

Leading in Context LLC Privacy Policy

Effective Date: April 12, 2021

Acceptance of Terms

Leading in Context LLC is committed to respecting and protecting the privacy of our clients, readers, and community. We strive to extend data privacy protections to all our clients, wherever they reside. The following Privacy Policy governs the online information collection practices of Leading in Context LLC ("we" or "us"). Specifically, it outlines the types of information that we gather while you are using the **LeadinginContext.com** website (the "Site"), and the ways in which we use this information.

Please read this Privacy Policy carefully. By visiting and using the Site, you agree that your use of our Site, and any dispute over privacy is governed by this Privacy Policy. We may need to change our Privacy Policy at some point in the future, in which case we'll post the changes to this Privacy Policy on this website and update the Effective Date of the policy to reflect the date of the changes. By continuing to use the Site after we post any such changes, you accept the Privacy Policy as modified.

How We Collect and Use Information

Purposes For Collecting Information

We only collect information about you if we have a reason to do so — for example, to provide our Services, to communicate with you, or to make our Services better. We have a long-standing policy that we do not sell our users' data. We don't sell your personal information to data brokers, and we don't sell your information to other companies that want to spam you with marketing emails.

We use information about you:

- **To provide our services.** For example, to manage your blog subscription and comments, answer your questions, and provide customer service.
- **To communicate with you.** For example, by emailing your blog subscription, sharing tips for getting the most out of our products, or keeping you up to date. You can opt out of communications at any time.
- **To improve our services.** For example, by using aggregate analytics data about the users and uses of our Site to improve the Site and our services.

The Leading in Context Blog publishes articles, videos, and resources of interest to readers. An email subscription is free and sent about once a week only to individuals who have specifically requested a subscription. When you subscribe, your information is stored at the list server that delivers LeadinginContext.com content and messaging. Your information can only be accessed by those who help manage those lists in order to deliver email to those who would like to receive LeadinginContext.com material.

Information You Provide to Us

We may collect and store personal or other information that you voluntarily supply to us online while using the Site (e.g., while on the Site or in responding via email to a feature provided on the Site). LeadinginContext.com collects personally identifying information from our users during online opt-in,

registration, and online purchasing. Generally, this information includes name and email address for registration to receive information from us. Here are some examples:

- **Basic account information:** We ask for basic information from you in order to process and manage your blog subscription.
- **Content information:** You might provide us with information about you in draft and published content (a comment that includes biographic information about you, or any media or files you link to).
- **Communications with us:** You may also provide us with information when you respond to surveys, communicate with us, post a comment, or sign up for regular blog posts. When you communicate with us via form, email, phone, WordPress.com comment, or otherwise, we store a copy of our communications.

We use the information we collect from you while you are using the Site in a variety of ways, including using the information to customize features that appear on the Site.

We also collect and store information that is generated automatically as you navigate online through the Site. For example, we may collect information about your computer's connection to the Internet, which allows us, among other things, to improve the delivery of our web pages to you and to measure traffic on the Site. We also may use a standard feature found in browser software called a "cookie" to enhance your experience with the Site. The Site also may use web beacons (single-pixel graphic files also known as "transparent GIFs") to access cookies and to count users who visit the Site or open HTML-formatted email messages. Most web browsers are initially set up to accept cookies. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. Please note, however, that certain features of the Site might not function if you delete or disable cookies.

Information Shared Publicly

Please keep in mind that whenever you voluntarily make your personal information available for viewing by third parties online - for example on message boards, blog comments, through email, or in chat areas - that information can be seen, collected, and used by others besides us. That means information like your public profile, and your "Likes" and comments are all available to others. For example, the photo that you upload to your public profile, or a default image if you haven't uploaded one, is your Globally Recognized Avatar, or Gravatar. Your Gravatar and public profile information may display with your comments, "Likes," and other interactions on our Site. We cannot be responsible for any unauthorized third-party use of such information.

Choices You Have

You have choices available when it comes to information about you:

- **Limit the information that you provide:** If you prefer not to provide your email to subscribe to our blog, you may choose to follow our blog posts and content through social media channels.
- **Close Your Account:** While we'd be very sad to see you go, you can unsubscribe if you no longer want to use our Services. Please keep in mind that we may continue to retain your information after unsubscribing— for example, when that information is reasonably needed to comply with (or demonstrate our compliance with) legal obligations such as law enforcement requests, or reasonably needed for our legitimate business interests.

Note that our Site may include links to other websites whose privacy policies we do not control. When you access another website or purchase third-party products or services through their Site, use of any information you provide is governed by the privacy policy of the operator of the site you are visiting.

Minimum Age Requirements

Our Services are not directed to children. You're not allowed to access or use our Services if you're under the age of 13 (or 16 in Europe). If you register as a user or otherwise use our Services, you represent that you're at least 13 (or 16 in Europe). You may use our Services only if you can legally form a binding contract with us. In other words, if you're under 18 years of age (or the legal age of majority where you live), you can only use our Site and Services under the supervision of a parent or legal guardian who agrees to the Agreement.

Legal Bases for Collecting and Using Information

A note here for those in the European Union about our legal grounds for processing information about you under EU data protection laws, which is that our use of your information is based on the grounds that:

- (1) The use is necessary in order to fulfill our commitments to you under the applicable terms of service or other agreements with you or is necessary to administer your account — for example, in order to enable access to our website on your device; or
- (2) The use is necessary for compliance with a legal obligation; or
- (3) The use is necessary in order to protect your vital interests or those of another person; or
- (4) We have a legitimate interest in using your information — for example, to provide and update our Services; to improve our Services so that we can offer you an even better user experience; to safeguard our Services; to communicate with you; to improve the effectiveness of our services; and to understand our user retention and attrition; to monitor and prevent any problems with our Services; and to personalize your experience; or
- (5) You have given us your consent — for example by entering your email and subscribing to our blog.

How We Share Information

We share information about you in limited circumstances, and with appropriate safeguards on your privacy. These are spelled out below.

- **Subsidiaries and independent contractors:** We may disclose information about you to our independent contractors who need the information to help us provide our Services or process the information on our behalf. We require our independent contractors to follow this Privacy Policy for any personal information that we share with them.
- **Third-party vendors:** We may share information about you with third-party vendors who need the information in order to provide their services to us, or to provide their services to you. This includes cloud storage services, email delivery services that help us stay in touch with you, customer email support services that help us communicate with you and our hosting provider; those that assist us with our marketing efforts; those that help us understand and enhance our

Services (like analytics providers); and those that make tools to help us run our operations (like programs that help us with task management, scheduling, word processing, email and other communications, and collaboration among our teams); other third-party tools that help us manage operations.

- **Site Administrators.** Your information may be shared with the administrators of our Site. For example, if you visit our Site, subscribe to our Blog, or leave a comment on our Site, your IP address and email address are shared with Wordpress.com (owned by Automatic, Inc.) to provide our website services to you. Review the [Automatic Privacy Policy For Visitors to User's Sites](#) for details.
- **To protect rights, property, and others:** We may disclose information about you when we believe in good faith (based on your posted blog comment or communication) that disclosure is reasonably necessary to protect the property or rights of Leading in Context LLC, third parties, or the public at large. For example, if we have a good faith belief that there is an imminent danger of death or serious physical injury, we [may disclose information related to the emergency without delay](#).
- **Aggregated or de-identified information:** We may share information that has been aggregated or de-identified. For instance, we may publish aggregate statistics about the use of our Services.

Please also note that as our business grows, we may buy or sell various assets. In the unlikely event that we sell some or all of our assets, or one or more of our websites is acquired by another company, information about our users may be among the transferred assets.

Site Security

While no online service is 100% secure, we work very hard to protect information about you against unauthorized access, use, alteration, or destruction, and take reasonable measures to do so. Our Site is protected by security settings including Two Step Authentication and Automatic, Inc. monitors our Site services for vulnerabilities and attacks and provides updates to address security issues that may arise.

Your Rights

If you are located in certain parts of the world, including California and countries that fall under the scope of the European General Data Protection Regulation (aka the "GDPR"), you may have certain rights regarding your personal information, like the right to request access to or deletion of your data.

European General Data Protection Regulation (GDPR)

If you are located in a country that falls under the scope of the GDPR, data protection laws give you certain rights with respect to your personal data, subject to any exemptions provided by the law, including the rights to:

- Request access to your personal data;
- Request correction or deletion of your personal data;
- Object to our use and processing of your personal data;
- Request that we limit our use and processing of your personal data; and

- Request portability of your personal data.

You also have the right to make a complaint to a government supervisory authority.

California Consumer Privacy Act (CCPA)

The California Consumer Privacy Act (“CCPA”) requires us to provide California residents with some additional information about the categories of personal information we collect and share, where we get that personal information, and how and why we use it. The CCPA also requires us to provide a list of the “categories” of personal information we collect, as that term is defined in the law. In the last 12 months, Automatic, Inc. collected the following categories of personal information from California residents, depending on the Services used:

- Identifiers (like your name, contact information, and device and online identifiers);
- Internet or other electronic network activity information (such as your usage of our Services)
- Geolocation data (such as your location based on your IP address);

You can find more information about what Automatic collects and sources of that information on their page [Privacy Notice For Visitors to Our Users' Sites](#).

Automatic’s Services are worldwide. Different Automatic companies are the controller (or co-controller) of personal information, which means that they are the company responsible for processing that information, based on the particular service and the location of the individual using the Service.

California Do Not Track Disclosure

The Leading in Context LLC Site does not respond to do-not-track browser signals.

Transferring Information

Because Leading in Context LLC Services are offered worldwide, the information about you that Leading in Context LLC and Automatic, Inc. process when you use the Services in the EU may be used, stored, and/or accessed by individuals operating outside the European Economic Area (EEA) who work for them, other service providers who support the Site, or third-party data processors. This is required for the purposes listed in *Purposes For Collecting Information*. Your use of this Site indicates your consent.

Privacy Policy Changes

We encourage you to periodically review this privacy statement to stay informed about how we are helping to protect the information we collect. This policy may be changed at any time at our discretion. If we should update this policy, we will post the updates to this page on our Website. By continuing to use the Site after we post any such changes, you accept the Privacy Policy as modified.

Contacting Us

If you have any questions or concerns regarding our privacy policy, please direct them to Info@LeadinginContext.com or contact us by phone at 1-804-270-4088.

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