



ThoughtTech

Privacy Policy

Last update: July 29, 2021

This policy describes how Thought Technology Ltd collects, processes, uses and shares personal information and personal data about users of the Thought Technology website (the "**Website**"). This policy only applies to the Website. The activities and services offered by Thought Technology Ltd other than the Website are covered by other policies regarding privacy and data processing.

In this policy, the term personal data refers to information that relates to an individual who is identifiable.

The contact details of the data controller under this policy are as follows:

Thought Technology Ltd

Marketing/Sales Director

Helen@Thoughttechnology.com

North America: (800) 361-3651 ext. 139

International: +1 (514) 489-8251 ext. 139

Basis for Data Processing

In order to enable you to use the Website and the services offered through the Website, we must collect and process personal data about you. Our processing of personal data is mainly based on the following principles:

- We must process some personal data in order to be able to provide you with services and to allow you to use the Website.
- We may process certain personal data because you have given specific consent. You may withdraw your consent at any time and we will stop personal data processing that is based on your consent.
- We process certain personal data when necessary for the purpose of our legitimate interests, those of our users and partners, when the processing is not likely to infringe on users' fundamental rights.

Data We Collect

Information that comes from you

We collect the information you provide to us (for example by completing a form) through the Website interface or otherwise. This information may include:

- Your first and last name;
- Your address;
- Your phone number;
- Your email address;
- Any questions or comments you send through our Website's chatbot;
- Your credit card numbers or bank account coordinates (as the case may be);
- Your Tax ID or Social Insurance number (for customers located in the USA)*.

For transactions originating in the USA your SIN (social insurance number) or TIN (tax identification number) will be requested. As Thought Technology is a Canadian Company, goods entering the U.S. from overseas are considered imports and U.S. Customs and Border Protection (CBP) must approve all imports for entry. CBP requires documentation which includes shipment details such as the identification of the consignee that is located in the USA and that will receive the shipment. The SIN or TIN number is used by CBP to identify the consignee.

Without these numbers, we are not able to process the transactions as the CBP does not know who the consignee is and therefore will not accept the shipment into the U.S.

Data Collected Automatically

We collect information automatically when you use the Website. This information is saved each time you interact with the Website and includes information about your mobile device and data about your interactions with the Website, in particular:

- The operating system and identification number of your mobile device;
- The make and model of your mobile device
- The version of the Website in use;
- The operating language of your mobile device
- The IP address from which your mobile device accesses the Website;
- The country, state, city, and zip code where your mobile device is located
- Screens consulted, actions taken, the number of connections to the Website, the date of the connections to the Website.

Data from Analysis Tools

When you access the Website, we collect data provided by analytics tools such as Google Analytics. This data may include, for example, sex, age, interests, but it is not associated with you personally and is provided to us in aggregated form.

Data from Social Networks

We collect information from sites or social networking Websites (Facebook, Twitter, YouTube, LinkedIn, Vimeo, Pinterest, Yahoo, etc.) when you interact with profiles belonging to us. These sites or Websites are also governed by their own policies regarding your personal data which may be different from ours and may be applicable.

How We Use your Data

We process personal data collected through the Website for the purposes described below. Some processing is subject to your specific consent, while other processing is necessary to provide you with services or is based on the pursuit of legitimate interests.

Contacting You

We use the personal data you provided us (for example your name and email address) to contact you, but only if you have provided such data and if you agree to receive communications from us (through our chatbot, our newsletter, a purchase you have made, a request you have made, etc.). We communicate with you via e-mail, phone, Skype, GoToMeeting™, webinars, and other social media platforms such as Facebook, Twitter, Google Analytics and constant contact.

We abide by applicable regulations with respect to unwanted electronic communications. If you no longer wish to receive electronic communications from Thought Technology, you can notify us at any time at the following address: mail@thoughttechnology.com.

Providing Information to our Partners

We use the data collected through the Website, in aggregate form that does not associate data to a particular individual or mobile device, in order to provide marketing information to our business partners. We share statistics that are segmented using certain personal characteristics, without these characteristics being associated with any particular individual.

Website Maintenance

We use data collected through the Website and data collected from analytics tools to monitor usage of the Website generally, to prevent misuse of the Website, to identify problems or bugs in the Website and to determine which features we should improve.

Legitimate Interests

We process personal data collected through the Website to fulfill our legitimate interests, including improving our services and providing our users with personalized content.

We take the privacy of our users seriously. That is why the processing of personal data based on our legitimate interests never involves targeted monitoring or communicating specific personal data about identifiable individual to third parties.

How do we Store your Data?

We keep your personal data until you ask us to destroy it, until our activities no longer require keeping your data. We do not, however, undertake to keep any data for a determined period of time.

Personal data is stored electronically on our servers located in the United States of America. These servers are operated by our hosting provider, BigCommerce who undertakes in writing to keep your personal data confidential.

How Personal Data is Protected

Your personal data is hosted by our hosting provider, Bigcommerce and Stripe for payments. We ensure that we and our providers use industry-standard security measures to maintain the integrity and confidentiality of data. All credit card and banking information is encrypted. All Stripe payments as per the privacy policy of Stripe [Privacy Policy - Canada | Stripe | Canada](#).

All payment card information is processed in accordance with the requirements of the payment card industry standards.

Our employees and service providers are aware that the personal data collected through the Website is confidential and are informed about the appropriate security measures to prevent unauthorized access to personal data.

How Personal Data Is Disclosed

We only share your personal data as described in this policy or when we have your consent. Your personal data may be disclosed to the categories of recipients described below for the purposes mentioned.

Employees

Collected personal data is only available to our officers and employees who must access it for the purposes described in this policy.

Service Providers

We share some personal data with service providers that enable us to render our services more efficiently. These providers agree in writing to keep personal data confidential and to limit their use of personal data to what is necessary to provide their services.

Partners

We may disclose data, in an aggregate form that does not identify the individuals involved, with business partners for marketing purposes. This data includes, but is not limited to, statistics about our users, how the Website is used, comments or questions received through our chatbot.

Legal Obligations

We may also disclose personal data to third parties if the law expressly authorizes or requires such disclosure, or if we are ordered to do so by a competent authority. We may disclose personal data in the context of court proceedings if necessary to protect our rights or those of our users.

Sale of Business

In the event that the sale or restructuring of all or part of our business is envisioned, we may disclose collected personal data to the persons or organizations involved before and after the transaction, whether or not it takes place. In such a case, these persons or organizations undertake to keep disclosed personal data confidential and to use same exclusively in order to evaluate the feasibility or the opportunity of the proposed transaction as well as in accordance with this policy.

Sharing Content

The Website includes features that allow you to share content through social networking platforms. If you share content that includes personal data, that information may become publicly available based on the settings you selected.

What are your Rights about your Personal Data

Access your data

You may have access to some personal data that you have personally provided to us by accessing your account through the Website.

To access the personal data that we hold about you or to rectify personal data that is incorrect, you may make a request in writing to the following address: mail@thoughttechnology.com or to the address of the data controller at the beginning of this policy.

We will respond to your request promptly (within 30 days of receipt), allowing you to access your personal data that is under our control. When required by law, we will provide your data in a portable machine-readable format.

Withdrawal of Consent

You may withdraw your consent to the collection and processing of some personal data, including location data, by denying the Website access to the location data of your mobile device.

The Website allows you to withdraw your consent to certain processing of your personal data, including by opting in or out of promotional offers based on your activities on the Website.

If you wish to withdraw your consent to the processing of your personal data beyond what the Website or your mobile device allows, please notify us in writing at mail@thoughttechnology.com. It is not possible to stop all processing of your personal data and continue using the Website. The only way to stop all processing of your personal data is to stop using the Website.

Objection

In certain circumstances, depending on your place of residence, you may have the right to object to the processing of your personal data based on our legitimate interests. You may object to the processing of your data in writing at mail@thoughttechnology.com.

Erasure

You may request the erasure of personal data that we hold about you in writing at mail@thoughttechnology.com. We will respond to your request as soon as possible (within 30 days of receipt).

If you continue to use the Website after your personal data has been erased, we will continue to collect certain data about you.

Complaints

If you reside in the European Union, you have the right to lodge a complaint about the processing of your personal data with a supervisory authority responsible for the protection of privacy. The competent authority may vary depending on your country of residence.

If you reside outside of the European Union, this policy shall be governed by the laws applicable in Canada and the Canadian authorities shall have exclusive jurisdiction to hear any complaint or proceedings.

Verification

We reserve the right to verify the identity of individuals requesting access to personal data. Any information collected to perform this verification will not be used for any other purpose.

Updates to This Policy

We may update this policy from time to time to reflect changes in our personal data management practices. If this policy is modified, the new policy will be available through the Website and on our website at the following URL : <http://thoughttechnology.com/index.php/privacy-policy>.

If you provided us with your email address, we will notify you of any material changes to our privacy policy by email prior to the coming into force of the new policy.

Additional Information

For any additional information concerning the processing of your personal data, you may contact us using the contact information at the beginning of this policy.