

# Data Processing and Privacy Notice

*How ThinkCapital LLC collects, uses, and protects your personal data*

| Document Reference | Definition   |
|--------------------|--|
| Document code      | TC-GIAG-PRIVACY-v1.0   |
| Version            | 1.0 — March 2026   |
| Issued by          | Michael Bragen, Principal, ThinkCapital LLC                                |
| Contact            | research@thinkcapital.org   thinkcapital.org/research-integrity            |
| Applies to         | ThinkCapital Government IT/AI Governance (GIAG) Initiative — Streams 1 & 2 |

## Data Processing and Privacy Notice

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### Data Controller

|              |                           |
|--------------|---------------------------|
| Organization | ThinkCapital LLC          |
| Principal    | Michael Bragen            |
| Address      | Belmont, California, USA  |
| Contact      | research@thinkcapital.org |
| Website      | thinkcapital.org          |

ThinkCapital LLC is the data controller for personal data collected in connection with the Government IT/AI Governance (GIAG) research initiative.

### What Data We Collect

In connection with your research participation, ThinkCapital may collect and process the following categories of personal data:

| Category                            | Examples   |
|-------------------------------------|--|
| Contact and identification          | Name, title, organization, email address, and professional role                                    |
| Interview content                   | Recorded or transcribed responses to interview questions; notes made during or after the interview |
| Contextual professional information | Organization type, AI systems portfolio, and other professional context you provide                |
| Communication records               | Correspondence related to scheduling, consent, and findings review                                 |

|                       |  |
|-----------------------|--|
| <b>Technical data</b> | Basic metadata associated with video/telephone call connections, if applicable |
|-----------------------|--|

*We do not intentionally collect special categories of personal data (e.g., health information, political opinions, racial or ethnic origin). Please do not volunteer such information during the interview.*

## Legal Basis for Processing

ThinkCapital processes your personal data on the following legal bases:

| Legal Basis                                     | Application  |
|---|--|
| <b>Consent (GDPR Art. 6(1)(a))</b>              | Processing of your interview responses and any identifiable data. Consent is recorded via the Research Participation Agreement (Document 1). You may withdraw consent at any time.               |
| <b>Legitimate interests (GDPR Art. 6(1)(f))</b> | Maintaining records necessary for research integrity, audit trail, and participant data deletion requests. ThinkCapital's interest is the conduct of credible, accountable independent research. |

## How We Use Your Data

- To conduct and transcribe the research interview.
- To code and analyze interview content as part of the GIAG research program.
- To produce aggregate findings reports in which individual participants are not identifiable (unless attributed consent has been granted).
- To contact you regarding the research — including scheduling, consent, findings review, and any follow-up questions — until the research program concludes.
- To fulfill deletion requests and maintain an audit trail of data handling decisions.

We do not use your data for marketing, advertising, vendor intelligence, or any commercial purpose unrelated to the GIAG research program.

## Data Retention

| Data Type   | Retention Period   |
|---|--|
| <b>Interview recordings</b>   | Deleted within 12 months of research program conclusion, or upon withdrawal request, whichever is earlier  |
| <b>Transcripts and coded interview notes</b>                        | Retained for the duration of the research program plus 24 months to support findings review and potential follow-on research. Deleted thereafter, or upon request. |
| <b>Participant register (name, contact, attribution preference)</b> | Retained for the duration of the research program plus 24 months. Held separately from analytical files and accessible only to the Principal.                      |
| <b>Aggregate findings and reports</b>                               | Retained indefinitely. Aggregate findings contain no personal data.  |
| <b>Correspondence</b>   | Retained for the duration of the research program plus 12 months.  |

## Data Security

ThinkCapital applies the following security measures to protect your personal data:

- Interview recordings and transcripts are stored on password-protected devices or encrypted cloud storage with access restricted to the Principal (Michael Bragen).
- The participant register is stored separately from analytical files and is not transmitted via unencrypted channels.
- The ThinkCapital website (thinkcapital.org) is served over HTTPS with SSL/TLS encryption.
- No personal data is stored in the GIAG Coding Workbook or other analytical files that are shared or published.
- In the event of a data breach affecting your personal data, you will be notified within 72 hours of ThinkCapital becoming aware of the breach, where required by applicable law.

## Third-Party Processors

ThinkCapital may use the following third-party services that may process your data:

| Processor                                      | Purpose   |
|--|---|
| <b>IONOS (1&amp;1 IONOS SE)</b>                | Website hosting for thinkcapital.org. Data processed: website interaction metadata only.  |
| <b>Cloudflare Inc.</b>                         | SSL/TLS certificate and CDN services for thinkcapital.org. Data processed: connection metadata.   |
| <b>Formspree</b>                               | Research engagement form submission. Data processed: form field content submitted by prospective participants. Formspree's privacy policy applies.                        |
| <b>Video call provider (e.g., Zoom, Teams)</b> | Interview conduct. Data processed per the provider's privacy policy. Recordings, if made, are downloaded and deleted from the provider's servers promptly after the call. |
| <b>AI transcription service (if used)</b>      | Interview transcription. Any such service will be disclosed to participants before use. Recordings are submitted only with participant consent.                           |

No third party receives your identifiable interview content for any purpose other than transcription, and only with your explicit consent.

## Your Rights

Depending on your location and applicable law, you may hold some or all of the following rights regarding your personal data:

| Right                         | How to Exercise  |
|-------------------------------|--|
| <b>Right of access</b>        | Request a copy of the personal data ThinkCapital holds about you.  |
| <b>Right to rectification</b> | Request correction of inaccurate personal data.  |
| <b>Right to erasure</b>       | Request deletion of your personal data. ThinkCapital will fulfill deletion requests within 30 days. Note that aggregate findings from which you cannot be identified will not be affected. |

|                                     |  |
|-------------------------------------|--|
| <b>Right to restrict processing</b> | Request that processing of your data be restricted while a dispute is resolved.  |
| <b>Right to data portability</b>    | Request your personal data in a structured, machine-readable format.   |
| <b>Right to withdraw consent</b>    | Withdraw your participation consent at any time. Withdrawal does not affect the lawfulness of processing prior to withdrawal.  |
| <b>Right to complain</b>            | Lodge a complaint with your applicable data protection authority. In the EU, this is the supervisory authority in your member state. In California, the California Privacy Protection Agency (CPPA). |

To exercise any of these rights, contact [research@thinkcapital.org](mailto:research@thinkcapital.org) with the subject line: 'GIAG Data Rights Request.' ThinkCapital will respond within 30 days.

### **Transfers Outside the EEA**

ThinkCapital LLC is based in California, USA. If you are located in the European Economic Area, your personal data will be transferred to and processed in the United States. The United States does not have an adequacy decision from the European Commission equivalent to GDPR protections. ThinkCapital relies on your explicit consent (Article 49(1)(a) GDPR) as the transfer mechanism, and on the minimal-data principle — we collect only what is necessary for the research.

If this presents a concern for your participation, please contact [research@thinkcapital.org](mailto:research@thinkcapital.org) to discuss alternative arrangements.

*This Notice may be updated to reflect changes in ThinkCapital's data practices or applicable law. Participants will be notified of material changes by email. Current version always available at [thinkcapital.org/research-integrity](https://thinkcapital.org/research-integrity).*