

# **LeadGPT Privacy Policy**

Effective Date: 1 October 2024

#### 1. Definitions

- Personal Data: Information about an individual who can be identified directly or indirectly.
- **Processing:** Any operation performed on Personal Data, such as collection, use, or storage.
- Data Controller: Entity determining the purpose and means of processing Personal Data.
- **Data Processor:** Entity processing Personal Data on behalf of the Data Controller.

### 2. Scope

This policy applies to Personal Data collected and processed to provide LeadGPT services. It includes data processed during lead generation activities.

# 3. Legal Basis for Processing

- Consent: Obtained where legally required.
- Legitimate Interests: For business operations, unless outweighed by individual rights.
- Contractual Necessity: Required to fulfill contracts or pre-contractual obligations.

#### 4. Personal Data We Collect

#### 4.1 Client Data

Includes contact, account, billing, and communication details.



#### 4.2 Lead Data

Includes professional information such as:

- Name
- Title
- Company
- Publicly available social or web data
- Interaction and campaign response data

#### 5. How We Collect Data

- Information shared during onboarding or platform usage
- Automated technologies (e.g., cookies)
- Third-party or publicly available sources

# 6. Purposes of Processing

- To provide, improve, and maintain our services
- For billing, marketing, and legal compliance
- To personalize and generate outreach for clients

#### 7. Disclosure of Personal Data

We may share data with:

- Clients
- Authorized third-party service providers
- Legal authorities, if required
- Entities involved in business transfers (e.g., mergers)



#### 8. International Data Transfers

Personal Data may be transferred outside the user's country. We use safeguards like **Standard Contractual Clauses** to protect this data.

# 9. Data Security

We employ technical and organizational measures including:

- Encryption
- Access control
- Routine security assessments

#### 10. Data Retention

Data is retained only as long as necessary. It is securely deleted or anonymized once no longer needed.

### 11. Data Subject Rights

You have the right to:

- Access, correct, delete, or restrict your Personal Data
- Object to data processing
- Withdraw consent, where applicable

# 12. Cookies and Tracking Technologies

We use cookies for:

- Enhancing user experience
- Analytics and advertising
  You can manage cookie preferences through your browser settings.



### 13. Third-Party Links

Our services may include links to external websites. We are not responsible for their privacy practices.

#### 14. Children's Privacy

Our services are not directed at individuals under 18. We do not knowingly collect children's data.

# 15. Changes to This Privacy Policy

We may update this policy.

- Updated versions will be posted with the new effective date.
- Significant changes will be communicated to users.

#### 16. Data Protection Officer

For inquiries, please contact: **Email:** info@leadgpt.org

# 17. Data Protection in Specific Jurisdictions

#### 17.1 European Economic Area (EEA) & UK

- GDPR Compliance
- Legal bases: Consent, Legitimate Interest, Contractual Necessity
- International transfers are protected via Standard Contractual Clauses

#### 17.2 California Consumer Privacy Act (CCPA)

• Applies to California Residents



- Rights include:
  - Right to know
  - o Right to delete
  - Right to opt-out of data sales
  - o Right to non-discrimination
- We do not sell Personal Data

#### 17.3 Other Jurisdictions

We comply with applicable laws in all jurisdictions where we operate.

### 18. Security Incident Response

- Affected parties will be notified in the event of a breach, as required by law
- Incident response procedures are in place to minimize damage

### 19. Client Responsibilities

- Ensure lawful use of our services
- Provide accurate data
- Ensure lawful basis for data shared with LeadGPT

# 20. Employee and Contractor Confidentiality

- Access is limited to authorized personnel
- Confidentiality agreements are in place
- Staff receive regular privacy and data protection training



### 21. Subprocessors

- We may engage third-party subprocessors
- Due diligence is performed to ensure they meet security standards
- Subprocessor agreements reflect our data protection obligations

### 22. Record of Processing Activities

We maintain documentation of all processing activities as required by law.

# 23. Monitoring and Enforcement

- We conduct regular internal audits
- Non-compliance may lead to disciplinary action, including contract termination

### 24. Complaints and Dispute Resolution

- You may contact our DPO for concerns
- You also have the right to contact a regulatory authority in your jurisdiction

#### **Contact Us**

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