# **Privacy Policy**

#### Introduction

The protection of your personal data is of particular importance to us. This privacy policy explains how your personal data is processed when using our website. This policy applies to all websites, functions, and content we offer (hereinafter collectively referred to as the "Website").

This privacy policy complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

#### Controller

The responsible party for processing your personal data (as defined in Article 4 No. 7 UK GDPR) is:

Leadoo Ltd
77 Camden Street Lower
Dublin, Dublin 2
Ireland
Email: leadoolimited@proton.me

#### Collection and Processing of Personal Data

We collect and process personal data only to the extent necessary to provide a functional website, our content, and services, to fulfill contractual obligations, or where you have given your consent for direct marketing purposes (telemarketing, SMS, email marketing). This particularly includes:

- Registration Data: Name, email address, contact details, and other required information you provide during registration.
- Usage Data: IP address, browser type, operating system, access times, referrer URL, and other technical data generated when using our website.
- Cookies: Files stored in your browser to enable specific website functions or analyze user behavior.

#### Purposes of Data Processing

We process your personal data for the following purposes:

- Provision and Optimization of Our Services: We process your data to provide our services and ensure the technical operation of our website.
- Customer Service and Inquiry Handling: Your contact details are used to respond to inquiries and communicate with you.

- User Behavior Analysis: Cookies and similar technologies help analyze user behavior and improve our services.
- Compliance with Legal Obligations: We process your data to fulfill legal requirements (e.g., tax or business record-keeping obligations).
- Direct Marketing (with Consent): With your explicit consent, we may use your data or share it with third-party clients for telemarketing, SMS, and email marketing campaigns.

### Marketing and Third-Party Use

With your explicit consent, we may share your personal data (such as name, phone number, and email address) with carefully selected third-party clients and partners for the following purposes:

- Telemarketing: To contact you by telephone with relevant offers, services, or information.
- SMS Marketing: To send promotional or service-related text messages to your mobile device.
- Email Marketing: To provide you with promotional emails, newsletters, or offers that may be of interest.

You will only receive such communications where you have given prior consent under Article 6(1)(a) UK GDPR. You may withdraw your consent at any time with effect for the future by contacting us (see Controller section) or by using the opt-out/unsubscribe mechanisms provided in each communication.

Third-party clients are contractually obligated to process your data in accordance with UK GDPR, and only for the purposes you have consented to.

#### Legal Bases for Processing

The processing of your personal data is based on the following legal bases under the UK GDPR:

- Article 6(1)(b) UK GDPR: When processing is necessary for the performance of a contract or for pre-contractual measures.
- Article 6(1)(f) UK GDPR: When we have a legitimate interest in processing data that does not override your rights (e.g., certain cookies, user behavior analysis).
- Article 6(1)(a) UK GDPR: When you have given consent (e.g., for certain cookies or marketing activities).

#### Disclosure of Data to Third Parties

Your personal data will only be shared with third parties if:

- It is necessary to provide our services (e.g., technical service providers, hosting providers).
- We are legally required or obligated by an official or judicial order.
- You have explicitly consented to the disclosure (e.g., for advertising, telemarketing, SMS, or

email marketing purposes).

Data transfers outside the UK (third countries) only occur if the conditions of Chapter V UK GDPR are met (e.g., an adequacy decision by the UK government or the use of standard contractual clauses).

#### **Storage Duration**

We store your personal data only as long as necessary for fulfilling the purposes stated in Section 4 or due to legal retention obligations (e.g., commercial or tax laws). Once these requirements no longer apply, your data will be deleted or blocked.

## Your Rights

Under the UK GDPR, you have the following rights regarding your personal data:

- Right of Access (Article 15 UK GDPR): You may request information about the personal data we process at any time.
- Right to Rectification (Article 16 UK GDPR): If your data is incorrect or incomplete, you may request correction.
- Right to Erasure (Article 17 UK GDPR): Under certain conditions, you may request the deletion of your personal data.
- Right to Restriction of Processing (Article 18 UK GDPR): You may request limited processing of your data under specific circumstances.
- Right to Data Portability (Article 20 UK GDPR): You have the right to receive your personal data in a structured, commonly used, and machine-readable format.
- Right to Object (Article 21 UK GDPR): You may object to data processing if it is based on Article 6(1)(e) or (f) UK GDPR.

To exercise these rights, please contact us using the details in Section 2.

Right to Lodge a Complaint with a Supervisory Authority

If you believe that the processing of your personal data violates the UK GDPR or the Data Protection Act 2018, you have the right to lodge a complaint with the UK data protection authority:

Information Commissioner's Office (ICO)
Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

**United Kingdom** 

Website: www.ico.org.uk

Use of Cookies and Similar Technologies

We use cookies and similar technologies (e.g., tracking pixels, local storage) on our website to ensure functionality, analyze website usage, and improve our offerings (in compliance with the Privacy and Electronic Communications Regulations (PECR) and UK GDPR).

- Necessary Cookies (Legal basis: Article 6(1)(b) or (f) UK GDPR): These are essential for operating our website.
- Analytics or Marketing Cookies (Legal basis: Article 6(1)(a) UK GDPR): These are only set with your explicit consent.

You can manage cookie preferences in your browser settings and delete existing cookies at any time. However, disabling cookies may limit website functionality.

### Changes to This Privacy Policy

We reserve the right to update this privacy policy to reflect changes in legal or technical requirements. The latest version is always available on our website.