

# GDPR Analysis Leadinfo - Whitepaper

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Leadinfo B.V. ("Leadinfo") has developed software which it offers to its customers. This software makes it possible to link IP addresses of business website visitors to public company information. In addition to company data, this database includes names, positions, contact information and hyperlinks to LinkedIn profiles of employees and directors. This enables customers to see a comprehensive profile of their business website visitors.

Leadinfo considers privacy to be extremely important and it therefore asked Privacy Verified to assess its service against the General Data Protection Regulation ("GDPR") by conducting a privacy audit.

Based on this, **Privacy Verified has concluded that Leadinfo's service complied with the GDPR at the time of review.**

For example, Leadinfo has implemented the following safeguards:

- Leadinfo only collects the data it needs to build its database and provide its services. In addition, the end user only gets to see the data that are important to him or her. In principle, no data of self-employed workers, consumers and other natural persons are shown in the results which Leadinfo makes available to the end user.
- IP addresses of business website visitors and business profiles linked to these IP addresses are kept for a maximum of three years after they are collected.
- Leadinfo has a legitimate interest in compiling profiles of business website visitors and in building the database. To ensure that its own interest outweighs the privacy interest of data subjects, Leadinfo has weighed up these interests in the form of a *Legitimate Interest Assessment* ("LIA").
- Leadinfo has an 'opt-out' button in the footer of its website which enables visitors to object to the collection of personal data based on its legitimate interest. If a party whose data has been collected objects to that, Leadinfo will delete their data and ensure that the data of the company concerned are not collected again. An objection can also be made at any time by contacting Leadinfo.
- A privacy and cookie statement placed on the website informs data subjects about the handling of their personal data. This privacy and cookie statement is kept up-to-date so that the information given corresponds to Leadinfo's actual processing activities.
- Leadinfo gives its customers the possibility to use its services without the need for placing first- or third-party cookies.
- If a customer chooses to allow cookies for Leadinfo's services, Leadinfo will proactively inform that customer of any changes that may be necessary with respect to the cookie banner.
- A data breach contingency plan is in place, as well as a procedure for dealing with any requests from data subjects to exercise one of their rights under the GDPR.



**PRIVACY  
VERIFIED**

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- Leadinfo maintains a record of parties from whom it obtains data and with whom it shares data. Where required, a processing agreement is concluded: both with processors/subprocessors and with customers. Appropriate arrangements are made about the handling of personal data in this processing agreement.
- Leadinfo agrees Standard Contractual Clauses with third parties located outside the European Economic Area (EEA). Leadinfo also takes appropriate measures to eliminate or mitigate any risks associated with processing operations being carried out outside the EEA. These include pseudonymisation and encryption.
- A privacy policy and a security policy are in place.
- An overview of the processing operations that Leadinfo carries out is kept in processing records.
- A list of the (possible) data breaches that occur at Leadinfo, as well as any follow-ups to them, is kept in a data breach register.

