



Posted/Revised: February 1, 2017

## PRIVACY POLICY

We collect and save certain information through our website, located at ThruThink.com (our "Website"), including through the products and services provided at the Website and the use of the *ThruThink<sup>SM</sup>* service ("System"). This page (this "Privacy Policy") lays out our policies and procedures surrounding the collection and handling of such information that identifies an individual user or that could be used to contact or locate him or her ("Personally Identifiable Information" or "PII") and the data inputs made by the Customer into the System ("Customer Data"). Together the PII and Customer Data are called the secured data of the Website ("Secured Data").

This Privacy Policy applies only to our Website and to the products and services provided through our Website. It does not apply to any third party site or service linked to our Website or recommended or referred by our Website, through our products or services, or by our staff. And it does not apply to any other website, product, or service operated by our company, or to any of our offline activities.

### **A. Personally Identifiable Information**

#### What we collect

We collect only the Customers e-mail address from users who purchase subscriptions for our services and e-mail addresses of their Sub Users. Upon creating an account with us, the Customer and Sub Users will be required to create a password. We do not have access to this password and the Customer will need to reset the password if lost or forgotten.

Our subscription will require a payment from our Customers which may require a credit card or PayPal number. We use a payment processing service that will receive your Credit Card information and if applicable PayPal will receive your PayPal information. We will only receive notification of your payment and will not have any record of your specific Credit Card or PayPal information. Although we use credible industry accepted companies to provide this service, we have no control and have no responsibility over the security of their sites and what they do with your information. Upon request, we will identify the Credit Card payment processing service that is currently being used by our Website.

We also use "cookies" to collect certain information from all users, including Web visitors who don't buy anything through our Website. A cookie is a string of data our Website sends to your computer and then uses to identify your computer when you return to our Website. Cookies give us usage data, like how often you visit, where you go at the site, and what you do on our site and how long you spend on our site. In addition, we may also collect information such as your computer's Internet Protocol address, browser type and browser version.

#### Our Use of PII

We use your Personally Identifiable Information to create your account, to communicate with you about products and services you've purchased, to offer you additional products and services, and to bill you. We also use that information to the extent necessary to enforce our Website terms of service and to prevent imminent harm to persons or property.

We use cookies so that our Website can remember you and provide you with the information you're most likely to need. For instance, when you return to our Website, cookies identify you and prompt the site to provide your username (not your password), so you can sign in more quickly. Cookies also allow our Website to remind you of your past purchases and to suggest similar products and services. Finally, we use information gained through cookies to compile statistical information about use of our Website, such as the time users spend at the site and the pages they visit most often. Those statistics do not include PII.

#### **B. Customer Data**

We collect and save the Customer Data that the Customer inputs into the System as a service to the Customer. Outside the Customers own use or allowed use through their authorized sub users (see Terms of Service), except as provided in Section D and E below, we will not share, distribute or allow access to the Customer Data without the express written permission from the Customer.

#### **C. Chat Responses**

If a chat response is provided in the System, we will use an outside vendor for that service. Chat dialog which will include the Users e-mail address will be retained on the outside vendors server as well as on the System's server. Except as provided in Section D and E below, to the best of our knowledge, this information will not be shared or distributed except that we may use suggestions or comments contained in the chat dialog to improve the System or for using excerpts from the chat dialog to promote the System as outlined in the Terms of Service.

#### **D. Protection of Secured Data**

We do not employ any special security tools to protect unauthorized gathering of your Secured Data. We employ a one way hash encryption method to protect the password you create for your account which means that we do not have access to your password. Unfortunately, even with these measures, we cannot guarantee the security of your Secured Data. By using our Website, you acknowledge and agree that we make no such guarantee, and that you use our Website at your own risk.

#### **E. Contractor and Other Third Party Access to Secured Data**

We give certain employees and independent contractor's access to your Secured Data. Those employees and contractors assist us with System customer service, System maintenance, improvements and new features as well as problem solving and new products. All those employees and contractors are required to sign contracts in which they promise to protect Secured Data using procedures reasonably similar to ours. (Users are not third party beneficiaries of those contracts.) We also may disclose Secured Data to attorneys, collection agencies, or law enforcement authorities to address potential AUP violations, other contract violations, or illegal behavior. And we disclose any information demanded in a court order or otherwise required by law or to prevent imminent harm to persons or property. Finally, we may share the Secured Data in connection with a corporate transaction, like a merger or sale of our company, or a sale of all or substantially all of our assets or of the product or service line you received from us, or a bankruptcy.

As noted above, we compile Website usage statistics from data collected through cookies. We may publish those statistics or share them with third parties, but they don't include the Secured Data.

Except as set forth in this Privacy Policy, we do not share the Secured Data with third parties.

#### **F. Persons under the age of 18**

We do not knowingly collect any information or receive payments from persons under the age of 18

except for Classroom Accounts where persons must be at least 16 years of age. For a classroom Account, students may sign up and pay fees either through their school or directly with the Vendor for the use of the System.

**G. Accessing and Correcting Your Secured Data**

You can access and change any Personally Identifiable Information we store through your “Account Page”. You may change or delete the Customer Data we store for your account by deleting the individual data or the entire project in the System.

**H. Amendment of This Privacy Policy**

We may change this Privacy Policy at any time by posting a new version on this page or on a successor page. The new version will become effective on the date it’s posted, which will be listed at the top of the page as the new Effective Date.