

Privacy Statement

LeapSTK is an all-in-one supervisor toolkit platform to help organizations streamline lineup and communication processes, facilitate digital data collection, manage employee training and development, and track SOP compliance. By integrating these functions, LeapSTK ensures the enforcement of safety protocols, reduces harm, and enhances operational excellence and compliance.

Our Relationship with You

Depending on the context of our users' engagements with LeapSTK's services, such as under our Subscriber Agreement, Enterprise Master Services Agreement, or other Master Services Agreement, LeapSTK acts as the processor or service provider. In this capacity, LeapSTK processes personal data on behalf of or at the direction of our customers (typically companies or organizations), who are designated as the controllers or businesses responsible for determining how and why information is processed.

In all other situations not covered by the aforementioned agreements, LeapSTK assumes the role of the controller of the information.

For example, if you get an account with your corporate email address, your company is the controller of your LeapSTK domain and the information stored in it.

LeapSTK is utilized by both companies:

If you are using LeapSTK through your company, educational institution, or with your company email address, the designated LeapSTK administrator from your organization assumes responsibility for the associated accounts. This administrator has the authority to:

- Restrict, suspend, or terminate your access to or use of the services.
- Access information about you.
- Access or retain information stored with us, including your workspace content and log data regarding your use of LeapSTK.
- Restrict your ability to edit, modify, or delete information associated with your use of our products and services.



Information We Process

LeapSTK processes information that we receive directly from you, automatically collected when you use LeapSTK or visit our websites.

Information LeapSTK Receives Directly From You

Information you provide to us through your use of LeapSTK may include:

- Information provided in projects, communication, tasks, and other features of LeapSTK.
- Information uploaded to LeapSTK, such as attachments.
- Professional or employment information, such as your title or role at your company, if voluntarily provided by you.
- Any other information that you choose to provide while using LeapSTK, which identifies or can be reasonably associated with you.

Other information you may provide to us when you interact with LeapSTK in other ways

If you directly interact with LeapSTK staff, user operations groups, LeapSTK may process the following information voluntarily provided by you:

- Your requests, questions, and responses to us via forms, or email, or other means
- Information to verify your identity

Information related to your use of LeapSTK websites

We may also collect the following:

Metadata and Inference Information

- Usage Data: We collect metadata and inference information related to your use of LeapSTK, our websites to better understand your work patterns. This includes logging actions you take within LeapSTK, such as:
 - The number of LeapSTK workspaces you engage with.
 - The number of tasks you are assigned.
 - \circ Interaction with features and embedded content.
 - Types of files transmitted.

Internet Network Activity and Tracking Technologies

- **Tracking Data:** We collect data through cookies and similar tracking technologies, as well as data our servers automatically log, including:
 - Your web request.
 - IP address.



- Browser type and settings.
- Referring/exit pages and URLs.
- Number of clicks.
- Date and time stamps.
- Language preferences.

For more details, please refer to our Cookie Notice for information on the types of data collected via cookies, including details about advertising and analytics, and their usage.

Beta Testing Participation

• **Beta Data:** Information collected during beta testing, such as error reports or feedback you provide, to help us improve our services.

Marketing Website Interaction

- Website Interaction Data: We collect information about how you interact with our marketing websites, such as:
 - Click patterns.
 - Duration of page visits.
 - Scrolling and mouse hover behavior.
 - Other data to enhance your user experience.

Device Information and Activity

- Mobile Device Data: Information related to the device you use to access LeapSTK, including:
 - Type of device.
 - Device IDs.
 - Operating system version.
 - Mobile network information.

This ensures that you receive the correct version of our application.

How We Use Your Information

LeapSTK uses your information to operate our products and services, communicate with you, process transactions when you change LeapSTK plans, for security and fraud prevention, and to comply with the law. Specifically, we may process your information to:

Provide services to you and operate our business

- Maintain, provide, and improve our products and services
- Understand User Interests and Customize LeapSTK
- Analyze and research user Interactions
- Protect LeapSTK and you, for example:



- Securing our systems and products against fraud or unauthorized activity
- Identifying, troubleshooting, and fixing bugs and errors
- Complying with global laws and regulations
- Investigate in good faith alleged violations of our User Terms of Service
- If you use LeapSTK as part of an organization, company, or academic institution, LeapSTK will process your information as required by our contract with your organization or academic institution. Those contractual terms may differ from, and, in the event of a conflict, take precedence over, the uses described in this Privacy Statement.

Provide you with support and get your feedback

- Respond to your requests for information
- Help identify and troubleshoot any issues with your account and answer your questions
- Resolve support requests
- Provide you with reports about usage
- Survey your opinions through surveys, research studies, and questionnaires

Aggregated and de-identified data

We may aggregate and/or de-identify information related to your use of LeapSTK, such as the number of tasks or projects you create, in a way that ensures it can no longer be associated with you or your device. This aggregated and de-identified data may be used for various purposes, including research and marketing.

How We Disclose Your Information

We need to disclose the information we collect about you to make our products and services run smoothly and to operate our business under the following conditions:

- Because you request us to disclose. We may share your information with third parties when you specifically ask us to do so.
- Consistent with your settings within our products and services. The information you submit through and post to LeapSTK may be visible to other users in your workspace, team, division, or organization, depending on the settings you have selected and if an organization has been established for your domain.



- Business transfers. If the ownership of all or substantially all of our business changes, or if all or some of our assets are sold as part of a bankruptcy or other proceeding, we may transfer your information to the new owner to ensure the services continue to operate. In such cases, your information will remain subject to the commitments in this Privacy Statement until updated by the acquiring party. If the transfer is subject to additional mandatory restrictions under applicable laws or agreements, LeapSTK will adhere to those restrictions.
- Compliance with legal obligations. To comply in good faith with a valid legal subpoena, request, or other lawful process that meets the requirements of our Law Enforcement Guidelines. We will notify customers of such requests unless we are prohibited from doing so by law or court order, or if there are exceptional circumstances, such as an emergency involving the risk of bodily injury or death to a person or group of people, or potential harm to minors.
- Your company's own LeapSTK account administrator (if you have one). If you are using LeapSTK in connection with an organization, academic institution, or company domain, your company's LeapSTK account administrator can export data associated with the domain they manage if their subscription plan permits it.

We utilize and disclose the categories of information we collect from and about you in line with the various business purposes discussed throughout this Privacy Statement. We do not share your information with third parties for their own direct marketing purposes. For further details, please refer to our Privacy Commitment.

Protection, Storage, Transfer and Retention of Your Information

Security

LeapSTK implements technical and organizational measures to safeguard your information from accidental or unlawful destruction, loss, alteration, unauthorized access, or disclosure. However, it's important to note that no method of transmission over the Internet or electronic or physical storage is entirely secure. Therefore, we cannot guarantee the absolute security of your information.

Storage

When you use LeapSTK, all information about you will be stored in Canada.

Data Retention

We will keep your information for as long as necessary to fulfill the purposes stated in this Privacy Statement, to provide our products and services to you, or as instructed by you, unless a longer retention period is mandated or allowed by law.



Your Privacy Rights

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LeapSTK users utilize our products to streamline their work processes. Regardless of your location, we uphold your rights to know, access, correct, export, restrict the processing of, and delete your information, and we extend these rights globally. We do not engage in discrimination against individuals who exercise their privacy rights.

Information about your rights

Upon your request, and subject to applicable legal exceptions, we will:

- Grant access to and/or provide a copy of specific information we hold about you.
- Provide details about the categories of information we collect or disclose about you, the sources from which we collect this information, the business or commercial purpose for collecting your information. This information is included in this Privacy Statement for your convenience.
- Stop processing your information for promotional purposes, including any direct marketing processing based on profiling.
- Update outdated or incorrect information we have about you.
- Delete specific information we hold about you.
- Restrict how we process and disclose certain parts of your information.
- Transfer your information to a third-party service provider.
- Withdraw your consent for the processing of your information.

If you request these rights, we will verify your identity and may also need to verify your relationship with LeapSTK (for instance, if you're an administrator of a LeapSTK organization, division, or workspace making a request on behalf of someone else) to ensure security and prevent fraud. You may designate an authorized agent to act on your behalf. To verify an authorized agent, they must provide signed written permission or a power of attorney authorizing them to make such requests. We may contact you to verify your identity before proceeding with the authorized agent's request.

We may take further measures to verify your authorization to make the request. If you are an end user of LeapSTK's services, please direct requests regarding your information to your company's LeapSTK account administrator. We will either redirect you to your administrator or notify them directly.

Please note that certain information may not be accessible for requests in certain situations (for instance, if we must continue processing your information for our legitimate interests or to fulfill a legal obligation). Depending on applicable laws, you may have the right to challenge our decision to deny your



request. If your request is denied, we will include information on how to appeal the decision, if applicable, in our communications with you.

Right to manage cookies preferences and opt out of targeted advertising.

If you wish to opt out of our disclosure of your information through cookies and pixel technology, please check here: Change settings or enable Global Privacy Control in your browser.

Changes To Our Privacy Statement

We will revise this Privacy Statement to ensure it accurately reflects our data collection and usage practices, innovative features, technological advancements, or as necessitated by applicable laws. We will adhere to relevant legal requirements regarding notifying you and/or obtaining consent when implementing such updates, depending on the nature of the changes.