

Leading Edge Privacy Policy

Under the General Data Protection Regulation (Regulation EU 2016/679, also known as GDPR), if you are an individual protected by the GDPR you may have certain rights as a data subject.

This Privacy Policy tells you about Leading Edge Snc policies and practices for the collection, use, processing, storage, transfer, and disclosure of information that we may collect through, but not limited to, our website or through our Partners listed on www.leading-edge.it, through HTML-formatted email messages that link to this Privacy Policy, and offline during our events, training, presentations.

Collection of Personal Information

“**Personal Information**” is information that identifies you as an individual or relates to an identifiable individual, including:

- Name
- Postal address (including billing and shipping addresses)
- Telephone number
- Email address
- Company and job title

We and our service providers collect Personal Information in a variety of ways, including:

- **Through the Web:** We collect Personal Information through the Web, for example, when you communicate with us via email, fill out online forms or surveys, or register for an event, course, or free product trial.
- **Offline:** We collect Personal Information from you offline, e.g., when you attend one of our events, place an order or contact us over the phone.
- **From Other Sources:** We receive your Personal Information from other sources, for example, our Partners and joint marketing partners, when they share the information with us. The information may include, for example, contact, company, and industry data, as well as title, department, address, phone number, and updated e-mail addresses.

We need to collect Personal Information in order to provide the requested services to you. If you do not provide the information requested, we may not be able to provide the services.

Use of Personal Information

We and, in some instances, our service providers use the Personal Information that we collect for legitimate business purposes, including:

Accomplishing our business purposes

- For improving the content of our services, for example, by incorporating information that is relevant to our clients;
- For developing new products and services;
- For enhancing, improving, or modifying our current products and services;
- For determining the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users;
- For operating and expanding our business activities, for example, understanding which parts of our services are of most interest to our users so we can focus our energies on meeting our users' interests.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest.

Providing the functionality of the Services and fulfilling your requests

- To send administrative information to you, such as changes to our terms, conditions and policies and to notify customers about updates to our Services;
- To respond to your inquiries and fulfill your requests, when you contact us via one of our online contact forms or otherwise, for example, when you request to be registered for an event or a Leading Edge training course;
- To process your orders, and provide you support;

Providing you with our newsletter and/or other marketing materials

- To contact you for marketing and sales purposes, including notifications related to product enhancements, warranties, and renewals, that are related specifically to customer needs and interests;
- To contact you about a Leading Edge offer in support of your business needs or to conduct online surveys to better understand our customers' needs;

We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.

Analysis of Personal Information for business reporting and providing personalized services

- To better understand you, so that we can personalize our interactions with you and provide you with information and/or offers tailored to your interests;
- To better understand your preferences so that we can deliver content via our Services that we believe will be relevant and interesting to you.

We will provide personalized services either with your consent or because we have a legitimate interest.

We use this information to manage our contractual relationship with you.

Aggregating and/or anonymizing Personal Information

- We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose.

Communications or Utilization Information

Through your use of telecommunications services to reach us via Web, your communications data (e.g. Internet protocol (“IP”) address) or utilization data (e.g. information on the beginning, end and extent of each access, and information on the telecommunications services you accessed) are technically generated. Your IP address is automatically assigned to your computer by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We might use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Services. We may also derive your approximate location from your IP address.

Information Collected Automatically Through Your Browser or Device

At the moment we do not collect any information but we might do it along the time. If that will happen, when you access our Web, we might automatically collect information such as: number of visits, average time spent on the site, pages viewed, type of Internet browser and operating system used,. We use this information to ensure the web site function properly and improve the performance or content.

“Cookies” - Information Stored Automatically on Your Computer

A cookie is a piece of information that is stored on your computer’s hard drive by your Web browser. Currently our website does not use Cookies but we may in the future.

Disclosure of Personal Information

We disclose Personal Information to our Partners for the purposes described in this Privacy Policy. Leading Edge is the party responsible for the management of the jointly-used Personal Information.

Leading Edge uses third-party entities to provide services on our behalf and may share Personal Information with them to assist them in providing these services. These can include providers of services such as website hosting, customer service, email delivery, auditing, and other services. We also may share Personal Information with channel partners or resellers if

you inquire about our products or services typically fulfilled through channel partners or resellers. These channel partners or resellers may also use this information to inform you about third-party products or services that may be of interest.

Other Uses and Disclosures

We also use and disclose your Personal Information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- To comply with applicable law.
 - This can include laws outside your country of residence.
- To respond to requests from public and government authorities.
 - These can include authorities outside your country of residence.
- To cooperate with law enforcement.
 - For example, when we respond to law enforcement requests and orders.
- For other legal reasons.
 - To enforce our terms and conditions; and
 - To protect our rights, privacy, safety or property, and/or that of our subsidiaries, you or others.
- In connection with a sale or business transaction.
 - We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings) Such third parties may include, for example, an acquiring entity and its advisors.

Choices and Access

Your choices regarding our use of your Personal Information

E-mails: If you no longer want to receive marketing-related e-mails from us, you may opt out by:

- sending an email through the WWW.LEADING-EDGE.IT web site, clicking the unsubscribe link in the “*contact us*” section; or
- clicking on our “Unsubscribe” link contained in each of our marketing-related emails.

Postal mail or telephone: If you no longer wish to receive information about new products and services or upcoming events from us by postal mail or telephone, contact us at privacy@leading-edge.it, write to us at the postal address at the end of this document.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt-out.

Data Owner

Leading Edge Snc, Via delle Attivita' 18, 24041 Brembate (BG) – Italy, is the owner of collected data and Pietro Vergine and Nigel Woolaway are responsible for the treatment of such data.

How you can access, change or delete your Personal Information

If you would like to request to review, correct, update, suppress, restrict or delete Personal Information that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us at privacy@leading-edge.it, write to us at the address at the end of this document. We will respond to your request consistent with applicable law.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to respond to your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase, you may not be able to change or delete the Personal Information provided until after the completion of such purchase).

Retention Period

We will retain your Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you keep using our Services);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or

- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Security

Leading Edge seeks to use reasonable technical and organizational security measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately contact us at privacy@leading-edge.it.

Third Party Web Sites and Services

Leading Edge email, newsletter and/or Web pages may contain links to other Web sites or services. Leading Edge is not responsible for the privacy, information or other practices of third parties or for the content of other Web sites. The inclusion of a link or a reference on the third parties communications/Web sites does not imply endorsement of the linked site or service by us.

Third Party Advertising

We use third-party advertising companies to serve advertisements regarding our products and services that may be of interest to you when you access their websites or online services.

You may receive advertisements based on information relating to your access as well as on information received from third parties. These companies may place or recognize a unique cookie on your browser (including through the use of pixel tags). They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop.

Cross-Border Transfers

Your Personal Information may be stored and processed in any country in which we engage service providers (for instance our Software providers partners). You should understand that your information might be transferred to countries outside of your country of residence, including Europe, The United States and Australia, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information.

Sensitive Information

We ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions,

religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through our communication channels (e-mail, postal mail, phone or otherwise) to us.

Updates to this Privacy Policy

We might post changes to our Privacy Policy on this page. Please check this page regularly to keep up-to-date.