

Data Protection Policy

Introduction:

Leader Potential Group takes your privacy seriously. Our Privacy Policy is an expression of our commitment to treating all information processed by our organization in a secure and confidential manner. Before you submit any information to us directly or through our services, please carefully review this Policy together with your contract with us and any other documents referred to therein to understand our views and practices regarding your information and how we will treat it.

Information we collect and use:

Information You Submit to Leader Potential Group

When you enter information on our website, it is retained and stored by Leader Potential Group. For example, you could enter the following types of information to us:

- Your name
- Your email address
- Questions submitted to us
- Your phone number
- Your employer's name

This kind of information is only stored to be able to meet your requests. You may always choose not to provide such information, but please note that this could prevent us from meeting your requests.

We provide opt-out and unsubscribe options in all communications. You may also unsubscribe at any time to such communications by emailing sonja@leaderpotentialgroup.com or ann@leaderpotentialgroup.com

Information we Collect from Website Visitors:

Leader Potential Group collects certain information from visitors to our website. This information can include, but is not limited to, a visitor's IP address, the type of browser used to access our website, pages viewed and access device used to connect to our website. This information is used to better understand how our website is used and to improve our service.



How We Use Your Information:

We may use your information for the following purposes:

- For the purposes for which you provided it;
- To carry out our obligations arising from any contracts entered into between you and us including the provision to you with information and services that you request from us, online content and dealing with your requests and enquiries;
- To process a transaction you initiate or to provide the features and services available through us;
- To send you information about your relationship or transactions with us or other communications, such as newsletters to which you have subscribed;
- To notify you about new features, changes and/or offerings of the Services, including, but not limited to, updates, events and/or news about our services;
- To contact you with information, surveys, or advertising that we believe may be of interest to you both regarding our services and those of third parties;
- To process and respond to your inquiries or to request your feedback;
- For internal research and reporting;
- To analyse and improve the content and features of our services or develop new services;
- To ensure that content from our website is presented in the most effective manner for you and on the device or browser from which you are accessing our services;
- To keep our website safe and secure;
- To use IP addresses to identify the location of users, to block disruptive use, to establish the number of visits from different countries and to determine the jurisdiction in which you are accessing our services; and
- To administer and troubleshoot our site.

Sensitive information:

If you provide to us any information that classifies as 'sensitive personal information' (for example racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, criminal proceedings and offences), we will only use this information to provide the service you require in accordance with this Policy or a contract. Examples of such sensitive personal information that could be processed by us is:

- Your responses to our leadership assessments or
- Your personal bio.



When We Disclose Your Information:

We may disclose and/or share your information with any non-affiliated third parties under the following circumstances:

- **Consent.** We may disclose your information to any third parties based on your consent to do so.
- **Service Providers.** We may provide access to or share your information with select third parties who perform services on our behalf and for any other legitimate business purpose. These third parties provide a variety of services to us, including without limitation billing, sales, marketing, advertising, market research, customer support, data storage, analysis and legal services.
- **Protection of Leader Potential Group and Others.** By using our services, you acknowledge, consent and agree that we may access, preserve and disclose your information, including, but not limited to, any user content, if required to do so by law or in a good faith belief that such access, preservation or disclosure is reasonably necessary to: (a) comply with legal process; (b) enforce this Policy or other contracts with you, including investigation of potential violations thereof; (c) respond to your requests for customer service.
- **Business Transfers.** As we continue to develop our business, we may buy, merge or partner with other companies. In such transactions, (including in contemplation of such transactions, e.g., due diligence) user information may be among the transferred assets. If a portion or all of Leader Potential Group's assets are sold or transferred to a third-party, customer information (including your email address) would likely be one of the transferred business assets.

Legal Basis For Processing Personal Data:

The laws in some jurisdictions require companies to tell you about the legal ground they rely on to use or disclose your personal data. To the extent those laws apply, our legal grounds for processing your personal data are as follows:

- **To Honour Our Contractual Commitments to You.** Much of our processing of personal data is to meet our contractual obligations to our clients, or to take steps at a client's request in anticipation of entering into a contract with them.
- **Legitimate Interests.** In many cases, we handle personal data on the ground that it furthers our legitimate interests in commercial activities such as the following in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals:
 - Customer service
 - Marketing



- Analyzing and improving our business
- Managing legal issues

We may also process personal data for the same legitimate interests of our customers and business partners.

- **Legal Compliance.** We need to use and disclose personal data in certain ways to comply with our legal obligations.
- **Consent.** Where required by law, and in some other cases, we handle personal data on the basis of consent. Where we handle your personal data on the basis of consent, you have the right to withdraw your consent.

Your Rights as a Data Subject:

Individuals in the European Economic Area (“EEA”) and many other jurisdictions have certain legal rights to obtain confirmation of whether we hold personal data about them, to access personal data we hold about them, and to obtain its correction, update, amendment, or deletion in appropriate circumstances. You may also have rights to object to our processing of your personal data, restrict our processing of your personal data, and to withdraw any consent you have provided. To exercise these rights, please contact us as at sonja@leaderpotentialgroup.com or ann@leaderpotentialgroup.com with the nature of your request.

Our security procedures mean that we may request proof of identity before we reveal information. While we strongly encourage you to first raise any questions or concerns about your personal data with us, you also have a right to contact the relevant supervisory authority.

Many of the rights described here are subject to significant limitations and exceptions under applicable law (e.g., objections to the processing of personal data, and withdrawals of consent, typically will not have retroactive effect).

Data Retention:

We will keep your information only for as long as is reasonably necessary for the purpose that it has been processed, taking into account any legal requirements under Applicable Law. Usually this will be for the duration of a contract between us and the client. We will also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Information may persist in copies made for backup and business continuity purposes for additional time.



Cookies:

Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and transferred to your device. We use cookies to collect information in order to improve our services for you.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The Help feature on most browsers provide information on how to accept cookies, disable cookies or to notify you when receiving a new cookie.

If you do not accept cookies, you may not be able to use some features of our services and we recommend that you leave them turned on.

Google:

We use Google Analytics. Google Analytics does not store any visitor specific data and we will not use visitor specific data in any way related to Google Analytics, Google Adwords, and Remarketing. We and other third-party vendors, including Google, use cookies together to inform, optimize, and serve ads based on visitors past visits to our website. Visitors can opt out of Google Analytics for Display Advertisers and opt out of customized Google Display Network ads by visiting the Ads Preferences Manager at www.google.com/ads/preferences/.

Service Providers:

We may employ third party companies and individuals to facilitate our services, to perform service-related services and/or to assist us in analyzing how our service is used.

These third parties have access to your Personal Information only to perform specific tasks on our behalf and are obligated not to disclose or use your information for any other purpose and only process the Personal Information in accordance with the Data Processing Agreement between us and the Service Provider.

Security:

The security of your Personal Information is important to us, and we strive to implement and maintain reasonable, commercially acceptable security procedures and practices appropriate to the nature of the information we store, in order to protect it from unauthorized access, destruction, use, modification, or disclosure.

However, please be aware that no method of transmission over the internet, or method of electronic storage is 100% secure and we are unable to guarantee the absolute security of the Personal Information we have collected from. There are safeguards in place to protect your data and have the right to be notified within 72 hours per the GDPR.

International Transfer:

In most cases, all data is processed within the EEA. Your information may in some instances be transferred to — and maintained on — computers located outside of the EU. In case of such transfers we make sure that processors outside of EU adhere and comply with Privacy Shield and GDPR legislations.

Links To Other Sites:

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over, and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes To This Privacy Policy:

This Privacy Policy was updated May 25, 2018 in compliance with the GDPR. It will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

This policy shall be reviewed annually, or more frequently if appropriate, to reflect relevant legislative, regulatory, or organisational developments.

Contact details:

For information about this policy or data protection in general please contact:
sonja@leaderpotentialgroup.com or ann@leaderpotentialgroup.com

Owner: Leader Potential Group

Approval date: 25 May 2018