below sets out our typical retention periods.

Category	Retention
Customer account data (active users)	For the duration of the customer's subscription to the Services
Prompt and output logs processed through the Services	For the duration of the customer's subscription. On termination, deleted from active systems within 90 days, in line with our Data Processing Agreement
Backups and disaster-recovery copies	In line with our standard backup retention schedule

Billing and tax records	Six years from the end of the relevant accounting period (HMRC requirement)
Support communications (including those handled via HubSpot and Gmail)	Three years from the date of the last communication
Waitlist sign-ups	Until launch of the relevant Services, until you convert to an account, or until you ask us to remove your details, whichever happens first
Newsletter subscribers	Until you unsubscribe
Prospect data held in our CRM	Reviewed at least every 12 months and deleted or refreshed if no longer relevant
Webinar attendee data	12 months from the date of the relevant webinar
Unsuccessful job applicants	12 months from the conclusion of the recruitment process
Website analytics (when introduced)	In line with the period set in our cookie banner and the relevant provider's defaults
Security and access logs	12 months

Where personal data is held in backup or disaster-recovery systems, residual copies will be deleted in accordance with our standard backup retention schedule and remain subject to appropriate confidentiality and security obligations until then.

9. Your rights

Subject to applicable law, you have the following rights in relation to your personal data:

- **access** — to ask us for a copy of the personal data we hold about you;
- **rectification** — to ask us to correct inaccurate or incomplete personal data;
- **erasure** — to ask us to delete your personal data, in certain circumstances;
- **restriction** — to ask us to limit how we process your personal data, in certain circumstances;
- **portability** — to receive certain personal data in a structured, commonly used and machine-readable format, where we process it on the basis of consent or contract;
- **objection** — to object to our processing of your personal data where we rely on legitimate interests, including for direct marketing (where the right to object is unconditional);
- **not to be subject to a decision based solely on automated processing** that produces legal or similarly significant effects on you; and

- **to withdraw consent** at any time, where we rely on consent (without affecting the lawfulness of processing carried out before withdrawal).

To exercise any of these rights, please contact us at hello@primerapp.com. We may need to verify your identity before responding to your request, for example by asking for additional information. We aim to respond to requests within one month, although the law allows us to extend this by a further two months for complex requests.

If you are based in the United Kingdom, the European Economic Area or Switzerland and you are not satisfied with how we have handled your personal data, you have the right to complain to a data protection authority. In the United Kingdom, this is the Information Commissioner's Office (ico.org.uk). We would, however, appreciate the chance to address your concerns first.

10. Cookies and similar technologies

Cookies are small text files placed on your device when you visit a website. We use cookies and similar technologies in the following ways:

10.1 Marketing website (primerapp.com)

Our marketing website currently uses only strictly necessary cookies that are required for the site to function. We plan to introduce analytics and advertising tools (such as Google Tag Manager, Google Analytics and Google Ads). Before we do, we will deploy a cookie banner that allows you to accept or reject non-essential cookies, and non-essential cookies will not be set without your consent.

10.2 Logged-in application (studio.primerapp.com)

When you sign in to the Primer application, we use:

- strictly necessary cookies provided by Supabase to maintain your authenticated session; and
- product analytics technologies provided by PostHog and RudderStack to understand how the Service is used, identify issues and improve the Service for our customers.

These analytics technologies are used to operate and improve the Service that customer users have signed up for. We do not use them to track you across other websites and we do not share the data they generate with advertising networks.

10.3 Managing your preferences

You can control cookies through your browser settings, but blocking strictly necessary cookies may affect the functioning of the Services. Once we introduce a cookie banner on our marketing website, you will be able to change your preferences at any time through that banner.

11. Security

We implement appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. These measures include encryption of data in transit, access controls, monitoring and logging, vulnerability management, and workforce confidentiality and security-awareness obligations. We are working towards SOC 2 compliance.

No method of transmission over the internet or method of electronic storage is completely secure. While we strive to protect personal data, we cannot guarantee its absolute security.

12. Children

The Services are not intended for individuals under the age of 18. We do not knowingly collect personal data from children. If you believe we have collected personal data from a child, please contact us at hello@primerapp.com so we can delete it.

13. Artificial intelligence and automated decision-making

Primer is an AI platform. Our customers use the Services to support equity research and financial-analysis workflows. Outputs generated by the Services are intended to assist suitably qualified human users and are not designed to make automated decisions about individuals that produce legal or similarly significant effects on them.

In our own activities as a controller (the activities described in this Privacy Policy), we do not currently use AI or machine learning to make automated decisions about visitors, prospects, customer users, applicants or other individuals.

Where we share prompt or output content with AI service providers in order to deliver the Services, we have agreements in place under which those providers do not use that content to train their models. The processing of personal data contained in customer content is governed by our Data Processing Agreement, not this Privacy Policy.

14. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. Where we make material changes, we will take reasonable steps to bring those changes to your attention, for example by posting a

prominent notice on our website or notifying account holders by email. The "last updated" date at the top of this Privacy Policy indicates when it was most recently revised.

15. How to contact us

If you have any questions, comments or concerns about this Privacy Policy or our handling of personal data, please contact us at:

- Email: hello@primerapp.com
- Post: Kernel AI Ltd, 128 City Road, London EC1V 2NX, United Kingdom

You can also lodge a complaint with the Information Commissioner's Office (ico.org.uk) if you are based in the United Kingdom, or with another competent supervisory authority in the European Economic Area or Switzerland.
