

LEADR



Privacy Policy

LEADR Privacy Policy

Last Updated: December 17, 2025

1. Acceptance of Privacy Policy

Welcome to Thought-Leader LLC, a Wyoming limited liability company (“**LEADR**,” “**we**,” “**our**,” or “**us**”), its website leadr.co (“**Website**”) and our Privacy Policy (“**Privacy Policy**”).

By accessing or using the Website and various related websites, products, and services (collectively, the “**LEADR Services**”), you agree to be bound by this Privacy Policy and all of the terms incorporated herein by reference. By using the LEADR Services and/or submitting or collecting any personal data via the LEADR Services, you accept and expressly consent and agree to our practices surrounding the collection, use, and sharing of your personal information in accordance with this Privacy Policy. IF YOU DO NOT CONSENT AND AGREE WITH THE TERMS OF THIS PRIVACY POLICY, YOU CANNOT, AND WE DO NOT AUTHORIZE YOU TO, ACCESS, BROWSE, OR USE THE LEADR SERVICES.

Our processing of personal information, such as your name, address, e-mail address, or telephone number, will be undertaken consistent with the requirements of applicable privacy laws, including, but not limited to, the California Consumer Privacy Act, the California Privacy Rights Act, the Virginia Consumer Data Protection Act of 2021, the Colorado Privacy Act of 2021, and the Utah Consumer Privacy Act of 2022, the Connecticut Data Privacy Act of 2022, the Texas Data Privacy and Security Act, the Oregon Consumer Privacy Act, the Montana Consumer Data Privacy Act, the Tennessee Information Protection Act of 2023, the Iowa Consumer Data Protection Act of 2023, the Delaware Personal Data Privacy Act of 2023, the Nebraska Data Privacy Act of 2024, the New Hampshire Privacy Act of 2024, and the New Jersey Data Privacy Act of 2024, the EU General Data Protection Regulation, the UK General Data Protection

Regulation, and the Canadian Personal Information Protection and Electronic Documents Act.

2. Information We Collect

“Note that under some legislations, we may be allowed to process information until you object to such processing (by opting out), without having to rely on consent or any other of the following legal bases below. In any case, we will be happy to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into a contract. You further understand that this is a soft pull and will not harm your credit in any way whatsoever.”

2.1 Personal Information We Collect Directly from You

We receive personal information as described to you at the point of collection, pursuant to your consent, and/or when you voluntarily provide us with personal information, including:

- (1) individual information (such as your e-mail address and phone number);
- (2) company information (such as your company's address); and
- (3) other identifying information that you voluntarily choose to provide to us, including without limitation unique identifiers such as passwords, application questionnaires, financial qualification information, and personal information in messages you send to us.

We may also collect additional information, which may be personal information, as otherwise described to you at the point of collection or pursuant to your consent.

2.2 Information We Automatically Collect When You Use Our Site

In order to access and use certain areas or features of the LEADR Services, you consent to our collection and use of certain information about your use of the LEADR Services through the use of tracking technologies or by other passive means, including when you receive, open, engage, forward, and/or click through

the Services. Your consent to our access and use of this “passively collected” information includes, but is not limited to, the domain name of the website that allowed you to navigate to the LEADR Services, search engines used, the internet protocol (IP) address used, the length of time spent on the LEADR Services, the pages you looked at on the LEADR Services, other webpages you visited before and after visiting the LEADR Services, the type of device and/or internet browser you have, the frequency of your visits to the LEADR Services, and other relevant statistics (collectively “**Traffic Data**”).

2.3.Identity Verification, Qualification, and Credit-Related Processing

Certain LEADR Services involve identity verification, eligibility assessment, and pre-qualification processes. As part of these Services, we may collect, process, and enrich the information you provide, including personal identifiers, to verify identity and determine eligibility for specific offerings.

These processes may involve the use of hashed or encrypted identifiers and may include a soft credit inquiry conducted for pre-qualification purposes. A soft credit inquiry does not affect your credit score. LEADR does not obtain, display, or store full credit reports or credit scores as part of this process.

We may engage trusted third-party service providers to assist with identity verification, data enrichment, and pre-qualification activities. These providers process information solely on our behalf and are subject to contractual confidentiality, security, and data protection obligations.

Information processed for qualification or eligibility purposes is used only in connection with the specific service requested and is not used for unrelated marketing, advertising, resale, or improper profiling.

3. How We Collect Information

We collect information (including personal information and Traffic Data) when you use and interact with the LEADR Services, and in some cases from third party sources. Such means of collection include:

- When you access, use, or contact us through the LEADR Services.

- When you voluntarily provide information through the LEADR Services.
- If you use a location-enabled browser, we may receive information about your location and device.
- Through Cookies, Web Beacons, analytics services, and other tracking technologies (collectively, “**Tracking Tools**”).

4. Tracking Tools, Behavioral Advertising, and Opt Out Options

4.1 Tracking Tools

We may use tools outlined below in order to provide the LEADR Services, advertise to, and better understand users.

- **Cookies:** “Cookies” are small computer files transferred to your device that contain information such as user ID, user preferences, lists of pages visited and activities conducted while using the LEADR Services. We use Cookies to: (i) improve and tailor the LEADR Services, (ii) customize advertisements, (iii) measure performance, (iv) store authentication so re-entering credentials is not required, (v) customize user experiences, and for (vi) analytics and fraud prevention. For more information on Cookies, including how to control your Cookie settings and preferences, visit <https://www.allaboutCookies.org>. You can also manage Cookies in your web browser (for example, Edge, Explorer, Chrome, Safari). If you choose to change your settings, you may find that certain functions or features of the LEADR Services will not work as intended. The following details the types of Cookies we use and why we use them:

- o Absolutely Necessary Cookies. These Cookies are essential to enable you to move around a website and use its features. Without these Cookies, services you have asked for, like adding items to an online order, cannot be provided.

- o Performance Cookies. These Cookies collect information about how you use the LEADR Services. Information collected includes, the Internet browsers and operating systems used, the domain name of the website previously visited, the number of visits, average duration of visit, and pages viewed. These Cookies do not collect information that personally identifies you and only collect aggregated and anonymous information. Performance Cookies are used to improve the user-friendliness of a website and enhance your experience.

o **Functionality Cookies.** These Cookies allow the LEADR Services to remember choices you make (such as your username, language preference, or the area or region you are in) and provide enhanced, more personal features. These Cookies can also be used to remember changes you have made to text size, fonts, and other customizable parts of the LEADR Services. The information these Cookies collect may be anonymized, and they cannot track your browsing activity on other websites.

- **Web Beacons: “Web Beacons”** (a.k.a. clear GIFs or pixel tags) are tiny graphic image files embedded in a web page or email that may be used to collect information about the use of the LEADR Services. The information collected by Web Beacons allows us to analyze how many people are using the LEADR Services, using selected publishers’ websites, or opening emails, and for what purpose.
- **Web Service Analytics:** We may use third-party analytics services in connection with the LEADR Services, including, for example, to register mouse clicks, mouse movements, scrolling activity and text typed into the LEADR Services. We use the information collected from these services to help make the LEADR Services easier to use and as otherwise set forth in Section 5 (How We Use Your Information). These analytics services generally do not collect personal information unless you voluntarily provide it.
- **Mobile Device Identifiers:** As with other Tracking Tools, mobile device identifiers help LEADR learn more about our users’ demographics and Internet behaviors in order to personalize and improve the LEADR Services. Mobile device identifiers are data stored on mobile devices that may track activities occurring on and through it, as well as the applications installed on it. Mobile device identifiers enable collection of personal information (such as media access control, address, and location) and Traffic Data.

4.2 Behavioral Advertising

We may use a type of advertising commonly known as interest-based or online behavioral advertising. This means that some of our partners use Tracking Tools to collect information about a user’s online activities to display LEADR ads to the user based on the user’s interests (“**Behavioral Advertising**”). Our partners may include third-party advertisers and other third-party service providers, and such partners may collect information when you use the LEADR Services, such as IP address, mobile device ID, operating system, and demographic information.

These Tracking Tools help LEADR learn more about our users' demographics and Internet behaviors.

4.3 Options for Opting out of Cookies and Mobile Device Identifiers

If we process Cookies based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any point in time by contacting us at accounting@leadr.co. Please note, if you exercise this right, you may have to provide your consent on a case-by-case basis to enable you to utilize some or all of the LEADR Services.

You may be able to reject Cookies and/or mobile device identifiers by activating the appropriate setting on your browser or device. Although you are not required to accept LEADR's Cookies or mobile device identifiers, if you block or reject them, you may not have access to all features available through the LEADR Services.

- You may opt out of receiving certain Cookies by visiting the Network Advertising Initiative (NAI) opt out page or the Digital Advertising Alliance (DAA) [opt out page](#), or by installing the DAA's AppChoices app (for [iOS](#); for [Android](#)) on your mobile device. When you use these opt-out features, an "opt-out" Cookie will be placed on your device indicating that you do not want to receive interest-based advertising from NAI or DAA member companies. If you delete Cookies on your device, you may need to opt out again. For information about how to opt out of interest-based advertising on mobile devices, please visit <https://thenai.org/opt-out/mobile-opt-out/>. You will need to opt out of each browser and device for which you desire to apply these opt-out features.
- Even after opting out of Behavioral Advertising, you may still see LEADR advertisements that are not interest-based (i.e., not targeted toward you). Also, opting out does not mean that LEADR is no longer using Tracking Tools. LEADR still may collect information about your use of the LEADR Services even after you have opted out of Behavioral Advertising and may still serve advertisements to you via the LEADR Services based on information it collects through the LEADR Services.

This Privacy Policy does not cover the use of Cookies and other Tracking Tools by any third parties, and we are not responsible for the privacy practices of any third

party. Please be aware that some third-party Cookies can continue to track your activities online even after you have left the LEADR Services.

4.4 “Do Not Track” (DNT) and Universal Opt-Out Preference Signals

Some web browsers (including Safari, Internet Explorer, Firefox, and Chrome) incorporate a “Do Not Track” (DNT) or similar feature that signals to web services that a visitor does not want to have their online activity and behavior tracked. If a web service operator elects to respond to a particular DNT signal, the web service operator may refrain from collecting certain personal information about the browser’s user. Not all browsers offer a DNT option and there is currently no industry consensus as to what constitutes a DNT signal. For these reasons, many web service operators, including LEADR, do not proactively respond to DNT signals. For more information about DNT signals, visit <https://fpf.org/thank-you-for-visiting-allaboutdnt-com/>.

New standards are being developed for a Universal Opt-Out Mechanism, such as the Global Privacy Control (GPC), which allow users with GPC-enabled browsers and devices to send a signal that will communicate the user’s request to opt-out of sales of their personal information and to opt-out of certain sharing of their personal information. The CPRA and other laws allow for the acceptance of Opt-Out Preference Signals such as the GPC, as an option for users to transmit an Opt-Out of selling/sharing personal information. If we detect and recognize such a signal from your device or browser, we will honor it.

5. Artificial Intelligence & Automated Decision-Making

We employ artificial intelligence (AI) technologies (“**AI Systems**”) to enhance the performance and functionality of the LEADR Services which includes tailoring your experience through automated processing based on your activity using the LEADR Services. The AI Systems work by analyzing your usage patterns, preferences, and other interactions within our services to predict your interests and preferences. The insights gathered allow us to improve our service offerings, provide personalized content and advertising, and enhance user satisfaction.

By using the LEADR Services, you consent to the use of AI as described in this Privacy Policy. We encourage you to review your privacy settings regularly to

ensure they continue to reflect your preferences.

In connection with certain eligibility or pre-qualification services, we may use information subject to the Fair Credit Reporting Act (“FCRA”) to make prescreened offers or eligibility determinations where permitted by law.

You have the right to opt out of prescreened offers under the FCRA. You may exercise this right by visiting www.optoutprescreen.com or by calling 1-888-5-OPTOUT (1-888-567-8688). Opting out will not affect your ability to use the LEADR Services but may impact eligibility for certain offers.

For more information on your rights and how we use AI, or if you have any concerns about automated decision-making processes, please contact us at accounting@leadr.co.

5.1 Data Collection by AI Systems

Our AI Systems collect data that you provide directly or indirectly through your interactions with the LEADR Services. The data collected may include, but is not limited to:

- Usage data, such as the pages you visit, the links you click on, and the searches you conduct on our platform.
- Device and connection information, including your IP address, browser type, language, and cookies that uniquely identify your browser or account.
- Location information, determined through data such as your IP address or device’s GPS signal.

5.2 Automated Decisions

Our AI Systems may make automated decisions including:

- Content curation and recommendations based on user preferences and historical activity.
- Fraud detection and prevention through behavior analysis to identify and flag unusual activity that deviates from typical usage patterns.
- Call routing, message routing, and promotional content notifications

5.3 User Rights and Control

You have the right to:

- Obtain an explanation of any automated decision and challenge its basis.
- Opt-out of certain uses of your data, including profiling activities for personalized content or advertising.
- Access the personal data that the AI Systems use or contribute to, and request rectification or erasure of such data.
- Receive information about the logic involved in any automated decisions, as well as the significance and the envisaged consequences of such processing for you.

5.4 Safeguards and Oversight

We are committed to using AI responsibly. To this end, we implement the following safeguards:

- Regular auditing of our AI Systems for accuracy, fairness, and effectiveness.
- Human oversight to monitor AI decision-making and intervene as necessary to address anomalies or biases.
- Compliance with privacy regulations, ensuring that data used by AI is processed lawfully, transparently, and securely.

6. How We Use Your Information

We may use information (including information that has been de-identified and/or aggregated) to better understand who uses the LEADR Services and how we can deliver a better user experience. We use information, including personal information, to provide the LEADR Services and to help improve the LEADR Services, to develop new services, and to advertise our services. Specifically, such use may include:

- Providing you with the products, services, and information you request.
- Corresponding with you.

- Providing, maintaining, administering, or expanding the LEADR Services, performing business analyses, and for other internal purposes.
- Combining information received from third parties with information that we have from or about you and using the combined information for any of the purposes described in this Privacy Policy.
- Showing you advertisements, including interest-based or online behavioral advertising.
- Fulfilling our legal obligations, such as preventing, detecting, and investigating security incidents, fraud, and potentially illegal or prohibited activities.
- Conducting identity verification, eligibility assessment, and pre-qualification activities in connection with services you request, including facilitating soft credit inquiries that do not impact credit scores.
- Enforcing our Privacy Policy and other agreements.

By providing your e-mail and/or phone number and checking a box, clicking the “complete” button, or some other affirmative act, you are consenting to receive e-mails and/or calls and text messages, including live, prerecorded, and/or automated calls and messages, to that email or phone number. After signing up, you will receive a confirmation e-mail or text message from LEADR on your mobile number. This agreement is not entered into as a term or requirement of any purchase or promotion. Normal message and data rates may apply. Message frequency may vary. Neither we nor the participating carriers guarantee that messages will be delivered. We may discontinue these programs at any time without notice.

7. How We Share Your Information

In certain circumstances, and in order to perform the LEADR Services, we may share certain information about you as described in this section:

- We do not sell your personal information to third parties.
- We may share your personal information with our partners to customize or display our advertising.
- We may share your personal information and/or Traffic Data with our partners who perform operational services for us (such as hosting, billing, fulfillment,

data storage, security, insurance verification, web service analytics, or ad serving).

- We may share your personal information and/or Traffic Data with our partners to analyze device activities and generate targeted advertisements.
- We may transfer your personal information to another company in connection with a proposed merger, sale, acquisition or other change of ownership or control by or of LEADR (whether in whole or in part). We will make reasonable efforts to notify you before your information becomes subject to different privacy practices.
- We also may need to disclose your personal information or any other information we collect about you if we determine in good faith that such disclosure is needed to: (1) comply with or fulfill our obligations under applicable law; (2) protect the rights, property or safety of you, LEADR or another party; (3) enforce this Privacy Policy or other agreements with you; or (4) respond to claims that any posting or other content violates third-party rights.
- Sharing information with service providers that assist with identity verification, data enrichment, and eligibility or pre-qualification services, solely to deliver the services you request and subject to confidentiality and data protection obligations.

8. Collection and Use of Sensitive Information

We have collected the following categories of sensitive personal information from consumers within the last twelve months:

- Credit Score

While certain eligibility or qualification processes may involve credit-related information, LEADR does not receive or store full consumer credit reports or credit scores. Any credit-related inquiry conducted for pre-qualification purposes is a soft inquiry that does not affect credit scores.

We do not use or disclose sensitive personal information for purposes other than those specified in the CCPA/CPRA.

9. Storage and Security of Information

Any information you send to us electronically, while using the LEADR Services or otherwise interacting with us, may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us. Please be aware, despite our best efforts, no security measures are perfect or impenetrable, and we cannot guarantee “perfect security.” Any information you send us through any means is transmitted at your own risk.

10. Your Choices

10.1 Information You Provide

You can choose whether or not to provide personal information through the LEADR Services. We will not discriminate against you for exercising any of your rights relating to your personal information and will not (i) deny you goods or services, (ii) provide you with a different level or quality of services, or (iii) charge you different prices for services for doing so.

10.2 California Privacy Rights

In the preceding 12 months, we collected and disclosed for a business purpose the following categories of personal information about California consumers:

Category	Examples	Collected?	Categories of Recipients
Identifiers	Name, address, e-mail address, IP address	Yes	i.e., Organizations providing services to LEADR

Personal information categories listed in the California Customer Records statute	Name, professional-related information; and employment-related information	Yes	i.e., Organizations providing services to LEADR
Protected classification characteristics under California or federal law	Name, age, citizenship, nationality, ancestry, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, proof of eligibility to work	Yes	i.e., Organizations providing services to LEADR

Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes	i.e., Organizations providing services to LEADR
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with the LEADR Services	Yes	i.e., Organizations providing services to LEADR
Inferences from the foregoing	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes	i.e., Organizations providing services to LEADR

Purposes for Collection, Use, and Sharing. We use and disclose the personal information we collect for our commercial purposes, as further described in this Privacy Policy, including for our business purposes with our partners and service providers as follows:

- Legal compliance and auditing related to our interactions with you.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and exercising our related rights.
- Performing and improving our services (by us or our service provider(s)).
- Internal operations.
- Other one-time or short-term uses.

Your Rights. If you are a California resident you may have the following rights under the CCPA/CPRA in relation to personal information we have collected about you, to the extent required by the CCPA/CPRA and subject to verification:

Right to Know/Access: You have the right to request certain information about our collection and use of personal information about you as described below:

- The specific pieces of your personal information collected.
- The categories of your personal information collected.
- The categories of sources from whom your personal information is collected.
- The purpose for collecting your personal information.
- The categories of third parties with whom we have shared your personal information.

Right to Delete: You have the right to request that we delete certain personal information we have about you.

Freedom from Discrimination: You have the right to be free from unlawful discrimination for exercising any of your privacy rights.

Right to Correct: You have the right to request that we correct inaccurate personal information regarding the information you provide us.

Right to Restrict the Use of Sensitive Personal Information: You have the right to restrict the use of your sensitive personal information.

Right to Access Information on Automated Decision-Making: You have the right to access information collected through automated decision-making.

Additionally, you can opt-out of our use of automated decision-making related to your personal information.

To make a request in relation to the above rights, please contact us using the information in Section 14 below. To fulfil your request, we will need to verify your identity. Only you or someone legally authorized to act on your behalf may make a request related to your personal information. To designate an authorized agent, the authorized agent must provide sufficient information that allows us to reasonably verify that you authorize them to act on your behalf.

10.3 Canada, European Union and United Kingdom Privacy Rights

If our processing of your personal information is subject to GDPR, UK GDPR, and/or PIPEDA, and unless subject to an exemption, you may have the following rights with respect to your personal information:

Right of Access: You have the right to view and request copies of your personal information.

Right to Rectification: You have the right to request that your inaccurate or outdated personal information be updated or corrected.

Right to be Forgotten/Right to Erasure: You have the right to request your personal data be deleted, upon providing verification to us.

Right to Restrict Processing: You have the right to request the restriction or suppression of our processing of your personal information.

Right to be Informed: You have the right to be informed about the collection and use of your personal information.

Right to Data Portability: You have the right to ask for your personal information to be transferred to you or to another controller.

Right to Withdraw Consent: You have the right to withdraw previously given consent to process your personal information.

Right to Object: You have the right to object to the processing of your personal information.

Right to Object to Automated Processing: You have the right to object to decisions being made with your personal information solely based on automated decision making or profiling.

We will need to verify your identity to process any requests described in this Section and may deny your request if we are unable to verify your identity. Government or other identification may be required.

If you are a resident of the European Economic Area (“EEA”), when we process your personal information, we will only do so in the following situations:

- We need to use your information to perform our responsibilities under our agreement with you.
- We have a legitimate interest in processing your personal information. For example, we may process your personal information to send you marketing communications, to communicate with you about the LEADR Services, and to provide and improve the LEADR Services.
- We have your consent to do so.

If your personal data is subject to GDPR or UK GDPR, we will transfer personal data from the EEA to a location outside the EEA only when there has been a documented adequacy determination, or where we have confirmed adequate privacy protections. If your personal data is subject to PIPEDA, we will transfer personal data from Canada to locations outside Canada only where we have confirmed adequate privacy protections. If we transfer personal data to a third party acting as our agent, we will also obligate the third party to have adequate privacy protections in place.

11. How Long We Retain Your Information

We retain personal information about you for as long as necessary to provide you the LEADR Services. In some cases, we retain personal information for longer, if doing so is necessary to comply with our legal obligations, or as otherwise

permitted by applicable law. Afterwards, we retain some information in a de-identified and/or aggregated form but not in a way that would identify you personally.

12. Information Provided on Behalf of Children and Others

The LEADR Services are not intended for use by children. Individuals under the age of 18 may not use the LEADR Services. LEADR does not knowingly collect any information from children. If you are under 18, do not attempt to register for the LEADR Services or send us any personal information. By accessing, using and/or submitting information through the LEADR Services, you represent that you are not younger than 18 and that you have authority to do so. If you are a parent or legal guardian of a minor child, you may, in compliance with this Privacy Policy, use the LEADR Services on behalf of such minor child. Information you provide through the LEADR Services on behalf of a minor child will be treated as personal information as provided herein. If you use the LEADR Services on behalf of another person, regardless of age, you represent and warrant that you have authority to do so.

13. Third Party Web Services

The LEADR Services may contain links or content from third party websites. A link or content from a third-party website does not mean we endorse that website, the accuracy of information presented, or the persons or entities associated with that website. If you visit a third-party website, you are subject to the privacy policy of the applicable third party and we are not responsible for the policies and/or practices of any third party. We encourage you to ask questions before you disclose your information to others.

14. Updates and Changes to Privacy Policy

The effective date of this Privacy Policy is set forth at the top of this webpage. We will notify you of any material change by posting notice on this webpage. Your continued use of the LEADR Services after the effective date of any amendment to this Privacy Policy constitutes your acceptance of the amended Privacy Policy. We encourage you to periodically review this page for the latest information on our privacy practices. Any amended Privacy Policy supersedes all previous versions. IF YOU DO NOT AGREE TO FUTURE CHANGES TO THIS PRIVACY POLICY, YOU

MUST STOP USING THE LEADR SERVICES AFTER THE EFFECTIVE DATE OF SUCH CHANGES.

15. Contact Us

The data controller for the purposes of GDPR, UK GDPR, PIPEDA or other data protection laws is LEADR. If you have any questions about this Privacy Policy, please contact us at:

Email: accounting@leadr.co:

Mailing Address: 1712 Carey Ave Suite 170 Cheyenne 82001

LEADR

LEADR



RESOURCES

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