

# Think Learning – Privacy Policy 2025–26

This document sets out what personal data we collect and use in managing and delivering our services.

## WHO WE ARE

- Think Associates Ltd (trading as Think Learning) is the data controller of the personal data we hold and use.
- Our registered office is: C/O Totara Learning (Europe) Limited, 19 New Road, Brighton BN1 1UF. We are registered as a data controller with the Information Commissioner’s Office and our registration number is Z8829404.
- We are a company providing employers with hosted learning management services.

## WHAT PERSONAL DATA WE COLLECT

### Users of our systems

We act as a processor on behalf of our customers (the controllers) in providing the use of Totara and other hosted learning, talent and HR management systems. These systems use the following personal data:

- Name
- Job and organisation-related information such as job title, payroll number and department
- Email address

### Our customers

We act as a controller in managing our relationships with customers, potential customers, and our marketing activities. We collect and use:

- Name of customer’s primary management, IT, L&D and finance contacts
- Business contact details, including email address, phone number and social media profiles.
- Records of relevant emails and phone calls

- Password [not readable by us]
- IP address
- Details of a user's learning activities
- Results of any quizzes/assessments taken on our systems
- Other information as directed by our customers and specified in a data processing agreement.

- Information about internet browsing history, where a visitor to our website has allowed the use of tracking cookies.

We also use information about how users interact with our systems to analyse and improve our platforms. We act as a controller for this purpose. This information will be used at an aggregated level wherever possible.

## **HOW WE USE YOUR PERSONAL DATA**

### **System users (i.e. employees of our customers)**

- To provide support to users

Each customer will have nominated system administrators within their organisation who will perform other data processing activities on behalf of their organisation.

### **Our customers**

- To manage the provision of our services and deal with any issues or queries
- To send invoices and take payments
- To communicate about any service messages
- To provide, where the customer has opted in, targeted sales, marketing and general communications messages
- To use customer name, job title and organisation, where the customer gives explicit permission, in case studies, references and marketing collateral.

## COOKIES

Cookies are small unique text files stored on your computer or device while you're visiting a website. Cookies help make websites work. They also provide us with information about how users interact with our site.

If you visit our website [www.think-learning.com](http://www.think-learning.com) then you should know about the cookies that we set.

Some of the cookies we set are needed to make our site work (necessary cookies). If you're unhappy with these you may be able to disable them using your browser settings but our site may not work correctly.

We need your consent to use non-essential cookies. When you first visit our site, you'll see a cookie banner giving you the option to accept our recommended cookie settings or offering you more control. A consent cookie will be placed on your browser to remember your choice. You'll be prompted to confirm this choice again after 120 days; if we add new cookies; or the next time you visit our site if you reset your browser settings.

Some cookies remain on your device only for as long as you keep your browser active (session cookies) and others remain for a longer period (persistent). Cookies may be placed by us when you visit our website, or by third parties.

The cookies we use are as follows:

Name	Category	Purpose	Set by	Duration
<code>_pk_ses.20.d2eb</code>	Analytics	These cookies send data to our in-house analytics tool, Matomo, which records data about user's devices, and actions on our site	Think Learning	Session
<code>_pk_id.20.d2eb</code>				4 weeks
<code>_GRECAPTCHA</code>	Essential	This cookie is set by Google reCAPTCHA, which protects our site against spam enquiries on contact forms.	Google	120 days

## **WHO DO WE SHARE YOUR PERSONAL DATA WITH**

- Our IT infrastructure is hosted in the UK, provided by Hyve Ltd and Bytemark Ltd. We back up user data to Amazon Web Services (UK). These providers hold personal data relating to our system users and process it on our behalf.
- Money Penny Ltd is our outsourced call management provider, who store basic information about contact details and reasons for calls, when a customer phones our core office number.
- Anthony Smith and Co, Ltd are our accountants, who process financial data on our behalf.
- Where our customer uses or intends to use Totara, we provide data of our customers' primary business contact to [Totara Learning](#) who may communicate in relation to use of the product – conducting surveys, for example. .
- Third party subcontracted software developers who help us to build our products and services.
- We use HubSpot, Jira, and FreshWorks (for user support and customer relationship management), Microsoft 365 (for general business administration, exchanging data with clients, and emails), HiBob (for HR Management) and Sage (for financial processing).

We may also be required to comply with a request or legal order to disclose personal data to a third party, for example in relation to a police investigation or insurance claim.

## **LAWFUL BASIS**

Under data protection law, we have to identify relevant lawful bases for our use of your personal data. We primarily rely on:

- **Legitimate interests** – to provide and administer our systems for users and customers, and to send marketing to customers and potential customers

- **Legal obligation** – in meeting our legal obligations under financial, health and safety and employment laws (among others)

**HOW LONG DO WE KEEP YOUR PERSONAL DATA**

**System users**

- We hold personal data of system users for as long as they are active users. The organisation’s administrators can set a relevant retention period for keeping the data once they are no longer active.

**Our customers**

- We hold the details of primary contacts employed by our customers for as long as they are a customer and for six years after the relationship ends (primarily as part of our financial records).

**YOUR RIGHTS**

Under data protection legislation, you have a number of rights in relation to your personal data, as below:

- The right of **access** (obtaining a copy of your data)
- The right to **rectification** (correcting your data)
- The right to **erasure** (deleting your data)
- The right to **restrict** processing (to stop use of your data for a time limited period)
- The right to data **portability** (to move your data to another organisation)
- The right to **object** (to object to our use of your data)
- Rights in relation to **automated decision making and profiling** (to know if and how we use any technology to make decisions about you)

There are some limited exemptions to these rights, so they may not apply in every scenario. For further information on these rights, please see the [Information Commissioner’s Office \(ICO\) website](#).

If you wish to make a request in relation to any of these rights, please contact us at [help@think-learning.com](mailto:help@think-learning.com) or by post at Think Associates Ltd, C/O Totara Learning (Europe) Limited, 19 New Road, Brighton BN1 1UF. Where we act as a processor on behalf of our customers, we will pass any requests to the customer to respond to (as a controller).

## **INFORMATION SECURITY**

We have information security measures in place to reduce the risk of unauthorised access to, misuse or loss of personal data. These include:

- Appropriate access controls and user authentication
- Staff policies and training
- Incident and breach processes
- Appropriate internal IT and network security
- Business continuity processes
- Contracts with our suppliers covering data protection and information security
- Regular testing and review of our security measures
- ISO27001 and Cyber Essentials Plus certifications, which are regularly externally audited.

For more information, please see our Information Security Policy at:

<https://www.think-learning.com/wp-content/uploads/2023/04/Think-Learning-Information-Security-Policy-2023-24.pdf>

**QUERIES OR  
COMPLAINTS**

In the first instance, we would hope to resolve any queries or concerns you have in an informal way, if you contact us at: [hello@think-learning.com](mailto:hello@think-learning.com) or by post at Think Associates Ltd, C/O Totara Learning (Europe) Limited, 19 New Road, Brighton BN1 1UF.

If you are not satisfied with our response, you also have a right to complain to the Information Commissioner's Office (ICO) as the regulator of data protection. For further information, please see: <https://ico.org.uk/make-a-complaint/>