

Privacy Policy

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Introduction

This privacy policy outlines how we (Leapsome GmbH) record and use the personal we collect from you or that your employer provides to use through your use of our website and our platform.

Applicability

This Privacy Policy applies to Leapsome's online platform (the "**Service**"), Leapsome.com (the "**Website**") and other interactions (e.g., customer service requests, etc.) you may have with Leapsome. If you do not agree with the terms, please do not access or use the Service, Website or any other aspect of Leapsome business.

In addition, a separate agreement governs delivery, access and use of the Service (the "**Service Agreement**"), including the processing of any personal data, messages or other content submitted through Service accounts (collectively, "**Customer Data**"). The organization that entered into the Service Agreement ("**Customer**") controls their instance of the Service (their "**Customer Account**") and any associated Customer Data.

Information we collect

Leapsome may collect and receive Customer Data and other information and data ("**Other Information**") in a several ways:

- **Customer Data.** Customers or individuals granted access to a Customer Account by a Customer ("**Registered Users**") regularly submit Customer Data to Leapsome when using the Service. This information may include your name, age, email address, job title, department, level of seniority, as well as any opinions you provide to us about your performance in your role, or information regarding your employer or your colleagues.
- **Other Information.** Leapsome also collects, generates and/or receives Other Information:
 1. **Customer Account and User Account Information.** To create or update a Customer Account, you or your employer (the Customer) supply Leapsome with an email address, name, password, and/or similar account details. In addition, Customers provide Leapsome (or its payment processors) with billing details such as credit card information, banking information and/or a billing address.

2. Usage Information.
 - Service Metadata. When a Registered User interacts with the Service, metadata is generated that provides additional context about the way Registered Users work. For example, Leapsome logs the people, features and content you interact with.
 - Device information. Leapsome collects information about devices accessing the Service, including type of device, what operating system is used and device settings. Whether we collect some or all of this Other Information often depends on the type of device used and its settings.
 - Log data. When you use our Website or Service our servers automatically record information, including information that your browser sends whenever you visit a website. This log data may include your IP address, the address of the web page you visited before using the our website, your browser type and settings, the date and time of your use of our website, information about your browser configuration and plug-ins, language preferences, and cookie data.
3. Cookie Information. Leapsome uses cookies and similar technologies in our Website and Service that help us collect Other Information. The Website and Service may also include cookies and similar tracking technologies of third parties, which may collect Other Information about you via the Website and Service and across other websites and online services.
4. Third Party Services. Customer can choose to permit Third Party Services for their Customer Account. Usually, Third Party Services are software that integrate with our Service (such as HRIS platforms or communication tools), and the Customer can permit its Registered Users to enable and disable these integrations for their Customer Account. Once enabled, the provider of a Third Party Service may share certain information with Leapsome. Registered Users should check the privacy settings and notices in these Third Party Services to understand what data may be disclosed to Leapsome. When a Third Party Service is enabled, Leapsome is authorized to connect and access Other Information made available to Leapsome in accordance with our agreement with the Third Party Provider.
5. Additional Information Provided to Leapsome. We receive Other Information when submitted to our Website or if you participate in an activity or event, apply for a job, request support, interact with our social media accounts or otherwise communicate with Leapsome.

Generally, no one is under a statutory or contractual obligation to provide any Customer Data or Other Information (collectively, "Information"). However, certain Information is collected automatically and, if some Information, such as Customer Account setup details, is not provided, we may be unable to provide the Service.

How we use information

Customer Data will be used by Leapsome in accordance with Customer's instructions, including any applicable terms in the Service Agreement and Customer's use of Service functionality, and as required by applicable law. Leapsome is a processor of Customer Data and Customer is the controller. A Customer may, for example, use the Service to grant and remove access to a Customer Account, assign roles and configure settings, access, modify, export, share and remove Customer Data and otherwise apply its policies to the Service.

Leapsome uses Other Information to pursue its legitimate interests in operating our Service, Website and business. More specifically, Leapsome uses Other Information:

- To provide, update, maintain and protect our Service, Website and business. This includes use of Other Information to support delivery of the Service under a Service Agreement, prevent or address service errors, security or technical issues, analyze and monitor usage, trends and other activities or at an Registered User's request.
- To communicate with you by responding to your requests, comments and questions. If you contact us, we may use your Other Information to respond.
- To develop and provide feedback, review, survey, goal tracking, learning and productivity tools and additional features. Leapsome tries to make the Service as useful as possible for specific Customer Accounts and Registered Users. For example, we may improve learning functionality by using Other Information to help determine and rank the relevance of content to a Registered User, make Service suggestions based on historical use and predictive models, identify organizational trends and insights, to customize a Service experience or create new productivity features and products.
- To send emails and other communications. We may send you service, technical and other administrative emails, messages and other types of communications. We may also contact you to inform you about changes in our Service, our Service offerings, and important Service-related notices, such as security and fraud notices. These communications are considered part of the Service and you may not opt out of them. In addition, we sometimes send emails about new product features, promotional communications or other news about Leapsome. These are marketing messages so you can control whether you receive them.
- For billing, account management and other administrative matters. Leapsome may need to contact you for invoicing, account management and similar reasons and we use account data to administer accounts and keep track of billing and payments.
- To investigate and help prevent security issues and abuse.
- As required by applicable law, legal process or regulation.

If Information is aggregated or de-identified so it is no longer reasonably associated with an identified or identifiable natural person, Leapsome may use it for any business purpose. To the

extent Information is associated with an identified or identifiable natural person and is protected as personal data under applicable data protection law, it is referred to in this Privacy Policy as **“Personal Data.”**

How We Share And Disclose Information

This section describes how Leapsome may share and disclose Information. Customers determine their own policies and practices for the sharing and disclosure of Information, and Leapsome does not control how they or any other third parties choose to share or disclose Information.

- **Customer’s Instructions.** Leapsome will solely share and disclose Customer Data in accordance with a Customer’s instructions, including any applicable terms in the Service Agreement and Customer’s use of Service functionality, and in compliance with applicable law and legal process.
- **Displaying the Service.** When a Registered User submits Other Information, it may be displayed to other Registered Users in the same or connected Customer Account. For example, a Registered User’s name may be displayed with their Customer Account profile.
- **Customer Access.** Owners, administrators, Registered Users and other Customer representatives and personnel may be able to access, modify or restrict access to Other Information. This may include, for example, your employer using Service features to access or modify your profile details.
- **Third Party Service Providers and Partners.** We may engage third party companies or individuals as service providers or business partners to process Other Information and support our business. These third parties may, for example, provide virtual computing and storage services, and may include
 - Amazon Web Services, Inc.
 - Microsoft, Inc.
 - Google, Inc.
 - Zendesk, Inc.
 - ObjectLabs, Inc.
 - SendGrid, Inc.
 - Rocket Science Group, LLC
- **Third Party Services.** Customer may enable Third Party Services (such as an integration with communication tools like Slack or Gmail). When enabled, Leapsome may share Other Information with Third Party Services. Third Party Services are not owned or controlled by Leapsome and third parties that have been granted access to Other Information may have their own policies and practices for its collection and use. Please check the privacy settings and notices in these Third Party Services or contact the provider for any questions.

- During a Change to Leapsome's Business. If Leapsome engages in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of Leapsome's assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence), some or all Other Information may be shared or transferred, subject to standard confidentiality arrangements.
- Aggregated or De-identified Data. We may disclose or use aggregated or de-identified Other Information for any purpose. For example, we may share aggregated or de-identified Other Information with prospects or partners for business or research purposes, such as telling a prospective Leapsome customer the average amount of time spent within a typical Customer Account.
- To Comply with Laws. If we receive a request for information, we may disclose Other Information if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation or legal process.
- To enforce our rights, prevent fraud, and for safety. To protect and defend the rights, property or safety of Leapsome or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.
- With Consent. Leapsome may share Other Information with third parties when we have consent to do so.

International data transfers

Other Information that we collect from you may be transferred to, processed and stored at, a destination outside the European Economic Area ("EEA") where required to support certain features of the Service and/or to fulfil obligations in the Service Agreement. We will only transfer your personal data outside the EEA in compliance with the GDPR (Art. 44). We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy.

Retaining your information

Leapsome will retain Customer Data in accordance with a Customer's instructions, including any applicable terms in the Service Agreement and Customer's use of Service functionality, and as required by applicable law. Leapsome may retain Other Information pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include keeping your Other Information after you have deactivated your account for the period of time needed for Leapsome to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

Security

Where we have given you a username, password and/or security information which enables you to access particular features of the Service, you are responsible for keeping these access credentials confidential. You must not share these details with anyone, or store them in a way that may allow a third party to access them.

Leapsome takes all appropriate technical and administrative security measures to protect your personal data from loss and misuse. Your data is stored in a secure operating environment, which is not publicly accessible. Your personal data is encrypted when transferred using Secure Socket Layer (SSL) technology. This means that communication between your computer and our servers uses a recognized encryption method, provided your browser supports SSL. You can read more about our security measures at <https://www.leapsome.com/security>.

Age Limitations

To the extent prohibited by applicable law, Leapsome does not allow use of our Service and Website by anyone younger than 16 years old. If you learn that anyone younger than 16 has unlawfully provided us with personal data, please contact us and we will take steps to delete such information.

Your Rights

You have the following rights with regards to your personal information.

- Access. You have the right to access information about the personal data we hold about you.
- Rectification or erasure. You have the right to request that we rectify or delete any personal information that we hold about you. If you request that we erase any personal information that we require in order to provide the Service to you, you may no longer be able to use the Service. This right does not extend to non-personal information.
- Portability. You have the right to obtain copies of your personal data to enable you to reuse your personal data across different services and with different companies. You may also request that your personal data is transmitted directly to another organisation where this is technically feasible using our data processing systems.
- Change of preferences. You can change your data processing preferences at any time. For example, if you have given your consent to direct marketing, but have changed your mind, you have the ability to opt out of receiving marketing communications by emailing us at support@leapsome.com or clicking the relevant link in any communication you receive.

- **Objections and Complaints.** In certain circumstances you have the right to object to our processing of your personal data. If for any reason you are not happy with the way that we have handled your personal information, you also have the right to make a complaint to the Information Commissioner's Office.

Your rights detailed above can be exercised free of charge in accordance with applicable data protection laws. Please contact the Customer directly if you would like to exercise any of these rights (other than a change to your marketing preferences, which should be notified directly to us via email to support@leapsome.com or by clicking the corresponding link in any communication you receive).

Contacting Leapsome

Please also feel free to contact Leapsome if you have any questions about this Privacy Policy or Leapsome practices, or if you are seeking to exercise any of your statutory rights. Please contact us at our [mail address](#) or via support@leapsome.com.

Cookies

Leapsome uses a technology called “cookies” to store session information. We use cookies in order to ensure system security and to continuously improve our Service. A cookie is a small amount of data, which includes an anonymous unique identifier that is sent to your browser from our website's computers and stored on your computer's hard drive. Leapsome will set and access Leapsome's cookies on your computer. Cookies are required for the Service to function fully and reliably.

Google Analytics

Leapsome uses Google Analytics to collect information about its visitors. Google Analytics, a web analysis service of Google Inc., (“Google”). Google Analytics stores cookies on your computer which allows to analyze the surfing patterns of visitors to a website. The information generated by the cookie about your use of this website (including your IP address) will be sent to a Google server in the United States and stored there. Google will use this information to evaluate your use of the website, to compile reports on website activity for website operators and to report other website activity and internet-related services. If required by law, Google will pass along this information to third parties. Google will also pass along data to third parties for processing, provided this processing is done on behalf of Google. Under no circumstances shall Google connect your IP address with any other data held by Google. If you wish, you can adjust your browser settings so as to refuse cookies. Please keep in mind, however, that if you refuse all cookies, you will not necessarily have access to all functions of this website. By using this site, you consent to the processing of your data by Google as described above, for the aforementioned purpose.

Changes To This Privacy Policy

Leapsome may update this Privacy Policy and will notify Customers and Registered Users regarding any significant changes in the way we treat Personal Data via email. If you disagree with the changes to this Privacy Policy, you should deactivate your Service account. Contact the Customer if you wish to request the removal of Personal Data under their control.