

Privacy Policy

Effective date: December 23, 2019

Thinky Ltd ("us", "we", or "our") operates the Thinky mobile application (hereinafter referred to as the "Service").

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

- **Personal Data:** We ask for basic information from you in order to set up your account. For example, we require individuals who sign up for a Thinky account to provide an email address.
- **Communications with Us:** You may also provide us information when you respond to surveys, communicate with us regarding a support question, or sign up for a newsletter. When you communicate with us via form, email, phone, or otherwise, we store a copy of our communications (including any call recordings as permitted by applicable law).
- **Log Information:** Like most online service providers, we collect information that web browsers, mobile devices, and servers typically make available, including, but not limited to, the browser type, IP address, unique device identifiers, language preference, referring site, the date and time of access, operating system, and mobile network information. We collect log information when you use our Services.
- **Usage Information:** We collect information about your usage of our Services. This includes, but is not limited to, the actions that you perform in the app—in other words, who did what, when and to what thing in the app (e.g., created a new journal entry, but not the contents of the entry). We also collect information about your device (e.g., screen size, name of cellular network, and mobile device manufacturer). We use this information to, for example, provide our Services to you, as well as get insights on how people use our Services, so we can make our Services better.
- **Location Information:** We may determine the approximate location of your device from your IP address. We collect and use this information to, for example, calculate how many people visit our Services from certain geographic regions. If you provided

access to your Location directly, we attribute this to the entries to the posts you make within the app. However, these are encrypted and not decryptable by us.

How and Why We Use Information

Thinky Ltd uses the collected data for various purposes:

- To provide and maintain our Services—for example, to set up and maintain your account.
- To further develop and improve our Services—for example by adding new features that we think our users will enjoy or will help them to make more effective use of the existing app features;
- To monitor and analyze trends and better understand how users interact with our Services, which helps us improve our Services and make them easier to use;
- To monitor and prevent any problems with our Services, protect the security of our Services, detect and prevent fraudulent transactions and other illegal activities, fight spam, and protect the rights and property of Thinky Ltd and others, which may result in us declining a transaction or the use of our Services;
- To communicate with you. For example, we may email you to solicit your feedback, share tips for getting the most out of our products, or keep you up to date on Thinky. If you don't want to hear from us, you can opt out of marketing communications at any time. (Please keep in mind that even if you opt out, we'll still send you important updates relating to your account); and
- To personalize your experience using our Services, provide content recommendations, target our marketing messages to groups of our users (for example, those who have been our user for a certain length of time), and serve relevant advertisements.

How We Share Information

We do not sell our users' private personal information. We share data to fulfill the purposes for which you provide it; to enforce or apply our Terms of Service. We may disclose or transfer personal information that we collect or you provide as described in this privacy policy:

- **Subsidiaries, Employees, and Independent Contractors:** We may disclose information about you to our subsidiaries, our employees, and individuals who are our independent contractors that need to know the information in order to help us provide our Services or to process the information on our behalf. We require our subsidiaries, employees, and independent contractors to follow this Privacy Policy for personal information that we share with them.
- **Third Party Vendors:** We may share information about you with third party vendors who need to know information about you in order to provide their services to us, or to provide their services to you or your site. This group includes vendors that help us provide our Services to you, those that assist us with our marketing efforts, those that help us understand and enhance our Services (like analytics providers) and vendors that help us aggregate your banking and other financial accounts.

- **Legal and Regulatory Requirements:** We may disclose information about you to comply with any court order, law or legal process, including to respond to any government or regulatory request, to protect and defend the rights or property of Thinky Ltd, to prevent or investigate possible wrongdoing in connection with the Service, to protect the personal safety of users of the Service or the public, to protect against legal liability.
- **To Protect Rights, Property, and Others:** We may disclose information about you when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of Thinky Ltd, third parties, or the public at large. For example, if we have a good faith belief that there is an imminent danger of death or serious physical injury, we may disclose information related to the emergency without delay.
- **Business Transfers:** In connection with any merger, sale of company assets, or acquisition of all or a portion of our business by another company, or in the unlikely event that Thinky Ltd goes out of business or enters bankruptcy, user information would likely be one of the assets that is transferred or acquired by a third party. If any of these events were to happen, this Privacy Policy would continue to apply to your information and the party receiving your information may continue to use your information, but only consistent with this Privacy Policy.
- **With Your Consent:** We may share and disclose information with your consent or at your direction. For example, we may share your information with third parties with which you authorize us to do so, such as the social media services that you connect to.
- **Aggregated or De-Identified Information:** We may share information that has been aggregated or reasonably de-identified, so that the information could not reasonably be used to identify you. For instance, we may publish aggregate statistics about the use of our Services and we may share a hashed version of your email address to facilitate customized ad campaigns on other platforms.
- **Published Support Requests:** And if you send us a request (for example, via a support email or one of our feedback mechanisms), we reserve the right to publish that request in order to help us clarify or respond to your request or to help us support other users.

How Long We Keep Information

We generally discard information about you when we no longer need the information for the purposes for which we collect and use it—which are described in the section above on How and Why We Use Information—and we are not legally required to continue to keep it.

Security

While no online service is 100% secure, we work very hard to protect information about you against unauthorized access, use, alteration, or destruction, and take reasonable measures to do so.

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Categories of services used to process data include:

Infrastructure

We partner with third-parties to provide storage and server access that acts as infrastructure for our website and apps.

The non-exhaustive list of third parties we use for infrastructure:

- Firebase—their privacy policy is available [here](#).

Analytics

We partner with third-party Service Providers to monitor and analyze the use of our Service.

The non-exhaustive list of third parties we use for analytics:

- Mixpanel—their privacy policy is available [here](#).

Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with data, please contact us. If we become aware that we have collected data from children without verification of parental consent, we take steps to remove that information from our servers.

Choices

You have several choices available when it comes to information about you:

- **Limit the Information that You Provide:** If you have an account with us, you can choose not to provide the optional account information. Please keep in mind that if you do not provide this information, certain features of our Services—for example, automatic loading of transactions from your bank account—may not be accessible.
- **Opt-Out of Marketing Communications:** You may opt out of receiving promotional communications from us. Just follow the instructions in those communications or let us know. If you opt out of promotional communications, we may still send you other communications, like those about your account and legal notices.
- **Close Your Account:** While we'd be very sad to see you go, if you no longer want to use our Services you can close your account. You can ask us to close your account by sending an email to support@thinkyapp.com. Please keep in mind that we may continue to retain your information after closing your account, as described in How Long We Keep Information above—for example, when that information is reasonably needed to comply with (or demonstrate our compliance with) legal obligations such as law enforcement requests, or reasonably needed for our legitimate business interests.

Transfer Of Data

Your information, including Personal Data, may be transferred to—and maintained on—computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal data, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Thinky Ltd will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Your Rights

If you are located in certain countries, including those that fall under the scope of the European General Data Protection Regulation (GDPR), data protection laws give you rights with respect to your personal data, subject to any exemptions provided by the law, including the rights to:

- Request access to your personal data;
- Request correction or deletion of your personal data;
- Object to our use and processing of your personal data;
- Request that we limit our use and processing of your personal data; and
- Request portability of your personal data.

You can usually access, correct, or delete your personal data using your account settings and tools that we offer, but if you aren't able to do that, or you would like to contact us about one of the other rights, see the How to Reach Us section below. EU individuals also have the right to make a complaint to a government supervisory authority.

How to Reach Us

If you have a question about this Privacy Policy, or you would like to contact us about any of the rights mentioned in the Your Rights section above, please [contact us](#).

Privacy Policy Changes

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Credit

This privacy policy was created with the help of the open source privacy policy provided by [Automattic](#), which you can find [here](#).