



ABFT International Training Institute

Privacy Policy

Last updated: July 2, 2025

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your Personal Data, as defined below, when you engage with our Website or Service, register for an event/product, or enter into a contract with us and tells You about your privacy rights and how the law protects You.

Our Privacy Policy applies to information we collect:

- On this Website and through our Service.
- In email, text, and other electronic messages between and our Service.
- Through any mobile applications through which We provide dedicated non-browser-based interaction between You and our Service.
- Offline or through other means, including when You interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

This Privacy Policy does not apply to information collected by any third party, including through any application or content (including advertising) that may link to or be accessible from or through the Service.

Please read this Privacy Policy carefully to understand our policies and practices regarding your Personal Data and how We Will treat it. We use your Personal Data to provide and improve the Website (including registering for an event and providing our learning management system) to be termed “the Service”. By using the Service, You agree to the collection and use of your Personal Data in accordance with this Privacy Policy. If you do not agree with our policies and practices, your choice is to not use our Service. This Privacy Policy may change from time to time. Your continued use of this Service after We make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

Interpretation and Definitions

Interpretation

Capitalized terms and words have the meanings and definitions assigned to them below. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

Account means a unique account created for You to access our Service or parts of our Service.

Affiliate means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

Business, for the purpose of State Privacy Laws, refers to the Company as the legal entity that collects Consumers' personal information and determines the purposes and means of the processing of Consumers' personal information, or on behalf of which such information is collected and that alone, or jointly with others, determines the purposes and means of the processing of consumers' personal information.

CCPA and/or **CPRA** refers to the California Consumer Privacy Act (the "CCPA") as amended by the California Privacy Rights Act of 2020 (the "CPRA").

Company (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to ABFT International Training Institute, LLC, 933 Montgomery Ave, #1060; Penn Valley, PA 19072.

For GDPR purposes, the Company is the Data Controller of information obtained on our Website, and the Data Processor for therapy training services.

Consumer, for the purposes of State Privacy Laws, means a natural person who is a resident of the United States. A resident is (1) every individual who is in the United States for other than a temporary or transitory purpose, and (2) every individual who is domiciled in the United States who is outside the United States for a temporary or transitory purpose.

Cookies are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses.

Country refers to: Pennsylvania, United States

Data Controller, for the purposes of the GDPR (General Data Protection Regulation), refers to the natural person or legal entity which alone or jointly with others determines the purposes and means of the processing of Personal Data.

Data Processor, for the purposes of the GDPR, refers to natural person or legal entity which processes Personal Data on behalf of another controller.

Device means any device that can access the Service such as a computer, a cellphone or a digital tablet.

Do Not Track (DNT) is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing internet users to control the tracking of their online activities across websites.

Facebook Fan Page is a public profile named Attachment-Based Family Therapy - ABFT International Training Institute specifically created by the Company on the Facebook social network, accessible from <https://www.facebook.com/Attachment.Based.Family.Therapy>

GDPR refers to EU and UK General Data Protection Regulation.

Personal Data is any information that relates to an identified or identifiable individual.

For the purposes of GDPR, Personal Data means any information relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

For the purposes of State Privacy Laws, Personal Data means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with You.

Service refers to the Website.

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used. For GDPR purposes, Service Providers are considered Data Processors.

State Privacy Laws refers to the CCPA, CPRA, and any other state consumer privacy laws in effect now or in the future addressing the collection, use, processing, disclosure, sharing, and/or sale of Personal Data.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website refers to ABFT International Training Institute, LLC, accessible from <http://www.abftinternational.com>

You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Under GDPR, You can be referred to as the Data Subject or as the User as you are the individual using the Service.

Collecting and Using Your Personal Data

Types of Data Collected

We collect several types of information from and about users of our Service, including those categories shown below. We collect this information:

- Directly from You when You provide it to Us.
- Automatically as You navigate through the Service.
- From third parties, when they provide it to Us on your behalf.

The information You provide to Us or that We collect through our Service may include:

- Information that You provide by filling in forms on our Service. This includes information provided at the time of registering to use or subscribing to our Service, posting material, or requesting further products or services. We may also ask You for information when you enter a contest or promotion sponsored by Us, and when You report a problem with our Service.
- Records and copies of your correspondence (including email addresses or other contact information), if You contact Us.
- Your responses to surveys that We might ask You to complete for evaluation purposes.
- Details of transactions You carry out through our Service and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Service.
- Your search queries on our Service.

You also may provide information to be published or displayed (hereinafter, “posted”) on public areas of the Service, or transmitted to other users of the Service or third parties (collectively, “User Contributions”). Your User Contributions are posted on and transmitted to others at your own risk. Although We limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, We cannot control the actions of other users of the Service with whom You may choose to share your User Contributions. Therefore, We cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Personal Data

While using our Service or making a purchase, or if you enter into a contract with us, We may ask You to provide Us with certain Personal Data that can be used to contact or identify You. This Personal Data may include, but is not limited to:

- Email address
- First name and last name

- Address, City, State, Province, ZIP/Postal code, Country, or other information that could be used to contact You
- Credit Card Information or other payment information

If you engage in supervision or certification with us,

- You may send case write-ups to us about your clients using aliases
- You may share videos of your therapy clients with us (Data Protection or Business Associates Agreement required, along with all necessary and applicable releases and consents)

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of your visit, the time spent on those pages, device type, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service. The technologies We use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on your Device. You can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted your browser setting so that it will refuse Cookies, our Service may use Cookies.
- **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close your web browser. You can learn more about cookies on TermsFeed website article.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

Functionality Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

****At this time, the Service does not track functionality cookies.**

Tracking and Performance Cookies

Type: Persistent Cookies

Administered by: Third Parties

Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new pages, features or new functionality of the Website to see how our users react to them.

When you visit our Service you must select your Cookie preferences. You can set your browser not to accept cookies, and the allaboutcookies.org website tells you how to remove cookies from your browser. However, if you disable

or block Cookies, some of the features of our Service may not function as a result.

We may also use third-party analytics tools such as Independent Analytics to track the performance of our Service and better understand how visitors use and interact with the Service.

Use of Your Personal Data

The Company may use Personal Data for the following purposes:

To provide and maintain our Service, including to monitor the usage of our Service.

To manage your Account: to manage your registration as a user of the Service (when you register for an event or create an account). The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.

For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.

To contact You: With appropriate consent, to contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.

To provide You with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about. We will only contact you if you have double opted in to our contact and mailing lists.

To manage your requests: To attend and manage your requests to Us.

To carry out our obligations and enforce our rights, including for billing and collection purposes.

For interactive features: to allow You to participate in interactive features within the Service.

For other purposes: We may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, and your experience. We may also use your information in any other way we may describe when you provide the information, or for any other purpose with your consent.

Sharing and Disclosure of Your Personal Data

We may share your Personal Data in the following situations:

- **With Service Providers:** We may share your Personal Data with Service Providers to monitor and analyze the use of our Service, for payment processing, and to contact You about the Services.

- **For business transfers:** We may share or transfer your Personal Data in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.
- **With Affiliates:** We may share your Personal Data with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With other users:** when You share Personal Data or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With your consent:** We may disclose your Personal Data for any other purpose with your consent.
- **For any other purpose:** We may disclose your Personal Data when necessary to fulfill the purpose for which you provided.
- **For legal purposes:** We may disclose your Personal Data when necessary to comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- **To enforce contracts or other agreements:** We may disclose your Personal Data when necessary to enforce or apply our terms of use or terms of sale and other agreements, including for billing and collection purposes.
- **To protect:** We may disclose your Personal Data if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others.

Detailed Information on the Processing of Your Personal Data

The Service Providers We use may have access to your Personal Data. These third-party vendors collect, store, use, process and transfer information about your activity on our Service in accordance with our instructions and agreements with them.

Analytics

We may use third-party Service providers such as Independent Analytics to monitor and analyze the use of our Service. Their Privacy Policy can be viewed at <https://independentwp.com/privacy-policy/>

Email Marketing

We may use your Personal Data to contact You with newsletters, marketing or promotional materials and other information that may be of interest to You. You must double opt-in to this service. You may opt out of receiving any, or all, of these communications from Us by following the unsubscribe link or instructions provided in any email We send or by contacting Us.

We may use Email Marketing Service Providers such as BREVO to manage and send emails to You. Their Privacy Policy can be viewed at <https://www.brevo.com/legal/privacypolicy/>

Payments

We may provide paid products and/or services within the Service. In that case, we may use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processor, Stripe. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information. Their Privacy Policy can be viewed at <https://stripe.com/us/privacy>

When You use our Service to pay for a product and/or service via bank transfer, We may ask You to provide information to facilitate this transaction and to verify your identity.

Usage, Performance and Miscellaneous

We may use third-party Service Providers to maintain and improve our Service.

Invisible reCAPTCHA

We use an invisible captcha service named reCAPTCHA. reCAPTCHA is operated by Google.

The reCAPTCHA service may collect information from You and from your Device for security purposes.

Retention of Your Personal Data

We will not retain your Personal Data for longer than is necessary for the stated collection and use purposes outlined in this Privacy Policy. Generally, we retain Personal Data for up to seven years after account deactivation or until account deletion. However, we will retain contact information related to workshops you attend indefinitely so that we can confirm your certification status. We will also retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your Personal Data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when it is used to strengthen the security or to improve the functionality of our Service, or We are legally obligated to retain it for longer time periods.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located.

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

Your consent to this Privacy Policy, as demonstrated by your use of the Service and submission of such information, represents your agreement to that transfer.

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

Your Control Over Your Personal Data

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You.

Our Service may give You the ability to delete certain information about You from within the Service.

You may update, amend, or delete your information at any time by signing in to your Account, if you have one, and visiting the account settings section that allows you to manage your Personal Data. You may also contact Us to request access to, correct, or delete any Personal Data that You have provided to Us.

Please note, however, that We may need to retain certain information when we have a legal obligation or lawful basis to do so.

If you make a request, we will do our best to respond to you as promptly as possible and within the time period required by applicable law. If you would like to exercise any of these rights, please contact us:

If in the USA

email: privacy@abftinternational.com

Call us at: 267-270-2245

Send us a message using our web form at:

<https://abftinternational.com/contact-us/>

Or write to us: ABFT International Training Institute

933 Montgomery Ave., #1060

Narberth, PA 19072

ATTN: Privacy

For more information on the rights you have regarding your Personal Data, or if you are located in the EU, UK, or Switzerland, please see below.

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GDPR Privacy

Legal Basis for Processing Personal Data under GDPR

We may process Personal Data under the following conditions:

- **Consent:** You have given your consent for processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** Processing Personal Data is necessary in order to protect your vital interests or of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Your Rights under the GDPR

The Company respects the confidentiality of your Personal Data and your ability to exercise your rights.

You have the right under this Privacy Policy, and by law if You are within the EU or UK, to:

- **Request access to your Personal Data.** The right to access, update or delete the information We have on You. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact Us to assist You. This also enables You to receive a copy of the Personal Data We hold about You.
- **Request rectification of the Personal Data that We hold about You.** You have the right to have any incomplete or inaccurate information We hold about You corrected.
- **Object to processing of your Personal Data.** You have the right to object to our processing of your Personal Data and to ask that We no longer use it.
- **Request erasure of your Personal Data.** You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.
- **Request the transfer of your Personal Data.** You have the right to data portability. We will provide to You, or to a third-party You have chosen, your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which You initially provided consent for Us to use or where We used the information to perform a contract with You.

- **Withdraw your consent.** You have the right to withdraw your consent to our use of your Personal Data. If You withdraw your consent, We may not be able to provide You with access to certain specific functionalities of the Service.
- **Request restriction on the use of your Personal Data.** You have the right to request that We restrict the processing of your Personal Data and to ask us to change how We use your Personal Data in certain circumstances, such as where You contest the accuracy of the Personal Data in our possession or where You object to Us using it in a certain way.
- **Request to be free of automated decision-making and profiling.** You have the right to be free from decisions We may make that are based solely on automated processing of your Personal Data, including profiling, if they produce a significant legal effect on You, unless such decision-making or profiling is necessary for entering into or performing a contract between You and Us, or is made with your explicit consent.

Exercising of Your GDPR Data Protection Rights

You may exercise your rights under the GDPR by contacting Us using the information below. Please note that We may ask You to verify your identity before responding to such requests. If You make a request, We will respond to You as soon as possible.

If you would like to exercise any of these rights, please contact us as follows:

In the EU

Rickert Rechtsanwaltsgesellschaft mbH
 ABFT International Training Institute, LLC
 Colmantstraße 15
 53115 Bonn
 Germany
 art-27-rep-ABFT-International-Training-Institute@rickert.law

In the UK

ABFT International Training Institute, LLC
 PO Box 1487
 Peterborough
 PE1 9XX
 United Kingdom
 art-27-rep-ABFT-International-Training-Institute@rickert-services.uk

You have the right to file a complaint with a Data Protection Authority if you have a concern about our collection and use of your Personal Data. Of course, we invite You to contact Us as we would be happy to try to resolve any concerns directly. For more information, if You are in the European Economic Area (EEA), please contact your local data protection authority in the EEA.

Facebook Fan Page

Data Controller for the Facebook Fan Page

The Company is the Data Controller of your Personal Data collected while using the Service. As operator of the Facebook Fan Page

<https://www.facebook.com/Attachment.Based.Family.Therapy>, the Company and the operator of the social network Facebook are Joint Controllers.

The Company has entered into agreements with Facebook that define the terms for use of the Facebook Fan Page, among other things. These terms are mostly based on the Facebook Terms of Service: <https://www.facebook.com/terms.php>

Visit the Facebook Privacy Policy <https://www.facebook.com/policy.php> for more information about how Facebook manages Personal data or contact Facebook online, or by mail: Facebook, Inc. ATTN, Privacy Operations, 1601 Willow Road, Menlo Park, CA 94025, United States.

Facebook Insights

We use the Facebook Insights function in connection with the operation of the Facebook Fan Page to obtain anonymized statistical data about our users.

For this purpose, Facebook places a Cookie on the device of the user visiting our Facebook Fan Page. Each Cookie contains a unique identifier code and remains active for a period of two years, except when it is deleted before the end of this period.

Facebook receives, records and processes the information stored in the Cookie, especially when the user visits the Facebook services, services that are provided by other members of the Facebook Fan Page and services by other companies that use Facebook services.

For more information on the privacy practices of Facebook, please visit Facebook Privacy Policy here: <https://www.facebook.com/privacy/explanation>

State Privacy Rights and California Privacy Notice

This privacy notice section supplements the information contained in our Privacy Policy and it applies to all visitors, users, and others who reside in those US states that have enacted their own consumer privacy laws.

Categories of Personal Information Collected

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or Device ("personal information"). The term "personal information" used in this section incorporates the definition of Personal Data as used elsewhere in this Privacy Policy. The following is a list of categories of personal information which we may collect or may have been collected from California residents or residents of other US states within the last twelve (12) months.

Please note that the categories and examples provided in the list below are those defined in the CCPA/CPRA. This does not mean that all examples of that category of personal information were in fact collected by Us, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been collected. For example, certain categories of personal information would only be collected if You provided such personal information directly to Us.

Identifiers.

Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.

Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

Commercial information.

Examples: Records and history of products or services purchased or considered.

Internet or other similar network activity.

Examples: Interaction with our Service or advertisement.

Sensitive personal information.

Examples: Account login and password information, payment card numbers with required access/security codes.

Under applicable State Privacy Laws, personal information does not include:

- Publicly available information from government records
- Deidentified or aggregated consumer information
- Information excluded from the applicable State Privacy Laws' scope, such as:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data
 - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California

Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994

Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- **Directly from You.** For example, from the forms You complete on our Service, preferences You express or provide through our Service, or from your purchases on our Service.
- **Indirectly from You.** For example, from observing your activity on our Service.
- **Automatically from You.** For example, through cookies We or our Service Providers set on your Device as You navigate through our Service (can opt in/out).
- **From Service Providers.** For example, third-party vendors to monitor and analyze the use of our Service, third-party vendors for payment processing, or other third-party vendors that We use to provide the Service to You.

Use of Personal Information

We may use or disclose personal information We collect for "business purposes" or "commercial purposes" (as defined under the applicable State Privacy Laws), which may include the purposes described in the "Use of Your Personal Data" section, above.

If We decide to collect additional categories of personal information or use the personal information We collected for materially different, unrelated, or incompatible purposes, We will update this Privacy Policy.

Disclosure of Personal Information

We may use or disclose and may have used or disclosed in the last twelve (12) months the following categories of personal information for business or commercial purposes:

- Identifiers
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Commercial information
- Internet or other similar network activity
- Sensitive personal information (only as necessary to provide the Service to you, and/or any other products or services you request from Us).

Please note that the categories listed above are those defined in the CCPA/CPRA. This does not mean that all examples of that category of personal information were in fact disclosed, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been disclosed.

When We disclose personal information for a business purpose or a commercial purpose, We enter a contract that describes the purpose and requires the recipient to both keep that

personal information confidential and not use it for any purpose except performing the contract.

Share of Personal Information

We may share, and have shared in the last twelve (12) months, your personal information identified in the above categories with the following categories of third parties:

- Service Providers
- Payment processors
- Our affiliates
- Our business partners
- Third party vendors to whom You or your agents authorize Us to disclose your personal information in connection with products or services We provide to You

Sale of Personal Information

As defined in applicable State Privacy Laws, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a Consumer's personal information by the Business to a third party for monetary or other valuable consideration. This means receiving some kind of benefit in return for sharing personal information, but not necessarily a monetary benefit.

We do not sell personal information as the term sell is commonly understood. We do allow Service Providers to use your personal information for the business purposes described in our Privacy Policy, for activities such as advertising, marketing, and analytics, and these may be deemed a sale under CCPA/CPRA or other State Privacy Laws.

We may sell and may have sold in the last twelve (12) months the categories of personal information shown above, excluding sensitive personal information.

Please note that the categories listed above are those defined in the CCPA/CPRA. This does not mean that all examples of that category of personal information were in fact sold, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been shared for value in return.

Sale of Personal Information of Minors Under 16 Years of Age

We do not knowingly collect personal information from minors under the age of 16 through our Service, although certain third-party websites that we link to may do so. These third-party websites have their own terms of use and privacy policies and We encourage parents and legal guardians to monitor their children's Internet usage and instruct their children to never provide information on other websites without their permission.

We do not sell the personal information of individuals We actually know are less than 16 years of age, unless We receive affirmative authorization (the "right to opt-in") from either the individual who is between 13 and 16 years of age, or the parent or guardian of an individual less than 13 years of age. Individuals who opt-in to the sale of personal

information may opt-out of future sales at any time. To exercise the right to opt-out, You (or your authorized representative) may submit a request to Us by contacting Us.

If You have reason to believe that a child under the age of 16 has provided Us with personal information, please contact Us with sufficient detail to enable Us to delete that information.

Your Rights under applicable State Privacy Laws

Certain states provide their residents with specific rights regarding their personal information. If You are a resident of one of those states, You have the following rights:

- **The right to notice.** You have the right to know which specific categories and pieces of personal information are being collected, the purposes for which the personal information is being used, and the right to a copy of your personal information. This is also called a “data portability” request. If You submit a data portability request, we will provide you with a copy of your personal information in a common and portable format that you may transfer to another organization of your choosing.
- **The right to know/access.** You have the right to request that We disclose information to You about our collection, use, sale, disclosure for business purposes and sharing of personal information. Once We receive and confirm your request, We will disclose to You:
 - The categories of personal information We collected about You
 - The categories of sources for the personal information We collected about You
 - Our business or commercial purposes for collecting or selling that personal information
 - The categories of third parties with whom We share that personal information, or a list of third parties to whom we have disclosed personal information generally.
 - The specific pieces of personal information We collected about You
 - If we sold your personal information or disclosed your personal information for a business purpose, We will disclose to You:
 - The categories of personal information categories sold
 - The categories of personal information categories disclosed for a business purpose
- **The right to say no to the sale or sharing of Personal information and targeted advertising (opt-out).** You have the right to direct Us to not sell your personal information. To submit an opt-out request, please see the "Do Not Sell My Personal Information" section or contact Us. Once We receive your request, We will no longer use or process your personal information for the purpose of providing targeted advertising to You based on your activity and interests. We will also no longer sell (as that term is defined by relevant and applicable State Privacy Laws) your personal information to third parties for targeted advertising purposes.
- **The right to correct personal information.** You have the right to correct or rectify any inaccurate personal information about You that We collected. Once We receive and

confirm your request, We will use commercially reasonable efforts to correct (and direct our Service Providers to correct) your personal information, unless an exception applies. We may deny your request to correct if We believe the updated information is incorrect or is being used for any fraudulent or deceptive purpose.

- **The right to restrict and limit the use and disclosure of sensitive personal information.** You have the right to request to limit the use or disclosure of certain sensitive personal information We collected about You, unless an exception applies. Once We receive your request, We will cease the processing of your sensitive personal information for the purpose of inferring characteristics about you. Please note that we may continue to process your sensitive personal information for other purposes consistent with this policy. To submit, please see the "Limit the Use or Disclosure of My Sensitive Personal Information" section or contact Us.
- **The right to delete personal information.** You have the right to request the deletion of your personal information under certain circumstances, subject to certain exceptions. Once We receive and confirm your request, We will delete (and direct our Service Providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for Us or our Service Providers to:
 - Complete the transaction for which We collected the personal information, provide a good or service that You requested, take actions reasonably anticipated within the context of our ongoing business relationship with You, or otherwise perform our contract with You.
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - Debug products to identify and repair errors that impair existing intended functionality.
 - Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
 - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
 - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if You previously provided informed consent.
 - Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with Us.
 - Comply with a legal obligation.
 - Make other internal and lawful uses of that information that are compatible with the context in which You provided it.
- **The right to opt out of profiling.** You have the right to opt out of profiling in furtherance of decisions that produce legal or similarly significant effects to You. Once

We receive your request, We will no longer use or process your personal information for making decisions that produce a legal or similarly significant effect to you.

- **The right to opt out of the sharing of personal information for cross-contextual behavioral advertising.** You have the right to opt out of the sharing of your personal information with third parties for cross-contextual behavioral advertising. Once We receive your request, we will no longer use or process your personal information for the purpose of advertising to You based on your individual activity.
- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of your consumer's rights, including by:
 - Denying goods or services to You
 - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
 - Providing a different level or quality of goods or services to You
 - Suggesting that You will receive a different price or rate for goods or services or a different level or quality of goods or services

However, We may offer You certain financial incentives permitted by State Privacy Laws that can result in different prices, rates, or quality levels. This may include loyalty and rewards programs. Any legally permitted financial incentive We offer will reasonably relate to your personal information's value and will contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which You may revoke at any time.

Exercising Your State Privacy Rights

To exercise any of your available privacy rights under applicable State Privacy Laws, You can contact Us:

- By email: privacy@abftinternational.com
- Online: <https://abftinternational.com/contact-us/>
- In writing: **ABFT International Training Institute**
933 Montgomery Ave. #1060
Narberth, PA 19072
United States
- Over the phone: +1 267-270-2245

Only You, or a person that You authorize to act on your behalf, may make a verifiable request related to your personal information.

Your request to Us must:

- Provide sufficient information that allows Us to reasonably verify You are the person about whom We collected personal information or an authorized representative

- Describe your request with sufficient detail that allows Us to properly understand, evaluate, and respond to it

We cannot respond to your request or provide You with the required information if We cannot:

- Verify your identity or authority to make the request
- And confirm that the personal information relates to You

We will disclose and deliver the required information free of charge within 45 days of receiving your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

Any disclosures We provide will only cover the 12-month period preceding the verifiable request's receipt.

For data portability requests, We will select a format to provide your personal information that is readily usable and should allow You to transmit the information from one entity to another entity without hindrance.

Please see the "Do Not Sell My Personal Information" section and "Limit the Use or Disclosure of My Sensitive Personal Information" section for more information on how to opt out and limit the use of sensitive information collected.

Do Not Sell My Personal Information

As defined in applicable State Privacy Laws, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a Consumer's personal information by the Business to a third party for monetary or other valuable consideration. This means that We may have received some kind of benefit in return for sharing personal information, but not necessarily a monetary benefit.

We do not sell personal information as the term sell is commonly understood. We instruct our Service Providers to use your personal information only for the business purposes described in our Privacy Policy.

You have the right to opt-out of the sale of your personal information. Once We receive and confirm a verifiable consumer request from You, we will stop selling your personal information. To exercise your right to opt-out, please contact Us.

Website

You can opt out of receiving ads that are personalized as served by our Service Providers by following our instructions presented on the Service:

- The NAI's opt-out platform: <http://www.networkadvertising.org/choices/>
- The EDAA's opt-out platform <http://www.youronlinechoices.com/>
- The DAA's opt-out platform: <http://optout.aboutads.info/?c=2&lang=EN>

The opt out will place a cookie on your computer that is unique to the browser You use to opt out. If you change browsers or delete the cookies saved by your browser, You will need to opt out again.

Limit the Use or Disclosure of My Sensitive Personal Information

If You are a California resident, You have the right to limit the use and disclosure of your sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests such services or goods.

We collect, use, and disclose sensitive personal information in ways that are necessary to provide the Service. For more information on how We use your personal information, please see the "Use of Your Personal Data" section or contact us.

"Do Not Track" Policy as Required by California Online Privacy Protection Act (CalOPPA)

Our Service does not respond to Do Not Track signals at this time. As a common and standardized technology for recognizing Do Not Track signals becomes available, we may update the Service accordingly.

Your California Privacy Rights Under California's Shine the Light law

Under California Civil Code Section 1798 (California's Shine the Light law), California residents with an established business relationship with us can request information once a year about sharing their Personal Data with third parties for the third parties' direct marketing purposes.

If you'd like to request more information under the California Shine the Light law, and if You are a California resident, You can contact Us using the contact information provided below.

California Privacy Rights for Minor Users (California Business and Professions Code Section 22581)

California Business and Professions Code Section 22581 allows California residents under the age of 18 who are registered users of online sites, services, or applications to request and obtain removal of content or information they have publicly posted.

To request removal of such data, and if You are a California resident, You can contact Us using the contact information provided below, and include the email address associated with your account.

Be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

Security of Your Personal Data

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted.

The safety and security of your information also depends on You. Where We have given You (or where You have chosen) a password for access to certain parts of our Service, you are responsible for keeping this password confidential. We ask You not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although We do our best to protect your Personal Data, We cannot guarantee the security of your personal information transmitted to our Service. Any transmission of Personal Data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Service.

Children's Privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from our servers.

If We need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, We may require your parent's consent before We collect and use that information.

Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on 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.

Changes to this Privacy Policy

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 "Last updated" 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.

Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By email: privacy@abftinternational.com
- Online: <https://abftinternational.com/contact-us/>
- In writing: **ABFT International Training Institute**
933 Montgomery Ave. #1060
Narberth, PA 19072
United States
- Over the phone: +1 267-270-2245