

LeadGPT Privacy Policy

Effective Date: 1 October 2024

Introduction

Voltera Group Limited ("Voltera", "we", "us", or "our") is committed to protecting the privacy of our clients ("Client", "you", or "your") and the individuals whose personal data we process in the course of providing our AI-powered lead generation services through our platform, **LeadGPT**. This Privacy Policy outlines how we collect, use, disclose, store, and protect personal information in compliance with applicable data protection and privacy laws.

By engaging with Voltera and utilizing LeadGPT services, you acknowledge that you have read, understood, and agree to the practices described in this Privacy Policy.

1. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person ("Data Subject") who can be identified, directly or indirectly, by reference to such information.
 - **Processing:** Any operation or set of operations performed on Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, alteration, retrieval, consultation, use, disclosure, dissemination, alignment, combination, restriction, erasure, or destruction.
 - **Data Controller:** The entity that determines the purposes and means of the processing of Personal Data.
 - **Data Processor:** The entity that processes Personal Data on behalf of the Data Controller.
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2. Scope

This Privacy Policy applies to:

- Personal Data collected by Voltera in the course of providing LeadGPT services to Clients.
- Personal Data of individuals whose information we process as part of our lead generation services on behalf of our Clients.

3. Legal Basis for Processing

We process Personal Data based on:

- **Consent:** Where appropriate, we obtain consent from Data Subjects for processing their Personal Data.
 - **Legitimate Interests:** Processing is necessary for the purposes of legitimate interests pursued by Voltera or our Clients, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of Personal Data.
 - **Contractual Necessity:** Processing is necessary for the performance of a contract to which the Data Subject is party or to take steps at the request of the Data Subject prior to entering into a contract.
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4. Personal Data We Collect

4.1. Information Collected from Clients

- **Contact Information:** Name, business address, email address, phone number, and other contact details.
- **Account Information:** Username, password, and other credentials used to access our services.
- **Billing Information:** Payment details, invoicing address, and transaction records.
- **Communications:** Records of correspondence and communications with Voltera.

4.2. Information Collected from Lead Data Subjects

- **Professional Information:** Name, job title, company name, business email address, business phone number, business address, industry, and other professional details.
 - **Publicly Available Information:** Information obtained from public sources such as company websites, social media profiles (e.g., LinkedIn), and industry directories.
 - **Interaction Data:** Responses, feedback, and communications resulting from our outreach efforts.
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5. How We Collect Personal Data

- **Directly from Clients:** When you provide information to us during account setup, onboarding, or through direct communications.

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- **Automated Collection:** Through the use of cookies, web beacons, and other tracking technologies when you interact with our website or platform.
 - **Third-Party Sources:** From publicly available sources, data brokers, and partners who have the right to share the information with us.
 - **Through Our Services:** When we process Personal Data on behalf of our Clients as part of our lead generation activities.
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6. Purposes of Processing Personal Data

6.1. For Clients

- **Service Delivery:** To provide, maintain, and improve our LeadGPT services, including account management and customer support.
- **Communication:** To send administrative information, updates, security alerts, and support messages.
- **Billing and Payments:** To process transactions, manage invoicing, and fulfill contractual obligations.
- **Marketing:** To send promotional materials, newsletters, and information about our services (with the option to unsubscribe).
- **Compliance and Legal Obligations:** To comply with applicable laws, regulations, legal processes, or enforceable governmental requests.

6.2. For Lead Data Subjects

- **Lead Generation:** To identify and reach out to potential leads on behalf of our Clients.
 - **Personalized Outreach:** To craft and send personalized communications using AI-powered tools.
 - **Engagement Analysis:** To monitor and analyze responses for the purpose of improving our services.
 - **Opt-Out Management:** To honor opt-out requests and maintain suppression lists to prevent unwanted communications.
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7. Disclosure of Personal Data

We may disclose Personal Data to:

- **Clients:** Sharing lead information and interaction data relevant to the services provided.

- **Service Providers:** Third-party vendors, consultants, and other service providers who perform services on our behalf, subject to confidentiality obligations.
 - **Legal Compliance:** Law enforcement agencies, regulators, courts, or other public authorities if we believe disclosure is necessary to comply with legal obligations or to protect our rights.
 - **Business Transfers:** In connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.
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8. International Data Transfers

- **Cross-Border Transfers:** Personal Data may be transferred to and processed in countries outside of the Data Subject's country of residence, including countries that may not provide the same level of data protection.
 - **Safeguards:** We implement appropriate safeguards, such as standard contractual clauses, to protect Personal Data during international transfers.
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9. Data Security

- **Protection Measures:** We implement technical and organizational measures to safeguard Personal Data against unauthorized access, disclosure, alteration, or destruction.
 - **Encryption:** Use of encryption technologies to protect data during transmission and storage where appropriate.
 - **Access Controls:** Restricting access to Personal Data to authorized personnel who need the information to perform their job duties.
 - **Regular Assessments:** Conducting periodic security assessments and audits to ensure ongoing effectiveness of security measures.
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10. Data Retention

- **Retention Period:** Personal Data is retained only for as long as necessary to fulfill the purposes for which it was collected, comply with legal obligations, resolve disputes, and enforce agreements.
 - **Deletion and Anonymization:** When Personal Data is no longer required, we will securely delete or anonymize it in accordance with applicable laws.
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11. Data Subject Rights

Depending on the applicable law, Data Subjects may have rights including:

- **Access:** The right to request access to their Personal Data and obtain a copy.
- **Rectification:** The right to request correction of inaccurate or incomplete Personal Data.
- **Erasure:** The right to request deletion of their Personal Data under certain circumstances.
- **Restriction of Processing:** The right to request the limitation of processing of their Personal Data.
- **Data Portability:** The right to receive their Personal Data in a structured, commonly used, and machine-readable format.
- **Objection:** The right to object to the processing of their Personal Data for direct marketing purposes or based on legitimate interests.
- **Withdrawal of Consent:** If processing is based on consent, the right to withdraw consent at any time.

Exercising Rights: Data Subjects can exercise their rights by contacting us at the details provided in the "Contact Us" section.

12. Cookies and Tracking Technologies

- **Use of Cookies:** We use cookies and similar technologies to enhance user experience, analyze website performance, and for advertising purposes.
 - **Types of Cookies:**
 - **Essential Cookies:** Necessary for the operation of our website.
 - **Analytics Cookies:** To collect information about how visitors use our website.
 - **Advertising Cookies:** To deliver relevant advertisements to users.
 - **Managing Cookies:** Users can manage cookie preferences through browser settings or our website's cookie consent tool.
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13. Third-Party Links and Services

- **External Websites:** Our website or communications may contain links to third-party websites or services. We are not responsible for the privacy practices of such third parties.

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- **Third-Party Integrations:** Any Personal Data provided to or collected by third-party services is subject to their privacy policies.
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14. Children's Privacy

- **Not Intended for Children:** Our services are not directed to individuals under the age of 18, and we do not knowingly collect Personal Data from children.
 - **Parental Guidance:** If you believe that we have collected Personal Data from a child, please contact us, and we will take appropriate measures to investigate and address the issue.
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15. Changes to This Privacy Policy

- **Updates:** We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements.
 - **Notification:** We will notify Clients of significant changes by posting the new Privacy Policy on our website and updating the Effective Date.
 - **Continued Use:** Continued use of our services after changes are made constitutes acceptance of the updated Privacy Policy.
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16. Data Protection Officer and Contact Information

For any questions, concerns, or requests regarding this Privacy Policy or our data protection practices, please contact our Data Protection Officer:

- **Data Protection Officer**
 - **Email:** privacy@volteragroup.com
 - **Address:** Suite-C, Level 7, World Trust Tower, 50 Stanley Street, Central, Hong Kong
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17. Data Protection in Specific Jurisdictions

17.1. European Economic Area (EEA) and UK

- **GDPR Compliance:** For Data Subjects in the EEA and UK, we comply with the General Data Protection Regulation (GDPR) and the UK Data Protection Act.

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- **Legal Bases for Processing:** As outlined in Section 3, processing is based on consent, legitimate interests, or contractual necessity.
 - **International Transfers:** When transferring Personal Data outside the EEA or UK, we ensure appropriate safeguards are in place.

17.2. California Consumer Privacy Act (CCPA)

- **Applicability:** For California residents, we adhere to the CCPA regarding the collection and processing of Personal Data.
- **Rights Under CCPA:**
 - Right to Know: About the Personal Data collected, used, disclosed, or sold.
 - Right to Delete: Request deletion of Personal Data.
 - Right to Opt-Out: Of the sale of Personal Data.
 - Right to Non-Discrimination: For exercising CCPA rights.
- **Do Not Sell My Personal Information:** We do not sell Personal Data as defined under the CCPA.

17.3. Other Jurisdictions

- **Local Compliance:** We comply with applicable data protection laws in other jurisdictions where we operate or process Personal Data.

18. Security Incident Response

- **Breach Notification:** In the event of a data breach involving Personal Data, we will promptly notify affected Clients and Data Subjects as required by applicable laws.
- **Incident Management:** We have procedures in place to identify, assess, and respond to security incidents to minimize impact.

19. Client Responsibilities

- **Compliance:** Clients are responsible for ensuring that their use of our services complies with applicable data protection laws.
 - **Data Accuracy:** Providing accurate and up-to-date Personal Data and informing us of any changes.
 - **Lawful Basis:** Ensuring that there is a lawful basis for us to process Personal Data on their behalf.
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20. Employee and Contractor Confidentiality

- **Access Control:** Only authorized personnel with a legitimate business need have access to Personal Data.
 - **Confidentiality Agreements:** Employees and contractors are bound by confidentiality obligations regarding Personal Data.
 - **Training:** Regular training is provided to employees regarding data protection and privacy practices.
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21. Subprocessors

- **Third-Party Processors:** We may engage subprocessors to assist in providing our services.
 - **Due Diligence:** We conduct due diligence to ensure subprocessors have appropriate security measures.
 - **Subprocessor Agreements:** Subprocessors are bound by data protection obligations consistent with this Privacy Policy.
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22. Record of Processing Activities

- **Documentation:** We maintain records of our processing activities as required by applicable laws.
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23. Monitoring and Enforcement

- **Internal Audits:** Regular audits are conducted to ensure compliance with this Privacy Policy and legal obligations.
 - **Non-Compliance Consequences:** Violations may result in disciplinary action, including termination of employment or contracts.
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24. Complaints and Dispute Resolution

- **Filing a Complaint:** Data Subjects can file complaints with our Data Protection Officer.
- **Regulatory Authorities:** Data Subjects have the right to lodge a complaint with a supervisory authority or data protection regulator in their jurisdiction.

25. Conclusion

Protecting Personal Data is of utmost importance to Voltera Group Limited. We are committed to transparency and accountability in our data processing practices. By partnering with us, Clients trust that we handle Personal Data responsibly and ethically.

Contact Us

For any questions or concerns about this Privacy Policy or our data handling practices, please contact us at:

- **Voltera Group Limited**
 - **Address:** Suite-C, Level 7, World Trust Tower, 50 Stanley Street, Central, Hong Kong
 - **Phone:** +852 8490 0225 / +91 83960 66327
 - **Email:** info@thevolteragroup.com
 - **Website:** www.thevolteragroup.com
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Voltera Group Limited is dedicated to empowering businesses through innovative AI-powered lead generation solutions while upholding the highest standards of data protection and privacy.

Please note: This Privacy Policy is intended to provide general information and may not address all possible data protection obligations. Clients are encouraged to seek legal counsel to ensure compliance with all applicable laws and regulations.