



## PRIVACY POLICY

Center for Behavior Analysis (hereinafter referred to as **"CBA," "us," "we," "our," or "Company"**) has created this Privacy Policy to apply to all users of this website ([www.centerforbehavioranalysis.com](http://www.centerforbehavioranalysis.com)) including our mobile site, and all digital assets contained, or offered therein (collectively, our "Services"). This Privacy Policy describes, among other things, the types of information we collect from users when you use our services, how we use this information, and how you can access your information.

This Privacy Policy is integrated into our Terms of Use. By using the Services and providing us with your Personal Information, you agree to the practices described in this Privacy Policy and our Terms of Use, and to the updates to these policies posted from time to time.

This Privacy Policy does not apply to information collected by or provided in connection with an individual's application for employment, current or former employment, or independent contractor arrangement with CBA. If you are a CBA employee, independent contractor, or applicant for employment, there is a CBA Employee and Applicant Privacy Policy located in the applicant portal for information about how CBA collects, uses, processes, discloses, shares, and retains employment information not covered by this Privacy Policy.

This Privacy Policy does not apply to Protected Health Information ("PHI") as defined by HIPAA or other applicable laws. For more information about PHI, please see the CBA HIPAA Notice of Privacy for information.

### **I. INFORMATION WE COLLECT ABOUT YOU**

For purposes of this Privacy Policy, **"Personal Information"** means information that identifies, relates to, describes, or can be associated with you or your household. Information that has been deidentified, aggregated, anonymized, or that otherwise cannot reasonably be related back to a specific person, is not considered Personal Information. Personal Information does not include publicly available information.



We may collect the following categories of information about you which are described in more detail below: (A) information you provide to us, (B) sensitive information, (C) information we may automatically collect, and (E) information we may receive from third parties. All of the information listed in (A)-(C), (E) above, is detailed below, and hereinafter referred to as “Information.”

### **A. Information You Provide to Us**

In using our Services, you may provide us with Personal Information, including, without limitation:

- Individual identifiers such as name, username, date of birth, contact information such as mailing address, phone number, and email address;
- Payment and transactional information such as Services purchased. Note that we use third party payment processors to facilitate your payments and do not store your payment information;
- Communications with us, preferences, and other Information you provide to us such as any messages (including via online chat feature), opinions and feedback that you provide to us, your user preferences (such as in receiving updates or marketing information), and other Information that you share with us when you contact us directly (such as for customer support services); and
- Additional Personal Information as otherwise described to you at the point of collection or pursuant to your consent.

### **B. Sensitive Information**

CBA may process the following categories of sensitive Personal Information when you use our Services, that may be deemed “**Sensitive Personal Information**” under certain laws. We may process the following categories of Sensitive Personal Information when you use our Services:

- Geolocation data, such as your physical location if you have enabled location services on your device;

- Payment information including debit or credit card information in combination with any required security or access code collected for the purpose of processing payment for our products or Services. We use third party payment processors to facilitate payment and do not store any of your payment sensitive information; and
- Authentication data, such as account Personal Information and log in credentials, including unique identifiers such as username, account number, and password.

### **C. Information We May Automatically Collect About You**

Our Services may automatically collect the following categories of usage and technical Information about you. This Information is used by CBA for the operation of the services, to maintain quality of the services, and to provide generalized statistics regarding use of the services. This Information may include:

- IP address, which is the number associated with the service through which you access the Internet, like your ISP (internet service provider);
- Date and time of your visit or use of our Services;
- Domain server from which you are using our Services;
- Type of computer, web browsers, search engine used, operating system, or platform you use;
- Data identifying the web pages you visited prior to and after visiting our website or use of our Services;
- Your movement and activity within the website, which is aggregated with other Information; and
- Mobile device Information, including the type of device you use, operating system version, and the device identifier (or “UDID”).

### **D. Cookies & Technologies Used to Collect Information About You**

We and/or certain service providers operating on our behalf may collect Information about your activity, or activity on devices associated with you over time, on our sites and applications, and across non-affiliated websites or online applications. We may collect this Information by using certain technologies, such as cookies, web beacons, pixels, software developer kits, third party libraries, and other similar technologies. Third-party service providers, advertisers, and/or partners may also view, edit, or set their own cookies or place web beacons.

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our website.
- Web Beacons. Website pages may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages and for other related statistics (for example, recording the popularity of certain content and verifying system and server integrity). We also use these technical methods to analyze the traffic patterns, such as the frequency with which our users visit various parts of the Services. These technical methods may involve the transmission of Information either directly to us or to a third party authorized by us to collect Information on our behalf. Our Services use retargeting pixels from Google, Facebook, and other ad networks. We also use web beacons in HTML emails that we send to determine whether the recipients have opened those emails and/or clicked on links in those emails.
- Analytics. Analytics are tools we may use, such as Google Analytics, to help provide us with information about traffic to our website and use of our Services, which Google may share with other services and websites who use the collected data to contextualize and personalize



the ads of its own advertising network. You can view Google's Privacy Practices here: [Privacy Policy – Privacy & Terms – Google](#).

- Mobile Application Technologies. If you access our website and Services through a mobile device, we may automatically collect Information about your device, your phone number, and your physical location.

Our use of online tracking technologies may be considered a “sale” or “sharing” under certain laws. To the extent that these online tracking technologies are deemed to be a “sale” or “sharing” under certain laws, you can opt out of these online tracking technologies by submitting a request via our Privacy Choices form or by broadcasting an opt-out preference signal. Please note that some features of our website may not be available to you as a result of these choices.

#### **E. Information We May Receive from Third Parties**

We may collect additional information about you from third party websites, social media platforms, and/or sources providing publicly available information (e.g., from the U.S. postal service) to help us provide services to you, help prevent fraud, and for marketing and advertising purposes.

This Privacy Policy only applies to Information collected by our services. We are not responsible for the privacy and security practices of those other websites or social media platforms or the Information they may collect (which may include IP address). You should contact such third parties directly to determine their respective privacy policies. Links to any other websites or content do not constitute or imply an endorsement or recommendation by us of the linked website, social media platform, and/or content.

## **II. HOW WE USE YOUR INFORMATION**

#### **F. Use and Purpose of Processing Your Information**

We use and process your Information for things that may include, but are not limited to, the following:

- To provide you with the services and information you request;
- To respond to your inquiries and questions and provide customer service;
- For general or targeted marketing and advertising purposes, including sending you promotional material or special offers on our behalf or on behalf of our marketing partners and/or their respective affiliates and subsidiaries and other third parties, provided that you have not already opted-out of receiving such communications;
- To fulfill contracts we have with you;
- To manage, improve, and foster relationships with third party service providers, including vendors, suppliers, and parents, affiliates, subsidiaries, and business partners;
- Maintain, improve, customize, or administer the Services, perform business analyses, or other internal purposes to improve the quality of our business, the Services, resolve technical problems, or improve security or develop other products and services;
- To comply with our Terms of Use;
- Analytics for business purposes and business intelligence;
- To comply with any applicable laws and regulations and respond to lawful requests; and/or
- For any other purposes disclosed to you at the time we collect your Information and/or pursuant to your consent.

We may also use Information that has been de-identified and/or aggregated for purposes not otherwise listed above.

### **G. Sharing or Disclosing Your Information**

We may share and/or disclose your Information as set forth in the Privacy Policy and in the following circumstances:

- **Third-Party Service Providers.** We may share your Information with third party service providers that perform certain functions or services on our behalf (such as to host the Services, manage databases,

perform analyses, process credit card payments, provide customer service, or send communications for us). These third-party service providers are authorized to use your Information only as necessary to provide these services to us. In some instances, we may aggregate Information we collect so third parties do not have access to your identifiable Information to identify you individually.

- **Disclosure of Information for Legal and Administrative Reasons.** We may disclose your Information without notice: (i) when required by law or to comply with a court order, subpoena, search warrant, or other legal process; (ii) to cooperate or undertake an internal or external investigation or audit; (iii) to comply with legal, regulatory, or administrative requirements of governmental authorities (including, without limitation, requests from the governmental agency authorities to view your Information); (iv) to protect and defend the rights, property, or safety of us, our subsidiaries and affiliates, and any of their officers, directors, employees, attorneys, agents, contractors, and partners, and the website Service users; (v) to enforce or apply our Terms of Use; and (vi) to verify the identity of the user of our Services.
- **Business Transfers.** Your Information may be transferred, sold, or otherwise conveyed (“Conveyed”) to a third party where we: (i) merge with or are acquired by another business entity; (ii) sell all or substantially all of our assets; (iii) are adjudicated bankrupt; or (iv) are liquidated or otherwise reorganize.
- **Information Shared with our Subsidiaries and Affiliates.** We may share your Information with our subsidiaries and affiliates.
- **De-Identified or Aggregated Data.** We may share your Information on an aggregated basis for any purpose in which your specific Personal Information is blinded, masked, or otherwise not identifiable.
- **With Your Consent.** We may share Information consistent with this Privacy Policy with your consent.

CBA does not use or disclose Sensitive Personal Information, other than for the business purposes permitted by law as described above.



## H. Categories of Information Sold

We may sell the below categories of Personal Information. For purposes of this Privacy Policy, “sell”, “sold” or “sale” means the disclosure of Personal Information for monetary or other valuable consideration but does not include, for example, the transfer of Personal Information as an asset that is part of a merger, bankruptcy, or other disposition of all or any portion of our business.

<b>Category of Information</b>	<b>Examples of Information Disclosed</b>
Identifying Information	Name, mailing address, email address, phone number, date of birth, geolocation, and other identifiers.
Payment Information	Your name and billing totals for payment and invoice processing. Note that we use third party payment processors to facilitate your payments and do not store your payment card information.
Usage and Technical Information	Information about your interaction with our website and content on third party sites or platforms, such as social networking sites (e.g. IP address; browsing history; search history; device information; information about user’s interaction with website, such as scrolling, clicks, and mouse-overs via cookies, pixel tags, web beacons, transparent GIFs; browser information; operating system and platform; geolocation information; user content (e.g. photos, videos, audio, images, social media /online posts, first-party works)).

## III. LINKS TO OTHER WEBSITES

Our Services may contain links to other websites or services that are not owned or controlled by us, including links to social media platforms such as Facebook, Instagram, or YouTube, or may redirect you off our website away from our services.

This Privacy Policy only applies to Information collected by our Services. We are not responsible for the privacy and security practices of those other websites or Social Media Platforms or the Information they may collect (which may include IP address). You should contact such third parties directly to determine their respective privacy policies. Links to any other websites or content do not constitute or imply an endorsement or recommendation by us of the linked website, social media platform, and/or content.

## IV. INFORMATION SECURITY





We use commercially reasonable and appropriate administrative, physical, and technical security measures to provide our Services and safeguard your Information. However, no data transmitted over the Internet or stored or maintained by us or our third-party service providers can be 100% secure. Therefore, we do not promise or guarantee, and you should not expect, that your Information or private communications will always remain private or secure. We do not guarantee that your Information will not be misused by third parties. We are not responsible for the circumvention of any privacy settings or security features. You agree that we will not have any liability for misuse, access, acquisition, deletion, or disclosure of your Information.

If you believe that your Information has been accessed or acquired by an unauthorized person, you should promptly contact us so that necessary measures can quickly be taken.

## **V. DATA RETENTION**

We will retain your Information for as long as needed to provide you services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. We will retain and use your Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. In accordance with our routine record keeping, we may delete certain records that contain Information you have submitted to us. We are under no obligation to store such Information indefinitely and disclaim any liability arising out of, or related to, the destruction of such Information.

## **VI. YOUR CHOICES**

- I. **Marketing Communications.** If you do not want to receive marketing and promotional emails from us, you may click on the “unsubscribe” link in the email to unsubscribe and opt-out of marketing email communications or see ‘how to contact us’ below for more information.

- J. **Text Messages.** You may sign up to receive text messages from CBA or third-party service providers on behalf of CBA (e.g., text message marketing). By using our Services, signing up for text messaging services or otherwise opting in to receive text messages (opting in via short code or entering your phone number into an on-site collection widget), you agree that you have provided CBA or its third-party service providers with prior express written consent to be contacted by text message, including recurring automated promotional and personalized marketing text messages.
- a. By providing prior express and/or prior express written consent, you agree to receive text messages under the Telephone Consumer Protection Act and related state laws, including by the use of an automatic telephone dialing system (“ATDS”) to deliver text messages to the mobile phone number which you provided to CBA. While you consent to receive messages sent using an ATDS (or “auto dialer”), the foregoing shall not be interpreted to suggest or imply that any or all of CBA mobile messages are sent using an auto dialer. We will use the Information provided by you in connection with the text messaging services in accordance with this Privacy Policy. Your consent is not a condition of any purchase or use of our services and your consent to be contacted as described is voluntary. The number of text messages you receive may vary based upon the text messaging service(s) you sign up for. Message and data rates may apply.
  - b. You may revoke your consent and opt out to discontinue text messages at any time. If you no longer want to receive text messages from us, reply STOP (or as otherwise instructed).
- K. **Opting Out of Direct Marketing by Third Parties.** To exercise choices regarding the marketing information you receive, you may also review the following links:
- You may opt-out of tracking and receiving tailored advertisements on your mobile device by some mobile advertising companies and other similar entities by downloading the App Choices app at [www.aboutads.info/appchoices](http://www.aboutads.info/appchoices)

- You may opt-out of receiving permissible targeted advertisements by using the NAI Opt-out tool available at <http://optout.networkadvertising.org/?c=1> or visiting About Ads at <http://optout.aboutads.info>
- You can opt-out of having your activity on our Services made available to Google Analytics by installing the Google Analytics opt-out add-on for your web browser by visiting: <https://tools.google.com/dlpage/gaoptout> for your web browser.

You have the right to request that the Information described above be provided to you in a portable and readily useable format, to the extent technically feasible (“data portability”).

- **Deletion Request Rights.** You have the right to request that we delete the Information that we collected from you, subject to certain exceptions. To the extent that we can delete your Information, once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Information, unless an exception applies.
- **Right to Correct Inaccurate Information.** To the extent that we may maintain inaccurate Personal Information, you have the right to request that we correct such inaccurate personal information taking into account the nature of the personal information and the purposes of the processing of the personal information. Once we receive and verify your verifiable consumer request, we will use commercially reasonable efforts to correct your Personal Information.
- **Sale and Sharing of Personal Information and the Right to Opt Out.** You have the right to opt out of the processing of your Information for the following purposes:
  - Sale of your Information; and
  - Sharing of your Information for cross-context behavioral advertising.



To help protect your privacy and maintain security, if you request access to or deletion of your Information, we will take steps and may require you to provide certain Information to verify your identity before granting you access to your Information or complying with your request. In addition, if you ask us to provide you with specific pieces of Information, we may require you to sign a declaration under penalty of perjury that you are the consumer whose Information is the subject of the request. Only you or your authorized agent may make a verifiable consumer request related to your Information. If you designate an authorized agent to make a request on your behalf, we may require you to provide the authorized agent written permission to do so and to verify your own identity directly with us (as described above). You may also make a verifiable consumer request on behalf of your minor child.

Email us: [Info@centerforba.com](mailto:Info@centerforba.com)

Call us: 877-857-8517

Write us: CBA Compliance  
500 S Australian Ave  
Suite 600 #1103  
West Palm Beach, FL 33401

## **IX. GEOGRAPHIC LOCATION OF DATA STORAGE AND PROCESSING**

Our services collect Information and process and store that Information in databases located in the United States. If you are visiting the services from a country outside the United States, you should be aware that you may transfer personally identifiable Information about yourself to the United States, and that the data protection laws of the United States may not be as comprehensive as those in your own country. By visiting the services and submitting any personally identifiable Information you consent to the transfer of such personally identifiable Information to the United States.



## **X. CHILDREN'S INFORMATION**

The Services are intended only for users over the age of eighteen (18). If we become aware that a user is under eighteen (18) (or a higher age threshold where applicable) and has provided us with Information, we will take steps to comply with any applicable legal requirement to remove such Information. Contact us if you believe that we have mistakenly or unintentionally collected Information from a child under the age of eighteen (18).

## **XI. DIFFICULTY ACCESSING OUR PRIVACY POLICY**

Individuals with disabilities who are unable to usefully access our Privacy Policy online may contact us to inquire how they can obtain a copy of our policy in another, more easily readable format.

## **XII. "DO NOT TRACK" SIGNALS**

We do not support "Do Not Track." Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable "Do Not Track" by visiting the "Preferences" or "Settings" page of your web browser. Do Not Track is different from Global Privacy Controls ("GPC"), which may notify websites of consumers' privacy preferences regarding the sale or sharing of Personal Information, or the use of Sensitive Personal Information.

## **XIII. CHANGES TO THIS PRIVACY POLICY**

We reserve the right to change, modify, or amend this Privacy Policy at any time to reflect changes in our products and Service offerings, accommodate new technologies, regulatory requirements, or other purposes. If we modify our Privacy Policy, we will update the "Effective Date" and such changes will be effective upon posting. It is your obligation to check our current Privacy Policy for any changes.

## **XIV. HOW TO CONTACT US**



If you have any questions or concerns regarding this Privacy Policy, please contact us at:

Email us: [Info@centerforba.com](mailto:Info@centerforba.com)

Call us: 877-857-8517

Write us: CBA Compliance  
500 S Australian Ave.  
Suite 600 #1103  
West Palm Beach, FL 33412