



LEAD Security Group — Privacy Policy

Effective date: 07/01/2024

Introduction LEAD Security Group (“LEAD,” “we,” “us,” “our”) values privacy and is committed to protecting personal information of clients, employees, contractors, suppliers, website visitors, and other stakeholders in the United States and Nigeria. This policy explains what personal data we collect, why we collect it, how we use and share it, and your rights and choices.

Scope Applies to all personal data processed by LEAD Security Group USA and LEAD Integrated Security Solutions Limited (Nigeria) in connection with:

- Employment and contractor relationships;
- Client, prospect, and supplier relationships;
- Delivery of security and monitoring services;
- Use of our websites, portals, and mobile apps; and
- Other business interactions.

Categories of Personal Data Collected We collect only data necessary for legitimate purposes, which may include:

Identity: name, date of birth, photo, government ID, nationality.

Contact: mailing address, email, telephone, emergency contacts.

Employment & professional: resume, qualifications, licenses, background check results, work history.

Service & operational: client site information, incident reports, visitor logs, access logs, patrol records, CCTV footage, audio recordings where legally permitted.

Financial & transactional: billing details, bank account or payment card information, invoicing history.

Technical & usage: IP address, device identifiers, cookies, usage logs from websites and apps.

Health & safety: medical or fitness-for-duty information, incident-related medical details (only when required for safety or legal compliance).

Sensitive personal data: where required (e.g., criminal conviction data for background checks), processed only with legal basis and protections.

Purposes for Processing. We process personal data to:

- Provide and manage security, monitoring, and protective services;
- Recruit, hire, and manage employees and contractors;
- Perform background checks, licensing, and compliance screening;
- Administer payroll, invoicing, and payments;

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- Investigate incidents, respond to emergencies, and support law enforcement when required;
- Operate, secure, and improve our websites, apps, and systems;
- Communicate with clients, suppliers, and stakeholders;
- Comply with legal, regulatory, and contractual obligations; and
- Carry out legitimate business operations and risk management.

Legal Basis (where applicable)

- Contract: processing necessary to perform contracts with clients, employees, or suppliers.
- Legal obligation: compliance with laws, regulatory requirements, and court orders.
- Legitimate interests: for security operations, fraud prevention, business administration, and safety, balanced against individual rights.
- Consent: where required (e.g., certain marketing communications, non-essential cookies). Consent will be requested and recorded where applicable.
- Sharing and Disclosure We may share personal data with:
- Clients, suppliers, subcontractors, and service providers who perform services on our behalf (background screening, payroll, cloud hosting, payment processors).
- Law enforcement, courts, or regulatory authorities when required by law or to protect legal rights.
- Affiliates within LEAD for operational needs.
- Professional advisors (legal, audit) and insurers. We require third parties to protect data consistent with this policy and applicable law.
- International Transfers Data may be transferred between the U.S., Nigeria, and other jurisdictions for operational purposes. We implement appropriate safeguards (contracts, security measures) to protect personal data in cross-border transfers and to meet local legal requirements.
- Data Retention We retain personal data only as long as necessary for the purpose collected, legal or contractual obligations, or legitimate business needs. Retention periods vary by data type (e.g., employment records, client contract records, CCTV footage) and applicable law; we maintain documented retention schedules.

Security Measures: We use administrative, technical, and physical controls to protect data, including:

- Access controls and role-based permissions;
- Encryption for data in transit and where feasible at rest;
- Secure cloud hosting, firewalls, and monitoring;
- Regular backups, patching, and vulnerability management;
- Incident response procedures. No system is fully immune to risk; we will notify affected individuals and authorities of breaches as required by law.

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Your Rights & Choices Subject to local law, you may have rights to:

- Access and obtain a copy of your personal data;
- Correct or update inaccurate data;
- Request deletion or restriction of processing (subject to legal/contractual limits);
- Object to certain processing (e.g., direct marketing or processing based on legitimate interests);
- Request portability of data you provided;
- withdraw consent where processing is based on consent.

To exercise rights or ask questions, contact moke@leadsginc.com. We will verify requests and respond within applicable legal timeframes.

Cookies & Similar Technologies: We use cookies and analytics tools on our websites to improve functionality, understand usage, and for security. Non-essential cookies may be subject to consent; you can manage cookie preferences via your browser and any site consent tool. **Third-Party Links** Our websites may link to third-party sites. This policy does not cover third-party practices. Review their privacy policies before sharing personal data.

Children: We do not knowingly collect personal data from children under applicable minimum ages for our services. If we learn we collected such data unlawfully, we will delete it in accordance with legal requirements.

Employees, Contractors & Applicants: Additional privacy notices and procedures apply to employees, applicants, and contractors consistent with employment laws and background-check requirements in the relevant jurisdiction.

Complaints & Supervisory: Authorities If you are not satisfied with our response, you may lodge a complaint with the relevant data protection authority in your jurisdiction (e.g., U.S. state authority or Nigeria's National Information Technology Development Agency/other applicable regulator).

Changes to This Policy: We may update this policy to reflect changes in law, business practices, or services. Material changes will be posted with an updated effective date.

Contact: Privacy questions, requests, or complaints: moke@leadsginc.com.