

Think Academy Privacy Policy

Effective as of: 08/01/2021

We at Think Academy International Education, Inc. (collectively with any subsidiaries or affiliates, "we", "us", "our", or "Think Academy") have created this privacy policy ("Privacy Policy") to describe our policies and practices regarding the collection, use, and disclosure of personal information about individuals in connection with the <https://www.thethinkacademy.com/> website, Think Academy mobile application, and any other website or mobile application that we own or control and which posts or links to this Privacy Policy (collectively, the "Services") and the rights and choices available to individuals with respect to their information.

We provide additional important information for individuals located in the European Union, European Economic Area, and the United Kingdom (collectively, "Europe" or "European") [here](#) and for individuals located in California [here](#).

BY USING THE SERVICES, YOU AGREE TO BE BOUND BY THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THESE TERMS, PLEASE DO NOT USE THE SERVICES. WHERE REQUIRED UNDER APPLICABLE LAW, WE WILL OBTAIN YOUR NOTIFIED CONSENT BEFORE COLLECTING, USING AND/OR DISCLOSING YOUR PERSONAL INFORMATION; IF YOU ARE A CHILD, WE WILL OBTAIN THE CONSENT OF YOUR PARENT/LEGAL GUARDIAN BEFORE COLLECTING, USING AND/OR DISCLOSING YOUR PERSONAL INFORMATION. IF THE PRIVACY POLICY CHANGES IN A WAY THAT REQUIRES PARENTAL CONSENT, WE WILL REACH OUT TO THE PARENTS TO OBTAIN NECESSARY CONSENT.

If you have questions about anything in our Privacy Policy, please contact us at:

E-mail: privacy@thethinkacademy.com

or

Tel: 844-844-6587

If you are located in Singapore, please contact our Data Protection Officer at zhuangyingjie@tal.com.

1. Children under 13-years-old and COPPA

We provide tutoring and other educational programs to students from Elementary to Middle School, including children under 13. Following the Children's Online Privacy Protection Act ("COPPA") requirements in the United States, and the Personal Data Protection Act 2012 ("PDPA"), and our own policies, this Privacy Policy describes our practices with regards to our collection, use, or disclosure of personal information from children under the age of 13, and how we obtain verifiable parental consent prior to collecting, using, or disclosing any such information.

If you are a parent and believe that we have collected information about your child without your consent, please contact us immediately at privacy@thethinkacademy.com. If we discover that we have collected information from a Child in a manner inconsistent with COPPA's or PDPA's requirements, as the case may be, we will either seek the Parent's consent for that collection or delete the information. We will not require a child to disclose more information than is reasonably necessary to utilize our Services.

Verifiable Parental Consent: In order for a Child under the age of 13 to access our Services, a parent or legal guardian ("Parent") must provide verifiable parental consent. We will obtain verifiable consent from Parents when they create an account. A verification code will be sent to the phone number parents used to sign up for the Service. By purchasing and paying for the Service to be provided, parents provide verifiable consent to the personal information we collect from Children as described in this policy.

- We obtain verifiable parental consent prior to collecting, using, or disclosing any personal information from Students.
- Additional Important Information Regarding Children's Data:

We do not use Children’s data for marketing or promotional purposes.

- **Disclosure of information provided by Students.**
We might disclose the information collected from Students to our affiliates and subsidiaries to improve our Services. We may also disclose the information to government authorities if required for compliance and law enforcement purposes. We may share the information with a third party as a result of merger, acquisition, consolidation, and reorganization. We may provide such information to our professional advisors such as accountants, auditors, lawyers, bankers, insurers, or other professionals in the course of their provision of services to us.
- **Except in limited circumstances, Parents have the right to access, modify, delete, or stop further collection of the personal information provided by their child. To access and modify personal information provided by Children, Parents can log-in to the Think Academy Classroom. To delete or stop further collection of the personal information provided by Children, Parents can send a request to delete or stop collection to privacy@thethinkacademy.com.**
- **Real-time Video and Audio Communication:** We use real-time video and audio communication in our interactive online learning system. A Student can participate in streaming courses, record videos and take photos while using our Services.
- **Please contact us at privacy@thethinkacademy.com or 844-844-6587. If you are located in Singapore, please contact our Data Protection Officer at yjingjiehuang@tal.com. We will take steps to verify that any person contacting us in relation to a Child’s information is that Child’s Parent(s).**

2. Personal Information We Collect

Personal information that you may provide to us, that Students may provide to us, that Parents may provide to us about Students, through the Service or otherwise, or that we may automatically collect, include:

- **Contact Information**, such as name, email, cell phone number, and address.
- **Account Information**, provided when a Parent creates an account on our Services. When creating an account, we may request certain information, such as an avatar, username and password, nickname, and a photo (we may obtain this information when a Parent via a social media platform). Refusal to provide part or all of such information may result in the inability to use the Services.
- **Demographic Information**, such as country of residence, age, and gender.
- **Feedback or Correspondence**, such as when you contact us so that we can provide customer support.
- **Marketing Information**, such as your preferences for receiving communications about our activities, events, and publications, and details about how you engage with our communications. Where required under applicable law, we will obtain your separate consent for sending you marketing information.
- **Student Data** that Parents provide about Students to register them for our Service. We will not make a Student’s real name publicly available on our website.
- **Student Performance Data**, when Students use our Service, we may record and store their progress and performance ("**Student Performance Data**"). We use this data in order to provide our Service and to analyze and improve our Service. The Parent can access the Student's Performance Data by logging to the Think Academy Classroom.
- **User-Generated Information**, we retain the information uploaded, provided, or created by Parents and Students while using the Service. A Parent can log in to Think Academy Classroom to view and manage any content created or uploaded by the Student. For example, during the class, there might be interactive practices that require Students to upload photos, video or audio recordings. Parents may instruct Students to opt-out of such interactive practices by deactivating the camera.

- **Payment Information**, such as parents' credit card information, billing address, bank account number as well as any other information necessarily required to process a transaction.
- **Publicly-available Information**, including comments describing support for and experience with our websites or mobile applications and information that parents or others publish on social media, testimonials, blogs or other forums, such as tweets, comments, photographs, or video or audio content.
- **Transaction Information**, such as information about payments to and from parents and other details of products or services parents have purchased from us.
- **Other Information** that we may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

Information Collected from Third-Party Accounts and Third-Party Sources

We may, with users' consent where required under applicable law collect and use personal information obtained from third party platforms such as Facebook, Google, Amazon, WeChat and other accounts you use to interact with us ("**Third-Party Accounts**"), such as parents' name, user name or profile picture, friend list and other details parents may have on your Third-Party Account profile ("**Third-Party Information**"). We may also obtain parents' personal information from other third parties, such as marketing partners, and publicly available sources.

If parents choose to login to the Services via a third-party platform or social media network, or otherwise connect your account on the third-party platform or network to your account through the Services, we may collect information from that platform or network. For example, this information may include your Facebook username, user ID, profile picture, cover photo, and networks to which parents belong (e.g., school, workplace). Parents may also have the opportunity to provide us with additional information via the third-party platform or network, such as a list of parents' friends or connections and email address.

We do not have access to your Third-Party Account passwords. The data we receive from Third-Party Accounts is dependent upon your privacy settings with these third parties. You should always review, and if necessary, adjust your privacy settings on Third-Party Accounts before linking or connecting them to our Services. We use Third-Party Information to operate, maintain, and provide to you the features and functionality of the Services, to process and ship orders including textbooks, to provide customer Services, and to communicate directly with you, such as to send you information about your orders, product sales, special offers, and new features of the Services. Where required under applicable law, we will obtain your consent before sending you information relating to special offers and product sales.

The personal information we collect is subject to this Privacy Policy. The information collected and stored by a third party remains subject to the third party's privacy practices, including whether the third party continues to share information with us, the types of information shared, and your choices with regard to what is visible to others on that third party web site and service. The third party may allow you to remove the application or feature, in which case we will no longer collect information about you through the application or feature, but we may retain the information previously collected in compliance with all applicable laws.

Cookies and Other Information Collected Automatically

Our Services utilize cookies, web beacons and similar technologies to improve your current and future experience by allowing us to understand your usage of our Services. Using such technologies, we, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and activity over time occurring on or through the Services and other online services.

See our [Cookie Policy](#) for more information.

The information that may be collected automatically includes:

- **Device Properties and Operations:** We collect certain information from and about your smartphone, tablet, or personal computers ("**Device**"), such as Device number, model, hardware and software version, signal intensity, browser type, browser version, Internet Protocol (IP) addresses, your operating system, the type of Internet browser you use, unique Device identifiers and other diagnostic data.

- **Usage Information:** We collect information about your use of and actions on the Services, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access.
- **Device Signals:** We collect information that your Device sends out or receives to tailor the Services to our users in different regions, such as geo-location, IP addresses, and external hardware information from your Device about surrounding Wi-Fi access points, beacons, and cell towers. You can enable and disable communicating such information to us by adjusting your Device security and privacy settings.
- **Analytics Information:** We may collect analytics data or use third-party services to help us measure traffic and usage trends for the Services and to understand more about the demographics of our users.
- **Precise Geolocation Information** when you authorize our mobile application to access your location.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

3. How We Use Your Personal Information

We will with your consent where required under applicable law (provided by your Parent if you are a Child) We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

To provide our Services. We use your personal information to:

- To create and administer accounts, fulfill and record transactions, analyze the performance of Students and our Services, and provide you with related assistance (e.g., technical help, answer inquiries relating to personal information, etc.)
- To provide, operate and improve the Services
- To provide information about our products and Services
- To enable security features of the Service, such as by sending you security codes via email or SMS, and remembering devices from which you have previously logged in
- To communicate with you about the Service, including by sending you announcements, updates, security alerts, and support and administrative messages
- To understand your needs and interests, and personalize your experience with the Services and our communications
- To provide support and maintenance for the Services
- To respond to your requests, questions, and feedback

To send you marketing and promotional communications.

Where required under applicable law, we will obtain your separate consent before sending you marketing and promotional communications.

- To send you marketing communications and offer other materials that we believe may be of interest to you,
- We do not use a child’s personal information for the purposes of behavioral advertising or serve the child behaviorally targeted ads.
- For advertising purposes.
- To facilitate social sharing functionality if you choose to do so.
- You may opt-out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send. Or by contacting us at privacy@thethinkacademy.com or 844-844-6587. If you are located in Singapore, please contact our Data Protection Officer at Yingjie Zhuang. If you opt out as mentioned above, you will no longer receive this marketing information from us, but you will continue to receive communications relating to our Service.

For research and development. We analyze use of the Services to analyze and improve the Services and to develop new products and Services, including by studying user demographics and use of the Services.

For compliance, fraud prevention, and safety. We may use your personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims); (b) enforce the terms and conditions that govern the Service; (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity; (d) comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

With your consent. In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

To create anonymous, aggregated or de-identified data. We may create anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated or de-identified data by removing information that makes the data personally identifiable to you. We may use this anonymous, aggregated or de-identified data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

4. How We Share Your Personal Information

We will, with your consent where required under applicable law (provided by your Parent if you are a Child), disclose your information in specific circumstances to a third party unless otherwise stated below:

Affiliates. We may share your personal information with our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

Advertising and Analytics Partners. When we use third-party cookies and other tracking tools, we may disclose your personal information to those third-party companies to help us analyze use of our Services and advertise our Services.

Business Transaction. We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

Payment Processors. For online payments and/or automated clearing house (ACH) payouts, we use the payment services of PayPal. We do not process, record or maintain your credit card or bank account information and we will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. For more information on how payments are handled, or to review PayPal's Privacy Policy at <https://www.paypal.com/va/webapps/mpp/ua/privacy-full>.

Service Providers. We may share your personal information with third party companies and individuals that provide services on our behalf or help us operate the Services (such as customer support, hosting, analytics, email delivery, marketing, and database management services). These third parties may use your personal information only as directed or authorized by us and in a manner consistent with this Privacy Policy, and are prohibited from using or disclosing your information for any other purpose.

Professional advisors. We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

Other Users of the Service and the Public. We may provide functionality that enables you to disclose personal information to other users of the Services (such as Parents or Students) or the public.

Parents. We share certain information about Students, such as Student Performance Data, with parents.

For compliance, fraud prevention and safety. We may share your personal information for the compliance, fraud prevention and safety purposes described above.

5. Data Security

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we use industry customary means designed to protect your personal information, we cannot guarantee its absolute security.

6 International Data Transfers

Think Academy is headquartered in the United States and may have affiliates and service providers in other countries. Your personal information may be transferred to the United States or other locations outside of your state, province, country, or other governmental jurisdiction where privacy laws may not be as protective as those in your jurisdiction.

Individuals in the European Union should read the important information provided [here](#) about the transfer of personal information outside of the European Economic Area.

7. Links to Other Websites and Services

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties. The inclusion of a link does not imply endorsement of the linked site or Services by us.

Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other application developer, application provider, social media platform provider, operating system provider, wireless Services provider or Device manufacturer, including any personal information you disclose to other organizations through or in connection with our Services. We do not expect Children under 13 to share their personal information with third party websites and services.

8. Your Choices

In this section, we describe the rights and choices available to all users. Whether these rights are available to you will depend on the nature of the personal data processing activity, and the jurisdiction in which the processing takes place. Users who are located within the European Union can find additional information about their rights [below](#).

- **Access or Update Your Information.** If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into the account.
- **Opt out of Marketing Communications.** You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us at privacy@thethinkacademy.com.
- **Cookies & Browser Web Storage.** We may allow service providers and other third parties to use cookies and similar technologies to track your browsing activity over time and across the Services and third party websites. Some of the business partners that collect information about users' activities on or through the Services may be members of organizations or programs that provide choices to individuals regarding the use of their browsing behavior or mobile application usage for purposes of targeted advertising. Please review our [Online Tracking Opt-out Guide](#) for additional detail on how to opt out of cookies.
- **Withdraw your Consent or Parental Consent.** To the extent that we process personal information of your children based on your consent, you may withdraw your consent at any time. You may make the request to withdraw your consent to the contacts provided in the [contact us](#) section below.
- **Choosing not to Share your Personal Information.** Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Service to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with our Services. We will tell you what information you must provide to receive the Services by designating it as required at the time of collection or through other appropriate means.
- **Mobile Location Data.** You can disable our access to your device's precise geolocation in your mobile device settings.

9. Changes to Our Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. We may, if required by law, also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information) or another manner through the Service. Where required under applicable laws, we will obtain your consent to these changes.

Any modifications to this Privacy Policy will be effective upon our posting the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

10. Contact Us

If you have any concerns relating to this Privacy Policy, you may correspond with us by:

Think Academy International Education, Inc.
1081 S De Anza Blvd, San Jose, CA 95129
Email: privacy@thethinkacademy.com
Tel: 844-844-6578

For customers in Singapore please contact our Data Protection Officer at zhuangyingjie@gmail.com

11. Notice to European Residents

The information provided in this “Notice to European Users” section applies only to individuals in Europe.

Personal information. References to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

Controller. Think Academy is the controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation.

The contact information for our representative in Europe is: michael.li@tal.com

Legal bases for processing. We use your personal information only as permitted by law. Our legal bases for processing the personal information described in this Privacy Policy are described in the table below.

Processing purpose (click link for details) <i>Details regarding each processing purpose listed below are provided in the section above titled “How we use your personal information”.</i>	Legal basis
<ul style="list-style-type: none"> • To provide the Service 	Processing is necessary to perform the contract governing our provision of the Service or to take steps that you request prior to signing up for the Service. If we have not entered into a contract with you, we process your personal information based on our legitimate interest in providing the Service you access and request.
<ul style="list-style-type: none"> • For research and development • To send you marketing and promotional communications • To display advertisements • For compliance, fraud prevention and safety • To create anonymous, aggregated or de-identified data. 	These activities constitute our legitimate interests. We do not use your personal information for these activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
<ul style="list-style-type: none"> • To comply with law 	Processing is necessary to comply with our legal obligations.
<ul style="list-style-type: none"> • With your consent 	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consent or in the Service.

Use for new purposes. We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

Sensitive personal information. We ask that you not provide us with any sensitive personal information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Service, or otherwise to us.

If you provide us with any sensitive personal information to us when you use the Service, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Service.

Retention

We retain personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

Your rights

European data protection laws give you certain rights regarding your personal information. If you are located within the European Union, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by email to privacy@thethinkacademy.com or our postal address provided above. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

Cross-Border Data Transfer

If we transfer your personal information out of Europe to a country not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be performed:

- Pursuant to the recipient's compliance with standard contractual clauses, Binding Corporate Rules, or other GDPR-compliant cross border data transfer mechanism
- Pursuant to the consent of the individual to whom the personal information pertains
- As otherwise permitted by applicable European requirements.

You may contact us if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.

12. Notice to California Residents

This section applies only to California residents. It describes how we collect, use and share personal information of California residents in operating our business, and their rights with respect to that personal information. For purposes of this section, “Personal Information” has the meaning given in the California Consumer Privacy Act of 2018 (“CCPA”) but does not include information exempted from the scope of the CCPA.

A. Personal information that we collect, use and share

The chart below summarizes how we collect, use and share Personal Information by reference to the categories specified in the CCPA, and describes our practices during the 12 months preceding the effective date of this Privacy Policy. Categories in the chart refer to the categories described above in the general section of this Privacy Policy.

We do not sell personal information. As we mentioned in this Privacy Policy, like many companies, we use services that help deliver interest-based ads to you. Our use of some of these services may be classified under California law as a “sale” of your Personal Information to the companies that provide the services because they collect information from our users (e.g., device data and online activity data) to help them serve ads more likely to interest you. You can request to opt- out of this “sale” of your personal information here: [Do Not Sell My Personal Information](#).

Category of personal information (PI) (click HERE for details)	PI we collect	Source of PI	Business/ commercial purpose for collection	Categories of third parties to whom we “disclose” PI for a business purpose	Categories of third parties to whom we “sell” PI
Identifiers	<ul style="list-style-type: none"> • Contact Information • Account Information • Demographic Information • Student Data • Third-Party Information 	<ul style="list-style-type: none"> • You • Parents • Students • Public sources • Third Party sources 	<ul style="list-style-type: none"> • To provide our Services • To send you marketing and promotional communications • For research and development • To comply with law • For compliance, fraud prevention, and safety • With consent • To create anonymous, aggregated, de-identified data 	<ul style="list-style-type: none"> • Affiliates • Advertising and Analytics partners • Professional advisors • Authorities and others • Business transferees • Other users of the Services and the Public 	<ul style="list-style-type: none"> • Advertising partners (to facilitate online advertising)
Commercial Information	<ul style="list-style-type: none"> • Marketing Information • Transactional Information • Usage Information 	<ul style="list-style-type: none"> • You • Parents • Students • Automatically collected 	<ul style="list-style-type: none"> • To provide our Services • To send you marketing and promotional communications • For research and development • To comply with law 	<ul style="list-style-type: none"> • Affiliates • Advertising and Analytics partners • Professional advisors • Authorities and others • Business transferees 	<ul style="list-style-type: none"> • Advertising partners (to facilitate online advertising)

			<ul style="list-style-type: none"> • For compliance, fraud prevention, and safety • With consent • To create anonymous, aggregated, de-identified data 		
Financial Information	<ul style="list-style-type: none"> • Payment information • Transaction information 	<ul style="list-style-type: none"> • Parents 	<ul style="list-style-type: none"> • To provide our Services • For research and development • To comply with law • For compliance, fraud prevention, and safety • With consent • To create anonymous, aggregated, de-identified data • 	<ul style="list-style-type: none"> • Affiliates • Payment processors • Professional advisors • Authorities and others • Business transferees 	<ul style="list-style-type: none"> • <i>None</i>
Online Identifiers	<ul style="list-style-type: none"> • Account Information • Device Properties and Operations 	<ul style="list-style-type: none"> • You • Parents • Students • Automatic collection 	<ul style="list-style-type: none"> • To provide our Services • To send you marketing and promotional communications • For research and development • To comply with law • For compliance, fraud prevention, and safety • With consent • To create anonymous, aggregated, de-identified data 	<ul style="list-style-type: none"> • Affiliates • Advertising and Analytics partners • Professional advisors • Authorities and others • Business transferees 	<ul style="list-style-type: none"> • <i>Advertising partners (to facilitate online advertising)</i>
Internet or Network Information	<ul style="list-style-type: none"> • Device Properties and Operations • Usage Information • Device Signals 	<ul style="list-style-type: none"> • Automatic collection 	<ul style="list-style-type: none"> • To provide our Services • To send you marketing and promotional communications 	<ul style="list-style-type: none"> • Affiliates • Advertising and Analytics partners • Professional advisors 	<ul style="list-style-type: none"> • <i>Advertising partners (to facilitate online advertising)</i>

	<ul style="list-style-type: none"> ● Analytics Information 		<ul style="list-style-type: none"> ● For research and development ● To comply with law ● For compliance, fraud prevention, and safety ● With consent ● To create anonymous, aggregated, de-identified data ● 	<ul style="list-style-type: none"> ● Authorities and others ● Business transferees 	
Geolocation Data	<ul style="list-style-type: none"> ● Device Signals ● Analytics Information ● Precise Geolocation Information ● Device Properties and Operations 	<ul style="list-style-type: none"> ● Automatic collection 	<ul style="list-style-type: none"> ● To provide our Services ● To send you marketing and promotional communications ● For research and development ● To comply with law ● For compliance, fraud prevention, and safety ● With consent ● To create anonymous, aggregated, de-identified data 	<ul style="list-style-type: none"> ● Affiliates ● Professional advisors ● Authorities and others ● Business transferees 	<ul style="list-style-type: none"> ● <i>None</i>
Inferences	<p>May be derived from your:</p> <ul style="list-style-type: none"> ● Device Properties and Operations ● Usage Information ● Device Signals ● Analytics Information 	<ul style="list-style-type: none"> ● Automatic collection 	<ul style="list-style-type: none"> ● To provide our Services ● To send you marketing and promotional communications ● To display advertisements ● For research and development ● To comply with law ● For compliance, fraud prevention, and safety ● With consent 	<ul style="list-style-type: none"> ● Affiliates ● Advertising and Analytics partners ● Professional advisors ● Authorities and others ● Business transferees 	<ul style="list-style-type: none"> ● <i>Advertising partners (to facilitate online advertising)</i>

			<ul style="list-style-type: none"> • To create anonymous, aggregated, de-identified data 		
Education Information	<ul style="list-style-type: none"> • Student data • Student performance data 	<ul style="list-style-type: none"> • Students 	<ul style="list-style-type: none"> • To provide our Services • For research and development • To comply with law • For compliance, fraud prevention, and safety • With consent • To create anonymous, aggregated, de-identified data 	<ul style="list-style-type: none"> • Affiliates • Professional advisors • Authorities and others • Business transferees 	<i>None</i>
Sensory Information	<ul style="list-style-type: none"> • User-Generated Information 	<ul style="list-style-type: none"> • Students • Parents 	<ul style="list-style-type: none"> • To provide our Services • For research and development • To comply with law • For compliance, fraud prevention, and safety • With consent • To create anonymous, aggregated, de-identified data 	<ul style="list-style-type: none"> • Affiliates • Professional advisors • Authorities and others • Business transferees • Other users of the Service 	<i>None</i>

We describe the sources from which we collect this information in the section above entitled [Personal Information We Collect](#), and the business and commercial purposes for which we collect this information in the section above entitled [How We Use Your Personal Information](#), and the categories of third parties to whom we disclose this information in the section above entitled [How we share your personal information](#).

- B. **Your California privacy rights.** The CCPA grants California residents the following rights.
- ☐ **Information.** You can request information about how we have collected and used your personal information during the past 12 months.
 - ☐ **Access.** You can request a copy of the personal information that we maintain about you.
 - ☐ **Deletion.** You can ask us to delete the personal information that we collected or maintain about you.
 - ☐ **Right to opt-out of the “sale” of your personal information.** Like many companies, we use services that help deliver interest-based ads to you. Our use of some of these services may be classified under California law as a “sale” of your Personal Information to the companies that provide the services because they collect information from our users (e.g., device data and online activity data) to help them serve ads more likely to

interest you. You can request to opt-out of this “sale” of your personal information here: [Do Not Sell My Personal Information](#).

Please note that the CCPA limits these rights by, for example, prohibiting us from providing certain sensitive information in response to an access request and limiting the circumstances in which we must comply with a deletion request. If we deny your request, we will communicate our decision to you. You are entitled to exercise the rights described above free from discrimination.

C. **How to make a request.** To request access to or deletion of personal information:

- ☒ email: privacy@thethinkacademy.com.
- ☒ calling us toll free at: +1 (844) 844-6587

Identity verification. CCPA requires us to verify the identity of the individual submitting the request before providing a substantive response to the request.

Authorized agents. California residents can empower an “authorized agent” to submit requests on their behalf. We will require the authorized agent to have a written authorization confirming that authority.

California Shine the Light Law. California Civil Code Section 1798.83 permits users who are California residents to obtain from us once a year, free of charge, a list of third parties to whom we have disclosed personal information (if any) for direct marketing purposes in the preceding calendar year. If You are a California resident and you wish to make such a request, please send an e-mail with “California Privacy Rights” in the subject line to privacy@thethinkacademy.com.

Cookie Policy

This Cookie Policy explains how Think Academy International Education, Inc. (“**Think Academy**”, “**we**”, “**us**” or “**our**”) uses cookies and similar technologies in connection with the <https://www.thethinkacademy.com/> website and any other website that we own or control and which posts or links to this Cookie Policy (collectively, the “**Sites**”), along with the Think Academy mobile application and any other mobile applications that we own or control and which posts or links to this Cookie Policy (collectively, the “**Apps**”).

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies serve different purposes, like helping us understand how a site is being used, letting you navigate between pages efficiently, remembering your preferences and generally improving your browsing experience.

Our Sites may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them).

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Sites; and (2) third party cookies, which are served by service providers or business partners on our Sites, and can be used by these parties to recognize your computer or mobile device when it visits other websites. Third party cookies can be used for a variety of purposes, including site analytics, advertising and social media features.

What types of cookies and similar tracking technologies does Think Academy use on the Sites?

On the Sites, we use cookies and other tracking technologies in the following categories described in the table below.

<i>Type</i>	Description	Who serves the cookies (link to privacy policy/site)	How to control them
<i>Advertising</i>	These cookies are used by advertising companies to collect information about how you use our Sites and other websites over time. These companies use this information to show you ads they believe will be relevant to you within our Service and elsewhere, and to measure how the ads perform.	Google Ads	See ‘ Online Tracking Opt-out Guide ’ below.
<i>Analytics</i>	These cookies help us understand how our Service is performing and being used. These cookies may work with web beacons included in emails we send to track which emails are opened and which links are clicked by recipients.	Google Analytics	See ‘ Online Tracking Opt-out Guide ’ below. Google Analytics uses its own cookies. You can find out more information about Google Analytics cookies here and about how Google protects your data here . You can prevent the use of Google Analytics relating to your use of our Sites by downloading and installing a browser plugin available here .

<i>Essential</i>	These cookies are necessary to allow the technical operation of our Service (e.g., they enable you to move around on a website and to use its features).	Google Tag Manager	See ' Online Tracking Opt-out Guide ' below.
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Other technologies

In addition to cookies, our Sites may use other technologies, such as Flash technology and pixel tags to collect information automatically.

Browser Web Storage

We may use browser web storage (including via HTML5), also known as locally stored objects (“LSOs”), for similar purposes as cookies. Browser web storage enables the storage of a larger amount of data than cookies. Your web browser may provide functionality to clear your browser web storage.

Flash Technology

We may use Flash cookies (which are also known as Flash Local Shared Object (“Flash LSOs”)) on our Sites to collect and store information about your use of our Sites. Unlike other cookies, Flash cookies cannot be removed or rejected via your browser settings. If you do not want Flash LSOs stored on your computer or mobile device, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel. You can also control Flash LSOs by going to the Global Storage Settings Panel and following the instructions. Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with our Sites.

Web Beacons

We may also use web beacons (which are also known as pixel tags and clear GIFs) on our Sites and in our HTML formatted emails to track the actions of users on our Sites and interactions with our emails. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages or within HTML formatted emails. Pixel tags are used to demonstrate that a webpage was accessed or that certain content was viewed, typically to measure the success of our marketing campaigns or engagement with our emails and to compile statistics about usage of the Sites, so that we can manage our content more effectively.

Mobile Application Software Development Kits (SDKs)

We may use third-party software development kits (“SDKs”) in our mobile applications. A SDK is third-party computer code that may be used for a variety of purposes, including to provide us with analytics regarding the use of our mobile applications, to integrate with social media, add features or functionality to our app, or to facilitate online advertising. SDKs may enable third parties to collect information directly via our App.

Online Tracking Opt-out Guide

Like many companies online, we may use services provided by Google and other companies that use tracking technology. These services rely on tracking technologies – such as cookies and web beacons – to collect directly from your device information about your browsing activities, your interactions with websites, and the device you are using to connect to the Internet. There are a number of ways to opt out of having your online activity and device data collected through these services, which we have summarized below:

- ❑ **Blocking cookies in your browser.** Most browsers let you remove or reject cookies, including cookies used for interest-based advertising. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit <https://www.allaboutcookies.org/>.
- ❑ **Blocking advertising ID use in your mobile settings.** Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

- ② **Using privacy plug-ins or browsers.** You can block our websites from setting cookies used for interest-based ads by using a browser with privacy features, like Brave, or installing browser plugins like [Privacy Badger](#), [Ghostery](#) or [uBlock Origin](#), and configuring them to block third party cookies trackers.
- ② **Platform opt-outs.** The following advertising partners offer opt-out features that let you opt-out of use of your information for interest-based advertising:
 - Google: <https://adssettings.google.com>
 - Facebook: <https://www.facebook.com/policy/cookies/>
- ② **Advertising industry opt-out tools.** You can also use these opt-out options to limit use of your information for interest-based advertising by participating companies:
 - Digital advertising Alliance: <http://optout.aboutads.info>
 - Network Advertising Initiative: <http://optout.networkadvertising.org/?c=1>

Note that because these opt-out mechanisms are specific to the device or browser on which they are exercised, you will need to opt-out on every browser and device that you use.

Changes

Information about the cookies we use may be updated from time to time, so please check back on a regular basis for any changes.

Questions

If you have any questions about this Cookie Policy, please contact us by email at privacy@thethinkacademy.com.

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