

## Privacy Policy for Leading AI Limited

**Effective Date:** 01-Jun-2024

We respect your privacy and we are committed doing the right thing when it comes to protecting your personal data, including how we collect, use and protect your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This Privacy Policy aims to give you information on the types of personal data that we collect;

- why we collect and use your personal data;
- when and why we will share personal data with other organisations;
- the rights and choices you have when it comes to your personal data; and
- why and how we collect and process your personal data when you use our website, including any data you may provide through its website and anyone else who contacts or otherwise submits information to Leading AI.

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

It is important that you read this Privacy Policy together with the Cookie Policy and any other processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

Please take the time to read this Privacy Policy. If you have any questions about this Privacy Policy or our use of your information you can contact the Data Protection Officer of Leading AI at [info@leadingai.co.uk](mailto:info@leadingai.co.uk) or on our telephone number 020 4570 4094.

### Third-party links

The websites may include links to third-party advertisers, affiliates, 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, notices or policies. When you leave our website, we encourage you to read the privacy notice of every website you visit. We do not accept any responsibility or liability for the privacy policies or notices on third-party websites. We recommend you review these policies before you submit any personal data to third-party websites.

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.

### The Data Controller

The data controller (as defined under European Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR") is Leading AI Limited, which is registered as a data controller with the UK Information Commissioner's Office ("ICO") and its registration number is ZB733712.

This Privacy Policy is issued by Leading AI which is the entity which is responsible for processing your data.

Leading AI Limited is registered with company number 15172734 and its registered office address is 124 City Road, London, EC1V 2NX. You have the right to make a complaint at any time to the (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

This Privacy Policy also applies to personal information provided to affiliated companies of Leading AI Limited, irrespective of location or jurisdiction.

### **Why we may collect data about you**

There are many reasons why we may legitimately collect and process your personal information and data, including:

1. Consent in specific situations. We may collect and process your data with your consent.
2. Legal compliance. If the law or any regulator in any competent jurisdiction requires us to, we may need to collect and process your data and may need to provide this data to any such regulator.
3. Legitimate interest. We may process your information in the day to day marketing of our business. In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of marketing our business and which does not materially impact your rights, freedom or interests.

### **How we may obtain your data and information**

We may obtain information in several ways which may include:

1. Information which you provide to us.
2. Information that we receive from third parties – including affiliated companies and third parties who provide services to you or us.
3. Information that we learn about you through our relationship with you.
4. Information that we gather from the technology which you use to access our services (for example an IP address or telephone number).
5. Information that we gather from publicly available sources, such as the press, social media, third party databases, company registers and online search engines.

### **What information we may collect and process**

We collect and process various categories of personal information and data at the start of, and for the duration of, your relationship with us. We will limit the collection and processing of data and information to that which is necessary to achieve one or more legitimate purposes as identified in this Privacy Policy.

The types of personal information and data may include (but is not limited to):

1. Basic personal information, including name and contact details.

2. Company information, including job title, department, location address and contact details.
3. Visual images and personal appearance (such as images from social media). and
4. Online profile and social media information and activity, based on your interaction with us and our websites and applications, including for example your, Internet Protocol (IP) address, device information, location, searches and site visits.

### **How we use your information**

We may use your personal information and/or data to:

1. Contact you or, if applicable, your designated representative(s) by post, telephone, electronic mail, etc.;
2. Provide you with information relating to the marketing our products and services; and
3. Fulfilling our legal and regulatory requirements.

If your relationship with us ends, we will continue to treat your personal information, to the extent we retain it, as described in this Privacy Policy.

We do not sell or share your personal information and/or data to third parties for third party direct marketing purposes.

### **Disclosure of your information (including outside of the European Economic Area “EEA”)**

We may share your personal information with affiliates outside of the EEA.

When we share your information with third parties, they will process your information as either a data controller or as our data processor and this will depend on the purposes of our sharing your personal data with such third party. We will only share your personal data in compliance with the applicable data protection laws and regulatory requirements.

We may disclose your information to third parties:

1. When you specifically request this, such as when you submit information to inquire about jobs or submit a job application through the websites.
2. To buyers or any of our business or assets.
3. If we are under a duty to disclose or share your personal data to comply with any legal obligations or regulatory requirements.

We may transfer data to affiliates and third-party agents so for the marketing of products and services.

Transfers may be made outside the EEA where we are satisfied that appropriate safeguards are in place over the transferring and processing of such information or data.

We may share some broader statistics and profiling information with third parties, but the information or data will be anonymised, so you will not be identifiable from that data. We will not rent or sell your data and/or information details to any other organisation or individual.

### **Storage of your personal data (including outside of the “EEA”)**

The data and information that we collect, and process may be transferred to, and stored at, a destination outside of the UK. We will only do so on the basis that anyone to whom we transfer your data to protects it in the same way that we would and such entity or person or other third party is subject to the appropriate safeguards.

In the event that we transfer personal information to countries outside of the EEA, we will only do so where:

1. the European Commission has decided that the country or the organisation, entity or individual to whom we are transferring to or sharing your data and/or information with, will protect your information adequately;
2. the transfer has been authorised by the relevant data protection authority; and/or
3. we have entered into a contract with the organisation, entity or individual with whom we are sharing your data and/or information (on such terms as approved by the European Commission), to ensure your information is adequately protected. If you wish to obtain a copy of the relevant data protection clauses in such contracts, please contact us at [info@leadingai.co.uk](mailto:info@leadingai.co.uk).

## **Security**

We will take all steps reasonably necessary to ensure that your information and/or data is treated securely and in accordance with this Privacy Policy.

We follow strict security procedures as to how your information and/or data is stored and used, and who sees it, to help stop any unauthorised third parties getting hold of it. Once we have received your information and/or data, we will use strict procedures and security features to prevent unauthorised access. Unfortunately, the transmission of information via the internet is not completely secure and although we will do our best to protect your information and/or personal data, we cannot guarantee its security completely. Accordingly, in the case of a security breach we do not accept any liability for the direct or indirect loss, theft or misuse of the any information and/or data that you have provided to us and/or which you have registered on our website.

## **Your rights**

We want to make sure you are aware of your rights in relation to the information and/or data that we hold about you. Your rights and the circumstances in which they apply can be found at [www.ico.org.uk](http://www.ico.org.uk).

You have a right to object at any time to processing of your information and/or data for direct marketing purposes, including profiling you for the purposes of direct marketing.

If you would like to change your marketing preferences, please contact us at [info@leadingai.co.uk](mailto:info@leadingai.co.uk).

Lodge complaints – You have a right to lodge a complaint with the regulator.

If you wish to raise a complaint on how we have handled your information, you can contact our Data Protection Officer who will investigate the matter via e-mail at [info@leadingai.co.uk](mailto:info@leadingai.co.uk).

We hope that we can address any concerns you may have, but you can always contact the Information Commissioner's Office (ICO). For more information, visit [www.ico.org.uk](http://www.ico.org.uk)

### **How long we keep your information**

By providing you with products or services, we create records that contain your information, and/or data such as activity and marketing records. Records can be held on a variety of media (physical or electronic) and formats. Records help us demonstrate that we are meeting our responsibilities and to keep as evidence of our business activities.

Retention periods for records are determined based on the type of record, the nature of the activity, product or service, applicable local legal or regulatory requirements. Retention periods may be changed from time to time based on business or legal and regulatory requirements.

We may, on exception, retain your information for longer periods, particularly where we need to withhold destruction or disposal based on an order from the any courts of competent authority, or in relation to an investigation by law enforcement agencies or our regulators. This is intended to make sure that we are able to produce records as evidence if needed to those respective authorities.

If you would like more information about how long we keep your information, please contact us at [info@leadingai.co.uk](mailto:info@leadingai.co.uk).

This Privacy Policy may change from time to time and, if it does, the up-to-date version will always be available on our Website. Please note that by continuing to use our Website you are agreeing to any updated versions.

### **AI Engines**

This section covers use of our Private Large Language Model AI Engines (the "Service"). The Service is built using Azure Open AI services, and all data is hosted and processed in the UK South Azure region. "The Client" refers to the organisation that has engaged Leading AI to build and deploy the AI Assistant on their behalf.

### **Information We Collect:**

- **Retention of Prompts and Responses:** We retain the prompts that users enter into the AI Assistant and the responses generated by the assistant.
- **Anonymisation:** All prompts and responses are anonymised. We do not record any identifying information about who entered the prompts.
- **Sharing with Clients:** We share anonymised prompts and responses with the Client for whom we set up the AI Assistant.
- **Improvement of AI Tools:** We retain user prompts and responses to help refine and improve our AI tools.

### **Handling of Personal Data:**

- **Inclusion of Personal Data in Prompts:** If you enter personal data into a prompt, it will be recorded as part of the prompt. Even though the prompts are anonymised, the personal data itself may be identifiable if included in the input.

- **Retention Period:** We retain the data, including prompts and responses, for one year, unless otherwise specified.

### **Data Hosting and Processing**

All data related to the Service, including prompts and responses, is hosted and processed exclusively in the UK South Azure region.

### **Data Security**

**Built within Client's Azure Tenant:** Our AI Assistants are built within our Clients' existing Azure Tenant, leveraging the existing data security measures that the Client has in place. This includes compliance with their security policies and protocols.

**Technical and Organisational Measures:** We implement appropriate technical and organizational measures to protect the data we collect and retain. This includes encryption, access controls, and regular security assessments.

### **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and updating the "Effective Date."

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us at:

Leading AI Ltd  
124 City Road  
London, EC1V 2NX  
Email: [info@leadingai.co.uk](mailto:info@leadingai.co.uk)