

PRIVACY POLICY

LeadFlow Local

DATA GOVERNANCE

PRIVACY POLICY

How LeadFlow Local collects, uses, shares, protects, and retains personal data across its business operations and AI-enabled marketing services.

EFFECTIVE DATE 11 July 2026	LAST UPDATED 14 July 2026	PRIVACY CONTACT leadflowlocalvn@gmail.com
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Privacy at a glance

01 We do not sell personal data to data brokers or as a standalone commercial product.	02 For most client campaigns, the client decides why data is collected and we process it on the client's instructions.
03 Analytics cookies and similar non-essential technologies are activated only with consent where consent is required.	04 We minimise personal data used in AI-assisted workflows and do not use AI alone to make legal or similarly significant decisions about individuals.
05 Privacy requests can be sent to leadflowlocalvn@gmail.com.	

IMPORTANT CLIENT-CAMPAIGN NOTE This Policy does not replace a business client's own privacy notice. When you submit data through a client campaign, form, booking page, chat, or CRM workflow, the client's privacy notice, consent wording, and service terms may also apply.

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READING NOTES	CURRENT LEGAL FRAMEWORK
How to read this Policy	Applicable legislation
“Personal data” means information that identifies, relates to, or can reasonably be linked to an individual. “Processing” includes collecting, recording, organising, storing, accessing, analysing, sharing, transferring, deleting, or otherwise using personal data. The applicable law depends on the person, location, service, processing activity, and the parties' roles.	Where applicable, this Policy operates alongside Vietnam's Law No. 91/2025/QH15 on Personal Data Protection and Decree No. 356/2025/ND-CP, the Armenian Law on Personal Data Protection, and the EU General Data Protection Regulation (GDPR) when its territorial scope applies.

01 Who we are and how to contact us

LeadFlow Local LLC is a limited liability company registered in the Republic of Armenia. We provide AI-enabled marketing, websites and landing pages, lead generation, CRM and follow-up systems, advertising support, analytics, automation, and related digital services, primarily for businesses operating in Vietnam and internationally.

Armenian registered name	ԼԻՊՑԼՈՐԻ ԼՈՔՍԼ ՍՊԸ
Registration number	999.110.1593802
Taxpayer ID	08327707
Registered address	Armenia, Yerevan, Arabkir, Adontsi St. 4/3, 0014
Privacy email	leadflowlocalvn@gmail.com
Website	https://leadflow-local.com/

In this Policy, “LeadFlow Local”, “Company”, “we”, “us”, and “our” mean LeadFlow Local LLC. “You” means any individual whose personal data we process.

02 Scope and our role

This Policy applies to personal data processed through our website, inquiry and onboarding forms, client administration, contracts, billing, support, business communications, campaign pages, lead forms, booking pages, chat tools, CRM systems, advertising accounts, analytics, and automation workflows used in connection with our services.

For our own website, sales, client administration, billing, security, legal compliance, and direct business communications, we generally decide why and how personal data is processed and therefore act as a controller or personal data controller.

For most client campaigns, the business client decides the purposes and main methods of processing. In those cases, the client is generally the controller and LeadFlow Local acts as a processor, service provider, or instructed vendor. The actual role depends on the facts and the relevant agreement.

When we act as a processor, the service agreement and, where required, a data processing agreement may contain more specific instructions, security terms, deletion requirements, and allocation of responsibilities. For those processing activities, the applicable agreement controls to the extent of any inconsistency with this Policy.

CLIENT PRIVACY NOTICE A client campaign may include a separate privacy notice, cookie notice, consent statement, offer terms, and retention rules issued by the client. Those materials should be read together with this Policy.

03 Personal data we collect

The categories below describe data we may process. We do not collect every category in every project.

Identity and business contact data Name, business name, job title, email address, phone number, city or approximate location, preferred language, and business social-media or directory profiles.	Client, contract, and account data Onboarding answers, service requirements, contracts, invoices, payment status, transaction references, authorised users, account identifiers, permissions, and communications. Banks and payment providers may process bank or card information under their own privacy terms.
Campaign and lead data Contact details, service interests, appointment or booking requests, message content, lead source, campaign ID, CRM entries, follow-up status, marketing preferences, and consent records.	Content and project materials Brand assets, website content, offers, service descriptions, photos, videos, target-audience information, advertising materials, campaign plans, and performance reports.
Technical, analytics, and advertising data IP address, device and browser information, cookie or advertising identifiers, referral source, UTM parameters, page views, clicks, form events, conversion events, approximate location, and server logs.	AI and workflow data Prompts, draft copy, summaries, content variations, audience segments, classification labels, testing results, anonymised examples, performance information, and workflow notes.

04 How we collect personal data

Directly from you when you contact us, submit a form, book a call, sign an agreement, complete onboarding, request support, or otherwise communicate with us.

From business clients when they provide campaign materials, CRM records, lead lists, access permissions, customer requests, or processing instructions.

Automatically through cookies, pixels, tags, analytics scripts, server logs, local storage, and similar technologies.

From hosting, CRM, communications, advertising, analytics, automation, payment, security, and AI service providers used in connection with our work.

From public business sources, such as business websites, public social-media pages, maps, directories, and business listings, where lawful and relevant. Public availability does not create unrestricted permission to use personal data.

05 Why we use data and our legal grounds

We process personal data only for defined purposes and on a lawful basis or other valid processing ground. Depending on the activity and applicable law, this may include consent, performance of a contract or pre-contractual steps, compliance with legal obligations, legitimate interests where permitted, protection of legal rights, or a client's documented instruction when we act as a processor.

Purpose	Examples
Provide and administer services	Onboarding, project delivery, website and campaign work, CRM setup, automation, reporting, support, access management, invoicing, and contract administration.
Manage leads and communications	Responding to requests, routing leads, booking appointments, sending service or follow-up messages, and maintaining communication history.
Operate and improve systems	Analytics, quality assurance, testing, performance monitoring, troubleshooting, service development, and aggregated reporting.
Deliver advertising and measure results	Audience management, attribution, conversion measurement, retargeting, optimisation, and campaign reporting, subject to consent and platform rules where required.
Protect the business and comply with law	Security, fraud prevention, incident response, accounting, tax, record-keeping, regulatory cooperation, and establishing or defending legal claims.
Conduct our own business marketing	Sending information about our services to business contacts where permitted, with an opt-out mechanism.

Consent standards. Where consent is required, it should be voluntary, informed, specific to each purpose, explicit, and capable of being recorded or reproduced. Silence, inactivity, or pre-ticked boxes are not treated as consent where active consent is required. Consent may be withdrawn, but withdrawal does not invalidate processing lawfully completed before withdrawal.

For advertising-related processing in Vietnam, the notice and consent mechanism should make clear the content, method, form, and frequency of advertising and provide a practical way to stop receiving advertising.

06 Client campaigns, lead forms, CRM, and follow-up

Submitting a form, chat message, booking request, or campaign response may create a record in a CRM, route information to the responsible client, assign the request to a workflow, trigger permitted follow-up communications or reminders, and create campaign-performance records.

To support accountability, we or the client may record the lead source, timestamp, form version, campaign ID, consent status, privacy-notice version, cookie preferences, and marketing choices. These records are used only for legitimate campaign, service, compliance, and reporting purposes.

BEFORE SUBMITTING DATA

Do not include health, identity-document, financial, biometric, children's, or other sensitive information in a general marketing or contact form unless the form clearly requests it and provides the required notice and safeguards.

07 Cookies and Analytics

We use cookies and similar technologies to operate, secure, and improve our website.

Essential Cookies

Essential cookies are necessary for the website to function properly. They may be used to provide website security, maintain basic functionality, remember your privacy choices, and enable features you request.

Because these cookies are strictly necessary to provide the website, they cannot be disabled through our cookie banner.

Analytics Cookies

With your consent, we use analytics cookies and similar technologies to understand how visitors use our website and to improve its performance.

Analytics information may include:

- pages visited and interactions with the website;
- the date, time, and approximate duration of a visit;
- referral source;
- browser, device, and operating-system information;
- approximate location derived from an IP address; and
- website performance and error information.

We use this information to measure website usage, identify technical issues, and improve our website and services. We do not activate analytics cookies unless you provide consent.

Analytics Providers

Analytics data may be processed on our behalf by the analytics service provider identified through our cookie consent notice or cookie settings interface. Information about the provider, the technologies used, their purposes, and applicable retention periods is made available before consent is requested.

Some providers may process information outside the country where you are located. Where required, we use appropriate contractual or legal safeguards for international transfers of personal data.

Your Choices

You may accept or reject analytics cookies through the cookie banner. Rejecting analytics cookies will not prevent you from accessing the ordinary content and functions of the website.

Closing or ignoring the cookie banner, continuing to browse, or remaining inactive will not be treated as consent.

You may withdraw or change your consent at any time by reopening the cookie consent tool through the “Cookie Settings” link available on our website. Withdrawal does not affect processing that lawfully occurred before consent was withdrawn.

Consent Records

Where necessary to demonstrate compliance, we may retain a limited record of your cookie choice, such as your consent status, the date and time of your choice, and the version of the notice presented to you.

Retention

Essential and analytics cookies may be session cookies, which expire when you close your browser, or persistent cookies, which remain for a defined period.

Analytics information is retained only for as long as reasonably necessary for the purposes described above, subject to the retention periods applied by the relevant analytics provider.

You may also delete or block cookies through your browser settings. Disabling essential cookies through your browser may affect how the website functions.

Changes to Our Use of Cookies

We may update the cookies and similar technologies used on our website. If we introduce a new non-essential purpose or materially change how analytics information is processed, we will update this Privacy Policy and request new consent where required.

For questions about our use of cookies or personal data, please contact us using the details provided in the “Contact Us” section of this Privacy Policy.

08 AI-assisted tools and automated processing

We use AI and automation to assist with tasks such as drafting and editing content, summarising project information, generating creative concepts, classifying or tagging leads, preparing customer-support scripts, identifying workflow steps, and analysing aggregated campaign performance.

We apply a risk-based approach to personal data used in AI-assisted workflows. Depending on the task, safeguards may include data minimisation, removing direct identifiers, limiting access, using business or enterprise settings, restricting retention, reviewing provider terms, and selecting settings that prevent client data from being used for public model training where the provider offers those controls.

HUMAN OVERSIGHT FOR SIGNIFICANT DECISIONS We do not use AI alone to make decisions that produce legal or similarly significant effects on an individual. Lead scoring, segmentation, tagging, or qualification supports marketing prioritisation and human decision-making; it is not intended to make final legal, medical, financial, employment, credit, or insurance decisions.

09 How we share personal data

We share personal data only where reasonably necessary for the purposes described in this Policy, a client instruction, the applicable agreement, platform terms, or law. Recipients may include:

- the business client responsible for the campaign, website, booking page, lead form, CRM, or customer relationship;
- hosting, cloud, CRM, email, SMS, messaging, analytics, automation, security, payment, accounting, and technical providers;
- advertising and social-media platforms used for delivery, attribution, audience management, retargeting, and optimisation;
- AI service providers used for content generation, analysis, workflow support, or campaign improvement;
- professional advisers, accountants, lawyers, auditors, insurers, consultants, and compliance advisers;
- public authorities, regulators, courts, law enforcement, or other parties where legally required or necessary to protect rights, safety, or security; and
- a buyer, investor, lender, or successor in connection with a merger, restructuring, financing, sale, or similar business transaction, subject to appropriate confidentiality measures.

NO SALE AS A STANDALONE PRODUCT We do not sell personal data to data brokers or as a standalone commercial product. Sharing data with clients and providers as described above is for service delivery, administration, security, compliance, or other stated purposes.

10 International processing and transfers

LeadFlow Local is registered in Armenia and serves businesses in Vietnam using international cloud, advertising, AI, analytics, CRM, hosting, and communications tools. Personal data may therefore be stored in, transferred to, or accessed from Armenia, Vietnam, Singapore, the European Economic Area, the United States, and other countries where the relevant provider operates.

Vietnamese law may treat the use of a platform located outside Vietnam to process data collected in Vietnam as a cross-border transfer. Where LeadFlow Local or a client is responsible for the transfer, the responsible party should prepare, maintain, update, and submit any required cross-border transfer impact-assessment dossier or other documentation within the applicable legal deadlines.

For personal data subject to the GDPR, transfer safeguards may include an adequacy decision, Standard Contractual Clauses, transfer-risk assessment, and supplementary technical or organisational measures where required. For Armenian personal data, transfers are handled under Armenian requirements for lawful processing and protection.

No transfer mechanism eliminates all risk. We select providers and safeguards proportionate to the data, purpose, and available technology, and we limit transfers to legitimate purposes.

11 Retention

We retain personal data only for as long as reasonably necessary for the purpose for which it was collected, to follow client instructions, and to meet legal, accounting, security, or claims requirements. The periods below are general operating ranges; a contract, client instruction, platform setting, or law may require a shorter or longer period.

Data category	Typical retention
Client, contract, billing, accounting, and tax records	Generally up to 10 years after the relationship ends, or longer where legally required.
Active campaign and lead data	For the campaign or service term and generally up to 24 months afterwards, unless the client instructs earlier deletion or law requires otherwise.
Analytics and event data	Commonly 14 to 26 months, depending on the tool and settings, unless aggregated or de-identified.
Support and business communications	Generally up to 3 years after the last interaction, unless needed for a contract, dispute, security matter, or legal obligation.
Security logs and backups	Commonly up to 12 months, subject to investigation needs, backup cycles, continuity, and technical limitations.

When data is no longer required, we or the responsible client will delete, destroy, de-identify, aggregate, or securely archive it, subject to legal holds and technical backup cycles. De-identified information that no longer identifies an individual may be retained for lawful analytics, reporting, security, and service improvement.

12 Security

We use technical and organisational measures appropriate to the type of data, the systems used, and the level of risk. Depending on the system, these may include access controls, password managers, multi-factor authentication, role-based permissions, least-privilege access, encryption in transit, encryption at rest where available, secure backups, endpoint protection, logging, monitoring, incident procedures, confidentiality obligations, vendor review, and contractual data-protection terms.

SHARED RESPONSIBILITY No system is completely secure. Clients and users are also responsible for protecting their devices, credentials, accounts, and access permissions and for promptly reporting suspected unauthorised access connected with our services.

13 Your rights and choices

Depending on the applicable law and our role, you may have rights to receive information about processing, access personal data, request correction, withdraw consent, request deletion or restriction, object to certain processing, receive a copy or transfer of data where available, opt out of direct marketing, complain to a competent authority, bring a claim, or seek compensation where the law provides.

To make a request, email leadflowlocalvn@gmail.com with the subject “Privacy Request” and describe the data or campaign involved. We may ask for information needed to verify identity and protect the data from unauthorised disclosure.

When a request concerns data controlled by a business client, we may forward the request to that client or assist the client in responding. We will respond within the period required by applicable law and may refuse or limit a request only where law permits.

You may unsubscribe from our marketing emails using the unsubscribe link or by contacting us. Opting out of marketing does not stop service, billing, legal, security, or transactional messages. For marketing sent by a client, the client is responsible for the opt-out and we will assist when acting as processor.

14 Sensitive data and children

Our ordinary marketing services are not designed to collect sensitive personal data. Sensitive data may include health, biometric, precise location, financial account, identity document, political, religious, trade union, sexual life, criminal history, and other specially protected information under applicable law.

A client must not use our services to collect or process sensitive data unless LeadFlow Local has agreed in writing and the parties have established an appropriate lawful basis, notice, consent where required, security measures, access restrictions, retention period, and incident process.

Our services are intended for businesses and adult audiences and are not directed to children. We do not knowingly target children or intentionally collect their data through our own general website. A client campaign involving children or minors requires advance written disclosure to us and all safeguards required by applicable law.

For Vietnam-related processing, special rules apply to children. In particular, publishing or disclosing information about the private life or personal secrets of a child aged 7 or older requires the consent of both the child and the child's legal representative, unless an applicable legal exception applies.

15 Client responsibilities

A business client that uses our services to collect or process personal data is responsible for:

- identifying and documenting a lawful basis or other valid processing ground for each purpose;
- providing clear privacy and cookie notices and obtaining valid, recorded consent where required;
- complying with advertising, anti-spam, consumer, sector-specific, and platform rules;
- providing only data that it is legally permitted to collect, use, and share;
- keeping records of lead source, timestamp, form text, consent, notice version, cookie preferences, and marketing choices;
- handling data-subject requests and instructing us when correction, deletion, restriction, or export is required;
- notifying us before any high-risk campaign involving sensitive data, minors, health, financial, or biometric data; and
- entering into a data processing agreement and completing required processing or transfer assessments and filings.

RIGHT TO PAUSE OR RESTRICT PROCESSING We may refuse, pause, or restrict processing that we reasonably believe is unlawful, outside the agreed scope, unsupported by necessary safeguards, or inconsistent with applicable platform rules.

16 Data incidents

If we become aware of a personal data incident, we will investigate, take reasonable containment and mitigation steps, preserve relevant evidence, and make or support notifications required by law and the applicable agreement.

When we process data for a client, we will notify the client without undue delay after becoming aware of an incident affecting the client's data so the client can assess and meet its own obligations.

Under Vietnamese law, a controller, controlling-and-processing party, or relevant third party may be required to notify the personal-data protection authority within 72 hours after detecting a violation that is likely to cause the types of harm specified by law. The responsible party will meet that deadline where the statutory trigger is met.

17 Updates, language, and interpretation

We may update this Policy to reflect changes in our services, systems, providers, legal requirements, or business operations. The current version will be posted on our website with a revised "Last updated" date. Material changes may also be communicated by email, banner, account notice, or another reasonable method.

This English version is the original version. A Vietnamese translation may be provided for convenience and local transparency. If versions differ, the English version prevails to the extent permitted by law; mandatory local law prevails where it requires otherwise.

18 Contact details

Questions, complaints, and privacy requests may be sent to:

Armenian registered name	ԼԻՏԵԼՈՒՆԻ ԼՈՔԱԼ ՍՊԸ
Registration number	999.110.1593802
Taxpayer ID	08327707
Registered address	Armenia, Yerevan, Arabkir, Adontsi St. 4/3, 0014
Privacy email	leadflowlocalvn@gmail.com
Website	https://leadflow-local.com/
Effective and last updated	Effective 11 July 2026; last updated 14 July 2026

END OF PRIVACY POLICY This document ends here.