

# Leadership Companion

## Global Data and Privacy Policy

Effective Date: 26 March 2026 | leadershipcompanion.co

*What this document says: Leadership Companion is built to protect your thinking. Your conversations, reflections, and uploaded documents are confidential by design. We collect what we need to run the platform. We do not sell your data. We do not train public AI models on what you share. Everything is encrypted. Your data is yours.*

### 1. Who We Are

Leadership Companion provides AI-powered decision support software for business leaders via a self-serve SaaS platform.

We operate globally and are committed to handling personal data lawfully, transparently, and securely in accordance with applicable data protection laws, including:

- Australian Privacy Act 1988 (Cth)
- EU General Data Protection Regulation (GDPR)
- UK GDPR
- California Consumer Privacy Act (CCPA/CPRA)
- Canada Personal Information Protection and Electronic Documents Act (PIPEDA) and Quebec Law 25
- Brazil Lei Geral de Protecao de Dados (LGPD)
- India Digital Personal Data Protection Act 2023 (DPDP)
- Other applicable international privacy regulations

For privacy enquiries: [hello@leadershipcompanion.co](mailto:hello@leadershipcompanion.co)

### 2. Scope

This policy applies to visitors to [leadershipcompanion.co](https://leadershipcompanion.co), users of the Leadership Companion platform, paying customers and subscribers, and enterprise and organisational accounts.

### 3. What Data We Collect

*We collect the information we need to deliver and improve the service. Nothing more.*

#### Information you provide

- Name
- Email address

- Account credentials
- Payment information, processed securely via third-party provider
- Leadership context and onboarding responses

## Your conversations and reflections

*Your messages, reflections, and AI inputs are your most sensitive data. They are treated as confidential by design. They are encrypted in transit and at rest. Leadership Companion personnel cannot read your conversations as part of normal operations. Your reflections are yours. We have built the platform so they stay that way.*

Pro tier users may also upload documents. All uploaded files are subject to the same confidentiality and encryption protections applied to conversations.

## Automatically collected data

- IP address
- Device and browser information
- Usage and engagement data
- Analytics and cookie data

## 4. Legal Basis for Processing (GDPR and UK GDPR)

---

Where GDPR or UK GDPR applies, we rely on:

- Contractual necessity, to deliver the service
- Legitimate interests, for security and product improvement
- Legal compliance
- Consent, where required for marketing communications

## 5. How We Use Your Data

---

We use data to:

- Deliver AI-powered decision support
- Maintain longitudinal session memory
- Generate scheduled reflections and nudges
- Process payments
- Improve system performance
- Maintain analytics and product metrics
- Ensure security and fraud prevention
- Comply with legal obligations

*We do not sell personal data. We do not use your data to train public AI models.*

## 6. End-to-End Encryption and Confidentiality

---

Leadership Companion is built as a confidential decision-support environment.

All user data, including conversations and uploaded files, is encrypted in transit using TLS 1.2 or above, and at rest using AES-256 or equivalent industry standard encryption.

Leadership Companion personnel cannot read individual user conversations as part of normal operations. User data is encrypted and stored securely. Internal access is strictly role-based and controlled. Production databases are not publicly accessible. Personal data is not stored in logs.

Access to encrypted data would only occur in exceptional circumstances such as verified security incidents, legal obligations, or critical system integrity issues. All such access is logged, highly restricted, and audited.

## 7. AI Data Handling

---

Leadership Companion uses secure enterprise API integrations with AI providers.

- Your data is not used to train public AI models
- AI providers process data solely to generate real-time responses
- Conversations are private to your account
- We do not monetise or share your content

The platform operates under a zero-visibility design principle. Your reflections are inaccessible to founders, employees, or third parties during normal operations.

## 8. Automated Decision-Making

---

Leadership Companion uses AI to generate personalised reflections and suggested questions based on your inputs. This constitutes automated processing of personal data.

No automated decision-making produces legal or similarly significant effects for users. The platform supports your thinking. It does not make decisions about you or on your behalf.

Where required by applicable law, including GDPR Article 22, you may request human review of any output that has affected you in a material way. Contact us at [hello@leadershipcompanion.co](mailto:hello@leadershipcompanion.co) to exercise this right.

## 9. Sub-Processors and Third Parties

---

We use trusted third-party providers to deliver the service, including AI API providers, payment processors, and infrastructure and hosting providers.

All sub-processors are bound by data processing agreements and are required to handle personal data in accordance with applicable privacy law. We do not share personal data with third parties for marketing or advertising purposes.

An updated list of our current sub-processors is available on request at [hello@leadershipcompanion.co](mailto:hello@leadershipcompanion.co).

## 10. Data Retention

---

We retain data while your account is active, as required to deliver longitudinal functionality, and as required by law.

You may request account deletion at any time. Upon confirmed deletion, active account data is removed and AI memory associated with your account is deleted. Backup deletion follows secure retention schedules.

## 11. International Data Transfers

---

Data may be processed in Australia, the United States, the European Union, or other jurisdictions where service providers operate.

Where required, we implement appropriate safeguards including Standard Contractual Clauses (SCCs), data processing agreements, and enterprise API restrictions.

## 12. Your Rights

---

*Your rights depend on your jurisdiction. All users may contact us at any time to exercise any of the following rights.*

### All users

- Access your personal data
- Correct inaccurate data
- Request deletion of your data
- Withdraw consent at any time where processing is based on consent

### GDPR and UK GDPR (EU and UK users)

- Restrict or object to processing
- Request data portability
- Rights in relation to automated decision-making and profiling
- Lodge a complaint with your local supervisory authority. In the EU, this is your national data protection authority. In the UK, this is the Information Commissioner's Office (ICO) at ico.org.uk.

### California (CCPA/CPRA)

- Know what personal information is collected, used, shared, or sold
- Delete personal information we hold about you
- Opt out of the sale or sharing of personal information. We do not sell personal information.
- Non-discrimination for exercising your privacy rights
- Limit use of sensitive personal information

### Canada (PIPEDA and Quebec Law 25)

- Access and correction rights
- Withdraw consent, subject to legal and contractual restrictions
- File a complaint with the Office of the Privacy Commissioner of Canada

## Brazil (LGPD)

- Access, correction, anonymisation, portability, and deletion rights
- Information about public and private entities with which data has been shared
- Lodge a complaint with the Autoridade Nacional de Protecao de Dados (ANPD)

To exercise any right, contact: hello@leadershipcompanion.co

## 13. Cookies and Analytics

---

We use cookies and analytics to improve functionality, monitor performance, enhance security, and analyse engagement.

Where required by applicable law, including in the EU and UK, we obtain your consent before placing non-essential cookies. You may manage or withdraw cookie consent at any time via our cookie settings or your browser settings.

We use analytics tools to understand how users interact with the platform. This data is aggregated and does not identify individual users in our analytics reporting.

## 14. Enterprise Accounts

---

For organisational subscriptions:

- Individual conversations remain confidential
- Employers do not have access to private transcripts
- Organisational dashboards may include anonymised or aggregated data only, where applicable

## 15. Confidentiality Disclaimer

---

Leadership Companion provides decision-support insights. It does not provide legal, financial, medical, or psychological advice. Users remain responsible for all decisions taken.

## 16. Children

---

The service is not intended for individuals under 18 years of age. We do not knowingly collect data from minors.

## **17. Data Breach Notification**

---

In the event of a notifiable data breach, we will investigate promptly and notify affected users and regulators where required by law, within applicable statutory timeframes.

## **18. Changes to This Policy**

---

We may update this policy periodically. Updated versions will be posted with a revised effective date. Continued use of the platform constitutes acceptance of updates.

## **19. Contact**

---

Leadership Companion

Email: [hello@leadershipcompanion.co](mailto:hello@leadershipcompanion.co)

Website: [leadershipcompanion.co](http://leadershipcompanion.co)