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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 *ThruThink*® application ("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") and the data inputs made by the Customer into the System ("Customer Data"). Together the Personally Identifiable Information and Customer Data are called the secured data of the System ("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. What we collect

E-mail Address

We collect only the e-mail address from those who subscribe to communications from us through our Website and customers who purchase subscriptions (including the one-time Quick Deal purchase) to the *ThruThink*® application (System) or services along with the 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.

Partial Credit Card Information

A purchase or subscription will require a payment from our Customers which will require a credit card. We use a payment processing service that will receive your Credit Card information. We do not have access to your credit card information, but do receive notification of your payment. Although we use credible industry accepted companies who are PCI (Payment Card Industry) Service Provider Level 1 compliant 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 provide you with the Credit Card payment processing service that is currently being used by *ThruThink*®.

Cookies

We use "cookies" to collect certain information from all users, including Web visitors who just visit and do not purchase a subscription. 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. 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 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. We collect information about your browser type and browser version. In addition, we may also collect information such as your computer's Internet Protocol address, however we have made efforts to keep this information anonymous.

Cookies also allow our Website to remind you of upcoming subscription renewals 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. To track the statistical information for the Website analytics we use the Google Analytics and

HotJar services that monitor traffic on the Website and Google Analytics that monitors traffic on the System. Those services track the visitor usage information and patterns in order that we communicate effectively and efficiently to our visitors.

Please refer to our [Cookie Notification](#) in our Website for more specific detail about cookies on the Website and our System.

B. Our Use of Personally Identifiable Information

Your e-mail address is the process that we use to identify you. We will use that information to create your account and to communicate with you. We will communicate to you about your subscription or Quick Deal purchase, provide you updates about *ThruThink*®, provide interesting articles and information on business and life issues, offer you announcements or insights on additional products and services, and we will contact you about renewing your subscription. We also use that information to the extent necessary to enforce our Website terms of service.

C. 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 E and F below, we will not share, distribute or allow access to the Customer Data without the express written permission from the Customer.

D. 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 E and F 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.

E. 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. Your Secured Data will be stored in a cloud based server provided by an independent storage service. Unfortunately, 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.

F. Contractor and Other Third Party Access to Secured Data

The e-mail addresses for those who subscribe to the communication service contained in our Website and for those who subscribe to the System, are collected in databases that are controlled and managed by the Website host and an outside service contracted for the System (Contracted Outside Services). These are well established standard services. Although we are not aware of any exposure of this information to outside parties, we have no control over the actions of the Contracted Outside Services.

We give certain employees and independent contractor's access to your Secured Data within the System. 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. (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 Acceptable Use Policy 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 in Section A above and in Section I below, we compile Website usage statistics from data collected through cookies. We may publish those statistics or share them with third parties, but to the best of our knowledge, they don't include any information that identifies individual users.

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

G. 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.

H. Accessing, Correcting and Deleting Your Secured Data

For the Website, (<https://thruthink.com>), you may contact us and we will remove your email from our mailing list and site member data base and to the best of our ability, we will remove any other Personally Identifiable Information from the Website.

For the *ThruThink*[®] application site (<https://app.thruthink.com>), 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. Upon subscription expiration or cancellation, you may contact us and we will remove your e-mail from the System, delete your account and your Customer Data and to the best of our ability, we will remove any other Personally Identifiable Information from the System.

I. 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.