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Introduction

LEAP India Private Limited ("us", "LEAP ", or "our") is a leader in sustainable supply chain solutions, offering pay-per-use returnable packaging such as wooden pallets, foldable containers (FLCs), totes, and crates. Our solutions help businesses reduce costs, improve efficiency, and lower their carbon footprint. With 33 warehouses, a dedicated team of over 1,000 FTEs, and a robust network of 7,000 customer touchpoints, LEAP manages over 11 million assets and serves a 1,000-strong customer base across industries like FMCG, automotive, retail, and pharma.

This page informs you of our policy regarding the collection, use and disclosure of personal data when you use our Service and the choices you have associated with that data.

LEAP as a body corporate is required to provide privacy guidelines while handling or dealing in personal information including sensitive personal data or information (As per Information Technology Act 2000 & Information Technology Rules 2011). The privacy of individual is important and critical. LEAP always endeavors to ensure that personal information which is collected and stored would always be held, used, transferred and processed in accordance with the applicable legal obligations.

Reference

Definitions

"Personal Data"

Personal Data means data about a natural person who can be identified from such data which is includes but is not limited to name, mailing address(/es), email address(/es), government issued unique identification numbers, phone numbers or any other personal attributes. Any data that cannot be identified (directly or indirectly) to a specific individual is not considered Personal Data.

"Sensitive personal data or information of a person" means such personal information which is related to:

- a. Password
- b. Financial information such as Bank account or credit card or debit card or other payment
- c. Financial details
- d. Physical, physiological and mental health condition
- e. Sexual orientation
- f. Medical records and history
- g. Biometric information





Provided that any information that is freely available or accessible in public domain or furnished under Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of these rules.

For the purposes of this Policy document, a 'Third Party' is a service provider who associates with LEAP and is involved in handling, managing, storing, processing, protecting and transmitting information of LEAP and also includes all sub-contractors, consultants and/or representatives of the Third party.

Collection of Personal Information

LEAP, its employees, and authorized third parties may collect various types of Personal Information including Sensitive personal Data or Information as required for business/ hiring of individuals under laws and regulation and based on desire and consent of individual concerned.

This Personal Information including Sensitive personal Data or Information may include but are not limited to:

- Personal Information: Person's name, age, gender, date of birth, photographs, password etc.
- Contact Information: Person's address, telephone numbers, email etc.
- Financial Information: Any detail pertaining to bank account, credit/debit cards, payment Health Information: Person's Height, Weight, illness / diseases, Medical Reports etc.
- Other Information: Any Information used as proof of Identity, proof of address, proof of age, proof of income etc.

In case the individual do not provide his consent for usage of personal information and / or withdraw his consent for usage of personal information, LEAP reserves the right to discontinue or cancel its services or engagement for which the said information was sought from the individual.

Social Listening

LEAP uses the services of a third party to monitor (primarily by key-word searches) and analyse statements, comments, opinions and similar interactions on social media channels about LEAP made by LEAP's customers, employees, followers, fans and others. LEAP has a legitimate interest to do so in order to identify and assess what is being said about our brand on social media, to understand sentiment, intent, mood, market trends and our stakeholders' needs, to improve our services and to protect our brand.

We may collect publicly accessible data from social media networks and websites, including

- user IDs
- social network profile names and information
- social network communications





Usage Data

Usage Data is data collected automatically either generated using the our website or from the Service infrastructure itself (for example, the duration of a page visit).

Cookies

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a LEAP website and stored on your device. Other tracking technologies are also used such as beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

Customer / Employee / Third Party can instruct browser to refuse all cookies or to indicate when a cookie is being sent. However, if Customer / Employee / Third Party do not accept cookies, you may not be able to use some portions of our Service.

Location Data

LEAP may use and store information about the location if the Customer / Employee / Third Party give LEAP permission to do so ("Location Data"). LEAP use this data to provide features of our Service, to improve and customize our Service. Customer / Employee / Third Party can enable or disable location services at device settings of the device.

Use of Personal Information

All Personal Information including Sensitive personal Data or Information is held in accordance with the applicable laws and regulations for use in number of lawful purposes connected with business and professional activities, which may include but are not limited to:

- a. Verification of identity as per prevalent laws and regulations.
- b. Processing individual's request and providing individual concerned with products and /or services requested.
- c. Settling the accounts with those who provide services.
- d. Dealing with requests, enquiries or complaints and other customer care related activities; and all other general administrative and business purposes.
- e. Carrying out market and product analysis and marketing our companies' products and services and communicating updates, offers and promotion.
- f. Customer analytics on usage pattern and deliver customized content and advertising that may be of interest to individual
- g. Provide customer support.
- h. Address network integrity and security issues
- i. Carrying out any activity in connection with a legal, governmental or regulatory requirement, for the purpose of compliance of a legal obligation, in connection with legal proceedings, in connection with prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences protect and defend our rights or property or act in an emergency to protect someone's safety or to help investigations, monitor or prevent or take action regarding unlawful and illegal activities, suspected fraud, potential threat to the safety or security of any person.





Tracking Cookies Data

LEAP doesn't uses cookies and similar tracking technologies to track the activity of Services and which LEAP hold certain information.

All individuals whose data is collected can contact us at **privacy@leapindia.net** to limit the usage of the data or if you have any concerns about the usage of the data. LEAP is committed to cooperating with the data subjects to ensure that their data is kept secured during and after the employment with LEAP. Customer / Employee / Third Party can contact LEAP at **privacy@leapindia.net** for any concerns on the usage of the personal data or its removal or restrictions. LEAP is further committed to not use Customer / Employee / Third Party data for any other purpose without Customer / Employee / Third Party consent other than the ones mentioned in this privacy policy.

Disclosure of Personal Information

- a. Any Personal Information including Sensitive personal Data or Information at times may be disclosed where it is necessary to third parties such as:
 - Other companies that provide services directly to you on our behalf or provide services to us by collecting, receiving, processing, storing, dealing or handling your information. To enable them to do this, we may need to share your personal information and/or Sensitive personal Data or Information with them.
 - Anyone we transfer our business to in respect of which you are a customer or a potential customer.
 - To any other entity or organization in order for them to understand the environment and consequently, provide better services.
- b. LEAP may share Personal Information including Sensitive personal Data or Information, without obtaining any prior written consent of individual with government agencies mandated under the law to obtain information including Sensitive Personal Data Or Information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences, or where disclosure is necessary for compliance of a legal obligation.
- c. Any Personal Information including Sensitive Personal Data or Information may be required to be disclosed to any third party by us by an order under the law for the time being in force.

Retention of Data

LEAP will retain Customer / Employee / Third Party Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy and contractual obligations with our customers which LEAP process as part of our services. LEAP will retain and use your Personal Data to the extent necessary to comply with LEAP legal obligations (for example, if LEAP are required to retain Customer / Employee / Third Party data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.





Transfer of Data

Customer / Employee / Third Party information, including Personal Data, may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

LEAP will take all the steps reasonably necessary to ensure that Customer / Employee / Third Party data is treated securely and in accordance with this Privacy Policy and no transfer of Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of data and other personal information. LEAP do not transfer Personal Data to any third party where LEAP are data processors, unless designated by the Data Controllers.

Security of Data

The security of Customer / Employee / Third Party data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. LEAP take every possible step to ensure that the data processed and stored in our database is secured and is not subject to any leakage. LEAP personnel are responsible for protecting Personal Data and Customer Confidential information, are trained in the applicable policies, and are expected to adhere to the procedures and intent of this Privacy Policy.

LEAP shall take steps to ensure that the personal information including Sensitive personal Data or Information is stored in secure environment protected from unauthorized access, modification or disclosure as long as required for business or otherwise required under the law.

If you wish to be informed about what Personal Data, LEAP holds about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

The right to access, update or delete the information LEAP has on Customer / Employee / Third Party.

The right of rectification. Customer / Employee / Third Party have the right to have your information rectified if that information is inaccurate or incomplete.

The right to object. Customer / Employee / Third Party have the right to object to our processing of your Personal Data.

The right of restriction. Customer / Employee / Third Party have the right to request that LEAP restrict the processing of your personal information.

The right to withdraw consent. Customer / Employee / Third Party also have the right to withdraw your consent at any time where LEAP relies on your consent to process your personal information.

Please note that LEAP may ask Customer / Employee / Third Party to verify the identity before responding to such requests.





Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

Changes to This Privacy Policy

LEAP reserve the right to update this guidelines as necessary from time to time.

Contact Us

If you have any questions about this Privacy Policy or to exercise, please contact us at **privacy@leapindia.net**

Document Review

The document is subject to annual review or based on any change in the Organizations Information Security Posture.

