

Privacy Policy

Introduction

This Privacy Policy explains how LGG Plus Ltd ("we", "our", "us") collects, uses, shares, and protects your personal information when you visit our website or use our services. It also covers how we use cookies and tracking technologies.

LGG Plus Ltd is a company registered in England and Wales (company number 17121212) with its registered office at 3rd Floor, 86-90 Paul Street, London, United Kingdom, EC2A 4NE.

This policy applies to all visitors and users of our website and services, regardless of location.

Notice at Collection (Summary)

- **What we collect:** identifiers, business and contact details, payment information, usage and technical data, communications, marketing preferences
- **Why:** to provide our services, communicate with you, process payments, market our services, comply with the law, and improve what we do
- **Who we share with:** service providers, professional advisers, and authorities where legally required
- **How long we keep it:** for as long as necessary to fulfil the purposes set out in this policy
- **We do not sell your personal information**
- **Your rights:** access, correct, delete, object, restrict, port, withdraw consent, and opt out of marketing. See below.

1. Information We Collect

1.1 Personal Identification Information

- Name
- Business name
- Email address
- Phone number
- Address
- Payment information (e.g. card details, billing address)

1.2 Technical Information

- IP address
- Browser type and version
- Time zone setting
- Browser plug-in types and versions
- Operating system and platform
- Device type and unique device identifiers

1.3 Usage Data

- How you use our website, products, and services
- Pages viewed and time spent on our website
- Referral source (how you arrived at our site)

1.4 Marketing and Communications Data

- Your communication and marketing preferences
- Interaction with our marketing (e.g. email opens and clicks)
- Records of communications you've had with us

2. How We Use Your Information

2.1 To Provide and Maintain Our Service

- Set up and manage your account
- Process transactions and send confirmations and invoices
- Provide customer support

2.2 To Improve Our Services

- Understand and analyse how you use our website and services
- Develop new products, features, and functionality
- Conduct troubleshooting, data analysis, and testing

2.3 To Communicate with You

- Provide service updates and related information
- Send marketing and promotional communications (where you've agreed or where permitted by law)
- Respond to your questions and requests

2.4 To Manage Your Requests

- Attend to and manage your requests
- Notify you of changes to our services, terms, and conditions

2.5 For Marketing and Promotional Activities

- Deliver targeted advertising and promotional communications
- Measure and analyse the effectiveness of our marketing
- Conduct retargeting and lookalike advertising on platforms such as Meta and Google

3. Our Lawful Basis for Processing (UK and EEA Users)

If you're in the UK or EEA, we process your personal data on the following lawful bases under UK GDPR and the EU GDPR:

- **Contract:** to provide our services to you and process payments
- **Legitimate interests:** to run and improve our business, market our services to existing and prospective business customers, conduct analytics, and protect against fraud and misuse
- **Consent:** for direct marketing to individuals (where required), for non-essential cookies and tracking, and for any other processing requiring it
- **Legal obligation:** to comply with tax, accounting, anti-money laundering, and other legal requirements

Where we rely on consent, you can withdraw it at any time. Withdrawal does not affect processing carried out before that point.

4. Sharing Your Information

We share your information only as described in this policy.

4.1 Service Providers

We share your information with third-party vendors, service providers, contractors, or agents who perform services on our behalf, including:

- Payment processing
- Data analysis and analytics
- Email and SMS delivery
- Hosting and infrastructure

- Customer service tools
- Marketing and advertising platforms (including Meta and Google)
- Professional advisers (legal, accounting, insurance)

These providers are bound by contract to use your data only for the purposes we direct.

4.2 Group Companies

We may share your information with other companies in our group for internal administrative purposes and to provide you with relevant services. All group companies operate under this same Privacy Policy.

4.3 Business Transfers

We may share or transfer your information in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business.

4.4 Legal Obligations

We may disclose your information where required by law, governmental request, judicial proceeding, court order, or legal process.

4.5 Protection of Rights

We may disclose your information where necessary to investigate or prevent policy violations, fraud, threats to safety, or illegal activity.

We do not sell your personal information to third parties.

5. International Data Transfers

LGG Plus Ltd is based in the United Kingdom. If you're located outside the UK, your information will be transferred to and processed in the UK.

- **For users in the EEA:** transfers to the UK are covered by the UK adequacy decision granted by the European Commission.
- **For users in the US:** your data is protected under UK GDPR, which provides standards equivalent to or stronger than most US state laws.
- **For users in other jurisdictions:** your data will be processed in the UK under UK GDPR.

Where we transfer data to service providers outside the UK and EEA, we use appropriate safeguards including Standard Contractual Clauses approved by the UK Information Commissioner, the UK International Data Transfer Agreement, or other approved transfer mechanisms.

6. How Long We Keep Your Information

We retain your personal information for as long as necessary to:

- Provide our services and manage our relationship with you
- Comply with our legal, tax, accounting, and regulatory obligations
- Resolve disputes, enforce our agreements, and protect our legal rights
- Improve our services and prevent fraud or misuse

The actual retention period depends on the nature of the information, the purposes for which it was collected, and our legal obligations. When your information is no longer needed, it is securely deleted or anonymised.

7. Security of Your Information

We use administrative, technical, and physical security measures to help protect your personal information. These measures include encryption, secure socket layer (SSL) technology, access controls, and secure storage.

While we take reasonable steps to secure the information you provide, no security measure is perfect and we cannot guarantee absolute security.

8. Your Data Protection Rights

8.1 UK and EEA Users

Under UK GDPR and EU GDPR, you have the right to:

- **Access:** request copies of your personal data
- **Rectification:** request correction of inaccurate or incomplete data
- **Erasures:** request deletion of your data, subject to legal and operational limits
- **Restriction:** request that we restrict processing
- **Objection:** object to processing based on legitimate interests, including direct marketing
- **Portability:** receive your data in a portable format
- **Withdraw consent:** at any time where consent is the lawful basis
- **Not be subject to solely automated decision-making** that has legal or similarly significant effects

We will respond to requests within one month. We may extend this by two further months for complex requests, and we will let you know if we need more time.

To exercise any right, contact us using the details below. We may need to verify your identity before responding.

8.2 California Residents

Under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA), you have the right to:

- Know what personal information we collect, use, share, and sell about you
- Request deletion of your personal information
- Correct inaccurate personal information
- Opt out of the sale or sharing of your personal information
- Limit the use of sensitive personal information
- Not be discriminated against for exercising these rights

Categories of personal information we collect (CCPA categories):

- Identifiers (name, email, phone, IP address, account identifiers)
- Customer records (contact and billing details)
- Commercial information (services purchased, interest in services)
- Internet or other electronic network activity (website usage, interactions with our marketing)
- Geolocation data (approximate location based on IP)
- Financial information (payment details, transaction records)
- Professional or employment-related information (business name, role, industry)
- Inferences (preferences and characteristics inferred from your usage and enquiries)

We do not collect biometric information, precise geolocation, or information about your health, religion, racial or ethnic origin, sexual orientation, union membership, or political views.

We do not sell your personal information. California residents can opt out of sharing for cross-context behavioural advertising (such as data shared with advertising platforms like Meta and Google) by contacting us using the details below.

8.3 Other US State Privacy Rights

If you're a resident of Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Montana, or another US state with a comprehensive privacy law, you may have similar rights to access, delete, or correct your personal information, and to opt out of certain processing. Contact us using the details below to make a request.

8.4 Identity Verification

We may need to verify your identity before acting on any rights request. This is to protect your data from unauthorised access. We may ask for information that matches what we already hold.

9. Marketing and How to Opt Out

We send marketing communications by email, SMS, and phone where you've agreed or where permitted by law (such as marketing to existing business customers).

You can opt out of marketing communications at any time by:

- Clicking unsubscribe in any marketing email
- Replying STOP to any marketing SMS
- Contacting us using the details below
- Updating your preferences in your account

Opting out of marketing does not affect transactional communications about your account, services, or legal notices.

10. Cookies and Tracking Technologies

10.1 What Are Cookies

Cookies are small text files placed on your device when you visit our website. They allow the site to recognise your device, remember your preferences, and improve your experience. We also use similar tracking technologies including pixels, tags, and local storage.

10.2 Types of Cookies We Use

Strictly necessary cookies: required for the website to function (e.g. session management, security, load balancing). These cannot be disabled.

Functional cookies: remember your preferences and choices to improve your experience.

Analytics cookies: help us understand how visitors use our website by collecting and reporting information anonymously. We use Google Analytics for this.

Marketing and advertising cookies: used to track visitors across websites and display relevant advertising. We use Meta Pixel, Google Ads, and similar technologies for retargeting and measuring advertising performance.

10.3 Third-Party Cookies

Some cookies are placed by third parties, including Meta, Google, and other advertising and analytics providers. These third parties may use your information in line with their own privacy policies.

10.4 Your Cookie Choices

You can control cookies through your browser settings. Most browsers let you refuse cookies, delete existing cookies, or be alerted when a cookie is being set. Disabling cookies may affect how the website works.

10.5 Do Not Track

Some browsers send "Do Not Track" signals. We do not currently respond to these signals as there's no industry-standard approach to interpreting them.

11. Automated Decision-Making

We do not use automated decision-making or profiling in ways that produce legal or similarly significant effects on you.

12. Children's Privacy

Our services are not directed at children. We do not knowingly collect personal information from anyone under 18.

If we become aware that we've collected personal information from a child without appropriate consent, we will delete it as soon as possible. If you believe we hold information about a child, contact us using the details below.

13. Changes to This Policy

We may update this policy from time to time to reflect changes in our practices, legal requirements, or for other operational reasons. The current version will always be available on our website.

For material changes, we will provide additional notice (e.g. by email or a prominent notice on the website).

14. Contact Us

For any questions about this Privacy Policy, to exercise your rights, or for any other privacy-related matter:

Email: legal@leadgenerationgroup.com

Post: LGG Plus Ltd, 3rd Floor, 86-90 Paul Street, London, United Kingdom, EC2A 4NE

15. Complaints

UK and EEA users: if you're not satisfied with how we've handled your data, you can complain to the UK Information Commissioner's Office (ICO):

- Website: ico.org.uk
- Phone: 0303 123 1113

US users: you can complain to:

- The Federal Trade Commission: reportfraud.ftc.gov
- Your state Attorney General's office
- The California Privacy Protection Agency (California residents): cppa.ca.gov

We'd appreciate the chance to address your concerns directly before you contact the regulator. Get in touch using the details above.