

# Privacy Policy

## **Introduction and Overview**

You have arrived at a web site that is provided by American Board of Pediatric Dentistry and/or its affiliated and subsidiary companies (collectively "ABPD" or "we" or "our" or "us" or "our").

# This Privacy Policy:

- governs your use of https://www.abpd.org/ and any other official ABPD sites, including mobile
  sites or apps, and any interactive features, applications, and/or services that we make available
  through a site or interactive platform that posts a link to this Privacy Policy (collectively referred
  to as the "Site") including, without limitation, any pages, facilities, services, or capabilities
  accessible on or by any top-level domain owned by us or any subsite, subdomain, subdirectory,
  virtual site, or virtual directory thereof;
- describes the types of information we may collect from you (an individual, representing
  yourself, or if applicable, acting as legal representative for a company or other legal entity), the
  user, ("you" and "your") or that you may provide when you visit the Site, why we collect it, how
  we use it, and otherwise manage it;
- describes the choices you can make about how we use and/or share your information; and
- applies to Personal Information (defined below) that we may collect from you in any instance
  when you contact us or we contact you, including without limitation at the Site, in email-textother electronic messaging, or when you interact with third parties referenced via the Site to
  whom you provide information (and who then provide such information to us).

Please read this Privacy Policy carefully so that you understand our policies and practices regarding your information and how we will treat it.

If you do not agree with our policies and practices, including our use and disclosure of your Personal Information, please do not use our Site and do not provide us with any of your information.

By accessing or using the Site, you agree to the terms of this Privacy Policy and consent to our privacy practices described in this Privacy Policy, including our use and disclosure of your Personal Information as described in this Privacy Policy.

This Privacy Policy may change from time to time. Your continued use of the Site after we make changes is deemed and treated as your acceptance of those changes, so please check the Privacy Policy periodically for updates.

Please note that we are located in the United States and any information you provide to us may be stored in the United States. If you are visiting a Site from the European Union or other regions with laws governing data collection and use that may differ from United States law, please note that you are transferring information about you, including Personal Information, to a country and jurisdiction that does not have the same data protection laws as the European Union, and you consent to the transfer of information about you, including your Personal Information, to the United States and the use and

disclosure of information about you, including your Personal Information, as described in this Privacy Policy and as allowed under the laws of the United States.

To the extent we provide you notice on our Site of different or additional privacy policies or practices (e.g., at the point of our collection), those additional terms shall also govern such data collection and use.

ABPD does engage third party service providers ("Service Providers") with whom your information may be shared. Service Providers have their own security policies and ABPD is not responsible for their conduct. Unless explicitly stated otherwise, any current, updated and new services shall be subject to this Privacy Policy.

ABPD cares about online privacy. If you have any questions concerning this Privacy Policy, please contact us at:

5034 Thoroughbred Lane, Ste A, Brentwood, TN 37027 info@abpd.org 1-800-410-12500

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. However, 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 Site, 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 and can potentially be intercepted or incorrectly routed. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Site. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on any Site. Please consider this before submitting any information to us or through the Site.

How we collect, use, disclose & otherwise manage your personal information.

## Collection and Use of Information You Provide To Us.

We may ask you to provide us: (1) your first and last name, email address, home address, phone number, government issued identification or licensure numbers, credit and debit card numbers for payment or identification/authentication/verification purposes, date of birth or other information that could reasonably be used to identify you personally (hereinafter "Personal Information"); (2) information that is about you but individually does not personally identify you, such as educational information for professionals and other relevant information for those seeking referrals or inquiring about certification; and/or (3) demographic information, such as your zip code/postal code or country of origin ("Demographic Information").

We may collect this information from you such as when you:

- Fill out forms or applications at our Site;
- Sign up to join our online mailing list or to receive updates from us;
- Contact us with questions;

- Visit our Site or participate in one of our programs;
- Provide us with comments or suggestions;
- Submit an application for certification or the purposes of certification (including testing);
- Provide us with any information contributed to our Sites on your behalf; and
- Provide us other contact information or otherwise enter into any transaction via the Site.

Your decision to provide this information is voluntary, but if you choose not to provide this requested information you may not be able to take advantage of all of the Site's features or our services.

## Information collected when you use the Site.

In addition to the information you choose to submit to us, we and/or our service providers may automatically collect and/or store certain non-personally identifiable information when you visit or interact with the Site or communicate with us by email ("Usage Information"). This Usage Information may be stored and/or accessed from your personal computer, laptop, tablet, mobile phone or other device (a 'Device") whenever you visit or interact with our Site or communicate with us by email.

Usage Information may include but is not limited to:

- Your IP address or other unique identifier ("Device Identifier");
- Your Device browser, operating system, and mobile network information;
- The areas within our Site that you visit and your activities there, including remembering you and your preferences;
- Your general location; and
- Certain other Device data, including the time of day you visit the Site, among other information.

We may use various methods to collect and/or store Usage Information, such as:

- General Tracking Information. ABPD keeps records of the pages visited by each site user. ABPD aggregates this information with data on the pages visited by other users to track overall visitor traffic patterns. ABPD uses this information to improve its Site and to develop functions and user tools which will make it more responsive to the needs and preferences of ABPD customers.
- Cookies. The Site uses a technology called "cookies" to help facilitate transactions on the Site. A cookie is an element of software code that ABPD Sites can send to your browser, which is then stored on your hard drive so we can recognize you when you return. All pages on our Sites where you are prompted to log in or that are customizable require that you accept cookies. If you access our Sites, these cookies: (1) may let us know who you are; (2) are necessary to access the personal information previously provided to us by you in order to deliver personalized services; and (3) will provide us and our Service Providers with information that we will use to personalize our Sites in accordance with your preferences. Should you decide not to accept cookies from our Sites, you will limit the functionality we can provide when you visit our Site. In addition to our own cookies, we may also use various third-party cookies to report usage statistics of the Service, deliver advertisements on and through the Service, and so on. If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.
- Tracer Tags. ABPD's Sites may use a technology called "tracer tags", which may also be referred to as "Clear GIFs" or "Web Beacons". This technology allows us to identify which

- pages you visit on our Sites. These tags are used by us to help optimize and update our Sites for you and other future website visitors.
- Browser Do Not Track Signals. We support Do Not Track ("DNT"). 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.
- Other Information. We may collect additional automatic information about your visit to our Site, such as time of day, browser type and version, browser language, your operating system and platform, the pages you visit at our Site and time spent on those pages, and the Internet Protocol (IP) address used to connect your computer to the Internet. This information is used for analytical purposes and to help us provide services to our customers. We may also use this information to administer and troubleshoot our Sites.
- Aggregate Information. On occasion we may provide this aggregate information (which shall not include personally identifiable information) to researchers, insurance companies, and for other purposes consistent with our mission, the Site's purpose and to help us plan for technical infrastructure requirements and the services that we may provide.

These technologies (or ones we incorporate in the future) are used for a variety of purposes, including:

- To present our Site and its contents to you.
- To provide you with information and services that you request of us.
- To fulfill the purpose for which you provide it (for example, to inform insurance carriers and/or patients of your professional status and accreditation/credentials.)
- To provide you with notices related to your account with us.
- Prevention of fraudulent activity and improved security functionality.
- To carry out our obligations, including contractual obligations, and enforce our rights arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of the Site.
- To administer and assess the performance of the Site.
- To analyze customer trends.
- To offer you enhanced functionality when accessing the Site, including identifying you when you sign-in to our Site or keeping track of your specified preferences.
- To deliver content relevant to your interests on our Site and third-party sites.
- To track users' movements around the Site and to gather demographic information about our user base as a whole.
- In any other way we may describe when you provide the information to us.
- For any other purpose with your consent.
- To comply with any court order, law, or legal process, including to respond to any government, law enforcement, or regulatory request.
- To enforce or apply our terms of use or terms of service.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our customers, other users, service providers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and/or credit risk reduction.

ABPD will not use Usage Information collected to market directly to you. Usage Information may; however, be shared with third-parties to provide more relevant services and all users in the aggregate.

We will retain your Personal Information for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws, and your consent to such purposes(s) remains valid during such time. When Personal Information is no longer needed or legally required, it will be permanently deleted or de-identified so that it can no longer be associated with a specific individual.

#### **Location-Based Information**

Our Site may use location-based services to verify your location, deliver you relevant content based on your location, as well as to share your location with our service providers as part of the location-based services we offer. Further, we or our Service Providers may use your location information to make referrals to you. You have the ability to turn location-based services on and off by adjusting the settings of your Internet browser or mobile device.

#### Information We Collect From Third Parties

We may also receive information about you from your friends and other third parties and combine or link that information with information we have about you. To the extent we combine information we receive from third parties with your Personal Information, the combined information, unless disclosed otherwise, will be treated as Personal Information under this Privacy Policy. In no other circumstances will this Privacy Policy apply to information we receive about you from third parties.

## Information We Collect When You Interact with Third-Party Sites.

The Site may allow certain kinds of interactions between the Site and your account on a third-party site or application. The use of this functionality may involve the third-party site providing information, including Personal Information, to us. If you choose to use this functionality, the third-party site may send Personal Information about you to us. If so, we will treat this information as Personal Information under this Privacy Policy. In addition, we may provide links on the Site to facilitate sending a communication from the Site. For example, we may use third parties to facilitate communications from the Site. These third parties may retain any information used or provided in any such communications or activities and these third parties' practices are not subject to our Privacy Policy. You should review the applicable third-party privacy policies before using such tools.

#### **Information You Provide About a Third Party**

You may send someone else a communication from the Site. If so, the information you provide will be used to facilitate the communication and will not be used for marketing purposes unless we obtain consent from that person or we explicitly say otherwise. Please be aware that when you use any send-to-a-friend functionality on our Site, your email address, mobile number, name or username and message may be included in the communication sent to your addressee(s). Some of these tools may be third-party tools subject to third-party privacy policies.

#### How we use the information we collect

We may use your Personal Information, Demographic Information or Usage Information for a variety of business purposes, including, but not limited to the following:

- Improving the effectiveness of our Site, marketing endeavors and service offerings;
- Processing credit applications and transactions;
- Site registration;
- Processing and completing purchases and similar transactions;
- Providing customer service, including managing your certification and notices concerning it;
- Notifying you of information concerning services you have purchased;
- Sending you direct e-mail;
- Enabling you to participate in the Site's features such as surveys;
- Identifying your service preferences and informing you of new or additional services;
- Providing mobile service messages;
- Evaluating inquiries or applications from prospective patients, insurance companies, and others directly interested in the professional credentialing we provide and your status;
- For internal business purposes;
- To enforce our terms of use and policies;
- To respond to legal requests and prevent legal harm; and
- For purposes disclosed at the time you provide your information or as otherwise set forth in this Privacy Policy.

Additionally, we may also collect, process, store and disclose certain registrant, candidate or diplomate information to research partners approved by the Board to conduct studies to assess the ABPD certification processes and/or for scientific research relating to dental care, the practice of dental care, and/or the education of dentists. Such information would be disclosed only to such approved research partners as agree to keep such information confidential. We also collect, process, store, and disclose certain registrant, candidate or diplomate information, including without limitation unidentifiable examination outcomes, to Advanced Dental Education Programs (including to assess program performance). Such information would only be disclosed to such Advanced Dental Education Programs as agree to keep such information confidential.

# **Sharing Information With Third Parties**

# When You Request We Share With Third Parties.

We may share information with third parties at your request. In the event we do so, all information we disclose will be subject to the privacy policies and practices of such third parties. In addition, the third parties may store, collect or otherwise have access to your information when you interact with their technologies, content or apps on our Site or link to them from our Site.

## Third Parties Providing Services to ABPD.

We may use third party service providers to perform certain services, such as: (a) to assist us in e-commerce operations; (b) to manage a database of customer information; (c) hosting the Site; (d) designing and/or operating the Site's features; (e) tracking the Site's activities and analytics; (f) enabling us to send you special offers or perform other administrative services; (g) to allow you to participate in communications on/at the Site; and (h) other services designed to assist us in maximizing business activities. We may provide third parties with access to your information to carry out the services they are performing for us. Third-party analytics and other service providers such as Google Analytics may set and access their own technologies on your device and they may otherwise collect or have access to

information about you. These service providers use the technology described above to help us analyze how users use the Site. We are not responsible for those third party technologies or activities arising out of them. However, some third parties may offer you certain choices regarding their practices. We are not responsible for the effectiveness of or compliance with any third parties' opt-out options.

#### Service Providers.

Some of our operations, may be managed by unaffiliated companies. These companies may have access to your personal information on a confidential basis only to the extent necessary to perform their functions.

#### Commerce.

If we ship materials to you, we will share your shipping information with our delivery Service Providers (United Parcel Service, FedEx, U.S. Postal Service, or other delivery companies we select).

## To Protect the Rights of ABPD and our Users.

We may disclose your Personal Information if we believe in good faith that doing so is necessary or appropriate to: (i) protect or defend the rights, safety or property of ABPD or third parties (including through the enforcement of this Policy, our Terms of Use, and other applicable agreements and policies); or (ii) comply with legal and regulatory obligations (e.g., pursuant to law enforcement inquiries, subpoenas or court orders).

## Affiliates and Business Transfer.

We may share your information with our parent, subsidiaries and affiliates. We also reserve the right to disclose and transfer all such information: (i) to a subsequent owner, co-owner or operator of the Site and/or our Stores; or (ii) in connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets or other corporate change, including during the course of any due diligence process.

#### Co-Administered Areas.

Certain areas of the Site may be provided to you in association with third parties ("Co-Administered Areas") such as co-promotional partners and may require you to disclose Personal Information to them. Such Co-Administered Areas will identify the third party and indicate if they have a privacy policy that applies to their collection and use of your information. If you elect to register for services, communicate with such third parties or download their content or applications, you may be providing your information to both us and the third party. Further, if you sign-in to a Co-Administered Area with a username and password obtained on the Site, your Personal Information may be disclosed to the identified third parties for that Co-Administered Area.

#### **Secure Commerce.**

When you place orders on a Site, your order information, including your card number and delivery address, is transmitted through the Internet using Secure Sockets Layer (SSL) technology works with your browser to encrypt your order information before transmitting it to our server.

We do not receive or distribute funds directly from or to you when you utilize the Site to purchase our services. We utilize a third party billing and payment processing gateway, who provides the infrastructure and security necessary to provide secure transmission of your credit card transaction data and their terms of service related to the transaction will govern the transaction. We can only accept credit cards for processing through our secured payment-processing gateway. Although we do not control the security environment for them and cannot make any guarantees regarding the secure processing of your credit card transaction data, we want to inform you that we require that our credit card processors are compliant with the Payment Card Industry Data Security Standard ("PCI DSS"). PCI DSS is the bankcard industry's stringent security standard.

## **Information You Submit Publicly**

#### User Content and Public Information.

Any information, communications, or material of any type or nature that you submit to us through a third party website including, but not limited to, any of our Sites or accounts contained on a social media platform or website such as Facebook, Instagram, LinkedIn, or Twitter, whether by e-mail, posting, messaging, uploading, downloading, or otherwise (collectively, a "Submission" of "User Content"), is done at your own risk and without any expectation of privacy. By visiting any of our social media accounts, you are representing and warranting to us that you have reviewed the applicable social media platform's or website's privacy policy and terms of use and that you will abide by all such provisions contained therein. We cannot control the actions of the providers or the other users of any social media platform and we are therefore not responsible for any content or Submissions contained on such platforms. We do not guarantee the privacy and safety of these areas. We encourage you to be wary of providing any of your personal information in such public forums. The information you submit can be collected and used by people you do not know. Again, your use of these features and your Submissions are fully at your own risk. Note that we or others may store, display, publish, distribute or otherwise use User Content online or offline in any media or format and may or may not attribute the User Content to you. Others may have access to this User Content and may have the ability to share it with third parties.

## Name and Personal Information.

We may also publish your name and other Personal Information that is part of your User Content, and we may use the content, or any portion of the content, for our organization's activities. For full terms and conditions regarding User Content you submit, please review our Terms of Use.

## Third Party Links and Data.

The Site may contain content that is supplied by a third party, and those third parties may collect Usage Information and your Device Identifier when pages from the Site are served to you. In addition, ABPD's Site may include links to services that are operated and controlled by third parties.

We are not responsible for the data collection and privacy practices employed by any of these third parties. For example, if you "click" on a link, the "click" may take you off the Site onto a different site. These other sites may independently collect data about you and may or may not have their own published privacy policies.

The inclusion of any link does not imply ABPD's endorsement of any other company, its websites, or its services. We have no control over such websites and therefore have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose and otherwise treat your personal information.

Third party Service Providers may need access to some of your personal information. In such cases, we only provide third party agents with the minimum amount of information needed to complete the requested service or transaction. We may also provide your information to our affiliated companies and successors. We reserve the right to provide third parties with aggregate statistics about our clients, traffic patterns and related site information. This data reflects Site usage patterns but does not contain personally identifiable information about any individual user.

#### Transfer of Information to the United States

Our Site is operated in the United States. If you are located outside of the United States, please be aware that information we collect will be transferred to, and processed, stored and used in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. By using the Site or providing us with any information, you consent to the transfer to, and processing, usage, sharing and storage of your information in the United States.

#### What Should Parents Know About Children

We understand the importance of protecting children's privacy in the interactive world. We do not use the Site to knowingly collect Personal Information from children under the age of 13 without parental consent. If you are a child under 13 years of age, you are not permitted to use the Site and should not send any information about yourself to us through the Site.

In the event that we become aware that we have collected Personal Information from any child, we will dispose of that information in accordance with the Children's Online Privacy Protection Act.

If you are a parent or guardian and you believe that your child under the age of 13 has provided us with information without your consent, please contact us at info@abpd.org, and we will take reasonable steps to ensure that such information is deleted from our databases.

## Security

We use commercially reasonable physical, electronic, and managerial procedures and safeguards to help protect and secure your Personal Information. However, no data transmission over the Internet, mobile networks, wireless transmission or electronic storage of information can be guaranteed 100% secure. As a result, we cannot guarantee or warrant the security of any information you transmit to or from our Site, and you provide us with your information at your own risk. We have implemented various measures to monitor compliance with and enforce the elements in this Privacy Policy, however, we expressly disclaim the obligation to monitor such compliance. If you have a privacy related inquiry, complaint or dispute, please contact us at the postal address, telephone number, or e-mail listed in this Privacy Policy.

# **How Long Is My Personal Information Retained?**

We will keep your Personal Information only as long as is commercially reasonable for the purposes described in the Privacy Policy or for any such period as may be required by applicable law.

## **Updating Your Information and Choices**

You may update or correct information about you through the Site's account registration forms or by contacting us:

- Send an e-mail to: info@abpd.org
- Call 1-800-410-1250;
- Send your request by mail to: American Board of Pediatric Dentistry 5034 Thoroughbred Lane, Ste A Brentwood, TN 37027

If you have any questions about the Privacy Policy, or practices described in it, please direct your communication to the above email and/or address.

## **California Privacy Rights**

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of personal information the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To request a copy of the information disclosure provided by ABPD pursuant to Section 1798.83 of the California Civil Code, please contact us.

### How to Contact ABPD.

You may contact us in one of the following ways:

- Send an e-mail to: info@abpd.org
- Call 1-800-410-1250;
- Send your request by mail to: American Board of Pediatric Dentistry 5034 Thoroughbred Lane, Ste A Brentwood, TN 37027

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