

# LEADTRACKER.MARKETING PRIVACY POLICY

## YOUR INFORMATION AND DATA PROTECTION

### ABOUT US AND THIS POLICY

We are Joyce Ong Limited t/a LeadTracker, a company registered in England and Wales, Company Registration Number 05599865 whose registered office and trading address is at Canbury Business Park, Units 6-7 Kingston upon Thames KT2 6HJ UK.

This Privacy Policy relates to LeadTracker.Marketing services including our cloud-based services, platforms, applications, application programming interface ("API"), products, tools, and anything which we offer, including any upgrades (our Website and Platform).

Our website is [www.LeadTracker.marketing](http://www.LeadTracker.marketing) and our email address is [joyce@marketingtech.london](mailto:joyce@marketingtech.london)

### (1) Why we have a privacy policy

Your individual privacy is important to us and this Privacy Policy is an overview to explain how we process (collect, use and hold) personal data (any information that identifies, or could reasonably be used to identify you) and comply with our legal obligations. Please read through the policy carefully and if you have any queries, email Joyce Ong at [joyce@marketingtech.london](mailto:joyce@marketingtech.london) or look at [section 2 below](#) to find alternative ways to contact us.

### (2) Making changes to this Privacy Policy

The policy applies when you use our Website and our services.

This policy was last updated on 15th May 2024.

We may make changes to the policy (for example to keep up with changes in the law) so we advise you to check the policy as you use the Website and Platform and our Services, although we will let you know about material changes. However, if we make a significant change (for example use your personal data in a way which you wouldn't expect) then we will actively let you know, for example, by emailing you.

## 2 CONTACTING US

### Who do I contact about personal data or change my mind about how you can use it?

The person responsible for our data protection is Joyce Ong whom you can contact if you need any help or information about this policy or about how we collect and use personal data. You can contact Joyce

**By Post/mail:** Joyce Ong, Joyce Ong Limited t/a LeadTracker, Canbury Business Park, Units 6-7 Kingston upon Thames KT2 6HJ UK.

**By Email:** [joyce@marketingtech.london](mailto:joyce@marketingtech.london)

## 3 COLLECTING PERSONAL DATA

Personal data is any information which could identify you, including your name, address and email address and IP address. Special category data is more sensitive, such as information about your health or ethnic origin.

Depending on how you use the Website and Platform or any services or anything which we provide to you, we collect a range of personal data from you, including your name and contact information (such as your address, telephone number and email) as well as other information which you choose to give us as you use the Website and Platform and our services. You may also choose (consent) to give us special category personal information so that we can provide services to you as you require.

## **(1) What personal data do you collect?**

### **(a) Data we collect**

A Data Controller decides on why we collect and process personal data and how to do this. As a Data Controller, we collect different types of personal data (any information that could identify you) but on the basis that we collect the minimum amount of data that we need. We may collect your personal data from you in the following ways:

- **Identification and contact information** – such as your name and contact details (address, email, telephone number), date of birth, gender, and information when you register on the Website and Platform, become an Affiliate, apply for a job with us or start to work with us.
- **Optional Information** which you choose (consent) to give us and allow us to use so we can provide you with our services. This may include **Special Categories** of personal data (such as health information).
- **Additional information** you give to us, such as, for example, you subscribe to a newsletter or take part in a survey or competition. This could be using the Website and Platform directly or through social media, for example, if we run a Facebook survey (when the social media own's privacy policy will also apply).
- **Customer Service Information** you give to us when you ask us for any help and support.
- **Accounting and transaction data** relating to what you buy from us and the running of our business and paying taxes (financial information is often anonymised – for example, we do not receive card details when you use one to pay us).
- **Information from others** which you ask or authorise them to provide to us. For example, from your employer where we provide services to your organisation or referrals from our clients and suppliers.
- **Marketing information** and preferences.
- **Technical and Website and Platform use information** such as IP (Internet Protocol) address, log-in data, browser information (type and version), location and time-zone settings, operating system and platform data, as well as data on how you use our Website and Platform and access partner websites, platforms, products, and services and error reporting.
- **Statistical information** such as information that forms part of the aggregate information. So, for example, we may combine (aggregate) information about how you use the Website and Platform and use it to share with our partners so we can improve our services to you and the features which we offer.
- **Publicly available data** such as information you share on social media.

If you choose not to provide us with personal data, we may be unable to provide some services to you. For example, without your email address we will not be able to email you.

### **(b) Children**

Our Website and Platform and services are not aimed at anyone who is under 18 and we don't knowingly collect any personal data from under 18 years old. Anyone who is under 18 must have the consent of their parent, guardian or someone with parental responsibility before they can use our Website and Platform and services.

### **(c) For California Residents**

For the purposes of the California Consumer Privacy Act 2018 ("CCPA"), during the last 12 months, we have collected the following categories of Personal Information:

- Identifiers – for example, your name, email address, address, and email.
- Commercial / Customer Record information – for example information about your purchase and/or use of our Website and Platform and services.
- Professional or Employment-Related Information
- Internet or other network or device activity details – including technical data about how you use our Website and Platform and services.
- Geolocation data – including such as your approximate location based on IP address;

- Financial information – including payment Information
- Other Personal Information – for example, information you give us when you communicate with us.
- Inferences drawn from any of the above information.
- We do not use or disclose sensitive personal information as defined in the CCPA.

We retain this Personal Data for as long as is needed for the purpose(s) for which it was collected which varies according to our business, legal and regulatory needs. This is never longer than is relevant and reasonably necessary

#### **(d) Data collected by LeadTracker.Marketing users**

LeadTracker.Marketing is a platform and channel agnostic software that allows a user (a LeadTracker user) to track, measure and analyse all their lead generation activities, both offline and online, to assist them with their marketing activities. This means that LeadTracker users store and use (processes) personal data and other information in an electronic form on LeadTracker.Marketing. This personal data and other information is the LeadTracker user's data and they are the Data Controller within the meaning of the Data Protection Act 2018 and the European Union's General Data Protection Regulation (GDPR).

We are NOT a controller of any LeadTracker user's data and we only process it on behalf of LeadTracker users. This means that we do NOT own, control, or decide on why or how a LeadTracker user collects and processes any LeadTracker user's data and we are not responsible for its security and privacy which may be different from our own. Only a LeadTracker user (which includes anyone whom they authorise to do so) is entitled to store, access, direct the use of or retrieve their own LeadTracker user's data.

As part of using LeadTracker.Marketing all LeadTracker users will enter into a Data Processing Agreement (A DPA) with us. If you have any queries or need to discuss the personal data or any other LeadTracker user's data please contact the LeadTracker user directly.

#### **(2) How do you collect personal data?**

We may collect your personal data from you in the following ways:-

- Information you provide to us when you buy from us or ask us to provide the Website and Platform or any other products and/or services to you.
- Forms you complete, such as when you register with us.
- The information you provide when you communicate with us such as during a meeting or session or by email or telephone.
- Information you provide when using our Website and Platform (such as when you ask us to help or provide support or give us feedback) or social media (for example, you may comment on one of our blogs or social media posts).
- Any surveys or feedback requests which you choose to complete or competitions which you choose to enter.
- Information we receive when you visit our Website and Platform from another website or from social media.
- If one of the people who work for us give us your contact details as their referee or emergency contact.
- Automated information about your visits to our Website and Platform which will include (but are not limited to) your IP address, online tracking such as location, browser and type of device you use, as well as automated technology which collects technical information about your equipment and internet use.

## 4 USING (PROCESSING) AND SHARING PERSONAL DATA

### (1) How do you use personal data?

We collect and use personal information in a variety of ways, including when we:

- Supply you with the Website and Platform or any other products and/or services which you have asked us for, including when you become an Affiliate and/or Ambassador and/ or Referral Partner and to fulfil our contractual obligations to you.
- Send you any information (including, but not limited to inviting you to events, LinkedIn Lives and Zoom webinars) you have asked for or which may interest you, where you have consented to this happening, or information we need to tell you about.
- Manage our relationship and communicate with you, including letting you know about important changes, including changes to our Services and upgrades which may be available to you.
- Carry out a credit check where you have specifically agreed that we can.
- Deal with any request for help or answer your queries and customer support generally.
- Interact and respond to you on social media.
- Give you the best user experience and to enable you to participate in any interactive features of our Website and Platform.
- Ask third parties to provide services to us including professional advisors, IT (including cloud providers), marketing, and outsourced services to help run our business properly and efficiently.
- Have your consent where applicable (for example, any marketing where your consent is required).
- Fulfil our contractual obligations to suppliers and other third parties.
- Assess your ability and suitability if you wish to work with or for us.
- Comply with regulations and legislation.
- To analyse and monitor how our Website and Platform is used and to help us to administer it (including security and fraud detection) and to run our business generally.
- Manage our business properly and efficiently including managing marketing and promotion, usage behaviour, segmenting users and monitoring usage trends
- Have other legitimate interests to do so.

### (2) What is the lawful basis for processing my personal data?

The law says that we cannot process (collect, use or store) your information unless we have a lawful basis for doing so. There are several lawful bases which we rely on, including:-

- **Consent** - when you agree that we can use your personal data in a particular way. You can withdraw your consent at any time by emailing [joyce@marketingtech.london](mailto:joyce@marketingtech.london) if you change your mind).
- **Contractual obligations** – to fulfil our contractual obligations to you or because you have asked us to do something before we enter into a contract together.
- **Legal obligation** – when the law says that we must, such as for tax reasons.
- **Legitimate Interest** - Sometimes we will process your data when, for example,
  - It is in our legitimate interests to do this and
  - These interests are not overridden by your data protection rights.

### (3) Who do you share personal data with?

There may be times when we must share your personal data with others, for example, where the law requires us or to enforce our rights or protect others. We may also share your data to:-

- Allow LeadTracker.Marketing users to use the Website and Platform
- Allow authorised third parties who are providing services to us. For example, IT Service Providers (including developers, testing platform providers, those providing technical support and customer services/chatbot, organisations who host our Website and Platform, so they stay online and are

secure, and organisations who provide us with email services so we can send and receive email, Social media providers, Advertising Organisations, Organisations who provide us with emails campaigns and newsletters, Organisations who provide us with analytics, Affiliates and/or Ambassadors and/or Referral Partners, Payment Providers, Credit Reference and Fraud Prevention Agencies and those who help us comply with Money Laundering obligations, Professional Service and other business and individuals who perform functions on our behalf. For more information please email Joyce Ong at [joyce@marketingtech.london](mailto:joyce@marketingtech.london) or look at [section 2 above](#) to find alternative ways to contact us.

- Meet our legal and regulatory obligations such as to HMRC for taxation purposes.
- When selling our business or carrying out associated business activities.

Otherwise we will only share your personal information if you have consented to this.

Where relevant, we take all steps required by law to protect personal data such as, for example, having written agreements with those third parties.

## **5 YOUR PERSONAL DATA RIGHTS**

### **(1) Your Rights**

The law gives you certain rights in relation to your personal data and to exercise or discuss these rights contact Joyce Ong at [joyce@marketingtech.london](mailto:joyce@marketingtech.london) or look at [section 2 above](#) to find alternative ways to contact us.

If you are a California Resident, please also see [section 5\(3\) following](#).

Your rights depend on our reason for processing your information but may include the following:

- Access your personal data
- Rectify your personal data if it is inaccurate or incomplete
- Ask us to erase your personal data and prevent processing in specific circumstances
- Restrict processing of your personal data in certain circumstances
- Data Portability - obtain and reuse your personal data for your own purposes across different services
- Object to processing your personal data in certain circumstances

For more information about your rights you can visit the Information Commissioner's website, where you can find detailed information about each of those rights <https://ico.org.uk/your-data-matters/>

### **(2) Exercising Your Rights**

We will deal with all personal data requests as soon as we are able and usually within one month of receipt. If there is going to be a delay (which could be up to 3 months) in dealing with your request or there is a reason why we can't comply with your request, we will let you know and explain why within one month of receiving your request.

We will ask you for some information first (primarily identification and clarification).

You also have the right to lodge any data protection complaints with the Information Commissioner's Office (ICO), the UK's supervisory authority. Visit [www.ico.org.uk](http://www.ico.org.uk) for more information including how to access their helpline.

### **(3) California Residents Rights**

Under the California Consumer Privacy Act 2018 ("CCPA") if you are a California Resident then you have the following rights:

- Right to know
- Right to delete
- Right to opt-out of sale or sharing
- Right to correct inaccurate data
- Right to limit use and disclosure of sensitive personal information
- Right to Non-Discrimination
- Right to be notified.

For more information about your rights you can visit the website for the State of California Department, where you can find detailed information about each of those rights <https://oag.ca.gov/privacy/ccpa>.

To exercise or discuss these rights contact Joyce Ong at [joyce@marketingtech.london](mailto:joyce@marketingtech.london) or look at section 2 above to find alternative ways to contact us.

## **6 DATA RETENTION - HOW LONG DO WE KEEP PERSONAL DATA FOR?**

Unless you have specifically agreed otherwise, we will only keep your personal data for as long as it is

- Necessary for the purposes for which the personal data are processed
- To enable us to comply with our legal obligations, for example for tax purposes

Retention depends on our relationship with you and please see below:

<b>Data Subject</b>	<b>How long personal information/data is retained</b>
Potential Clients	We will retain personal information for 12 months from the date of our last communication.
Clients	We will retain personal information for 7 years from the date that you ceased to be a client.
Potential employees who are not placed in employment using our services	We will retain personal information for 12 months from the date of our last communication, unless you agree otherwise.
Employees / workers	We will retain personal information for 7 years from the date that you ceased to be an employee/worked with us.
Potential Suppliers	We will retain personal information for 12 months from the date of our last communication.
Suppliers	We will retain personal information for 7 years from the date that you ceased to be a supplier.

## **7 PERSONAL DATA SECURITY**

### **(1) What we do**

We have implemented appropriate technology and operational security, including policies and measures to protect personal information under our control including from unauthorised access, improper use, alteration, unlawful or accidental destruction, and accidental loss on a “privacy by design and default” basis. This includes

- Regularly checking and renewing passwords and access
- Encrypting data where possible
- Anonymising or pseudonymising data wherever this is possible
- Storing personal data in our internal secure servers that are not accessible by third parties without our express permission

- Adhering to appropriate safeguards in accordance with UK Data Protection law if personal data is transferred from the UK and/or from the EEA – see section 8, Transferring of Personal Data To and From the UK section
- Providing internal policies, procedures and training about data protection to, as relevant, our employees and those who work with us
- Regularly reviewing how we process
- Restricting access to personal data to those who need it
- Physical security of our premises and our equipment
- Ensuring that we have procedures in place to deal with any data breach and/or security issues.

## **(2) Your Role**

Please ensure that

- your personal data is accurate and up to date
- you take reasonable care and safety when using your devices and the internet
- if you have a Website and Platform account with us, you use strong passwords which you regularly change and keep your log-in details secure
- you contact us immediately if you think or know your personal data and/or Website and Platform account has been used, compromised, or accessed without your express permission or if you have any other such concerns

For more information please contact [joyce@marketingtech.london](mailto:joyce@marketingtech.london)

## **8 TRANSFERRING OF PERSONAL DATA TO AND FROM THE UK**

### **(1) Receiving Personal Data from the EEA**

The UK left the EU on the 31<sup>st</sup> December 2020. Anyone in the EEA who sends personal data outside the EEA must comply with the relevant GDPR rules. As a UK receiver we aim to assist this process to help protect the privacy of that personal data.

### **(2) Transferring Data from the UK**

We may transfer some data outside the EEA (which may not have the same data protection), but, if we do this, we ensure that we have procedural and technical safeguards to protect the privacy of your data and to comply with the law and our own obligations, including under UK Data Protection law.

## **9 EXTERNAL WEBSITE LINKS AND SOCIAL MEDIA**

You may visit or leave our Website and Platform by clicking a link to or from another website or platform operated by others (third parties) and we are not responsible for those websites or platforms – for example, you may use social media icons (such as X or Twitter). If you do this, please also take the time to read the relevant privacy information provided by other websites/platforms because they may be different. Your information will only be shared where you have agreed to allow this.

## **10 NON-PERSONAL INFORMATION**

We also collect information which does not identify you (non-personal information). This includes the type of internet browser you use or the website from which you linked to our Website and Platform.

We may also aggregate information which you have submitted to us (for example, your age and the town where you live) which is anonymous - you cannot be identified from this information. We share this aggregate information with third parties to help us run our Website and Platform and business effectively.

We use cookies – please read our Cookie Policy

## **11 GOOGLE ADWORDS AND OTHER MARKETING**

We may use marketing such as Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to our site. However, please note that some browser have or are starting to add protection. For example, Google is adding Tracking Protection

This type of marketing means that we can advertise to previous visitors who have begun but not completed an action on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement, such as on the Google search results page, or, for example, a site in the Google Display Network. Third-party sellers may use cookies to serve ads based on someone's past visits to our Website and Platform. Any data collected will be used in accordance with our own privacy policy and when connected with Google, Google's privacy policies (you can find Google's Privacy policy here <https://policies.google.com/privacy?hl=en&gl=uk>)

## **12 COMPLAINTS AND DISPUTE RESOLUTION**

### **(1) Contacting us**

If you have a complaint, please contact Joyce Ong

**By Post/mail:** Joyce Ong, Joyce Ong Limited t/a LeadTracker, Canbury Business Park, Units 6-7 Kingston upon Thames KT2 6HJ UK.

**By Email:** [joyce@marketingtech.london](mailto:joyce@marketingtech.london)

### **(2) Contacting the Information Commissioner's Office**

You can also lodge any data protection complaints with the Information Commissioner's Office (ICO) who is the UK's supervisory authority. You can visit <https://ico.org.uk/> for more information including the best ways to contact them.