

leap cares about your privacy and wishes to share the steps it takes to protect your information in compliance with data privacy laws and best practices. the policy below describes: (1) what information may be collected; (2) how such information may be used; and (3) your rights as a visitor or user regarding such information. this privacy policy applies to all information collected or submitted on leap's website, all our applications and any other devices and platforms (collectively, the "site"). leap uses this information to deliver the services offered on the site, to inform you of changes to the site or your account, to prevent illegal or potentially prohibited conduct, and to enforce our terms of use (the "terms"), which incorporate this privacy policy by reference.

this privacy policy governs leap's information management policies including how leap gathers, stores or shares your information, if at all. notwithstanding anything to the contrary, this privacy policy does not apply to information that is gathered or collected offline. by using the site and by submitting information to leap, you agree to the practices described in this privacy policy and to any other applicable terms, including the terms. this privacy policy is intended to provide you with a clear explanation of how, when and why we collect and use your personal information, as well as an explanation of your legal rights. nothing in this policy is intended to override the terms of any contract you have with us or any rights you have under applicable data privacy laws.

please read the entire policy and make sure you fully understand our practices before using our services. if you do not agree with our practices you must immediately leave the site. if you have any questions after fully reading the policy, please contact us at: [hi@leap.club](mailto:hi@leap.club)

## 1. information we collect

we collect two types of information from visitors. the first, unidentified and non-identifiable information ("anonymous information") does not enable leap to identify the visitor from whom it was collected. the anonymous information that leap may collect consists of: (1) the date, time and length of your visit, including how much content you viewed (in the aggregate); (2) your internet browser, operating system or internet service provider; (3) what parts of the website or app you used and for how long; and (4) the referring site, advertisement or email linking to and from the site. leap may, from time to time, also collect information regarding your wireless device (if any). we may collect information about your wireless device and your wireless communications carrier. leap may aggregate, use and share anonymous information with third parties for marketing and advertising purposes.

our site does not require any personal information to be accessed. however, you have the option to submit your information to apply to be a leap member, which we use to screen new applicants and may use to send announcements about major updates. your first and last name, email address, and company, is individually identifiable information, meaning information that can identify an individual or may, with reasonable efforts, lead to the identification of an individual ("pii"). pii may also be collected in creating a profile on the leap app. if any anonymous information is linked to pii, it is treated as pii as long as the connection exists.

## 2. how is information collected?

leap collects information about you only if we have a reason for such collection, such as to provide the services, email updates, or to improve our site. information is collected in three ways:

- (a) information collected automatically through accessing the site. when you visit the site (or any website), your actions while you browse the site, upload information, download information, or access any links, either directly through the site or with the help of any third-party services such as cookies, are tracked. learn more about how we use cookies and third-party services in section 5 below.
- (b) information you provide leap. when you register for our services or apply to become a member, we collect the pii you provide to us. we also store all communications you have directly with us and with other users on the leap applications or platforms.
- (c) information obtained from outside sources. you can learn about these practices in section 5 below.

## 3. why is information collected?

we use the information we collect (both anonymous information and pii) to operate and improve our website, apps, and customer support. this may include correspondence from leap regarding your application for membership, efforts to further develop and improve our services based on your input, to provide customer assistance and technical support, to create aggregated statistical data from anonymous information which leap or its partners may use to provide or improve their respective services, and to enhance data and fraud security capabilities.

in the future, we may sell to, buy, merge with, or partner with other businesses. in such transactions, user information may be among the transferred assets.

leap will not sell, license or otherwise disclose your pii except as stated herein, or under the following circumstances: (1) you have given your consent; (2) we previously notified you of the disclosure in this privacy policy or when you provided your information on the site; (3) we are compelled by law, legal process or court order to disclose; (4) disclosure is required to identify, contact, or bring legal action against someone who may cause harm to, or interfere with, leap's rights or property, our users, members, or anyone else; or (5) to respond to an inquiry, request or complaint that you have made. leap may cooperate with internet service providers to identify users whenever required to comply with law, to enforce compliance with this privacy policy or our terms, or to protect the site, our customers and others.

#### **4. where is information stored?**

leap uses industry standard technologies to safeguard your data (both anonymous data and pii) from unauthorized use and disclosure and to prohibit security breaches of the site. unfortunately, no website, computer system or online communication is completely secure. leap cannot guarantee that unauthorized access, hacking, data loss, or other breaches will never occur. your use of the site is at your own risk.

data will be maintained, processed and stored by leap in india or other jurisdictions, as necessary, for proper delivery of the services or as required by law.

#### **5. cookies and third-party providers**

some features and advertisements on the site may contain "cookies" or similar-tracking technologies. a cookie is a small data file stored by your internet browser, provided that your computer is set to accept cookies. cookies help improve the user experience by identifying and gathering information about a user, their browser and preferences for websites they have already visited. the use of cookies allows us to better understand how our users interact with the site so we can work to improve your user experience.

most modern internet browsers allow you to change your settings to prevent the storage of new cookies, receive warnings prior to their storage, or to delete cookies from your computer altogether. please review your browser's instructions for more information. please be aware that if you choose to disable cookies, some portions of the site may cease functioning properly.

leap does not and cannot control cookies in advertisements placed by our authorized advertising partners. this privacy policy does not govern the privacy practices of third parties who gather information directly from you to provide advertisements on this site and other websites. the site may embed or contain links and advertisements for third party websites. similarly, third-party websites may embed or contain links and advertisements for the site. leap cannot control and is not responsible for the privacy practices or content on any non-leap websites. leap is therefore not liable for your use of and exposure to such third-party websites and any content or advertisements they contain. you should familiarize yourself with the privacy policies and terms of use of these third parties to better understand their information management policies.

if you choose to opt in to receive communications from a third party, any information you provide to said third party, will be subject to the privacy policy of the third party. if you later decide to opt out, you should contact the third party directly.

where permitted by local data laws, leap may disclose or otherwise allow others to access your pii pursuant to a legal request, such as a subpoena, legal proceedings, search warrant or court order, or in compliance with applicable law. if we have a good faith belief that the law requires disclosure, we may disclose your pii, with or without notice to you.

#### **children and privacy**

we never collect or maintain information at our website from those we actually know are under 13, and no part of our website is structured to attract anyone under 13. leap is committed to complying with all applicable laws and regulations regarding children.

leap does not and will not knowingly request, collect, store, maintain, or share any personally identifiable information of children under the age of 13, without first obtaining the consent of a legal guardian. in those limited instances, leap will only collect reasonably necessary information, and will not share with third parties any personally identifiable information of a child under the age of 13 without the explicit consent of a legal guardian, or as permitted by coppa or other applicable law.

you may revoke your consent and request the removal of your child's information at any time. if you are the legal guardian of a child under the age of 13 and discover that your child has submitted their personally identifiable information without securing your consent, leap will use commercially reasonable efforts to remove this information. if at any point you wish to review,

amend, or request the removal of your child's information, please send an e-mail to [hi@leap.club](mailto:hi@leap.club) and provide the name and account information for your child's user account.

#### **6. changes to this policy**

if we decide to change our privacy policy, at our sole discretion, we will post those changes on this page and update the privacy policy modification date below. any changes to the privacy policy will be effective as of the posting date. your continued use of the site after leap posts any modifications to the privacy policy shall be deemed your explicit acceptance of those modifications and shall constitute your agreement to comply with the privacy policy, as modified.

#### **7. contacting us**

if you have questions regarding this privacy policy, you may email [hi@leap.club](mailto:hi@leap.club).  
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