

The Hot Lead Privacy Policy: Protecting Your Personal Data

Effective Date: October 1, 2025

Introduction

We at ILMA LLC | The Hot Lead ("we," "us," "our") respect your privacy. This Privacy Policy is designed to explain how we collect, use, and protect the personal information you provide to us when you access our website, purchase our courses, coaching, certifications or marketing services, or engage with us on social media, as well as your own rights to the information we collect.

Please read this Privacy Policy carefully. We will alert you to any changes to this Policy by changing the "last updated" date at the top of this Policy. Any changes become effective immediately upon publication on our website, and you waive specific notice of any changes to the Policy by continuing to use and access our site(s). We encourage you to review this Privacy Policy periodically, when you use our website for any purpose or engage with us on social media. You are deemed to have accepted any changes to any revised Privacy Policy by your continued use of our website after the revised Privacy Policy is posted.

AI TECHNOLOGY DISCLOSURE AND DISCLAIMER

The Hot Lead employs artificial intelligence (AI) technologies, including AI voice and text agents ("AI Agents"), to enhance customer service, respond to inquiries, and provide information about our products and services. By using our services, you acknowledge and agree to the following terms regarding our use of AI Agents:

1. NATURE OF AI INTERACTION

When you interact with our AI Agents, you are communicating with an automated system powered by artificial intelligence, not a human representative. We always identify when you are interacting with an AI Agent rather than a human representative. Our AI Agents are designed to provide helpful, accurate information, but as with any AI technology, there are inherent limitations.

2. AI DATA COLLECTION AND PROCESSING

Our AI Agents may collect and process the information you provide during interactions, including but not limited to your inquiries, preferences, and feedback. This information is subject to the same privacy protections outlined elsewhere in this Privacy Policy. Additionally:

- a. Conversations with our AI Agents may be stored and analyzed to improve the quality and accuracy of our AI systems.
- b. We may use anonymized conversations to train and enhance our AI Agents' capabilities.
- c. You can request deletion of your conversation history with our AI Agents by contacting info@thehotlead.com

3. AI LIMITATIONS AND DISCLAIMER

While we strive to ensure our AI Agents provide accurate and helpful information, you acknowledge and agree that:

- a. AI technology has inherent limitations and may occasionally provide incomplete, inaccurate, or inappropriate responses.
- b. Information provided by our AI Agents is for general informational purposes only and should not be considered professional advice (legal, financial, medical, or otherwise).

c. Critical decisions should not be made solely based on information provided by our AI Agents without appropriate verification.

d. Official company policies, terms, and conditions always supersede any information provided by our AI Agents in case of discrepancies.

4. AI CONTENT GENERATION

Our AI Agents may generate content in response to your queries. You acknowledge that:

a. AI-generated content may not always reflect our official position or advice.

b. We do not guarantee the accuracy, completeness, or reliability of AI-generated content.

c. The Hot Lead reserves the right to review, modify, or remove any AI-generated content at our discretion.

5. LIABILITY LIMITATION FOR AI INTERACTIONS

To the fullest extent permitted by law, The Hot Lead disclaims all liability for any damages, losses, or harm arising from:

a. Reliance on information provided by our AI Agents.

b. AI system errors, malfunctions, or unavailability.

c. Decisions made or actions taken based on AI-generated information.

d. Any misunderstandings or miscommunications that may occur during AI interactions.

6. BOT DISCLOSURE

In accordance with applicable laws and regulations, we disclose that our automated agents are bots, and this disclosure is clear, conspicuous, and made at the beginning of any conversation or interaction.

7. AI AGENT OPT-OUT

You may opt-out of interacting with our AI Agents at any time by requesting to speak with a human representative or by using the opt-out mechanisms provided within the communication channel you are using. Please note that opting out of AI interactions may limit the availability or timeliness of certain services.

INFORMATION THAT WE COLLECT

We collect a variety of information from you when you visit our website, purchase our courses, coaching, certifications or marketing services, or interact with us on social media. By accepting this Privacy Policy, you are specifically consenting to our collection of the data described below, to our use of the data, to the processing of this data, and to our sharing of the data with third-party processors as needed for our legitimate business interests. The information we collect may include:

PERSONAL DATA

Personal Data is information that can be used to identify you specifically, including your name, shipping address, email address, telephone number, or demographic information like your age, gender, or hometown. You consent to giving us this information by providing it to us voluntarily on our website or any mobile application. You provide some of this information when you register with or

make purchases from our website. You may also provide this information by participating in various activities associated with our site, including responding to blogs, contacting us with questions, or participating in group training. Your decision to disclose this data is entirely voluntary. You are under no obligation to provide this information, but your refusal may prevent you from accessing certain benefits from our website or from making purchases.

DERIVATIVE DATA

Derivative data is information that our servers automatically collect about you when you access our website, such as your IP address, browser type, the dates and times that you access our website, and the specific pages you view. If you are using a mobile application, our servers may collect information about your device name and type, your phone number, your country of origin, and other interactions with our application. Derivative data may also include data collected by third-party service providers, such as advertising and analytics providers, and may include cookies, log data, or web beacons. Cookies are discussed more fully below. Derivative data collected by third-party service providers generally does not identify a specific individual.

FINANCIAL DATA

Financial data is data that is related to your payment method, such as credit card or bank transfer details. We collect financial data in order to allow you to purchase, order, return, or exchange products or services from our website and any related mobile apps. We store limited financial data. Most financial data is transferred to our payment processors, STRIPE and INTUIT, and you should review these processors' Privacy Policy to determine how they use, disclose, and protect your financial data. As a courtesy, these payment processors' Privacy Policies can be found here:

STRIPE: <https://stripe.com/privacy>

INTUIT: <https://www.intuit.com/privacy/>

SOCIAL NETWORKING DATA

We may access personal information from social networking sites and apps, including Facebook, Instagram, LinkedIn, Twitter, Snapchat, or other social networking sites or apps not named specifically here, which may include your name, your social network username, location, email address, age, gender, profile picture, and any other public information. If you do not want us to access this information, please go to the specific social networking site and change your privacy settings.

MOBILE DEVICE DATA

If you use our website via a mobile device or app, we may collect information about your mobile device, including device ID, model and manufacturer, and location information.

OTHER DATA

On occasion, you may give us additional data in order to enter into a contest or giveaway or to participate in a survey. You will be prompted for this information and it will be clear that you are offering this kind of information in exchange for an entry into such a contest or giveaway.

MOBILE APPLICATION INFORMATION

If you connect to us using a mobile application, we may request geolocation information, which includes permission to track your mobile device, in order to provide you with location-based services. We may also request access to certain features on your device, including your device's calendar, camera, contacts, social media accounts, Bluetooth, and storage. We may also send you "push notifications" regarding your account or our mobile application. If you wish to change our access to any of this information, you may do so by changing your device settings.

HOW WE USE YOUR INFORMATION

Your information allows us to offer you certain products and services, including the use of our website, to fulfill our obligations to you, to customize your interaction with our company and our website, and to allow us to suggest other products and services we think might interest you. We generally store your data and transmit it to a third party for processing. However, to the extent we process your data, we do so to serve our legitimate business interests (such as providing you with the opportunity to purchase our goods or services and interact with our website or mobile app).

Specifically, we may use the information and data described above to:

- Create and administer your account;
- Deliver any products or services purchased by you to you;
- Correspond with you;
- Process payments or refunds;
- Contact you about new offerings that we think you will be interested in;
- Interact with you via social media;
- Send you a newsletter or other updates about our company or website;
- Deliver targeted advertising;
- Request feedback from you;
- Notify you of updates to our product and service offerings;
- Resolve disputes and troubleshoot any problems;
- Administer contests or giveaways;
- Generate a profile that is personalized to you, so that future interactions with our website will be more personal;
- Compile anonymous statistical data for our own use or for a third party's use;
- Assist law enforcement as necessary;
- Prevent fraudulent activity on our website or mobile app;
- Analyze trends to improve our website and offerings.

WHEN DO WE COLLECT INFORMATION?

We collect information from you when you subscribe to a newsletter, fill out a form, enter information on our site, or make a purchase of our courses, coaching, certifications or marketing services.

HOW DO WE PROTECT VISITOR INFORMATION?

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

DATA SHARING COMMITMENT

WE DO NOT SELL YOUR DATA

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information for marketing or promotional purposes. Your information will never be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested.

LIMITED SHARING WITH SERVICE PROVIDERS

We may share your information with trusted third parties who assist us in operating our website, conducting our business, processing payments, or servicing you, so long as those parties agree to keep this information confidential. These service providers include:

- Payment processors (Stripe and Intuit) - solely for the purpose of processing your payments
- Email service providers - solely for sending communications you have opted into
- Website hosting services - solely for the purpose of hosting our website and its content
- SMS message aggregators and providers - solely for delivering text messages you have opted into receiving
- Course delivery platforms - solely for the purpose of delivering digital course content you have purchased
- Coaching session schedulers - solely for the purpose of scheduling coaching sessions you have enrolled in
- Certification verification systems - solely for the purpose of issuing and verifying certifications you have earned
- HighLevel CRM - for client relationship management (see special provisions below)

Important Note About SMS Data: All text messaging originator opt-in data and consent information will not be shared with any third parties, excluding aggregators and providers of the Text Message services necessary to deliver the SMS service. Your mobile information will not be shared with third parties or affiliates for marketing or promotional purposes.

WHITE-LABELED CRM SERVICES

We provide white-labeled HighLevel CRM services to our clients. Please be aware of the following regarding these services:

Third-Party Platform: HighLevel CRM is a third-party platform that we provide access to under our brand. The actual software, servers, and infrastructure are owned and operated by GoHighLevel.

Limitation of Liability: We are not responsible for any issues, outages, data breaches, or other problems that may occur with the HighLevel platform. This includes but is not limited to:

- Service interruptions or downtime
- Data loss or corruption
- Security breaches or unauthorized access to data
- Changes to the HighLevel platform's features or functionality
- Any other technical issues related to the HighLevel platform

Support for Platform Issues: For any issues related to the core functionality of the HighLevel platform, clients may need to contact GoHighLevel directly at gohighlevel.com.

Data Processing: When you use our white-labeled HighLevel CRM services, your data may be processed according to GoHighLevel's own privacy policy and terms of service, in addition to our policies.

Service Continuity: We cannot guarantee the continued availability of the HighLevel platform or its features, as these decisions are made by GoHighLevel and are beyond our control.

OTHER LIMITED DISCLOSURES

We may also disclose your information:

- As required by law, such as to comply with a subpoena or similar legal process
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request
- To enforce our Terms of Service

- In the event of a merger, acquisition, bankruptcy, or sale of assets, in which case the privacy policy of the new entity will govern

Introduction to The Hot Lead Privacy Policy

We may use cookies for tracking purposes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (like Internet Explorer, Chrome, Firefox, or Safari) settings. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookies.

If you disable cookies, some features may be disabled and some of our services may not function properly.

THIRD PARTY INTEGRATIONS

GOOGLE

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users.

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We have implemented the following:

- Remarketing with Google AdWords
- Google Display Network Impression Reporting
- Demographics and Interests Reporting

We, along with third-party vendors such as Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.

Opting out of Google Analytics: You can opt out of having your activity on our website made available to Google Analytics by installing the Google Analytics opt-out browser add-on. This add-on prevents Google Analytics from retrieving information about your visits to our website. For more information about Google's Privacy Policy, please visit: <https://policies.google.com/privacy>.

FACEBOOK

Facebook's advertising requirements can be summed up by Facebook's Advertising Principles. They are put in place to provide a positive experience for users. <https://www.facebook.com/policies/ads/>

We have implemented the following:

- Advertising with Facebook Advertising
- Retargeting with Facebook Advertising
- Demographics and Interests Reporting

We, along with third-party vendors such as Facebook, use first-party cookies (such as the Facebook Pixel) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.

Opting out of Facebook's interest-based ads: You can opt out of Facebook's interest-based ads by visiting: <https://www.facebook.com/help/568137493302217>.

You can learn more about Facebook's Privacy Policy at: https://www.facebook.com/full_data_use_policy.

GROUNDS FOR USING AND PROCESSING YOUR DATA

The information we collect and store is used primarily to allow us to offer our courses, coaching, certifications and marketing services for sale. In addition, we may collect, use, and process your information based on the following grounds:

LEGITIMATE BUSINESS INTERESTS

We may use and process your data for our legitimate business interests, which include, among other things, communicating with you, improving our goods or services, improving our website, and providing you with the information or products that you have requested.

PERFORMANCE OF A CONTRACT

We may use and process your information to enter into a contract with you and to perform our contractual obligations to you.

CONSENT

We may use your data, or permit selected third parties to use your data, based on your consent to our use and sharing of that data. You may withdraw your consent at any time, but doing so may affect your ability to use our website or other offerings.

AS REQUIRED BY LAW

We may also use or process your data as required for us to comply with legal obligations.

INTERNATIONAL DATA

Our website is hosted by servers located in the United States of America. Therefore, if you reside outside the United States of America, some of your data will be transferred internationally to and stored on those servers. In addition, we may use third-party processors (including payment processors) and subcontractors located in the United States of America. We use all reasonable methods to protect the safety of your data during transfer, including hosting our website on reputable servers and engaging reputable third-party processors. By using this site and providing us with information, you consent to this transfer, processing, and storage of your information in the United States of America. Note that the privacy laws in the United States of America may not be as strict as those in other countries. Please be aware that:

- We may transfer data that we collect to locations outside of our headquarters for processing or storing, and the data may be processed by our staff or by third-party processors. For example, we may engage third parties to fulfill orders. By submitting your personal data, you agree to this transfer, storing, and processing. We take all reasonable steps to make sure your data is treated securely and in conformity with this Privacy Policy.
- Data that is provided to us is stored on secure servers. Payment information and other sensitive data will be encrypted to ensure its safety.
- The transmission of data via the internet is never completely secure, and we cannot guarantee the security of data that is sent to us electronically. Your transmission of data to us is at your own risk.

- Where data that you have transmitted to us is password protected, you are responsible for keeping the password confidential. You are exclusively responsible for any breaches of your data that results from your own disclosure of or failure to protect your password.

DATA RETENTION

We retain personal data as long as it is needed to conduct our legitimate business purposes or to comply with our legal obligations, or until you ask us to delete your data. For example, we will retain certain personal information indefinitely for the purposes of maintaining your account, unless and until you delete your account. Data that we gather for a specific and particular purpose, such as assisting law enforcement or analyzing trends, will be kept for no longer than is necessary for that particular purpose. Data that is no longer needed by us for any of the purposes listed above will be permanently deleted.

We will honor your request to delete your data, as described more fully below, unless we are required by law to retain access to the data. However, note that we cannot control the retention policies of third parties. If you wish to have any third parties, including those to whom we've transmitted your data, delete that data, you will need to contact those third parties directly. You may request from us a list of all third parties to whom we have transmitted your data.

We may retain usage data (that is, data that is gathered by our company or third-party analytics companies for the purpose of analyzing the use of our website) as needed for internal analysis purposes. This type of data is usually retained for a shorter period of time than personal data, unless the data is necessary to improve the security or functionality of our website or offerings, or we are legally obligated to retain the data for a longer period of time.

SECURITY OF YOUR INFORMATION

We take all reasonable steps to protect your personal data and keep your information secure. We use recognized online secure payment systems and implement generally accepted standards of security to protect against personal data loss or misuse. However, no security measure is foolproof, and no method of data transmission can be guaranteed against interception or misuse. We cannot guarantee complete security of any information you transmit to us.

By consenting to this Privacy Policy, you acknowledge that your personal data may be available, via the internet, around the world. We cannot prevent the use or misuse of your data by other parties.

We will notify you promptly of any known breach of our security systems or your data which might expose you to serious risk.

SENSITIVE DATA

We request that you do not submit any sensitive data to us, via public postings, email correspondence with us, or any other method, including social security number, health data, genetic data, or information related to your ethnic origin, religious beliefs, or criminal history. If you do send us this information, then by doing so you are consenting to our use, storage, and processing of this information in accordance with this privacy policy.

SMS/TEXT MESSAGE PRIVACY

If you have opted in to receive SMS/text messages from us, we are committed to protecting your privacy regarding these communications:

- **No Data Sharing:** All text messaging originator opt-in data and consent information will not be shared with any third parties, excluding the aggregators and providers necessary to deliver the SMS service.
- **Marketing Restrictions:** Your mobile information will not be shared with any third parties or affiliates for marketing or promotional purposes.
- **Limited Use:** Your SMS opt-in data will only be used for the specific purposes you have consented to, such as appointment reminders, event notifications, receipts, customer service updates, and promotional messages you've explicitly opted into.

- Opt-Out Control: You can stop receiving text messages at any time by texting "STOP" to our shortcode. Upon doing so, we will confirm your opt-out status via SMS and will cease sending you text messages.

YOUR RIGHTS

You have certain rights with respect to your personal data, as outlined below. Note that we may charge you a reasonable fee for actions that you ask us to take with respect to your data. In addition, we reserve the right to request that you provide us with evidence of your identity before we take any action with respect to the exercise of your data rights. Further, your rights may be restricted or nullified to the extent they conflict with our compelling business interests, the public interest, or the law.

UPDATE ACCOUNT INFORMATION

You have the right to update or change any information you have provided to us. To update or delete your information, please contact us at info@thehotlead.com

CONFIRM PERSONAL DATA AND ITS USE

You have the right to request that we confirm what data we hold about you, and for what purposes. You also have the right to confirmation of whether we process your data or deliver your data to third-party processors, and for what purposes. We will supply you with copies of your personal data unless doing so would affect the rights and freedoms of others.

CHANGE CONSENT

You have the right to change your consent to our use of your information. In such cases, we may require you to delete your account with us, as described above, and you may not have full access to our website.

REQUEST A COPY OF DATA

You have the right to request a digital copy of the data that we hold about you. Your first request for a copy of your personal data will be provided free of charge; subsequent requests will incur a reasonable fee.

TRANSFER YOUR DATA

You have the right to request that we gather and transfer your data to another controller, in a commonly used and machine-readable format, unless doing so would cause us an undue burden.

DELETE ALL DATA

You have the right to request that we delete all data that we hold about you, and we must delete such data without undue delay. There are exceptions to this right, such as when keeping your data is required by law, is necessary to exercise the right of freedom of expression and information, is required for compliance with a legal obligation, or is necessary for the exercise or defense of legal claims. Such a request may result in a termination of your account with us and you may have limited or no use of our website.

EMAILS AND COMMUNICATIONS

You may opt out of receiving future email correspondence from us by checking the appropriate box when you register for the account or make a purchase. You may change your communication settings by contacting us at info@thehotlead.com

MARKETING COMMUNICATIONS

You may opt out of receiving any third-party marketing communications or having your personal information used for marketing purposes. You may do this by contacting us at info@thehotlead.com

PROCESSING

You may, in some circumstances, restrict the processing of your data, such as when you contest the accuracy of your data or when you have objected to processing, pending the verification of that objection. When processing has been restricted, we will continue to store your data but will not pass it on to third-party processors without your consent, or as necessary to comply with legal obligations or protect your rights or those of others or our company. In addition, you may opt out of any processing of your data altogether. Note, however, that doing so may result in the termination of your account and loss of access to our website.

COMPLAINTS

If you believe we are misusing your data or have violated any of your rights under this Privacy Policy or applicable law, you have the right to file a complaint with us directly or with a regulatory body or data protection authority.

CALIFORNIA PRIVACY RIGHTS

The State of California has established its own unique regulations that apply to California residents. As of its effective date of January 1, 2020, we are also compliant with the California Consumer Privacy Act Of 2018, Cal. Civ. Code §§ 1798.100 Et Seq. (CCPA).

Any California resident may request, free of charge, the personal information we have collected or stored about themselves or about a member of their household. For security purposes, we reserve the right to ask for verification of your identity and proof of your California residency at the time of your request.

Any California resident has a right to request the personal data we have collected, or request deletion of the personal data we have collected, including but not limited to:

- Any personally identifying information, such as a real name, alias(es), mailing or resident address, IP address, email address, account name, biometrics, or any other data that could uniquely identify a California resident; and
- Commercial information, including products or services purchased, obtained, or considered, search history, interactions with our website, or any other purchasing or browsing history of our site and/or offer(s); and
- Site comments made publicly or privately; and
- Geolocation data; and
- Professional or employment-related information; and
- Education information.

We reserve the right to collect any of the above data on California residents and their households.

We DO NOT sell your data. California residents can email us at info@thehotlead.com to explicitly request to opt-out of any future data sales, should our policies change.

California residents also have the option to request a full deletion of their account and any data we have collected and associated with them.

We agree to comply with any data request or deletion made pursuant to the CCPA in a reasonable timeframe, during normal business hours and excluding holidays or our pre-scheduled time off.

COPPA (CHILDREN ONLINE PRIVACY PROTECTION ACT)

When it comes to the collection of personal information from children under 13, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, the nation's consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under 13 and do not knowingly collect personal information from children under 13.

FAIR INFORMATION PRACTICES

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices, we will take the following responsive action, should a data breach occur:

We will notify the users via email within 7 business days.

We also agree to the individual redress principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but

also that individuals have recourse to courts or a government agency to investigate and/or prosecute non-compliance by data processors.

CAN SPAM ACT

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions.
- Process orders and to send information and updates pertaining to orders of our courses, coaching, certifications or marketing services.
- Send additional information related to your product and/or service.
- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

To be in accordance with CANSPAM, we agree to the following:

- NOT use false, or misleading subjects or email addresses
- Identify the message as an advertisement in some reasonable way
- Include the physical address of our business or site headquarters
- Monitor third-party email marketing services for compliance, if one is used
- Honor opt-out/unsubscribe requests quickly
- Allow users to unsubscribe by using the link at the bottom of each email

If at any time you would like to unsubscribe from receiving future emails, you can email us at info@thehotlead.com or follow the instructions at the bottom of each email to unsubscribe, and we will promptly remove you from ALL correspondence.

CONTACT INFORMATION

If you have any questions about this Privacy Policy, please contact us at:

Email: info@thehotlead.com