

# **LEADCHEF - PRIVACY POLICY**

# CONTENTS

1.	Important information and who we are .....	1
2.	The types of personal data we collect about you .....	1
3.	How is your personal data collected? .....	2
4.	How we use your personal data .....	2
5.	Disclosures of your personal data .....	4
6.	International transfers .....	4
7.	Data security .....	5
8.	Data retention.....	5
9.	Your rights.....	5
10.	Contact details .....	7
11.	Complaints .....	7
12.	Changes to the privacy policy and your duty to inform us of changes .....	7
13.	Third-party links .....	7
14.	Cookies .....	8

## 1. Important information and who we are

This privacy policy gives you information about how LEADCHEF INC. collects and uses your personal data through your use of this website, including any data you may provide when you register with us and purchase our services.

This website is not intended for children, and we do not knowingly collect data relating to children.

### Controller

LEADCHEF INC. is the controller and responsible for your personal data (collectively referred to as "LEADCHEF", "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights (paragraph 9), please contact the us using the information set out in the contact details section (paragraph 10).

## 2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- ◁ **Identity Data** includes first name, last name, any previous names, username or similar identifier, title, date of birth, gender, employment history, billing address, delivery address, email address and telephone numbers.
- ◁ **Financial Data** includes bank account and payment card details.
- ◁ **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- ◁ **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- ◁ **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- ◁ **Usage Data** includes information about how you interact with and use our website, products and services.
- ◁ **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

### 3. How is your personal data collected?

- ◁ **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - request our services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us.
- ◁ **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. For further details, please see paragraph 14.
- ◁ **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
  - **Technical Data** is collected from the following parties:
    - analytics providers;
    - advertising networks; and
    - search information providers.
  - **Identity, Financial and Transaction Data** is collected from providers of technical, payment and delivery services.
  - **Identity Data** is also collected from:
    - publicly available sources such as social media profiles, web search and websites that we may use to find or validate your social media profiles; and
    - customers when we provide them with our services. When providing our services to a customer we process Identity Data on the customer's behalf, in which case we act as a data processor and only process such Identity Data on behalf and under the instruction of the customer, who is the data controller. This Privacy Policy does not apply when we are acting as a data processor. If you are an individual whose Identity Data we collected from a customer, then the processing of your Identity Data will be subject to the customer's privacy practices, and you should contact that customer for assistance with any requests or questions relating to the processing of your Identity Data.

### 4. How we use your personal data

#### Legal basis

We rely on one or more of the following legal bases for collecting and using your personal data:

- ◁ **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- ◁ **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- ◁ **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- ◁ **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

<b>Purpose/Use</b>	<b>Type of data</b>	<b>Legal basis</b>
To register you as a new customer	(a) Identity	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Financial (c) Transaction (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Profile (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Profile (c) Usage (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Profile (c) Usage (d) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and

effectiveness of our communications and marketing		to inform our marketing strategy)
To send you relevant marketing communications and make personalised suggestions and recommendations to you about services that may be of interest to you based on your Profile Data	(a) Identity (b) Technical (c) Usage (d) Profile (e) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business)

### Direct marketing

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving the marketing.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

### Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

### Opting out of marketing

You can ask us to stop sending you marketing communications at any time by emailing us at [legal@leadchef.ai](mailto:legal@leadchef.ai).

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

## 5. Disclosures of your personal data

For the purposes set out in the table **Purposes for which we will use your personal data** above, we may share your personal data where necessary with the parties set out below:

- ◁ Suppliers such as payment providers, web hosting providers and technology support providers, who process personal data on our behalf and under our instructions, unless such suppliers act as controllers of Personal Information.
- ◁ Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. International transfers

We may share your personal data within LEADCHEF and with third parties. This sharing of personal data may involve international transfers of your data between the following territories:

- ◁ European Economic Area (EEA)
- ◁ United Kingdom (UK)
- ◁ United States of America (USA)

## **Additional information for data subjects in the United Kingdom or the European Economic Area**

Whenever we transfer your personal data out of the EEA or UK, we ensure a similar degree of protection is afforded to it by ensuring that one of the following safeguards are in place:

- ◁ We will transfer your personal data to countries that have been deemed by the EEA or UK (as applicable) to provide an adequate level of protection for personal data ("adequacy decision"); or
- ◁ We use specific standard contractual terms approved for use in the EEA or UK (as applicable) which give the transferred personal data the same protection as it has in the EEA (namely, the European Commission's standard contractual clauses for international data transfers) or UK (namely, the European Commission's standard contractual clauses for international data transfers) or UK namely the International Data Transfer Agreement or The International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers.

### **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **8. Data retention**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see paragraph 9 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### **9. Your rights**

Unless another method of exercising your rights is specified, you can exercise any of the rights set out in (paragraph 9) by emailing us at [legal@leadchef.ai](mailto:legal@leadchef.ai).

You have the right to:

- ◁ Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- ◁ Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- ◁ Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully

exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- ◁ Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- ◁ Object at any time to the processing of your personal data for direct marketing purposes (see **OPTING OUT OF MARKETING** in paragraph 4 for details of how to object to receiving direct marketing communications).
- ◁ Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- ◁ Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- ◁ Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
  - if you want us to establish the data's accuracy;
  - where our use of the data is unlawful but you do not want us to erase it;
  - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

### **Additional rights of data subjects who are residents of California**

If you are a resident of California, you also have the right to:

- ◁ Opt-out of sale or sharing for cross-context behavioural advertising. You can direct us not to share your personal information for targeted advertising purposes and not to sell personal information we have collected about you to third parties now or in the future. You may exercise your right to opt-out of sale or sharing of your personal data by:
  - clicking this "[Do Not Sell or Share My Personal Information](#)" link, which is also available on our website and our website's footer and allows you to submit an opt-out request; or
  - emailing us at [legal@leadchef.ai](mailto:legal@leadchef.ai); or
  - submitting an opt-out request via a user-enabled global privacy control such as the [Global Privacy Control \(GPC\)](#) for each participating browser that you use.
- ◁ Non-discrimination. You have the right not to receive discriminatory treatment for exercising your California privacy rights. However, please note that if the exercise of these rights limits our ability to process personal information, we may no longer be able to provide you our services or engage with you in the same manner.
- ◁ "Shine the Light". If you have an established business relationship with us, you have the right to know how your information is disclosed to third parties for direct marketing purposes.
- ◁ Permit an authorised agent to submit requests to exercise your rights on your behalf. The authorized agent must provide a letter signed by you confirming the agent has permission to submit a request on your behalf or must provide sufficient evidence to show that the authorized agent has been lawfully vested with power of attorney.

### **Additional rights of data subjects who are residents of Delaware**

If you are a resident of Delaware, you can opt out of future sales of certain covered information by:

- ◁ clicking this "Do Not Sell or Share My Personal Information" link, which is also available on our website and our website's footer and allows you to submit an opt-out request; or
- ◁ emailing us at [legal@leadchef.ai](mailto:legal@leadchef.ai).

## No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within 15 days. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us by:

- ◁ email at [legal@leadchef.ai](mailto:legal@leadchef.ai);
- ◁ post at:
  - Leadchef Inc., 548 Broderick Street, San Francisco, CA, 94117, USA;
  - Grigorios Lamprou, 2 Zalokosta Street, Palaio Psychiko, 154 52, Greece, our authorised representative for EEA data protection matters; or
  - Constantinos Los, 70-72 Westbourne Terrace, London W2 6QA, our authorised representative for UK data protection matters.

## 11. Complaints

If you would like to make a complaint, please email us at [legal@leadchef.ai](mailto:legal@leadchef.ai) in the first instance. You also have the right to make a complaint to your data protection authority which may be the:

- ◁ the California Privacy Protection Agency, if you are a resident of California;
- ◁ the Delaware Department of Justice, if you are a resident of Delaware;
- ◁ the data protection authority of your state (which can be found [here](#)), if you are in the EEA;
- ◁ the Information Commissioner's Office (ICO), if you are in the UK.

## 12. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. Previous versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

## 13. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 14. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We may use the following cookies:

- ◁ **Essential (or strictly necessary) cookies.** These are cookies that are required for the operation of our website. These essential cookies are always enabled because our website won't work properly without them. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services. You can switch off these cookies in your browser settings, but you may then not be able to access all or parts of our website.
- ◁ **Analytical (or performance) cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- ◁ **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- ◁ **Marketing (or targeting) cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose so that they can serve you with relevant advertising on their websites.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Name	Purpose
_ga	Analytical cookie that distinguishes users on a domain and lasts two years.
_gat	Analytical cookie that limits the number of user requests and lasts one minute.
_gid	Analytical cookie that distinguishes users for 24 hours.
sessionid	Essential cookie to identify a user's session on a website, allowing the server to remember information about the user's activity during that session
wf_auth	Essential cookie for Webflow, the platform that this website is hosted on, that tracks access to the website and lasts for the session only.
_utmv	Analytical cookie that is used for visitor-level custom variable data and segmentation, allowing website owners to analyze user behavior more granularly, and can last for two years.

Please note that the following third parties may also use cookies, over which we have no control. These named third parties include:

- ◁ Cloudflare, Inc.
- ◁ Salesforce, Inc.
- ◁ Stripe, Inc.
- ◁ Webflow, Inc.

To deactivate the use of third-party cookies, you may visit the relevant consumer page to manage the use of these types of cookies.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

### **Choices about cookies**

You can choose which analytical (or performance), functionality and marketing (or targeting) cookies we can set by clicking on the button(s) in the cookies banner at the bottom of the screen.

You can also choose to "Reject All" cookies in the cookie banner.

However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

If you have any questions or concerns about our use of cookies, please send us an email at [legal@leadchef.ai](mailto:legal@leadchef.ai).