

Leadra Privacy Policy

Last Updated: 17 August 2026

LeadraLabs (Australia)

Leadra (“we”, “us”, “our”) is a leadership development platform that provides micro-learning, behavioural insights, reflection tools, and optional mentor-matching services. We are committed to protecting your privacy and handling your personal information in accordance with:

- **Australian Privacy Act 1988** and the **Australian Privacy Principles (APPs)**
- **EU General Data Protection Regulation (GDPR)**
- **UK GDPR**
- **California Consumer Privacy Act (CCPA/CPRA)**
- **Brazil LGPD**
- Other applicable global privacy laws

This Privacy Policy explains how we collect, use, disclose, store, and protect your personal information.

1. Who We Are

Leadra is operated by:

11/11-17 Clifford Street
Sydney
Australia
2088

info@leadralabs.com

Under GDPR, LeadraLabs is the **data controller** for EU/UK users.

2. What Personal Information We Collect

We collect only what is reasonably necessary to provide the Service, consistent with APP 3 and GDPR's data minimisation principle.

A. Information You Provide

- Account details (email, password)
- Profile information (name, role, leadership goals)
- Reflections, journal entries, micro-learning responses
- Mentor-matching preferences
- Community interactions (posts, comments, messages)
- Support requests

B. Information Collected Automatically

- Device information (OS, browser, device type)
- Usage data (features used, session duration)

- IP address and approximate location
- Cookies and similar technologies
- Timezone and language settings

C. Physiological & Lifestyle Indicators (Non-Clinical Data)

Leadra may offer features that allow users to record or reflect on lifestyle and wellbeing indicators—such as sleep quality, nutrition patterns, physical activity, stress levels, or relationship satisfaction—to support personalised leadership insights.

Providing this information is entirely optional and not required to use the Service. Users choose whether to share such data, and may add, edit, or delete it at any time.

These indicators are processed solely for generating behavioural insights and are treated as non-clinical data.

D. Sensitive Information

Leadra does not intentionally collect special category or sensitive information such as medical diagnoses, biometric identifiers, genetic data or information revealing racial/ethnic origin, political opinions, religious beliefs or sexual orientation.

If you voluntarily provide sensitive information within reflections or community interactions, it will be processed only to deliver the Service and will not be used for profiling or automated decision-making. You may delete this information at any time.

3. How We Use Your Information

We use your information to deliver personalised leadership insights, including behavioural pattern analysis and micro-learning recommendations. Some features involve **automated processing** to generate insights; however, these do not produce decisions with legal or significant effects. Physiological and lifestyle indicators are used only with your explicit consent and are processed using enhanced privacy safeguards.

Purposes

- Delivering leadership micro-learning content
- Generating personalised behavioural insights
- Providing mentor-matching services
- Improving the app and user experience
- Sending service-related communications
- Maintaining security and preventing misuse
- Complying with legal obligations

Legal Bases (GDPR)

- **Consent** (reflections, insights, mentor matching)
- **Contractual necessity** (providing the app)
- **Legitimate interests** (analytics, security)

We do **not** use your data for automated decisions with legal or significant effects (GDPR Art. 22). If this ever changes, APP 1 requires us to disclose ADM use explicitly.

4. Direct Marketing

We may send leadership-related updates only where permitted by law. EU/UK users receive marketing communications only with prior opt-in consent, and all users may withdraw consent or unsubscribe at any time.

5. Cookies and Tracking Technologies

Essential cookies are required for the Service to function. Non-essential cookies (such as analytics) are used only with your consent if you are located in the EU/UK. You may change your cookie preferences at any time.

6. Sharing Your Information

We may share your information with trusted service providers who support hosting, analytics, customer support, and mentor-matching functions. These providers are contractually required to protect your information and may only process it on our behalf. Where data is transferred outside your region, we use legally recognised safeguards such as Standard Contractual Clauses (EU/UK) and ensure compliance with the Australian Privacy Principles (APP 8).

Cross-Border Transfers

As an Australia-based company, we may transfer data internationally.

Australia does **not** have EU adequacy status.

Therefore, for EU/UK users, we rely on:

- **Standard Contractual Clauses (SCCs)**
- **Vendor contracts ensuring GDPR-equivalent protection**

Under **APP 8**, we remain accountable for overseas recipients.

7. Data Storage and Security

Leadra stores user data in secure cloud environments using encryption in transit and at rest, strict access controls, and data minimisation principles.

Journal entries and reflection content are stored as plain-text records within the application database to enable accurate insight generation and behavioural analysis. Authorised backend systems (operating under service-role credentials) may access journal content for the sole purpose of processing insights, maintaining system integrity, and improving user experience. Such access is restricted to designated system functions and does not extend to unauthorised personnel.

All data handling complies with applicable global privacy and data protection laws, including the GDPR, UK Data Protection Act 2018, Australian Privacy Principles, and other regional frameworks. Leadra applies appropriate technical and organisational measures to protect user data against unauthorised access, alteration, disclosure, or destruction.

8. Data Retention

We retain physiological and lifestyle indicators only as long as necessary to provide personalised insights. You may delete this data at any time through your account settings, and it will be removed from active systems promptly and from backups within a reasonable period.

Typical retention:

- Account data: until deletion
- Reflections/entries: until deletion
- Analytics logs: 12–24 months
- Backups: limited retention for security purposes

You may request deletion at any time.

9. Your Rights

To protect your information, we may need to verify your identity before fulfilling access, correction, deletion, or portability requests. Verification methods vary depending on your region and the sensitivity of the data involved.

To exercise rights, contact: info@leadralabs.com

10. Eligibility and Age Restrictions

Leadra is designed for adult users and is not intended for individuals under 18 years of age. Access by persons under 18 is permitted only when explicitly authorised, such as participation through an employer-sponsored leadership or development program. In such cases, the employer is responsible for ensuring appropriate consent, supervision, and compliance with applicable privacy and data protection laws.

11. Data Breaches

If a data breach occurs that is likely to result in harm, we will notify affected users and relevant authorities in accordance with applicable laws, including GDPR's 72-hour requirement and Australia's Notifiable Data Breaches scheme. .

12. Third-Party Services

Third-party providers may include cloud hosting services, analytics platforms, customer support tools, and mentor-matching facilitators. These providers are contractually bound to protect your information and may not use it for their own purposes.

13. International Users

Your data may be processed in Australia or other countries. We apply GDPR-equivalent safeguards for EU/UK users and ensure overseas recipients comply with the Australian Privacy Principles.

14. Changes to This Policy

We may update this Privacy Policy to reflect changes in law or our practices. We will notify users of material changes.

15. Contact Us

For privacy questions, complaints, or rights requests:

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Sydney, Australia
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