

LEAP – Website Privacy Policy

2019 Update

Last Updated: April 26, 2019

Privacy Policy

Leap Systems (“LEAP,” “we,” “us,” or “our”) respects the individual privacy of our users and has developed the following privacy policy (“Privacy Policy”) to demonstrate its commitment to protecting your privacy. This Privacy Policy is intended to describe the information we collect on our website and web applications available at www.leapcp.com (the “Website”), how that information may be used, with whom it may be shared, and your choices about such uses and disclosures. We encourage you to carefully read this Privacy Policy when using our Website and the services provided on the Website, or transacting business with us.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. By accessing and using our Website, you are accepting the practices described in this Privacy Policy and in our [License Agreement](#). If you have any questions about LEAP’s privacy practices, please refer to the end of this Privacy Policy for our contact information.

Information We Collect

In General

When you visit or interact with our Website, we collect personal information that may identify you such as your name and email address and/or other information that does not identify you, in each case as further described below. When you directly provide personal information through our Website, the information collected may be sent to servers located in the United States.

Information you provide. When you use our Website to create an account, contact us, or submit information through the client questionnaire or other information collection tools available on the Website, we or our third-party service providers or suppliers collect and store the personal information you provide in our database(s). Personal information that you may provide through these methods includes identifying information, such as your name, address, e-mail address, and telephone number, and, if you transact business with us, purchase history, financial information such as your payment method (valid credit card number, type, expiration date or other financial information). We also may request information about your interests and activities, your gender and age, your financial life and assets, and other demographic information, as well as public information such as user feedback ratings, reviews and comments, and other information you view or contribute to the Website, whether or not such information is viewable by other users.

Information from other sources. We may also periodically obtain both personal and non-personal information about you from other business partners, contractors (collectively, “Affiliates”) and other third parties. Examples of information that we may receive from Affiliates or third parties includes: updated delivery and address information, purchase history, complementary products and offerings, and additional demographic information. If you are working with a financial professional who

uses the platforms available on our Website, we may also obtain personal information about you that you have provided to the professional, if they choose to input the information into our Website.

Use of the Information We Collect

In General

We may use information that we collect about you to:

- provide our products and services to you;
- manage your account and provide you with client support;
- perform research and analysis about your use of the Website, or interest in, our products, services, or content, or products, services or content offered by Affiliates;
- communicate with you by e-mail, postal mail, telephone and/or mobile devices, or by intra-application messaging about products or services that may be of interest to you;
- develop and display content and advertising personalized to your interests from our Website or from other websites;
- enforce all the terms and conditions of our agreements with you;
- manage our business in our sole discretion; and
- perform any other functions not covered herein as otherwise described to you at the time of interacting with you.

Use of Cookies and Other Technologies to Collect Information

We use various technologies to collect information from your computer and about your activities on our Website.

Information collected automatically. Information about your computer hardware and software is automatically collected by LEAP when you visit the Website. This information may include information about your device type, operating system, IP address, browser type, domain names, access times, geographic location, the content of any undeleted cookies that your browser previously accepted from us, referring website addresses and other technical information such as protocol status and substatus, bytes sent and received, server information, and other non-personal identifying information that may assist the Website in both providing you with a good user experience as well as certain security provisions. We automatically collect information about and from your browser when you visit our Website or use the applications available on the Website. This information is used by LEAP for the operation and improvement of the website, for technical troubleshooting, to maintain quality of the website, to customize the experience of our users, and to provide us with general statistics regarding use of the Website.

Cookies.

What are cookies? A cookie is a small file containing a string of characters that is sent to your computer when you visit a website or use an online service. When you visit the website use the service again, the cookie allows that website or online service to recognize your browser or device. Cookies may store unique identifiers, user preferences and other information.

Why do we use them? Cookies help us improve the Website by providing us with information

about which parts of the Website are most popular, enabling us to analyze technical and navigational information about the Website, and helping us to detect and prevent fraud. We also use cookies and other data collection tools (such as web beacons and server logs) to help improve your experience with the Website. For example, we use Google Analytics to help analyze how users use the Website. These tools use cookies to collect standard Internet log information and visitor behavior information in an anonymous form. The information generated by the cookie about your use of the Website (including IP address) is transmitted to our data collection tool service providers. This information is then used by us to evaluate visitors' use of the Website and to compile statistical reports on Website activity for LEAP. If you would like to opt-out from the use of your information by Google analytics, you may use [Google's analytics opt-out browser add-on](#) designed for this purpose.

How do I control cookies? Web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to manage and delete cookies, visit www.allaboutcookies.org. Some web browsers provide settings that allow a user to reject cookies or to alert a user when a cookie is placed on the user's computer, tablet or mobile device. Most mobile devices also offer settings to reject mobile device identifiers. Although users are not required to accept cookies or mobile device identifiers, blocking or rejecting them may prevent access to some features available through the Website.

Other Technologies.

We may use standard Internet technology, such as web beacons and other similar technologies, to track your use of our Website and certain features of it for our purposes and for the purposes of providing you with data analytics (if and when the analytics of those features are reported to you at the sole discretion of LEAP). We also may include web beacons in promotional or e-mail or intra-application messages to determine whether messages have been opened and acted upon. The information we obtain in this manner enables us to customize user experience and the services we offer our users and Website visitors in order to deliver enhanced services and targeted advertisements and to measure the overall effectiveness of our online advertising, content, programming or other activities. None of LEAP's tracking technologies, to the extent that they become live within the Website, link to personally identifiable information. Web beacons (also known as clear gifs, pixel tags or web bugs) are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users or to access cookies. Unlike cookies which are stored on the user's computer hard drive, web beacons are embedded invisibly on the web pages (or in email) and are about the size of the period at the end of a sentence. Web beacons may be used to deliver or communicate with cookies, to count users who have visited certain pages and to understand usage patterns. We also may receive an anonymous identification number if you come to our Website from an online advertisement displayed on a third-party website.

Sharing of Personal information

We will share your personal information with Affiliates or other third parties only in the ways that are described in this privacy statement or in another license agreement you have with LEAP. **We do not sell your personal information to Affiliates or other third parties. Additionally, we do not share your personal information with any third parties for those third-parties' marketing purposes.**

We may share personal information with:

Authorized service providers: We may share your personal information with our Affiliates or other third parties that perform certain services on our behalf, such as processing credit card payments, providing customer order fulfillment services, marketing assistance, performing business and sales analysis, supporting our Website functionality, sending email updates about the Website, removing repetitive information from our user lists, and supporting contests, sweepstakes, surveys and other features offered through our Website and our social media network.

Other Situations. We also may disclose your information:

In response to a subpoena or similar investigative demand, a court order, or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.

When we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees, or others; to comply with applicable law or cooperate with law enforcement; or to enforce our website terms and conditions or other agreements or policies.

We may transfer information, including your personal information, in connection with a change of ownership or control by or of us or any affiliated entity (in each case whether in whole or in part).

Financial Professionals. If you utilize the services of a financial professional who uses the functionality available on our Website and choose to share your information with such financial professional, the information collected from you through the Website will be made available to him or her through the functionality on the Website. LEAP does not monitor or control, and is not responsible, for the data privacy and security practices of the financial professionals with whom you may share your information.

Security Used & Retention of Personal Information

LEAP uses reasonable security measures designed to prevent unauthorized intrusion to the Website and the alteration, acquisition or misuse of personal information, however, we will not be responsible for loss, corruption or unauthorized acquisition or misuse of personal information that you provide through the Website that is stored by us, or for any damages resulting from such loss, corruption or unauthorized acquisition or misuse. It is your responsibility to protect the security of your login information.

Third-Party Websites and Financial Professionals

There are a number of places on our Website where you may click on a link to access other websites that do not operate under this Privacy Policy. For example, if you click on an "information tab", you may be provided with a direct feed of data and a link to a website that we do not control. These third-party websites may independently solicit and collect information, including personal information,

from you and, in some instances, provide us with information about your activities on those websites. We recommend that you consult the privacy statements of all third-party websites you visit by clicking on the “privacy” link typically located at the bottom of the webpage you are visiting. LEAP cannot control and is not responsible for the information practices of such third party websites.

Additionally, as noted above, LEAP cannot control and is not responsible for the data privacy and security practices of the financial professionals with whom you may share your information, including if they utilize the functionality available on our Website to collect or store your information.

How you can Access your Account Information

If you have an active account with us, you have the ability to review and update your personal information online by logging into your account using the login link at top of the screen. You can also review and update your personal information by logging into the LEAP Website using your unique username and password or sending us an email at info@leapsystems.com.

If you chose to terminate your account, you will not be able to sign in to our Website or access any of your personal information. However, if you chose to terminate your account prior to the end of your termination period, your account will remain active for up to 30 days if you change your mind and you can re-access all of your information. If you close your account, we will still retain information associated with your account for analytical purposes and recordkeeping integrity, as well as to prevent fraud, enforce our terms and conditions, take actions we deem necessary to protect the integrity of our Website or our users, or take other actions otherwise permitted by law. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at info@leapsystems.com. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties’ policies.

Choice, Collection and Use of your Information

You can choose not to provide us with certain information, but that may result in you being unable to use certain features of our Website or the Website not providing all of the detail it is capable of because such information maybe required in order for you to register as a member; perform services for clients; utilize the financial applications available on the Website; participate in a contest, promotion, survey, or sweepstakes; ask a question; rate, review or comment on articles and merchants, or initiate other transactions on our Website.

You will be given the opportunity, in any commercial message that we send to you, to opt out of receiving such messages in the future. It may take up to 5 business days for us to process an opt-out request. LEAP’s employees may send you other types of transactional and relationship e-mail or intra-application message communications without offering you the opportunity to opt out of receiving them. Please note that changing information in your account, or otherwise opting out of receipt of promotional email communications will only affect future activities or communications from us. If we have already provided your information to a third party (such as an event provider) before you have changed your preferences or updated your information, you may have to change

your preferences directly with that third party.

How we Protect your Personal Information

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal information from unauthorized access, disclosure, and compromise. For example, only authorized employees are permitted to access personal information, and they may do so only for permitted business functions. In addition, we use reasonable security measures to help prevent unauthorized persons from gaining access to your personal information. We want you to feel confident using our Website to transact business. However, no system can be completely secure. Therefore, although we take steps to secure your information, we do not promise, and you should not expect, that your personal information, searches, or other communications will always remain completely secure. Users should also take care with how they handle and disclose their personal information, especially login credentials, and should avoid sending personal information through insecure email, such as bank account numbers, social security numbers, etc.

Visiting our Website and Using our Website from outside the United States

This Privacy Policy is intended to cover collection of information on our Website from residents of the United States and Canada. If you are visiting our Website from outside the United States and Canada, please be aware that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. Please be assured that we seek to take reasonable steps to ensure that your privacy is protected. By using our services, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this privacy policy. We do not actively solicit users from outside the United States or Canada.

Do Not Track

LEAP does not respond to Do Not Track signals at this time. Do Not Track is a privacy preference that you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. For details, including how to turn on Do Not Track, visit www.donottrack.us.

Children

We do not knowingly collect or maintain personal information from any person under the age of thirteen. No parts of our Website are directed to or designed to attract anyone under the age of thirteen.

No Rights of Third Parties

This Privacy Policy does not create rights enforceable by third parties or require disclosure of any personal information relating to users of the Website.

Changes to this Privacy Policy

Any changes to our Privacy Policy will be posted to this page so users are always aware of the information we collect and how we use it. Accordingly, please refer back to this Privacy Policy frequently as it may change.

How to contact us

If you have any questions about this Privacy Policy or our information-handling practices, please contact us by e-mail or postal mail as follows:

info@leapsystems.com

Attn: Privacy Officer

Leap Systems

600 Dresher Road

Horsham, PA. 19044