

Privacy Policy

Effective Date: September 30, 2026 **Last Updated:** September 30, 2026

This Policy is designed for Leonard Strategic Works' U.S.-based business and government procurement website and ordinary procurement operations. It should be read together with any transaction-specific notice, contract or legally required disclosure.

1. Purpose and Scope

This Privacy Policy describes how Leonard Strategic Works ("LSW," "we," "us," or "our") may collect, use, disclose, retain, secure, and otherwise process personal information in connection with our website, requests for quote, sourcing and procurement activities, supplier and customer relationships, transactions, communications, and other business interactions. It applies to information processed through the website and ordinary business operations unless a separate written agreement, government contract, mandatory law, or other controlling requirement governs the information.

2. Categories of Information We May Collect

Depending on the interaction, information may include identifiers and business contact information; organization, agency and job information; RFQ, solicitation, product, specification, part-number, quantity, pricing and delivery information; account and transaction records; purchase orders, invoices, payment status and tax documentation; supplier, manufacturer and logistics information; correspondence and attachments; website and device data; IP address, browser, operating system, referring page, timestamps, approximate location derived from IP address, security logs, cookie identifiers and interaction data; and other information voluntarily supplied or reasonably necessary for the transaction.

3. Sources of Information

Information may come directly from users; website forms; email, telephone and other communications; customers, suppliers, manufacturers, distributors, carriers, subcontractors and business partners; purchase orders and contracts; public records and government procurement systems; authorized representatives; website hosting, security and analytics technologies; and other lawful sources relevant to LSW's operations.

4. Purposes of Processing

LSW may process information to identify and communicate with business contacts; respond to inquiries; evaluate solicitations and RFQs; source, quote, purchase and deliver products; validate specifications, pricing, availability, lead times and product origin; administer orders, invoices, payments, freight, returns and warranties; maintain records; manage supplier and customer relationships; comply with contracts, procurement rules, tax, accounting, audit, sanctions, export-control, fraud-prevention, cybersecurity and legal requirements; secure systems; investigate incidents; establish or defend legal rights; improve operations; and carry out other purposes disclosed at collection or reasonably compatible with the context.

5. Data Minimization and Accuracy

LSW intends to collect and retain information reasonably relevant to legitimate business, contractual, security and legal purposes. Users should provide accurate information and avoid submitting information that is unnecessary for the requested transaction. LSW may request updated or corrected information when reasonably necessary.

6. How Information May Be Disclosed

Information may be disclosed to suppliers, manufacturers, distributors, freight carriers, warehouses, logistics providers, payment and financial service providers, insurers, accountants, attorneys, auditors, IT, hosting, security, cloud, communications and other service providers; government agencies, contracting personnel, prime contractors or authorized procurement participants; parties to corporate transactions; and other parties when disclosure is authorized, requested by the individual, reasonably necessary to perform a transaction, protect rights or security, investigate misconduct, comply with law or satisfy contractual obligations.

7. Service Providers and Contractors

LSW may engage service providers that process information on our behalf or in connection with services provided to us. We may use contractual, technical or administrative measures appropriate to the nature of the service and information. Third parties acting independently may maintain their own privacy obligations and policies.

8. Sale, Sharing and Targeted Advertising

LSW does not sell personal information for monetary consideration. LSW does not intend to use personal information for cross-context behavioral advertising unless appropriate notice and legally required choices are provided. Some privacy statutes define sale or sharing more broadly than an

exchange for money. If a practice becomes subject to an applicable opt-out requirement, LSW will provide the mechanism required by that law.

9. Cookies, Analytics and Similar Technologies

The website may use cookies, pixels, local storage, log files and similar technologies for essential operation, security, fraud prevention, preferences, performance and analytics. The specific technologies may change as the website changes. Where applicable law requires consent or an opt-out for non-essential technologies, LSW will implement the legally required control. Browser or device controls may also affect these technologies.

10. Do Not Track and Preference Signals

Browser Do Not Track signals are not governed by a single uniform U.S. standard. Where an applicable law requires recognition of a legally valid universal opt-out or preference signal, LSW will process the signal as required by that law and subject to its applicability and verification rules.

11. Data Security

LSW uses reasonable administrative, technical and organizational safeguards designed to protect personal information from unauthorized access, acquisition, destruction, use, modification or disclosure. Measures may include access controls, authentication, system and software maintenance, secure configurations, encryption where appropriate, backups, logging, vendor controls, incident-response procedures and restrictions based on business need. Security measures evolve with risk and technology. No system or transmission method can be guaranteed absolutely secure.

12. Security Incident and Breach Response

LSW may investigate suspected unauthorized access, acquisition, use, modification, destruction or disclosure of information, take reasonable containment and remediation measures, preserve relevant evidence, coordinate with service providers and authorities where appropriate, and provide legally or contractually required notices to affected persons, customers, government entities, regulators or other parties. Notification timing and content will be governed by applicable law and controlling contracts.

13. Retention and Disposal

LSW may retain information for the period reasonably necessary to fulfill the purposes described in this Policy and to satisfy contractual, procurement, warranty, tax, accounting, audit, litigation-hold, security, insurance, record-retention and legal requirements. Retention periods may vary by record type and transaction. When information is no longer reasonably required, LSW may delete, destroy, anonymize or securely dispose of it, subject to backup cycles and legal preservation obligations.

14. Government, Contract and Controlled Information

Government-related information may be subject to solicitation clauses, FAR or agency requirements, contract-specific cybersecurity requirements, records obligations, disclosure rules, export controls or other restrictions. This Policy does not authorize transmission of classified information, Controlled Unclassified Information, export-controlled technical data or other specially protected information through an ordinary website form or unapproved channel. A controlling government contract or mandatory requirement prevails where applicable.

15. Sensitive Information

Unless LSW expressly requests it through an approved method, users should not submit Social Security numbers, account credentials, complete payment-card numbers, health information, biometric identifiers, classified information, CUI, export-controlled technical data, or other highly sensitive information through ordinary website forms or general communications.

16. Payment Information

Payments may be processed by financial institutions or payment service providers. Where a third party processes payment credentials directly, its processing is subject to its own terms and privacy practices. LSW does not represent that it stores complete payment-card credentials unless that is actually part of its operations.

17. Children's Information

LSW operates as a business and government procurement supplier and does not direct the website to children. LSW does not knowingly seek personal information from children under 13 through the website. If such information is identified, LSW may take reasonable steps to delete or otherwise address it as required by law.

18. U.S. State Privacy Rights

Depending on residence, applicable law and LSW's legal status under that law, individuals may have rights to confirm processing; access; correct; delete; obtain a portable copy; opt out of regulated sale, sharing, targeted advertising or qualifying profiling; limit certain uses of sensitive information; or appeal a request decision. Rights are subject to definitions, thresholds, exceptions, exemptions and verification requirements in the applicable law. Nothing in this Policy grants a statutory right where the relevant law does not apply.

19. Exercising Privacy Rights

Where applicable, a privacy request may be submitted through the official privacy or contact mechanism made available on the LSW website. LSW may request information reasonably necessary to verify identity, authority, residency, applicable rights and the records involved. Authorized-agent requests may require proof of authorization. LSW may deny or limit requests where permitted by law and will provide required explanations or appeal mechanisms when applicable.

20. Non-Discrimination

LSW will not unlawfully discriminate against an individual for exercising a privacy right provided by applicable law. Different treatment may occur where permitted by law, reasonably related to the value of data, necessary to provide a requested service, or otherwise lawfully justified.

21. Legal Process, Fraud and Safety

LSW may preserve, use or disclose information where reasonably necessary to comply with law, subpoena, court order or government request; enforce agreements; collect amounts owed; detect, investigate or prevent fraud, cybersecurity incidents, unlawful conduct or procurement misconduct; protect persons, property, systems or rights; or establish, exercise or defend legal claims.

22. Corporate Transactions

Information may be disclosed or transferred in connection with due diligence, financing, investment, merger, acquisition, reorganization, bankruptcy, sale of assets or other corporate transaction, subject to applicable confidentiality and legal requirements.

23. Third-Party Sites and Independent Parties

Links to third-party websites, manufacturers, suppliers, government systems or other resources do not make LSW responsible for those parties' privacy, security or content. Independent parties may process information under their own policies and legal obligations.

24. International Users and Transfers

LSW is a U.S.-based business primarily serving U.S. government and commercial markets. Information may be processed or stored in the United States. If mandatory international privacy or transfer requirements apply to LSW, LSW will address them as required. Accessing the website from another country does not by itself create obligations that would not otherwise apply under law.

25. Automated Processing

LSW may use ordinary automation to route inquiries, detect spam or fraud, organize records, assist sourcing, analyze website performance or support business workflows. If LSW later engages in automated decision-making or profiling that triggers specific legal rights, legally required notices and choices will be provided.

26. Changes to this Policy

LSW may update this Policy as operations, technology or law change. The current version will be posted on the website with a revised effective or last-updated date. Material notice or consent will be provided when required by applicable law. Continued website use after an update does not waive rights that cannot legally be waived.

27. Contact and Requests

Questions, legally available privacy requests, and privacy-related communications may be submitted using the official contact or privacy method displayed on the Leonard Strategic Works website. No personal address, individual email address or personal telephone number is published in this Policy.