

# PRIVACY POLICY

Last updated September 8, 2025

This Privacy Notice for Leap srls (doing business as Leap) ('we', 'us', or 'our'), describes how and why we might access, collect, store, use, and/or share ('process') your personal information when you use our services ('Services'), including when you:

Visit our website at <https://leapstudio.it>, or any website of ours that links to this Privacy Notice

Download and use our mobile application (Leap), or any other application of ours that links to this Privacy Notice

Use Study Assistant. Leap is a new solution designed to enhance the learning experience for K-12 students. Many students come home exhausted from a day full of lessons, struggling to organize their homework, manage their time, and develop effective study strategies. This leads to frustration, reduced motivation, and a lack of creativity. Traditional afterschool programs are costly, and online resources can be overwhelming. Leap aims to eliminate these barriers by leveraging AI and an intuitive user interface. With Leap, students access personalized study plans, custom notes, and tailored simulations. Leap also fosters a community where students can connect, collaborate on quizzes, and share insights. The Focus feature minimizes distractions, helping students concentrate on their studies. By integrating neuroscience-based insights about memory processes, Leap helps students learn faster and more effectively. Positioned at the intersection of social and technological innovation, Leap provides a supportive, engaging learning environment. Leap's solution leverages AI to offer personalized study plans, interactive simulations, and social learning opportunities. Unlike traditional afterschool programs, Leap is affordable and accessible, integrating neuroscientific research to optimize study plans for better learning outcomes. The growing EdTech market, focused on personalized learning solutions, presents a significant opportunity for Leap to support K-12 students and their families with structured, affordable afterschool learning.

Engage with us in other related ways, including any sales, marketing, or events

**Questions or concerns?** Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [info@leapstudio.it](mailto:info@leapstudio.it).

## SUMMARY OF KEY POINTS

*This summary provides key points from our Privacy Notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our [table of contents](#) below to find the section you are looking for.*

**What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about [personal information you disclose to us](#).

**Do we process any sensitive personal information?** Some of the information may be considered 'special' or 'sensitive' in certain jurisdictions, for example your racial or ethnic origins, sexual orientation, and religious beliefs. We do not process sensitive personal information.

**Do we collect any information from third parties?** We do not collect any information from third parties.

**How do we process your information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about [how we process your information](#).

**In what situations and with which types of parties do we share personal information?** We may share information in specific situations and with specific categories of third parties. Learn more about [when and with whom we share your personal information](#).

**How do we keep your information safe?** We have adequate organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about [how we keep your information safe](#).

**What are your rights?** Depending on where you are located geographically, the applicable

privacy law may mean you have certain rights regarding your personal information. Learn more

about [your privacy rights](#). **How do you exercise your rights?** The easiest way to exercise your

rights is by visiting [leapstudio.it](#), or by contacting us. We will consider and act upon any request

in accordance with applicable data protection laws. Want to learn more about what we do with

any information we collect? [Review the Privacy Notice in full](#).

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## **1. WHAT INFORMATION DO WE COLLECT?**

Personal information you disclose to us

***In Short:** We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

**Personal Information Provided by You.** The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

names

email addresses

usernames

passwords

phone numbers

**Sensitive Information.** We do not process sensitive information.

**Payment Data.** We may collect data necessary to process your payment if you choose to make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is handled and stored by Apple Pay. You may find their privacy notice link(s) here: <https://www.apple.com/legal/applepayments/privacy-notice/>.

**Social Media Login Data.** We may provide you with the option to register with us using your existing social media account details, like your Facebook, X, or other social media account. If you choose to

register in this way, we will collect certain profile information about you from the social media provider, as described in the section called ['HOW DO WE HANDLE YOUR SOCIAL LOGINS?'](#) below.

**Application Data.** If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

*Mobile Device Access.* We may request access or permission to certain features from your mobile device, including your mobile device's storage, camera, contacts, reminders, calendar, bluetooth, notifications, microphone, sms messages, social media accounts, and other features. If you wish to change our access or permissions, you may do so in your device's settings.

*Mobile Device Data.* We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application(s) you accessed.

*Push Notifications.* We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

#### **Information automatically collected**

***In Short:*** *Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through

cookies and similar technologies. The information we collect

includes:

*Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files.

Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps' ), and hardware settings).

*Device Data.* We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

## Google API

Our use of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the [Limited Use requirements](#).

## 2. HOW DO WE PROCESS YOUR INFORMATION?

***In Short:** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

**To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can create and log in to your account, as well as keep your account in working order.

**To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.

**To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.

**To fulfil and manage your orders.** We may process your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.

**To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.

**To deliver targeted advertising to you.** We may process your information to develop and display personalised content and advertising tailored to your interests, location, and more.

**To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.

**To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.

**To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.

**To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

**Feedback improvement.** We collect data to resolve potential issues and improve our service

### 3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

*In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.*

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

**Consent.** We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about [withdrawing your consent](#).

**Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.

**Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:

Develop and display personalised and relevant advertising content for our users

Analyse how our Services are used so we can improve them to engage and retain users

Support our marketing activities

Diagnose problems and/or prevent fraudulent activities

Understand how our users use our products and services so we can improve user experience

**Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

**Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

#### **4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

***In Short:** We may share information in specific situations described in this section and/or with the following categories of third parties.*

**Vendors, Consultants, and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors, or agents ('**third parties**') who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organisation apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.

The categories of third parties we may share personal information with are as follows:

Ad Networks

AI Platforms

Data Analytics Services

Payment Processors

User Account Registration & Authentication Services

Website Hosting Service Providers

Social Networks

Sales & Marketing Tools

Data Storage Service Providers

Cloud Computing Services

Communication & Collaboration Tools

We also may need to share your personal information in the following situations:

**Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

**Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honour this Privacy Notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

**Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.

**Offer Wall.** Our application(s) may display a third-party hosted 'offer wall'. Such an offer wall allows third-party advertisers to offer virtual currency, gifts, or other items to users in return for the acceptance and completion of an advertisement offer. Such an offer wall may appear in our application(s) and be displayed to you based on certain data, such as your geographic area or demographic information. When you click on an offer wall, you will be brought to an external website belonging to other persons and will leave our application(s). A unique identifier, such as your user ID, will be shared with the offer wall provider in order to prevent fraud and properly credit your account with the relevant reward.

## 5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

*In Short: We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to gather information when you interact with our Services. Some online tracking technologies help us maintain the security of our Services and your account, prevent crashes, fix bugs, save your preferences, and assist with basic site functions.

We also permit third parties and service providers to use online tracking technologies on our Services for analytics and advertising, including to help manage and display advertisements, to tailor advertisements to your interests, or to send abandoned shopping cart reminders (depending on your communication preferences). The third parties and service providers use their technology to provide advertising about products and services tailored to your interests which may appear either on our Services or on other websites.



Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

## Google Analytics

We may share your information with Google Analytics to track and analyse the use of the Services. To opt out of being tracked by Google Analytics across the Services, visit <https://tools.google.com/dlpage/gaoptout>. For more information on the privacy practices of Google, please visit the [Google Privacy & Terms page](#).

## 6. DO WE OFFER ARTIFICIAL INTELLIGENCE-BASED PRODUCTS?

***In Short:** We offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies.*

As part of our Services, we offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies (collectively, 'AI Products'). These tools are designed to enhance your experience and provide you with innovative solutions. The terms in this Privacy Notice govern your use of the AI Products within our Services.

### Use of AI Technologies

We provide the AI Products through third-party service providers ('AI Service Providers'), including Groq, openrouter, OpenAI, Hugging Face and Google Cloud AI. As outlined in this Privacy Notice, your input, output, and personal information will be shared with and processed by these AI Service Providers to enable your use of our AI Products for purposes outlined in '[WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR PERSONAL INFORMATION?](#)' You must not use the AI Products in any way that violates the terms or policies of any AI Service Provider.

### Our AI Products

Our AI Products are designed for the following functions:

AI document generation

Machine learning models

Text analysis

### How We Process Your Data Using AI

All personal information processed using our AI Products is handled in line with our Privacy Notice and our agreement with third parties. This ensures high security and safeguards your personal information throughout the process, giving you peace of mind about your data's safety.

### How to Opt Out

We believe in giving you the power to decide how your data is used. To opt out, you can:

Contact us using the contact information provided

## **7. HOW DO WE HANDLE YOUR SOCIAL LOGINS?**

***In Short:** If you choose to register or log in to our Services using a social media account, we may have access to certain information about you.*

Our Services offer you the ability to register and log in using your third-party social media account details (like your Facebook or X logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, and profile picture, as well as other information you choose to make public on such a social media platform.

We will use the information we receive only for the purposes that are described in this Privacy Notice or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

## **8. HOW LONG DO WE KEEP YOUR INFORMATION?**

***In Short:** We keep your information for as long as necessary to fulfil the purposes outlined in this Privacy Notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **9. HOW DO WE KEEP YOUR INFORMATION SAFE?**

***In Short:** We aim to protect your personal information through a system of organisational and technical security measures.*

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## 10. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:** In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Switzerland, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.*

In some regions (like the EEA, UK, and Switzerland), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section '[HOW CAN YOU CONTACT US ABOUT THIS NOTICE?](#)' below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal

information, you also have the right to complain to your [Member State data protection authority](#) or

[UK data protection authority](#). If you are located in Switzerland, you may contact the [Federal Data](#)

[Protection and Information Commissioner](#).

**Withdrawing your consent:** If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section '[HOW CAN YOU CONTACT US ABOUT THIS NOTICE?](#)' below or updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

Log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

If you have questions or comments about your privacy rights, you may email us at [info@leapstudio.it](mailto:info@leapstudio.it).

## **11. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice.

## **12. DO WE MAKE UPDATES TO THIS NOTICE?**

***In Short:** Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated 'Revised' date at the top of this Privacy Notice. If we make material changes to this Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

## **13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, you may email us at [info@leapstudio.it](mailto:info@leapstudio.it) or contact us by post at:

Leap srls

Via Castel del Monte 252/A  
Corato, BA 70033  
Italy

#### **14. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

You have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please visit: [leapstudio.it](https://leapstudio.it).