



PRIVACY Policy

Last updated October 21, 2021

Thank you for choosing to be part of our community at ABA Horizons, LTD. ("Company," "we," "us," or "our"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice or our practices with regard to your personal information, please contact us at: info@abahorizons.co.uk.

This privacy notice describes how we might use your information if you:

- [visit our website](#)
- are a potential client and complete our [intake forms](#)
- are a current client receiving services
- are looking for a career with the us and complete our [careers forms](#)
- engage with us in other related ways — including any sales, marketing, or events.

In this privacy notice, if we refer to:

- "Website," we are referring to any website of ours that references or links to this policy
- "Services," we are referring to our Website, and Cost Analysis Tool.
- "ABA Service Provision," we are referring to Applied Behaviour Analysis services currently provided by us to You, as advertised on our Website.
- "Clients," we are referring to individuals that have signed a contract and are current recipients of ABA Service Provision with us.

The purpose of this privacy notice is to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately and contact info@abahorizons.co.uk, where we can delete any data, you may have submitted.

Please read this privacy notice carefully, as it will help you understand what we do with the information that we collect.



Contents

| | |
|---|----|
| PRIVACY NOTICE | 1 |
| 1. WHAT INFORMATION DO WE COLLECT? | 3 |
| 2. HOW DO WE USE YOUR INFORMATION? | 4 |
| 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE? | 5 |
| 4. WHO WILL YOUR INFORMATION BE SHARED WITH | 5 |
| 5. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY? | 6 |
| 6. HOW LONG DO WE KEEP YOUR INFORMATION? | 7 |
| 7. HOW DO WE KEEP YOUR INFORMATION SAFE? | 7 |
| 8. DO WE COLLECT INFORMATION FROM MINORS? | 8 |
| 9. WHAT ARE YOUR PRIVACY RIGHTS? | 8 |
| Cost Analysis Tool Account Information | 9 |
| 10. CONTROLS FOR DO-NOT-TRACK FEATURES | 9 |
| 11. DO WE MAKE UPDATES TO THIS NOTICE? | 9 |
| 12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE? | 10 |
| 13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU? | 10 |



1. WHAT INFORMATION DO WE COLLECT?

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Website, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Website, receive one of our services (Direct or Tele-Service) or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the services and features you use. The personal information we collect may include the following:

A. Personal Information Provided by you. We collect:

- names
- email
- addresses
- phone numbers
- mailing addresses

B. Personal Information about your child, provided by you. We collect:

- your child's name
- date of Birth
- diagnoses & Health information
- education information (EHCP status)
- and other similar information.

C. Personal Information about you and your child, we collect required for ABA Service provision:

- Contract
- Consent Forms
- Clinical Assessments (Vineland-3, ABLLS-R, etc.)
- Parent/guardian signatures (to verify service provision every session)
- Session notes
- Skill Acquisition data (learning objectives)
- Challenging Behaviour data (data on those behaviours that interfere with Skill Acquisition)
- Parent Training data

In order for us provide effective Services and ABA Service Provision, all personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.



2. HOW DO WE USE YOUR INFORMATION?

In Short: We process your information for purposes:

- based on legitimate business interests,
- the fulfilment of our contract with you,
- compliance with our legal obligations,
- and/or your consent.

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and login process.** Required to access the full version of our [Cost Analysis Tool](#).
- **Request feedback.** We may use your information to request feedback and to contact you about your use of our [Cost Analysis Tool](#).
- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
- **To send administrative information to you.** If you subscribe and consent, we may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **To protect our Services.** We may use your information as part of our efforts to keep our Website safe and secure (for example, for account hacking and cybersecurity).
- **To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**
- **To respond to legal requests and prevent harm.** If we receive a Witness Summons or other legal request, we may need to inspect the data we hold to determine how to respond.
- **Administer prize draws and competitions.** If you've subscribed and consented, we may use your information to administer prize draws and competitions when you elect to participate in our competitions.
- **To deliver and facilitate delivery of services to the user.** We may use your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Products or Services.
- **To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our Website, subscribing to marketing or otherwise contacting us, we will collect personal information from You. You can opt-out of our marketing emails at any time (see the "[WHAT ARE YOUR PRIVACY RIGHTS?](#)" below).



3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: If you are a Client, we never share any information you've submitted to us, or has been curated during ABA Service Provision, with anyone outside the Company or our international affiliates. Our affiliates never share your information with third parties. The only times we do share your information with other organisations are to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations.

We may process or share your data that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information 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.
- **International Affiliates.** We may share your information with our affiliates based in North America, in which case we will require those affiliates to honour this privacy notice. Affiliates include our subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

4. WHO WILL YOUR INFORMATION BE SHARED WITH?

In Short: If you are using our Website, we only share your information with the following third-parties:

- Google Analytics

If we have processed your data based on your consent and you wish to withdraw your consent, please complete our [DATA ACCESS REQUEST FORM](#).



5. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: If you are a Client, on rare occasion, we may transfer, temporarily store and process your information in countries other than your own, required for ABA Service Provision.

Our servers used to store information of our Clients' information are located in the United Kingdom and hosted Via [Microsoft 365 services](#).

If you are accessing our website from outside the United Kingdom, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those affiliates with whom we may share your personal information required for eventual service provision (see "[WILL YOUR INFORMATION BE SHARED WITH ANYONE?](#)" above), in and other countries.

If you are a resident in the European Economic Area (EEA) or United Kingdom (UK), then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

European Commission's Standard Contractual Clauses:

We have implemented measures to protect your personal information, including by using European Commission's Standard Clauses for transfers of personal information between us and our affiliates. These clauses require all recipients to protect all personal information that they process originating from the EEA or UK in accordance with European data protection laws and regulations.

Please refer to [Microsoft Products and Services Data Protection Addendum](#) for details of our Standard Contractual Clauses.



6. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless a longer retention period is required or permitted by law (such as tax, ABA credentialing, accounting or other legal requirements).

The duration we keep your information will depend on if you are exploring our services or are currently receiving one of our services.

When you are using our Website:

No purpose in this notice will require us keeping your personal information, or that of your child, for longer 193 days past the start of idle period of the user's account.

If you are a Client:

We will keep all information you provide us, or that we collect during ABA Service Provision (see "[WHAT INFORMATION DO WE COLLECT?](#)" section C above) for as long as we are providing you ABA Services. Access to your data is always on a "need-to-know" basis.

When we have no ongoing legitimate business need to process your personal information and that of your child, we will delete all non-service related and supplemental documentation that hasn't been curated by us during service provision.

As our many of our staff are licensed professionals, registered with the [Behavior Analyst Certification Board \(BACB\)](#), we are bound to their ethics code and service guidelines. Accordingly, any data and information that we have collected during service provision (see "[WHAT INFORMATION DO WE COLLECT?](#)" section C above) will be archived for 7 years.

Data that we must archive will be:

- Anonymised or Pseudonymised,
- Securely stored,
- Isolated from any further processing until deletion is possible,
- only accessed when You ask us,
- only accessible and retrievable by senior management.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented extensive technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.



8. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age. We provide services to children, but only with the consent and contractual arrangement with their parent(s) or legal guardian(s).

We do not knowingly solicit data from or market to children under 18 years of age. By using the Website, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Website.

If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have inappropriately collected from children under age 18, please contact us at info@abahorizons.co.uk.

9. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: In some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right:

- (i) to request access and obtain a copy of your personal information,
- (ii) to request rectification or erasure,
- (iii) to restrict the processing of your personal information; and
- (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information.

To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are a resident in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

- https://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are a resident in Switzerland, the contact details for the data protection authorities are available here:

- <https://www.edoeb.admin.ch/edoeb/en/home.html>.



Cost Analysis Tool Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can contact us at info@abahorizons.co.uk.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list — however, we may still communicate with you, for example to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes. To otherwise opt-out, can contact us at info@abahorizons.co.uk or by [UNSUBSCRIBING](#).

10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. We do not however knowingly track your information outside this website. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

11. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.



12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), Jamie Spencer, by email at info@abahorizons.co.uk, by phone at (01206) 258045, or by post to:

ABA Horizons, LTD.
Jamie Spencer
The North Colchester Business Centre
340 The Crescent
Colchester
Essex
CO4 9AD
United Kingdom

13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please submit a request form by [CLICKING HERE](#).

This privacy policy was adapted from [Termly's Privacy Policy Generator](#).