

Politex Privacy Policy

Ludus Games Ltd (trading as Politex)

Effective date: 19 August 2026

Last updated: 19 August 2026

1. Who We Are

Politex is operated by Ludus Games Ltd, a company registered in England and Wales (17331322). We trade under the name Politex at www.politex.uk

2. What Data We Collect

2.1 Account Data

When you create an account we collect:

- Your email address
- Your chosen username
- Your password (stored as a one-way cryptographic hash - we cannot read it)

2.2 Activity Data

When you use the platform we record:

- Trades you place (which MPs, how many shares, at what price)
- Your virtual portfolio balance and holdings
- Your Hustings entries and results

2.3 Technical and Analytics Data

We use PostHog (a GDPR-compliant analytics platform hosted in the EU) to collect:

- Pages within Politex you visit and how long you spend on them
- Actions you take (such as placing a trade)
- Your approximate location (country/region level, derived from IP address)
- Device type, browser and operating system

Your IP address is processed by PostHog but is not stored in identifiable form beyond the session.

3. Lawful Basis for Processing

We process your personal data on the following legal grounds under UK GDPR:

- Account data (email, username, password hash): Performance of a contract — processing is necessary to provide you with a Politex account.
- Activity data (trades, portfolio): Performance of a contract — necessary to operate your virtual portfolio.

- Analytics data (PostHog): Legitimate interests — we have a legitimate interest in understanding how users engage with the platform in order to improve it. This processing does not override your fundamental rights and you may object at any time (see Section 8).

4. How We Use Your Data

We use your personal data to:

- Create and maintain your account
- Operate your virtual portfolio and display your trade history
- Send you transactional emails (password reset, account notifications)
- Analyse how the platform is used so we can improve it
- Detect and prevent fraud or abuse

We do not use your data for automated decision-making that produces legal or similarly significant effects.

5. Third-Party Services

We share data with the following third parties solely to operate the platform:

- Railway (railwayapp.com) — cloud hosting provider. Your data is stored securely on Railway's infrastructure within the EU.
- PostHog (posthog.com) — analytics. Data is processed and stored securely on PostHog's EU Cloud servers.
- Anthropic (anthropic.com) — we use Claude AI to classify news articles about MPs. We do not send any user personal data to Anthropic, only public news article content is processed.

We do not sell your personal data to any third party. We do not share your data with advertisers.

6. Data Retention

We retain your data for as long as your account is active. If you request deletion of your account:

- Your email address, username and password hash are deleted within 30 days
- Your trade history and portfolio data are anonymised (not linked to any identifier) within 30 days
- Analytics data held by PostHog is subject to PostHog's own retention policy (90 days by default)

7. Data Security

We take reasonable technical and organisational measures to protect your personal data, including:

- Passwords stored as bcrypt hashes (never in plain text)
- All data transmitted over HTTPS/TLS
- Database hosted on Railway's private network, not publicly accessible
- Access to production systems limited to authorised personnel

No method of transmission or storage is 100% secure. If we become aware of a data breach that is likely to result in a risk to your rights, we will notify you and the ICO as required by UK GDPR.

8. Your Rights

Under UK GDPR you have the following rights:

- Right of access — you may request a copy of the personal data we hold about you
- Right to rectification — you may ask us to correct inaccurate data
- Right to erasure — you may ask us to delete your personal data
- Right to restriction — you may ask us to restrict processing in certain circumstances
- Right to data portability — you may request your data in a machine-readable format
- Right to object — you may object to processing based on legitimate interests (including analytics)

To exercise any of these rights, email admin@politex.uk. We will respond within one calendar month.

9. Cookies

We use the following cookies:

- Session cookie (next-auth.session-token) — strictly necessary to keep you logged in. This cookie cannot be disabled without breaking the platform.
- Analytics cookies set by PostHog — used to track usage patterns. These are set on the basis of legitimate interests. You may object to this processing by contacting us.

We do not use advertising or tracking cookies.

10. Children

Politex is not directed at children under the age of 13. We do not knowingly collect personal data from children under 13. If you believe we have inadvertently collected such data, please contact us and we will delete it promptly.

11. Changes to This Policy

We may update this Privacy Policy from time to time. We will notify registered users of material changes by email. The effective date at the top of this document will always reflect the most recent version.

12. Complaints

If you are unhappy with how we handle your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

- Website: ico.org.uk
- Telephone: 0303 123 1113

We would always prefer to resolve concerns directly - please contact us at admin@politex.uk in the first instance.