

Privacy Policy

1. Data Privacy and Protection

1.1. ThinkReliability ("Company"), a U.S.-based operating company, is committed to protecting your personal information. It is our policy not to sell, rent, or share your personal information with third parties except as permitted or required by applicable U.S. law (e.g., with your consent, to provide our services, or to comply with legal obligations). We restrict access to personal information to our employees, contractors, and agents who need it to operate, develop, or improve our services. These individuals are bound by confidentiality obligations and process personal information only according to our instructions and this policy.

1.2. Company implements reasonable technical and organizational measures to protect your personal information from unauthorized access, use, alteration, disclosure, or destruction. These measures include internal reviews of our data collection, storage, and processing practices, encryption where appropriate, and physical security safeguards for systems storing personal information.

1.3. Learner registration is managed through our Learner Management System, Thought Industries (www.thoughtindustries.com). Per their Privacy Policy, Thought Industries does not sell personal information to third parties. Credit card transactions on our website are processed via Stripe Payment Processing, which is Payment Card Industry (PCI) Level 1 compliant. Our learner platform operates through Zoom, and per the Zoom Privacy Policy, Zoom does not sell personal information to third parties. These service providers are contractually obligated to protect your data consistent with applicable U.S. laws and, where relevant, EU GDPR standards.

1.4. We collect and use personal information only as permitted by U.S. law, based on purposes such as:

- Providing services you request (e.g., fulfilling a contract);
- Your consent (e.g., for marketing communications);
- Compliance with legal obligations, including requirements from our accrediting institutions to maintain accreditation standards (e.g., collecting learner data like names, course completion records, or identifiers needed for certification or reporting);
- Our legitimate business interests (e.g., improving services or ensuring security), provided these do not override your rights. (EU Note: This aligns with GDPR lawful bases, such as consent, contract performance, legal obligation, or legitimate interests balanced against your rights.)

1.5. Company responds promptly to privacy complaints or inquiries. Violations of this policy may lead to disciplinary action, up to and including termination for employees, and may be reported to relevant U.S. authorities if required by law. (EU Note: GDPR also allows reporting to EU supervisory authorities where applicable.)

1.6. We regularly review our compliance with this policy and applicable U.S. laws, such as the California Consumer Privacy Act (CCPA), as well as other state regulations. For questions, concerns, or requests about your personal information, contact our Privacy Officer at info@thinkreliability.com. (EU Note: This role also serves as our Data Protection Officer for GDPR compliance.)

1.7. For international data transfers outside the U.S., we implement safeguards to protect your personal information as required by U.S. law. (EU Note: For transfers outside the European Economic Area, we use GDPR-compliant safeguards like Standard Contractual Clauses or rely on adequacy decisions.)

2. Definitions

2.1. "Personal information" means any data that identifies or can reasonably be linked to you, such as your name, email address, billing information, or payment details. Under U.S. laws like the CCPA, this

may also include IP addresses, browsing history, or inferences drawn to profile you. (EU Note: This aligns with GDPR's definition of "personal data.")

3. Your Rights

3.1. As a U.S.-based company, we provide the following rights under applicable U.S. laws:

- Right to know: You may request details about the personal information we collect, use, disclose, or sell about you, including categories and specific pieces of data.
- Right to deletion: You may request deletion of your personal information, subject to exceptions (e.g., retention required by accrediting institutions, legal obligations, or record-keeping). **Note:** If you request deletion, you will no longer have access to certificates or proof of course completion, effectively removing any benefits from taking the class, as this information is tied to your personal data as required by our accrediting institutions.
- Right to opt-out of sales: You may opt-out of the sale of your personal information. **Note:** Company does not currently sell, nor have any intent to sell personal information as defined by CCPA.
- Right to non-discrimination: We will not discriminate against you (e.g., by denying services or changing prices) for exercising these rights.
- Right to access: You may request a copy of your personal information we hold.

3.2. Additional rights for EU residents under GDPR:

- Right to rectification: You may request correction of inaccurate or incomplete data.
- Right to restrict processing: You may request limits on how we process your data in certain cases.
- Right to data portability: You may request your data in a structured, machine-readable format.
- Right to object: You may object to processing, including for marketing, unless required for legal obligations like accreditation compliance.
- Rights related to automated decision-making: You are protected from solely automated decisions with legal or significant effects.

3.3. To exercise your rights, contact our Privacy Officer at info@thinkreliability.com. We will respond within 45 days for U.S. requests (extendable to 90 days with notice) or within one month for EU GDPR requests (extendable by two months with notice).

3.4. U.S. residents may contact their state's Attorney General for complaints (e.g., California Attorney General for CCPA issues). EU residents may lodge complaints with an EU supervisory authority in their member state of residence, work, or alleged infringement.

4. Violations of Policy

4.1. Employees, contractors, and agents are bound by confidentiality obligations and may face disciplinary action, including termination or legal consequences, for violations.

4.2. For concerns or complaints, contact our Privacy Officer at info@thinkreliability.com.

This policy was last reviewed on April 3, 2025