Privacy Policy

Protecting your private information is our priority. This Statement of Privacy applies to leadingupcoach.com and Leading UP, LLC (collectively, "Leading UP", "company", "we", and "us")and governs data collection and usage. For the purposes of this Privacy Policy, unless otherwise noted, all references to Leading UP, include leadingupcoach.com ("Site"). The Site is a leadership coaching and professional development business on a mission to help emerging leaders develop the skills, self-awareness, and confidence to grow — especially when leadership gets hard.

This Privacy Policy applies to information collected through the Site. It does not govern information collected under a separate client engagement agreement.

Collection of Your Personal Information

In order to better provide you with products and services offered on our Site, Leading UP, may collect personally identifiable information.

We do not collect any personal information about you unless you voluntarily provide it to us.

However, you may be required to provide certain personal information to us when you elect to use certain products or services available on the Site. These may include:

- (a) signing up for our email list or newsletter;
- (b) sending us an email message or submitting our contact form;
- (c) scheduling an appointment through our online booking system;
- (d) submitting payment information when purchasing products or services on our Site.

We will use your information for, but not limited to, communicating with you in relation to services and/or products you have requested from us. We also may gather additional personal or non-personal information in the future.

Please do not submit any confidential, proprietary, or sensitive personally identifiable information (e.g., Social Security Number, Driver's License Number) to us through this Site. We are not liable or responsible for any consequences resulting from the submission of this personally identifiable information through this Site. If you do submit this information, you do so at your own risk.

We may collect and use the following personal information that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

Categories of Personal Information	Specific Types of Personal Information Collected

Identifiers (e.g., a real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, or other similar identifiers)	Name, postal address, Internet Protocol address, and/or email address
Characteristics of protected classifications under California or federal law.	We do not collect.
Biometric information	We do not collect.
Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement)	The information we collect could be aggregate and/or user-specific individual information but does not reveal your specific identity (like your name and/or contact information). This information is primarily needed to maintain the security and operation of our Site and for internal analytics and reporting purposes. This information includes device characteristics (including operating system and name), your IP address, browser characteristics, communication data, referring URLs (what web websites or search terms that referred you to the Site), how and when you use our and other technical information, time zone, location, country, language preferences and patterns of use (information on the individual web pages or services you view on our Site, and browsing and navigation patterns within our Site)
Geolocation data	We do not collect
Audio, electronic, visual, thermal, olfactory, or similar information	We do not collect
Mobile Device Data (if applicable)	Device ID, model and manufacturer and location information
Social Media Data (Personal information available on social networking sites and apps	name, social network name, location, email address, age, gender, profile picture and other public information
Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	We do not collect.
Demographic location	Age, gender, occupation but such information will not be connected to your personal information.

How Your Personal Information is Collected.

We collect most of this personal information directly from you—in person, by telephone, text, email, and/or via our Site.

However, we may also collect information:

- From cookies on our Site;
- Social media Sites and Apps; and
- Via our IT systems, including automated monitoring of our Site and other technical systems, such as our computer networks and connections, communications systems, email and instant messaging systems.

Use of Your Personal Information

1. **How and Why We Use Your Personal Information.** Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.,:

    - To comply with our legal and regulatory obligations;
    - For the performance of our contracts with you or to take steps at your request before entering into a contract;
    - Customize Your interaction with our Company and Our website;
    - For our legitimate interests or those of a third party; or
    - Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

1.

2.	What we use your personal information for	3.	Our reasons
4.	To prevent and detect fraud against you or Leading UP	5.	For our legitimate interests or those of a third party, i.e., to minimize fraud that could be damaging for us and for you
6.	Other processing necessary to comply with professional, legal, and regulatory obligations that apply to our business	7.	To comply with our legal and regulatory obligations
8.	Gathering and providing information required by or relating to audits, inquiries, or investigations by regulatory bodies	9.	To comply with our legal and regulatory obligations
10.	Ensuring business policies are adhered to, e.g., policies covering security and internet use	11.	For our legitimate interests or those of a third party, i.e., to make sure we are following our own internal procedures so we can deliver the best service to you

12.	Operational reasons, such as improving efficiency, training, and quality control	13.	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price
14.	Ensuring the confidentiality of commercially sensitive information	15. 16.	For our legitimate interests or those of a third party, i.e., to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
17.	Preventing unauthorized access and modifications to systems	18. 19.	For our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
20.	Updating and enhancing customer records	21. 22. 23.	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about existing orders and new products
24.	Ensuring safe working practices, staff administration and assessments	25. 26.	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
27.	Marketing our services and those of selected third parties to: — existing and former customers; — third parties who have previously expressed an interest in our services; — third parties with whom we have had no previous dealings.	28.	For our legitimate interests or those of a third party, i.e., to promote our business to existing and former customers

The above table does not apply to special category personal information, which we will only process with your explicit consent.

Sharing Information with Third Parties

- Business partners – These are businesses that we work with to offer you certain services or promotions.
- Non-affiliated service providers – These non-affiliated service providers may offer services like, but not limited to, payment processing, data analysis, email delivery, hosting services, customer service, marketing efforts, etc. These companies may use information about your visits to this Site and other websites that are contained in cookies to provide services, advertisements, or to collect data about how you interact with this Site over time
- Government and regulatory authorities – We may provide information to government and regulatory bodies to provide the services you have purchased or because of legal and regulatory obligations on our business.
- Auditors and financial and legal advisors – We may need to provide information to assist with provision of services or management of our business.
- Others only as permitted by law

We only allow our service providers to handle your personal information if we are satisfied, they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We do not sell your personal information, and we have contracts with service providers to prohibit any sale of your personal information and to provide written assurances regarding the security and privacy protections they have in place to protect your personal information.

Automatically Collected Information

Information about your computer hardware and software may be automatically collected by Leading UP, LLC. This information can include your IP address, browser type, domain names, access times, and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Leading UP, LLC website.

Data Retention

We retain personal information for as long as reasonably necessary for the purposes described in this Privacy Policy, including to manage inquiries and appointments, maintain business records, comply

with legal obligations, resolve disputes, and enforce agreements. The retention period may vary based on the type of information, the purpose for which it was collected, legal requirements, and whether an ongoing business or client relationship exists. When information is no longer reasonably necessary, we may delete, deidentify, or securely dispose of it.

Information Security.

We use reasonable administrative, technical, and physical safeguards designed to protect personal information. However, no method of transmission over the Internet or method of electronic storage is completely secure, and we cannot guarantee absolute security. Users should not submit sensitive financial information through public website forms or appointment notes.

Links

When you leave this Site and go to another linked website, we are not responsible for the content or availability of the linked website. Please be advised that if you enter into a transaction on the third-party website, we do not represent either the third party or you. Further, the privacy and security policies of the linked website may differ from those practiced by us.

Adults Only

Leading UP, LLC provides services exclusively to adults. We do not knowingly collect personally identifiable information from individuals under the age of 18. If you are under the age of 18, you may not use this website or submit any personal information to us. If we become aware that we have inadvertently collected information from someone under 18, we will delete it promptly. If you believe we have collected information from a minor, please contact us immediately.

California Consumer Privacy Act

The section of this Privacy Policy titled Collection of Your Personal Information describes the categories of personal information we collect and the specific types of information within those categories. The sections titled How Your Personal Information Is Collected, Use of Your Personal Information, and Sharing Information with Third Parties describe the sources from which we collect personal information, the business or commercial purposes for which we use it, and the categories of third parties to whom we may disclose it.

During the preceding 12 months, we may have collected and disclosed for business purposes the categories of personal information identified in this Privacy Policy. We disclose personal information only as described in this Privacy Policy, including to service providers that assist

with website hosting, scheduling, payment processing, analytics, email delivery, customer service, security, and similar business operations.

We do not sell personal information for monetary or other valuable consideration. We also do not share personal information for cross-context behavioral advertising, as “share” is defined under the CCPA.

California Privacy Rights

To the extent the CCPA applies to Leading UP and subject to applicable exceptions, California residents may have the right to:

Know and access: Request information about the categories and specific pieces of personal information we have collected about you; the categories of sources from which the information was collected; our purposes for collecting, using, selling, or sharing the information; the categories of third parties to whom we disclose it; and the categories of personal information sold, shared, or disclosed for a business purpose.

Delete: Request deletion of personal information we collected from you.

Correct: Request correction of inaccurate personal information we maintain about you.

Opt out of sale or sharing: Direct a business not to sell or share personal information. As stated above, Leading UP does not sell or share personal information as those terms are defined under the CCPA.

Limit certain uses of sensitive personal information: Direct a business to limit certain uses and disclosures of sensitive personal information. Leading UP, does not use or disclose sensitive personal information for purposes that require a right to limit under the CCPA.

Data portability: Receive personal information in a portable and, to the extent technically feasible, readily usable format.

Nondiscrimination: Exercise applicable privacy rights without receiving discriminatory treatment or retaliation.

Exercising Your Rights

To submit a request, contact us using either of the following methods:

Email: <Paula@LeadingUPCoach.com>

Please describe your request with enough detail for us to understand, evaluate, and respond to it. We may request information that is reasonably necessary to verify your identity and authority to make the request. We will use information submitted for verification only to verify and respond to the request. If we cannot verify your identity, we may be unable to fulfill the request.

You may designate an authorized agent to submit a request on your behalf. We may require proof that you authorized the agent to act for you and may ask you to verify your identity directly with us, unless the agent holds a valid power of attorney under applicable law.

We will respond within the time required by applicable law. We ordinarily do not charge a fee for processing a verifiable request but may charge a reasonable fee or decline to act on requests that are manifestly unfounded, excessive, or repetitive, as permitted by law.

E-mail Communications

From time to time, Leading UP, LLC may contact you via email for the purpose of providing announcements, updates, resources, and/or other general communication related to leadership development. If you would like to stop receiving marketing or promotional communications via email from Leading UP, LLC, you may opt out at any time by clicking the UNSUBSCRIBE link in any email.

Changes to this Statement

Leading UP, LLC reserves the right to change this Privacy Policy from time to time. We will notify you about significant changes in the way we treat personal information by placing a prominent notice on our site and/or by updating the privacy information on this page. Your continued use of the Site and/or Services available through this Site after such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by that Policy.

Contact Information

Leading UP, LLC welcomes your questions or comments regarding this Statement of Privacy. If you believe that Leading UP, LLC has not adhered to this Statement, please contact us at:

Leading UP, LLC , W728 Zion Church Road, Theresa, WI 53091

Email: Paula@LeadingUPCoach.com Phone: 414-439-3587

Effective as of July 23, 2026