

LeadSquared Privacy Policy

This privacy policy (“Policy”) was last updated on July 27th, 2020. We may change or update this policy at any time, and the same will be updated here. If you are a LeadSquared user or customer, we shall notify the changes or updates either by sending an email or a notification on the LeadSquared App (as defined below). Please ensure to read such notices carefully.

We sincerely believe that you should always know what data we collect from you, the purposes for which such data is used, and that you should have the ability to make informed decisions about what you want to share with us.

Therefore, we want to be transparent about: (i) how and why we collect, store and use your personal data in the various capacities in which you interact with us; and (ii) the rights that you have to determine the contours of this interaction.

While we would strongly advise you to read the Policy in full, the following summary will give you a snapshot of the salient points covered herein:

- This Policy details the critical aspects governing your personal data relationship with LeadSquared which is owned and operated by **MarketXpander Services Private Limited**, a company incorporated under the laws of India, and having its registered office at #33, Sector 6, H S R Layout, Bangalore – 560 102, Karnataka, India;
- Your personal data relationship with LeadSquared varies based on the capacity in which you interact with us/avail of our products and solutions (“**Services**”). You could be: (i) a visitor to leadsquared.com (“**Website**”) or any pages thereof (“**Visitor**”); (ii) a person/entity availing of one of our Services (“**Customer**”); or (iii) an employee/agent/representative/appointee of a Customer who uses the said Service (“**User**”);
- Based on whether you are a Visitor, Customer or User, the type of data we collect and the purpose for which we use it will differ and this Policy details such variations;
- This Policy is a part of and should be read in conjunction with our [Terms of Service](#); and
- This Policy will clarify the rights available to you vis-à-vis the personal data you share with us.

If you have any queries or concerns with this Policy, please contact our Grievance Officer (refer Section 12). If you do not agree with the Policy, we would advise you to not visit/use the Website or the LeadSquared mobile application(s)/platform(s) (collectively “**App**”).

1. INFORMATION WE COLLECT AND HOW WE USE IT

TYPE OF USER	VISITOR	CUSTOMER	USER
WHAT DATA WE	1. Your Address; IP	1. The name and e-mail of	1. Your name, e-mail; 2. Your IP Address;

TYPE OF USER	VISITOR	CUSTOMER	USER
MAY COLLECT	<ul style="list-style-type: none"> 2. Your location; 3. How you behave on the Website, (what pages you land on, how much time you spend, etc.); 4. What Device you use to access the Website and its details (model, operating system, etc.); 5. Cookies and Web Beacon data; and 6. Data from third parties who have your explicit consent to lawfully share that data. If you submit an inquiry through the Website, we will ask for your: 7. Name; and 8. e-mail. 	<ul style="list-style-type: none"> your representative who signs up for a Service on your behalf; and 2. Credit Card/Debit Card/Other Payment Mode information to check your financial qualifications, detect fraud and facilitate payments for our Services. 	<ul style="list-style-type: none"> 3. Your location unless you deactivate location services in the relevant section of the App; 4. How you behave in the relevant product environment and use the features; 5. What device you use to access the Website/App and its details (model, operating system, etc.); 6. Cookies and Web Beacon data; 7. Data from third parties who have your explicit consent to lawfully share that data; 8. SMSs that you send or receive on your Device from your existing and prospective customers (“Leads”) if you have opted for the same in the relevant section of the App; 9. Phone call logs to record your call activities with Leads (i.e. call time, duration, phone number of relevant Lead) if you have opted for the same in the relevant section of the App; and 10. E-mails that you send and receive for the

TYPE OF USER	VISITOR	CUSTOMER	USER
			<p>purpose of reading them to sync with your Leads, if you have opted to sync your e-mail with your LeadSquared account using our E-mail Sync App.</p> <p>If you do choose to activate SMS and Call Log parsing or E-mail Sync to improve your experience, you can be sure that we will never collect or store any information that does not pertain to Leads.</p>
<p>HOW AND WHY WE USE IT</p>	<p>We use this information to analyse and identify your behaviour and enhance the interactions you have with the Website.</p> <p>If you submit your details and give us your consent, we may use your data to send you e-mails/newsletters, re-target LeadSquared advertisements or re-market our Services using services from third-parties like Facebook and Google.</p>	<p>We collect this data in order to help you register for and facilitate provision of our Services.</p> <p>We also use this data to enable you to make payments for our Services. We use a third-party service provider to manage payment processing. This service provider is not permitted to store, retain, or use information you provide except for the sole</p>	<p>We collect this data in order to facilitate provision of our Services.</p> <p>We will occasionally send you e-mails regarding changes or updates to the Service that you are using. In the event you report an issue with a Service, we may also screen/video record your Device only when you use the App for a limited time period to help us better understand how to address the issue.</p> <p>If you give us your consent, we may send you newsletters and e-mails to market other products and services we may provide.</p> <p>We may also conduct anonymized usage behaviour</p>

TYPE OF USER	VISITOR	CUSTOMER	USER
		<p>purpose of payment processing on our behalf.</p> <p>If you give us your consent, we may send you newsletters and e-mails to market other products and services we may provide.</p>	<p>analysis at the aggregate level to determine how the features of a particular Service are being used.</p>

WHAT ARE THE COOKIES AND WEB BEACONS REFERRED TO ABOVE?

TYPE OF FILE	COOKIES	WEB BEACON
WHAT THEY DO	<p>Cookies are text files which are sent from our server and downloaded to your Device when you visit our Website.</p> <p>They are useful because they allow us to recognize your Device when you return. You can disable them through your browser should you so wish.</p> <p>You can find more information about cookies at: www.allaboutcookies.org</p>	<p>Web Beacon (also known as Clear GIF, Web Bugs or Pixel Tag) is a tiny picture file embedded on the Website/App that tracks your behaviour and navigation. It is similar to a cookie in what it does, but it doesn't get downloaded on to your Device.</p> <p>You can find more information about Web Beacons at: https://www.allaboutcookies.org/faqs/beacons.html</p>
WHAT THEY	<ol style="list-style-type: none"> 1. Harvest any personally identifiable information; or 2. Contain any executable software, malicious code or virus. 	

TYPE OF FILE	COOKIES	WEB BEACON
WON'T DO		

FOR THE AVOIDANCE OF ANY DOUBT, WE SHOULD CLARIFY THAT IN THE EVENT WE ANONYMIZE AND AGGREGATE INFORMATION COLLECTED FROM YOU, WE WILL BE ENTITLED TO USE SUCH ANONYMIZED DATA FREELY, WITHOUT ANY RESTRICTIONS OTHER THAN THOSE SET OUT UNDER APPLICABLE LAW.

Where such data is not being used by us to render Services to you, we shall explicitly seek your consent for using the same. You can choose to withdraw this consent at any time, [here](#).

2. YOUR RIGHTS & PREFERENCES AS A DATA SUBJECT IN THE EU

It might have come to your attention that a new law was passed in the European Union (EU) called the General Data Protection Regulation (GDPR). The GDPR gives certain rights to individuals who are EU data subjects, in relation to their personal data.

Subject to the GDPR and applicable law's limitations, the rights afforded to you if you are an EU data subject are:

<p>RIGHT TO BE INFORMED</p> <p>You have a right to be informed about the manner in which any of your personal data is collected or used which we have endeavoured to do by way of this Policy.</p>	<p>RIGHT OF ACCESS</p> <p>You have a right to access the personal data you have provided by requesting us to provide you with the same.</p>
<p>RIGHT TO RECTIFICATION</p> <p>You have a right to request us to amend or update your personal data if it is inaccurate or incomplete.</p>	<p>RIGHT TO ERASURE</p> <p>You have a right to request us to delete your personal data.</p>
<p>RIGHT TO RESTRICT</p> <p>You have a right to request us to temporarily or permanently stop processing all or some of your personal data.</p>	<p>RIGHT TO OBJECT</p> <p>You have a right, at any time, to object to our processing of your personal data under certain circumstances. You have an absolute right to object to us processing your personal data for the purposes of direct marketing.</p>

RIGHT TO DATA PORTABILITY

You have a right to request us to provide you with a copy of your personal data in electronic format and you can transmit that personal data for using another third-party's product/service.

RIGHT NOT TO BE SUBJECT TO AUTOMATED DECISION-MAKING

You have a right to not be subject to a decision based solely on automated decision making, including profiling.

In case you want to exercise the rights set out above you can contact our Grievance Officer whose details are set out in Section 12 below.

The data provided by you as a Visitor, or when you sign up as a Customer / User or register for our Services will be processed by us for the purpose of rendering Services to you or in order to take steps prior to rendering such Services, at your request. Where such data is not being used by us to render Services to you, we shall explicitly seek your consent for using the same. You can choose to withdraw this consent at any time, [here](#). Additionally, we may process your data to serve legitimate interests.

Accordingly, the grounds on which we can engage in processing are as follows:

NATURE OF DATA	GROUND S
Visitor Data	<ul style="list-style-type: none">• Consent;• Performance of a Contract; and• Legitimate Interest
Account Registration Data	<ul style="list-style-type: none">• Performance of a Contract; and• Legitimate Interest
Payment Data	<ul style="list-style-type: none">• Performance of a Contract;• Compliance with applicable laws; and• Legitimate Interest
Service Usage Data	<ul style="list-style-type: none">• Performance of a Contract; and• Legitimate Interest
Data for Marketing our Services	<ul style="list-style-type: none">• Consent; and• Legitimate Interest

If you believe we have used your personal data in violation of the rights above or have not responded to your objections, you may lodge a complaint with your local supervisory authority.

Additionally, please note:

- If you are a Customer/User using one of our Services to collect data about an EU data subject from third-parties, it shall be your sole obligation to inform such data subject about the source of such data; and
- We do not collect any Special Categories of Personal Data. Further, if you are a Customer/User, you hereby agree and acknowledge that you shall not, under any circumstances, whether directly or indirectly, use our Services to collect or process Special Categories of Personal Data or transfer to us any such data.
- The term “**Special Categories of Personal Data**” shall have the meaning ascribed to it under the GDPR and shall include, without limitation, data pertaining to a data subject’s race, ethnic origin, genetics, political affiliations, biometrics, health or sexual orientation.

3. YOUR RIGHTS UNDER CALIFORNIA CONSUMER PRIVACY ACT (CCPA)

LeadSquared complies with CCPA by giving you the five privacy rights for California consumers:

The right to know about the personal information a business collects about them and how it is used and shared	You have a right to be informed about the manner in which any of your personal data is collected or used which we have endeavoured to do by way of this Policy.
The right to delete personal information collected from them	LeadSquared gives you the right to request us to delete your personal data.
The right to opt-out of the sale of their personal information	LeadSquared does not sell any data of any of its users/customer/lead.
The right to non-discrimination for exercising their CCPA rights	LeadSquared assures no discrimination against consumers exercising their right of privacy under CCPA
No waiver of privacy rights	LeadSquared assures that it will not ask for waiver of privacy rights from California consumers

In case you want to exercise the rights set out above you can contact our Grievance Officer whose details are set out in Section 12 below.

4. RETENTION OF PERSONAL INFORMATION

We will store any personal data we collect from you as long as it is necessary in order to facilitate your use of the Services and for ancillary legitimate and essential business purposes – these include, without limitation, for improving our Services, attending to technical issues, and dealing with disputes.

We may need to retain your personal data even if you seek deletion thereof, if it is needed to comply with our legal obligations, resolve disputes and enforce our agreements.

If you are a Customer, please be advised that: (i) you will need to inform your Leads about how you store and deal with any data you collect from them using one of our Services, in compliance with applicable laws including the GDPR; and (ii) after you terminate your usage of a Service, we may, unless legally prohibited, delete all data provided or collected by you (including Lead information) from our servers.

5. TRACKING BY OUR ADVERTISEMENT PARTNERS

Upon receiving your specific consent, we may share the data we collect from Cookies or Web Beacons with our advertisement partners to track your visits, establish your non-personal identity and present you with targeted advertisements about our Services.

6. TOOLS USED BY OUR CUSTOMERS

If you are a Customer, you are empowered to use proprietary or other third party technologies (for example Flash Cookies) on your website and host them in our App. If you do, you agree and acknowledge that it is your sole obligation to inform your Leads about any data you collect by using such technologies and the policies by which such collection is bound.

7. COMPLIANCE WITH CHILDREN'S ONLINE PRIVACY PROTECTION ACT

As a business service, we neither target our Services toward nor knowingly collect any personal information from any individuals under the age of 13.

8. TRANSFER OF INFORMATION

In order for us to facilitate our global operations, we may transfer and access the data we collect and process in accordance with this Policy, to our group companies around the world. Your rights and protections will, under no circumstances, be diluted by this transfer.

Further, in the ordinary course of business, we may employ other companies and people to assist us in providing certain components of our Services in compliance with the provisions of this Policy. To do so, we may need to share your data with them.

Where applicable – if the entities to which these transfers are effected are not situated in countries deemed 'adequate' by the European Commission, we shall enter into appropriate Data Protection Addendums with the transferee parties that comprehensively protect your data. We shall also put in place industry-standard technical and organizational measures (including robust data handling policies) to ensure that such transfers are completed in accordance with applicable laws.

Some of the examples of where we may sub-contract processing activities to third parties include—data analysis, marketing assistance, processing credit card payments, and providing customer service.

9. THIRD PARTY LINKS

We may display links to third-party websites or applications on our Website or App for advertising or providing you with relevant content. We will not be responsible for such third-party websites or applications if you choose to access them. If you provide any data to such website/application, please ensure you read their policies given that you will no longer be bound by this Policy in doing so.

10. COMPELLED DISCLOSURE

In addition to the purposes set out in the Policy, we may disclose any data we collected or processed from you if it is required:

- Under applicable law or to respond to a legal process, such as a search warrant, court order, or subpoena;
- To protect our safety, your safety or the safety of others or in the legitimate interest of any party in the context of national security, law enforcement, litigation, criminal investigation or to prevent death or imminent bodily harm;
- To investigate fraud or violation of our [Acceptable Use Policy](#);
- If required in connection with legal proceedings brought against LeadSquared, its officers, employees, affiliates, customers or vendors; or
- To establish, exercise, protect, defend and enforce our legal rights.

11. SECURITY OF YOUR PERSONAL INFORMATION

We implement industry-standard technical and organizational measures by using a variety of security technologies and procedures to help protect your data from unauthorized access, use, loss, destruction or disclosure. When we collect particularly sensitive data (such as a credit card number or your geo-location), it is encrypted using industry-standard cryptographic techniques including but not limited to SSL, TLS, RSA, and AES.

Your password is your first line of defense once you set up a LeadSquared account, so we recommend that you set a strong password which you never share with anyone and ensure you sign out of your LeadSquared account once you have used that same.

12. GRIEVANCE OFFICER

The name and contact details of our Grievance Officer, who you may contact if you have any concerns, complaints or feedback pertaining to this Policy, are as follows:

NAME:	Prashant Singh
ADDRESS:	2nd Floor, Omega, Embassy TechSquare, Marathahalli-Sarjapur Outer Ring Road, Bellandur, Bangalore, Karnataka, India, 560103
TEL:	+91-80-67330900
EMAIL:	privacy@leadsquared.com

13. DISPUTE RESOLUTION

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.