

## Privacy Policy, effective January 1, 2020

Anderson Oxford Inc., dba ThinkLP (“ThinkLP” or the “Company”) is committed to protecting the privacy of individuals who visit the Company’s Web sites (“Visitors”), individuals who register to use the Services as defined below (“Customers”), and individuals who register to attend the Company’s corporate events (“Attendees”). This Privacy Statement describes ThinkLP’s privacy practices in relation to the use of the Company’s Web sites and the related applications and services offered by ThinkLP (the “Services”).

### 1. Web sites covered

This Privacy Statement covers the information practices of the <http://www.thinklp.com> and <http://thinklp.cloudforce.com> Web sites (collectively referred to as “ThinkLP’s Web sites” or “the Company’s Web sites”).

ThinkLP’s Web sites may contain links to other Web sites. The information practices or the content of such other Web sites is governed by the privacy statements of such other Web sites. The Company encourages you to review the privacy statements of other Web sites to understand their information practices.

### 2. Information collected

When expressing an interest in obtaining additional information about the Services or registering to use the Services, ThinkLP requires you to provide the Company with personal contact information, such as name, company name, address, phone number, and email address (“Required Contact Information”). When purchasing the Services, ThinkLP may require you to provide the Company with financial qualification and billing information, such as billing name and address, invoicing instructions, and the number of employees within the organization that will be using the Services (“Billing Information”). ThinkLP may also ask you to provide additional information, such as company annual revenues, number of employees, or industry (“Optional Information”). Required Contact Information, Billing Information, and Optional Information about Customers are referred to collectively as “Data About ThinkLP Customers”, or in the case of Attendees, “Data About ThinkLP Attendees”.

As you navigate the Company’s Web sites, ThinkLP may also collect information through the use of commonly-used information-gathering tools, such as cookies and Web beacons (“Web Site Navigational Information”). Web Site Navigational Information includes standard information from your Web browser (such as browser type and browser language), your Internet Protocol (“IP”) address, and the actions you take on the Company’s Web sites (such as the Web pages viewed and the links clicked).

### 3. Use of information collected

The Company uses Data About ThinkLP Customers to perform the services requested. For example, if you fill out a “Contact Me” Web form, the Company will use the information provided to contact you about your interest in the Services.

The Company also uses Data About ThinkLP Attendees to plan and host corporate events, host online forums and social networks in which event attendees may participate, and to populate online profiles for Attendees on the Company’s Web sites. Additional information on the Company’s privacy practices with respect to Data About ThinkLP Attendees may be found in additional privacy statements on the event Web sites, as the case may be.

The Company may also use Data About ThinkLP Customers and Data About ThinkLP Attendees for marketing purposes. For example, the Company may use information you provide to contact you to further discuss your interest in the Services and to send you information regarding the Company, its affiliates, and its partners, such as information about promotions or events.

ThinkLP uses Web Site Navigational Information to operate and improve the Company’s Web sites. The Company may also use Web Site Navigational Information alone or in combination with Data About ThinkLP Customers and Data About ThinkLP Attendees to provide personalized information about the Company.

#### 4. Web Site Navigational Information

##### **Cookies, Web Beacons and IP Addresses**

ThinkLP uses commonly-used information-gathering tools, such as cookies and Web beacons, to collect information as you navigate the Company’s Web sites (“Web Site Navigational Information”). This section describes the types of Web Site Navigational Information used on the Company’s Web sites and how this information may be used.

##### **Cookies**

ThinkLP uses cookies to make interactions with the Company’s Web sites easy and meaningful. When you visit one of the Company’s Web sites, ThinkLP’s servers send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your Web browser. Unless you choose to identify yourself to ThinkLP, either by responding to a promotional offer, opening an account, or filling out a Web form (such as a “Contact Me” Web form), you remain anonymous to the Company.

ThinkLP uses cookies that are session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer. Please note that if you disable your Web browser’s ability to accept cookies, you will be able to navigate the Company’s Web sites, but you will not be able to successfully use the Services.

The following sets out how ThinkLP uses different categories of cookies and your options for managing cookies’ settings:

<b>Type of Cookies</b>	<b>Description</b>	<b>Managing Settings</b>
<b>Required cookies</b>	Required cookies enable you to navigate the Company’s Web sites and use its features, such as accessing secure areas of the Web sites and using ThinkLP Services.	Because required cookies are essential to operate the Company’s Web

	<p>If you have chosen to identify yourself to ThinkLP, the Company uses cookies containing encrypted information to allow the Company to uniquely identify you. Each time you log into the Services, a cookie containing an encrypted, unique identifier that is tied to your account is placed on your browser. These cookies allow the Company to uniquely identify you when you are logged into the Services and to process your online transactions and requests.</p>	<p>sites and the Services, there is no option to opt out of these cookies.</p>
<p><b>Performance cookies</b></p>	<p>These cookies collect information about how Visitors use our Web site, including which pages visitors go to most often and if they receive error messages from certain pages. These cookies do not collect information that individually identifies a Visitor. All information these cookies collect is aggregated and anonymous. It is only used to improve how the Company’s Web site functions and performs.</p> <p>From time-to-time, ThinkLP engages third parties to track and analyze usage and volume statistical information from individuals who visit the Company’s Web sites. ThinkLP may also utilize Flash cookies for these purposes.</p>	<p>To learn how to opt out of performance cookies using your browser settings <a href="#">click here</a>.</p> <p>To learn how to manage privacy and storage settings for Flash cookies <a href="#">click here</a>.</p>
<p><b>Functionality cookies</b></p>	<p>Functionality cookies allow the Company’s Web sites to remember information you have entered or choices you make (such as your username, language, or your region) and provide enhanced, more personal features. These cookies also enable you to optimize your use of ThinkLP’s Services after logging in. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize.</p> <p>ThinkLP uses local shared objects, also known as Flash cookies, to store your preferences or display content based upon what you view on our Web sites to personalize your visit.</p>	<p>To learn how to opt out of functionality cookies using your browser settings <a href="#">click here</a>. Note that opting out may impact the functionality you receive when visiting ThinkLP.</p> <p>To learn how to manage privacy and storage settings for Flash cookies <a href="#">click here</a>.</p>
<p><b>Targeting or Advertising cookies</b></p>	<p>From time-to-time, ThinkLP engages third parties to track and analyze usage and volume statistical information from individuals who visit the Company’s Web sites. ThinkLP sometimes uses cookies delivered by third parties to track the performance of Company advertisements. For example, these cookies remember</p>	<p>To learn more about these and other advertising networks and their opt out</p>

	<p>which browsers have visited the Company’s Web sites. The information provided to third parties does not include personal information, but this information may be re-associated with personal information after the Company receives it.</p> <p>ThinkLP also contracts with third-party advertising networks that collect IP addresses and other information from Web beacons (see below) on the Company’s Web sites, from emails, and on third-party Web sites. Ad networks follow your online activities over time by collecting Web Site Navigational Information through automated means, including through the use of cookies. They use this information to provide advertisements about products and services tailored to your interests. You may see these advertisements on other Web sites. This process also helps us manage and track the effectiveness of our marketing efforts.</p> <p>Third parties, with whom the Company partners to provide certain features on our Web sites or to display advertising based upon your Web browsing activity, use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored.</p>	<p>instructions, click <a href="#">here</a> and <a href="#">here</a>.</p> <p>To learn how to manage privacy and storage settings for Flash cookies <a href="#">click here</a>.</p>
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**Web Beacons**

ThinkLP uses Web beacons alone or in conjunction with cookies to compile information about Customers and Visitors’ usage of the Company’s Web sites and interaction with emails from the Company. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Web site tied to the Web beacon, and a description of a Web site tied to the Web beacon. For example, ThinkLP may place Web beacons in marketing emails that notify the Company when you click on a link in the email that directs you to one of the Company’s Web sites. ThinkLP uses Web beacons to operate and improve the Company’s Web sites and email communications.

**IP Addresses**

When you visit ThinkLP’s Web sites, the Company collects your Internet Protocol (“IP”) addresses to track and aggregate non-personal information. For example, ThinkLP uses IP addresses to monitor the regions from which Customers and Visitors navigate the Company’s Web sites.

ThinkLP also collects IP addresses from Customers when they log into the Services as part of the Company’s “Identity Confirmation” and “IP Range Restrictions” security features.

**Social Media Features**

The Company’s Web sites may use social media features, such as the Facebook 'like' button (“Social Media Features”). These features may collect your IP address and which page you are visiting on the Company's Web site, and may set a cookie to enable the feature to function properly. You may be given the option by such Social Media Features to post information about your activities on the Company's Web site to a profile page of yours that is provided by a third party Social Media network in order to share with others within your network. Social Media Features are either hosted by a third party or hosted directly on the Company’s Web site. Your

interactions with these features are governed by the privacy policy of the company providing the relevant Social Media Features.

### **Do Not Track**

Currently, various browsers – including Internet Explorer, Firefox, and Safari – offer a “do not track” or “DNT” option that relies on a technology known as a DNT header, which sends a signal to Web sites' visited by the user about the user's browser DNT preference setting. ThinkLP does not currently commit to responding to browsers' DNT signals with respect to the Company's Web sites, in part, because no common industry standard for DNT has been adopted by industry groups, technology companies or regulators, including no consistent standard of interpreting user intent. ThinkLP takes privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

## [5. Public forums, refer a friend, and customer testimonials](#)

ThinkLP may provide bulletin boards, blogs, or chat rooms on the Company's Web sites. Any personal information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. ThinkLP is not responsible for the personal information you choose to submit in these forums.

Customers and Visitors may elect to use the Company's referral program to inform friends about the Company's Web sites. When using the referral program, the Company requests the friend's name and email address. ThinkLP will send the friend an email inviting him or her to visit the Company's Web sites.

ThinkLP may post a list of Customers and testimonials on the Company's Web sites that contain information such as Customer names and titles. ThinkLP obtains the consent of each Customer prior to posting any information on such a list or posting testimonials.

## [6. Sharing of information collected](#)

### **Service Providers**

ThinkLP may share Data About ThinkLP Customers and Data About ThinkLP Attendees with the Company's contracted service providers so that these service providers can provide services on our behalf. Without limiting the foregoing, ThinkLP may also share Data About ThinkLP Customers and Data About ThinkLP Attendees with the Company's service providers to ensure the quality of information provided, and with third-party social networking and media Web sites, such as Facebook, for marketing and advertising on those Web sites. ThinkLP does not share, sell, rent, or trade any information with third parties for their promotional purposes.

### **ThinkLP Affiliates**

The Company may share Data About ThinkLP Customers with other companies in order to work with them. For example, the Company may need to share Data About ThinkLP Customers for recovery integration purposes.

### **Business Partners**

From time to time, ThinkLP may partner with other companies to jointly offer products or services. If you purchase or specifically express interest in a jointly-offered product or service from ThinkLP, the Company may

share Data About ThinkLP Customers collected in connection with your purchase or expression of interest with our joint promotion partner(s). ThinkLP does not control our business partners' use of the Data About ThinkLP Customers we collect, and their use of the information will be in accordance with their own privacy policies. If you do not wish for your information to be shared in this manner, you may opt not to purchase or specifically express interest in a jointly offered product or service.

ThinkLP does not share Data About ThinkLP Attendees with business partners unless: (1) you specifically opt in to such sharing via an event registration form; or (2) you attend a Company event and allow ThinkLP or any of its designees to scan your attendee badge. If you do not wish for your information to be shared in this manner, you may choose not to opt in via event registration forms and elect not to have your badge scanned at Company events. If you choose to share your information with business partners in the manners described above, your information will be subject to the business partners' respective privacy statements.

### **Third Parties**

This Privacy Statement sets forth the information ThinkLP collects on the Company's Web sites and the information we share with third parties. ThinkLP does not authorize the collection of personal information by third parties through advertising technologies deployed on the Company's Web sites, nor do we share personal information with any third parties collected from the Company's Web sites, except as provided in this Privacy Statement. Section 4 of this Privacy Statement, Web Site Navigational Information, specifically addresses the information we collect through cookies and web beacons, and how you can control cookies through your Web browsers.

### **Billing**

ThinkLP uses a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use Billing Information except for the sole purpose of credit card processing on the Company's behalf.

### **Compelled Disclosure**

ThinkLP reserves the right to use or disclose information provided if required by law or if the Company reasonably believes that use or disclosure is necessary to protect the Company's rights and/or to comply with a judicial proceeding, court order, or legal process.

## [7. International transfer of information collected](#)

The Company primarily stores Data About ThinkLP Customers and Data About ThinkLP Attendees in the United States. To facilitate ThinkLP's global operations, the Company may transfer and access such information from around the world, including from other countries in which the Company has operations. This Privacy Statement shall apply even if ThinkLP transfers Data About ThinkLP Customers or Data About ThinkLP Attendees to other countries.

## [8. Communications preferences](#)

ThinkLP offers Visitors, Customers, and Attendees who provide contact information a means to choose how the Company uses the information provided. You may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of the Company's marketing emails. Additionally, you may send a request to [info@thinklp.com](mailto:info@thinklp.com).

## 9. Correcting and updating your information

Customers may update or change their registration information by editing their user or organization record. To update a user profile, please login to <http://thinklp.cloudforce.com> with your ThinkLP username and password and click "Setup." To update an organization's information, please login to <http://thinklp.cloudforce.com> with your ThinkLP username and password and select "Organization Setup." Attendees may update or change their registration information on the event's Web site after logging in. To update Billing Information or have your registration information deleted, please email [info@thinklp.com](mailto:info@thinklp.com). To discontinue your account and to have information you maintained in the Services returned to you, please email [success@thinklp.com](mailto:success@thinklp.com). Requests to access, change, or delete your information will be handled within 30 days.

## 10. Customer Data

ThinkLP Customers may electronically submit data or information to the Services for hosting and processing purposes ("Customer Data"). ThinkLP will not review, share, distribute, or reference any such Customer Data except as provided in the ThinkLP Master Subscription Agreement, or as may be required by law. ThinkLP does not classify Customer Data, and all information that has been electronically submitted by Customers to the Services is considered Customer Data and is protected with the highest level of security. Customers are responsible for using the features of the Services to define adequate security access controls and data retention schedules according to their own security risk posture and internal policies and procedures. In accordance with the ThinkLP Master Subscription Agreement, ThinkLP may access Customer Data only for the purpose of providing the Services or preventing or addressing service or technical problems, or as may be required by law.

## 11. Security

ThinkLP uses robust security measures to protect Data About ThinkLP Customers and Data About ThinkLP Attendees. Because the Company uses the Services to maintain Data About ThinkLP Customers and Data About ThinkLP Attendees, this information, which is stored in the Services, is secured in the same manner as described in the Trust and Compliance documentation.

## 12. Mobile applications

Without limiting the generality of this Privacy Statement, in addition to information gathered through its Web sites or submitted to its Services, ThinkLP may obtain information through applications ("Mobile Applications") that Customers or their authorized individuals ("Users") download to, and run on, their mobile devices ("Devices"). Mobile Applications provided by ThinkLP may obtain information from, or access data stored on, Users' Devices to provide services related to the relevant Mobile Application. For example, a Mobile Application may: access a camera on a User's Device to enable the User to upload photographs to the Services; access the call history on a User's Device to enable the User to upload that information to the Services; access calendar information on a User's Device to enable the User to match meeting attendees with contacts submitted by the User to the Services; or access the geographic location of a User's Device to enable

the User to identify contacts submitted by the User to the Services who are nearby. Information obtained to provide Mobile Application services may include information obtained in preparation for anticipated updates to those services. Mobile Applications may transmit information to and from Devices to provide the Mobile Application services.

Mobile Applications may provide ThinkLP with information related to Users' use of the Mobile Application services, information regarding Users' computer systems, and information regarding Users' interaction with Mobile Applications, which ThinkLP may use to provide and improve the Mobile Application services. For example, all actions taken in a Mobile Application may be logged, along with associated information (such as the time of day when each action was taken). ThinkLP may also share anonymous data about these actions with third party providers of analytics services. In addition, if a User downloads a ThinkLP Mobile Application after clicking on a third-party mobile advertisement for the Mobile Application or for ThinkLP, the third-party advertiser may provide ThinkLP with certain information, such as the User's Device identification information, which ThinkLP may use to track the performance of its advertising campaigns.

Customers may configure ThinkLP Mobile Application services, and the information accessed or obtained by the Mobile Application on a User's Device may be affected by the Customer's configuration. In addition, if a Customer purchases more than one Service from ThinkLP and its affiliates, a Mobile Application may be designed to interoperate with those Services; for instance, to provide a User with access to information from any or all of those Services or to provide information from a User's Device to any or all of those Services. Information accessed or obtained by the Mobile Application on a User's Device may be accessible to the Customer and its organization, depending on the intended functionality of the Mobile Application.

Notices and contractual terms related to a particular Mobile Application may be found in the End User License Agreement or relevant terms of service for that application. The Company encourages you to review the End User License Agreement or relevant terms of service related to any Mobile Applications you download, install, use, or otherwise interact with to understand that Mobile Application's information practices. The Mobile Application's access to information through a User's Device does not cause that information to be "Customer Data" under ThinkLP's Master Subscription Agreement with the Customer or under this Privacy Statement, except as follows: To the extent that a User uses a Mobile Application to submit electronic data and information to a Customer account on our Services pursuant to the Customer's Master Subscription Agreement with ThinkLP (or a similar agreement that governs the Customer's subscription(s) to ThinkLP's Services), that information constitutes "Customer Data" as defined in such agreement, and the provisions of that agreement with respect to privacy and security of such data will apply.

### [13. Changes to this Privacy Statement](#)

ThinkLP reserves the right to change this Privacy Statement. ThinkLP will provide notification of the material changes to this Privacy Statement through the Company's Web sites at least thirty (30) business days prior to the change taking effect.

### [14. Contacting us](#)

Questions regarding this Privacy Statement or the information practices of the Company's Web sites should be directed to ThinkLP Privacy at [legal@thinklp.com](mailto:legal@thinklp.com) or by mailing ThinkLP Privacy, 219 Labrador Drive, Waterloo, Ontario, Canada N2K 4M8.