PRIVACY NOTICE

LeazeOn Private Limited

Effective Date: 15 October 2026
Last Reviewed: 15 October 2026

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1. Introduction

This Privacy Notice is issued by LeazeOn Private Limited, having its registered office at Office No. G-001, Stilt floor, Pinnac House-II, S. No. 7/4(P), 8/4, Near City Pride, Kothrud, Pune 411038, Maharashtra, India having a CIN: U72900PN2018PTC179724 ("we", "us", "our"). It explains how personal data is collected, used, processed, stored, and shared in connection with Website interactions and inquiries.

We are committed to protecting personal data in accordance with all data protection and privacy laws applicable in the countries in which we operate and from which we receive personal data ("Applicable Data Protection Laws"), including, in particular, the EU General Data Protection Regulation (Regulation (EU) 2016/679) ("EU GDPR"), the UK General Data Protection Regulation together with the UK Data Protection Act 2018 ("UK GDPR"), and India's Digital Personal Data Protection Act, 2023 and the rules made under it ("DPDP Act").

This Notice applies to individuals worldwide. Where you are located in a country or region not specifically referred to in this Notice, we will process your personal data in accordance with the Applicable Data Protection Laws of that jurisdiction, and you may exercise the rights available to you under those laws. Where local law gives you greater protection than this Notice, that law will prevail.

In this Notice, references to "GDPR" mean the EU GDPR and the UK GDPR, as applicable. Terms such as "data controller" and "data subject" include the equivalent terms used in other Applicable Data Protection Laws, such as "Data Fiduciary" and "Data Principal" under the DPDP Act.

2. Scope and Roles

For the purposes of this Privacy Policy, **"clients" refer to organisations or legal entities that license and use our software**, and not individual end users unless expressly stated. References to clients do not include individual users, employees, or representatives whose personal data may be processed in different capacities as described in this Policy.

2.1 Data Controller / Data Fiduciary

We act as a data controller (under the EU GDPR and UK GDPR) / data fiduciary (under DPDP Act), or in an equivalent role under other Applicable Data Protection Laws, in relation to personal data that we collect directly from individuals, including but not limited to:

- Visitors to our website
- Prospective clients submitting enquiries or requesting product demonstrations
- Representatives of prospective clients or prospective business partners

In this capacity, we determine:

- The purposes for which personal data is collected
- The means by which such personal data is processed

We ensure that such processing is carried out in a lawful, fair, and transparent manner and that individuals are provided with appropriate privacy notices at the point of data collection.

2.2 As Data Processor

We act as a data processor when providing our lease accounting software and related services to our clients, being organisations or legal entities that use our software for managing lease accounting and financial reporting obligations.

In this context:

- Clients act as data controllers / data fiduciaries
- We process personal data solely on their behalf and in accordance with their documented instructions

Our obligations include:

- Processing personal data only for agreed and lawful purposes

- Implementing appropriate technical and organisational security measures
- Assisting clients in fulfilling their legal obligations, including data subject rights requests and breach notifications
- Ensuring that sub-processors are engaged only under written agreements imposing equivalent data protection obligations
- Not engaging sub-processors without appropriate authorisation from clients (where contractually required)

What We Do as a Data Processor:

- Collect, use, share, and retain personal data only for purposes for which we were authorised by the Data Principal (DPDP Act) / data subject (GDPR) or their Data Controller / Data Fiduciary.
- Disclose clearly in this Privacy Notice and in contracts what types of personal data we collect, the purposes for which it is used or shared with third parties, in a manner easy for Data Principals / data subjects to understand.
- Support access to and correction of personal data by the Data Principal (DPDP Act) / data subject (GDPR) or their authorised representative, by assisting the Data Controller / Data Fiduciary in fulfilling its rights and obligations.
- Maintain a comprehensive security program that is reasonably designed to protect the security, privacy, confidentiality, and integrity of personal information against risks – such as unauthorized access or use, or unintended or inappropriate disclosure – through the use of administrative, technological, and physical safeguards appropriate to the sensitivity of the information.
- Allow a successor entity to maintain the personal information, in the case of our merger or acquisition by another entity, provided the successor entity is subject to these same commitments for the previously collected personal information.
- Obtain third-party attestation of our alignment with applicable data protection regulations.

3. Personal Data We Collect

3.1 Data Collected Directly from Individuals

We collect limited personal data necessary for business communication and service delivery. All data fields are mandatory unless otherwise stated.

- First and last name
- Employer's name / Name of Company on whose behalf product inquiry is sought
- Work email address
- Phone number
- Job Title *(optional)*

This data is collected through:

- Website forms for requesting demo and pricing

3.2 Data Collected Automatically

When individuals interact with our website or services, we may collect following data which is not classified as personal information:

- IP address
- Device type, browser type, and operating system
- Date and time of access
- Pages viewed and interaction patterns

This data is used only for system administration and security monitoring.

3.3 Data Collected Directly from Clients (as a data processor on behalf of Clients)

As part of our Services, we process personal data uploaded or entered by clients, which may include:

- Client's Employee or authorised user's details which is limited to full name, employees' official email address and mobile number (which is an optional information)
- Client's Vendor (lessor from whom client has obtained asset on lease), Client's customer (lessee to whom client has provided asset on lease for rental income), or counterparty information which is limited

to full name of vendor (mandatory) and other optional information which includes lessor's / lessee's address, tax registration numbers, bank account details, full name, phone number and email address of the representative of such lessor / lessee.
- Hard copy documents (lease agreements, addendums to such lease agreement, etc.) uploaded by client. This is also an optional information.

We process such data strictly on behalf of our clients and do not determine the purposes or means of such processing.

4. Purpose of Processing [Use of data collected]

We process personal data for the following purposes:
- Managing enquiries and providing product demonstrations
- Facilitating onboarding and client relationship management
- Delivering and operating our Services
- Ensuring system integrity, security, and fraud prevention
- Complying with applicable legal, regulatory, and contractual obligations

We do not process personal data for purposes incompatible with those stated above without appropriate notice and, where required, consent.

5. Legal Basis for Processing

Under the EU GDPR and UK GDPR

We rely on one or more of the following legal bases:
- Consent
- Contractual necessity
- Legal obligations
- Legitimate interests (subject to a balancing test and safeguards)

Under DPDP Act

We process personal data based on:
- Consent obtained through clear affirmative action
- Legitimate uses as permitted under applicable law
- Under Other Applicable Data Protection Laws
- Where other Applicable Data Protection Laws apply, we process personal data only on a lawful basis recognised under those laws, which may include consent, performance of a contract, compliance with a legal obligation, or our legitimate business interests.

6. Children's Personal Data

Our services, website, and digital platforms are **not directed at or intended for children under the age of 16** (or the applicable age required by local law in your jurisdiction).

We **do not knowingly collect, store, or process any personal data from children**. If you believe that a child has provided us with personal information without parental or guardian consent, please contact us immediately at **dataprivacy@leazeon.com**

7. Sharing or Storing of Personal Data

We may share or store personal data with:
- Cloud hosting and infrastructure providers
- CRM and client support tools
- Professional advisors (legal, audit, compliance)
- Regulatory authorities or law enforcement agencies, where required

All recipients are bound by contractual obligations to ensure confidentiality, security, and compliance with applicable data protection laws.

We do not share personal data for third-party marketing purposes. We do not have any sub-processors as on the last review date of this notice.

8. Data storage

- We maintain reasonable administrative, technological and physical safeguards designed to improve the integrity, privacy, confidentiality, and security of your information.
- All data is securely and exclusively hosted in SOC 2 compliant data centres.
- User roles are clearly defined to manage the access level.
- Data is protected by a password for data subject/ data principal / controller's privacy and security. They may help protect against unauthorized access to these account and personal information by selecting and protecting password appropriately and limiting access to computer and browser by signing off after finishing accessing account.
- We endeavour to protect user information to ensure that user account information is kept private. However, we cannot guarantee the security of user account information.
- Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time.
- For additional information about the security measures we use in connection with our Site and Services, contact us at dataprivacy@leazeon.com.
- Like other online services, we cannot guarantee the security of any information that a data subject / data principal or controller transmits to us or stores on the site. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by unauthorized persons.
- If we learn of a security systems breach, then we will notify data subject/ data principal or controller electronically so that they can take appropriate protective steps.
- We may post a notice on the Site if a security breach occurs.
- Once data subject/ data principal or controller's information is removed from the Site, copies of this information, other than Data, may remain stored in backup systems or cached and archived pages.
- We are not responsible for the practices employed by websites, applications or services linked to or from our Site.
- Any information collected through the Services is stored and processed as per the local regulatory requirement.

9. Data Retention

We retain personal data only for as long as necessary, including:

- Enquiry / contact data: up to 12 months, unless converted into a business relationship
- Client data: as per contractual terms and client instructions
- Legal and compliance data: as required under applicable laws

Upon expiry of retention periods, personal data is securely deleted or anonymised.

10.Data Security

We implement appropriate technical and organisational measures, including:

- Encryption in transit and at rest
- Access controls and authentication mechanisms
- System monitoring, logging, and audit trails
- Periodic vulnerability assessments and security reviews

Access to personal data is restricted on a need-to-know and least privilege basis.

11. Links to Third Party Sites or Apps

The Site may contain links to websites and apps operated and maintained by third parties, over which we have no control.

Privacy policies on linked sites may be different from our Privacy Policy. If you access such linked sites, it is at your own risk.

You should always read the privacy policy of a linked site before disclosing any information to such site.

12.Data Subject Rights

Under GDPR
Individuals have the following rights under the EU GDPR and UK GDPR: (1) Access (Art. 15); (2) Rectification (Art. 16); (3) Erasure / Right to be Forgotten (Art. 17); (4) Restriction of processing (Art. 18); (5) Data portability (Art. 20); (6) Objection (Art. 21); (7) Rights in relation to automated decision-making and profiling (Art. 22).
We maintain processes to respond to such requests within one (1) month as required under the EU GDPR and UK GDPR.

Under DPDP Act
Data Principals have the following rights under the DPDP Act: (1) Right to obtain summary of personal data processed and processing activities (S.11); (2) Right to correction, completion, updating and erasure of personal data (S.12); (3) Right of grievance redressal (S.13) (4) Right of Nomination — the right to nominate another individual to exercise data rights on their behalf in the event of death or incapacity (S.14).
Where the DPDP Act applies, requests are addressed within reasonable timelines or such period as may be prescribed under applicable law.

Under Other Applicable Data Protection Laws
Depending on where you are located, you may have rights similar to those described above, such as the right to access, correct, delete or obtain a copy of your personal data, to object to or restrict certain processing, to opt out of the sale or sharing of your personal data or of targeted advertising, to withdraw consent, and to lodge a complaint with your local data protection authority. We will respond to such requests within the timelines required by the applicable law.

- Where permitted, timelines may be extended in accordance with applicable legal provisions.
- We have processes in place to act against impersonation and filing of false grievance.
- Individuals may withdraw consent at any time where processing is based on consent. Such withdrawal will not affect prior lawful processing.
- On withdrawal of consent, we immediately stop processing the related data and erase it, unless a legal retention obligation exists.
- Erasure of data is notified to the data subject/ data principal and / or our client, as applicable.

13.Data Breach Notification
In the event of a personal data breach:

- We will take prompt steps to contain and mitigate the breach
- Notify the relevant supervisory authority within 72 hours of becoming aware of the breach (EU GDPR / UK GDPR Art. 33), where feasible, or explain any delay. Notification to the Data Protection Board of India is required under DPDP Act S.8(6) in such manner and form as may be prescribed. Where other Applicable Data Protection Laws apply, we will notify the relevant authorities within the timelines prescribed by those laws.
- Inform affected individuals where there is a risk to their rights and freedom.

14.Third-Party Processing and Sub-processors
Third-party processing is governed by written agreements ensuring:

- Confidentiality
- Security safeguards
- Compliance with applicable laws

We remain responsible for ensuring that sub-processors meet required standards.

15.Cross-Border Data Transfers
As on the date of last review of this notice, there are no any cross-border data transfers which are being carried out.

16.Data Subject Requests
Requests may be submitted to: dataprivacy@leazeon.com. We will respond within timelines prescribed under applicable law.

17.Updates to this Privacy Notice

This Privacy Notice may be updated periodically. Where changes are material, we will notify affected individuals by email or by a prominent notice on our website prior to the changes taking effect. All updates will be published with a revised effective date.

18.Contact Information

Data Protection / Grievance Officer details:

Name : Amit Darekar
Designation : Director
Postal address : Office No. G-001, Stilt floor, Pinnac House-II S. No. 7/4(P), 8/4, Near City Pride, Kothrud, Pune 411038, Maharashtra, India
Email : dataprivacy@leazeon.com

Individuals may also lodge complaints with:

- The relevant supervisory authority in the European Union / European Economic Area member state where you live or work, or where the alleged infringement took place
- The Information Commissioner's Office (ICO) in the United Kingdom
- The Data Protection Board of India
- The data protection authority in your country of residence, wherever applicable