

Our Privacy Policy, which is part of our Terms of Use (“Terms”), is designed to advise you about how we use, protect, and disclose the information we receive or collect about individuals, explains your privacy rights, and how you can manage the privacy of your Personal Information. Please read the following information carefully. Capitalized terms herein have the same definition as specified in the Terms.

我们的隐私政策构成使用条款（以下简称为“条款”）的一部分，旨在告知我们使用、保护和披露收到或收集的个人信息的方式，解释您享有的隐私权，以及您如何管理个人信息的隐私。请通读以下信息。凡本条款中出现的大写术语，应按照条款中给出的相应定义理解。

By accessing or otherwise using the Services, you consent to the data collection and use practices described below. Continued use by you of the Services constitutes your agreement to be bound by and subjected to this Privacy Policy as well as the Terms and User Agreement. If you do not agree with or accept the terms of this Policy and/or the Terms and/or User Agreement, you must not access or use the Services and you must discontinue all access and use of the Services.

一旦访问或使用服务，即表示您同意下文所述的数据收集和使用方法。对服务的持续使用，即表示您同意接受本隐私政策及条款和用户协议的约束，拒绝同意或接受本政策和/或条款和/或用户协议的条款的，您不得访问或使用服务，并停止当前对服务的访问和使用。

Please note that this Policy does not govern practices of third parties, such as our partners or third party service providers. Any information you provide to a third party while utilizing their website or service will be governed by the third party’s privacy policy and/or terms of use. Please read all third parties’ privacy policies and terms of use carefully.

请注意，本政策对我们的合作伙伴或第三方服务供应商等第三方的行为不具约束力。在使用第三方网站或服务时，凡您向第三方提供的任何信息，将受到第三方隐私政策和/或使用条款的约束。请通读所有第三方隐私政策和使用条款。

1. Information We Collect

1. 我们收集的信息

We collect certain information when you use our Services. For instance, certain users must register before they may use the Services. During the course of this registration process, IBAO® collects certain information about users. Moreover, through the use of our Services, users can provide us certain information about themselves. Such information includes:

当您使用我们的服务时，我们会收集一些信息。例如，某些用户必须完成注册才可使用服务。在注册过程中，IBAO®会收集用户的一些信息。此外，在使用我们的服务时，用户可能会向我们提供某些个人相关信息。此类信息包括：

Personal Information (also known as “Personal Data”): Any information that can be used to identify, locate, or contact an individual. This includes an individual’s (a) name; (b) phone number; (c) email address; (d) mailing/billing address; (e) an identification number (“User ID”) or other similar identifiers; (f) date of birth or age; (g) gender; (h) company name; (i) online identifiers, such as an IP address; (j) payment card information; (k) tax identification number; (l) location information; and/or (m) educational records or transcripts (n) supervision records (o) other identifying information.

个人信息（也称为“个人数据”）。凡可用于验证身份、定位或联系个人的信息，包括用户个人的（a）姓名；（b）电话号码；（c）电子邮件地址；（d）邮寄/账单地址；（e）身份号码（“用户ID”）或其他类似的身份信息；（f）出生日期或年龄；（g）性别；（h）公司名称；（i）IP地址等网络标识符；（j）付款卡信息；（k）纳税识别号；（l）位置信息；

和 (m) 学历记录或成绩单 (n) 监督记录 (o) 其他身份认证信息。

Non-Personal Information (aka “Generic Information”): IBAO® may also gather generic information from visitors to our Services automatically, but which does not directly reveal a visitor’s identity. This may include aggregate usage metrics such as the total number of visitors, the frequency of visitors to our Services, pages viewed, usage patterns within the Services, among others. We gather this information for limited purposes, like determining our Services or customer service needs. This information is not otherwise linked to your Personal Information. However, at times the combination of various types of data, including Generic information, may enable you to be identified, and may therefore qualify as Personal Information.

非个人信息（亦称“一般性信息”）。IBAO®还可能自动收集访问我们服务者的一般性信息，但这些信息并不直接显示访问者的身份，包括访客总人数，访客使用我们服务的频率，浏览的页面，服务使用模式等汇总使用指标。我们收集的信息仅限于有限用途，比如，确定我们的服务或客户服务需求。此类信息与您的个人信息无其他联系。但是，各类数据（包括一般性信息）的组合有时可能会使您的身份得到识别，因此可能会成为个人信息。

Aggregate Information: As noted above, we may collect aggregate usage metrics that inform how users use our Services. We may also aggregate and/or de-identify the data about users of our Services and/or learners about whom information is provided via the Services, and use it for product and service development and to improve the quality of our products and Services. This includes the information on users’ age, gender, or location, but cannot be used to individually identify any person.

汇总信息：如上所述，我们可以收集汇总使用指标，这样可以帮助我们了解用户使用服务的方式。我们也可能汇总和/或取消识别我们服务的用户和/或通过服务提供信息的学习者的数据，并将其用于产品和服务开发，以及提高我们产品和服务的质量。此类信息包括用户的年龄、性别或地点的信息，但不能单独用于识别任何人。

2. How We Collect Information

2. 我们如何收集信息

IBAO® collects and obtains information in a few ways: there is information you choose to give to us, information we obtain through your use of our Services, and information we obtain from third parties.

IBAO®收集和获得信息的方式如下：您主动提供给我们的信息，我们通过您使用我们的服务获得的信息，和我们从第三方获得的信息。

A. Information You Give To Us

A. 您主动提供给我们的信息

At times, we may require you to provide certain Personal Information to use certain Services or to fulfill your request. For instance, users may be required to provide to IBAO® the following information upon registration: legal name (first and last), e-mail address, telephone number, company name (if applicable), title or role (if applicable) and mailing address (“ Contact Information”), date of birth, gender, educational records, transcripts, supervisor information and records. You consent to transfer and storage of any Contact Information and Student Information you provide to us on our servers. Upon user account activation, the email address used for registration is assigned as the account user ID. Upon first login to the Services, it is the user’s responsibility to create a private password.

我们有时可能要求您提供某些个人信息以使用特定服务或满足您的要求。例如，在注册时，用户可能需要向 IBAO®提供以下信息：姓名（姓氏和名字）、电子邮件地址、电话号码、公

司名称（如有）、职务或岗位（如有）和邮寄地址（“联系信息”）、出生日期、性别、学历背景记录、成绩单、指导老师信息和记录。您同意凡提供给我们的联系信息和学生信息，将被转移并储存在我们的服务器上。在激活用户账户时，用于注册账户的电子邮件地址被分配为账户用户 ID。首次登录服务时，用户须创建一个个人密码。

In addition, by registering to use our Services, you agree that IBAO® may collect billing account information, which includes billing-related contact information as well as payment card information, and/or tax identification number information (“Billing Information”). IBAO® may share Billing Information with third party payment processors and fulfillment companies for the purpose of fulfilling and processing payments for customer orders.

此外，注册使用我们的服务后，即表示您同意 IBAO®可以收集账单账户信息，其中包括账单联系信息以及付款卡信息和/或纳税人识别号信息（“账单信息”）。IBAO®可能会与第三方支付处理机构和履行公司分享账单信息，以履行和处理客户订单的付款。

We will also collect information you voluntarily provide to us, such as when you sign up for our subscription mailing service, or contact us when you have questions, feedback or comments about our Services.

我们还将收集您主动提供给我们的信息，例如，当您注册我们的订阅邮件服务时，或当您对我们的服务有疑问、反馈或评论时与我们联系。

To the extent users post information on or submit information to our Services, IBAO® may collect this information and associate it with Personal Information to construct personalized user pages detailing a user’ s transaction activity.

当用户在我们的服务上发布信息或提交信息时，IBAO®可能会收集这些信息，并将其与个人信息相关联，以建立列明用户交易活动的个性化用户页面。

B. Information We Obtain When You Use Our Services

B. 我们在您使用服务时获得的信息

We also collect certain information from you through your use of our Services. For instance, our Services automatically record information a browser sends whenever a user requests login to the Services. These server logs may include information such as an Internet Protocol address, the User ID entered, the date and time of the request, and one or more cookies that may uniquely identify the browser. Any such information collected will be used only to detect and identify user login attempts/failures when login assistance is requested.

在您使用服务时，我们也会收集您的某些信息。例如，我们的服务会自动记录用户要求登录服务时浏览器发送的信息。这些服务器日志可能包括互联网协议地址、输入的用户 ID、请求的日期和时间，以及一个或多个可能唯一识别浏览器的 cookies 等信息。凡此类收集的信息，将仅用于在请求登录协助时检测和识别用户的登录尝试/失败。

Cookies

We may use “cookies” and other similar technologies (e.g., Google Analytics) to collect certain information about your activities when accessing our Services. This is so that we can customize certain aspects of your specific experience, and improve the overall function and efficiency of our Services. Cookies are small data text files stored locally on your computer that uniquely identify your browser. For instance, certain cookies are used to enable you to move around pages that may be accessible through our Services without having to reenter your password as frequently. We may use cookies and other similar technologies (e.g., Google Analytics) to perform various tasks such as: monitoring aggregate usage metrics, storing and remembering your passwords (if you choose this option), storing your account and advertising preferences you have set, and

personalizing the Services we make available to you. We do not otherwise associate your Personal Information with any information collected through the cookies.

我们可能使用 "cookies"和其他类似的技术（例如，谷歌分析）来收集您在访问我们的服务时的某些活动信息，其目的是实现您特定体验定制化，并改善我们服务的整体功能和效率。Cookie 是指存储在电脑上的小数据文本文件，它可以唯一地识别您的浏览器。例如，使用某些 cookies 后，您能够在可通过我们的服务访问的页面上移动，而无需频繁地重新输入个人密码。我们可能使用 cookies 和其他类似技术（例如，谷歌分析）来执行各种任务，例如：监测汇总使用指标，存储和记住您的密码（如事先选择此选项），存储您的账户和您设置的广告偏好，以及实现我们为您提供的服务的个性化。我们不会将您的个人信息与通过 cookies 收集的任何信息相关联。

You can adjust your browser or mobile device settings to limit, control, or let you know about what cookies your computer or device accepts. Please refer to instructions provided by your mobile device ' s manufacturer and/or your browser to determine how you can limit the placement of and/or remove cookies or other technologies on your device. Please note, however, if you set your browser to reject cookies, some features of our Services may not work for you, which could impact your experience.

您可以调整浏览器或移动设备设置，以限制、控制或让您了解电脑或设备接受哪些 cookies。请参考移动设备制造商和/或浏览器提供的说明，以确定您如何限制存放和/或删除个人设备上的 cookies 或其他技术。但需要注意一点，如果您将浏览器设置为拒绝接受 cookies，我们服务的某些功能可能无法使用，这可能会影响您的体验。

Our third-party service providers may use cookies or other similar technologies to collect your information and track your behavior. These companies may collect information about your use of our Services and other online services over time and across different services. IBAO® is not responsible for the functioning of cookies or other technologies used and placed by third parties on your device.

我们的第三方服务供应商可能使用 cookies 或其他类似技术来收集您的信息并跟踪您的行为。这些公司可能会收集有关您在一段时间内和不同服务中使用我们的服务和其他在线服务的信息。IBAO®不负责第三方在您的设备上使用和存放的 cookies 或其他技术的运行。

Pixel tags: Pixel tags and web beacons are tiny graphic images placed on website pages or in our emails that allow us to determine whether you have performed a specific action. When you access these pages or open or click an email, the pixel tags and web beacons generate a notice of that action. These tools allow us to measure response to our communications and improve our web pages and promotions.

像素标签：像素标签和网络信标是指存放在网站页面或我们的电子邮件中的微型图形图像，它可以让我们确定您是否执行了具体操作。当您访问这些网页或打开或点击电子邮件时，像素标签和网络信标会生成一个有关此操作的通知。凭借这些工具，我们能够衡量服务对各种通信的响应，并改进我们的网页和推广活动。

Other technologies: We collect many different types of information from other technologies to improve the quality of services we provide. For example, we may collect information about the device you use to access our Services, your operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. Our server logs also record the IP address of the device you use to connect to the Internet. An IP address is a unique identifier that devices use to identify and communicate with each other on the Internet.

其他技术：为了改善我们的服务质量，我们使用其他技术收集许多不同类型的信息。比如说，我们可能收集的信息包括通过哪种设备访问我们的服务，您使用的操作系统类型、浏览器类型、域名和其他系统设置，以及系统语言设置，设备所在的国家及时区。我们的服务器日志还记录了您用于连接互联网的设备的 IP 地址。IP 地址是一种独特的标识符，设备凭此识别身份并实现互联网上的相互通信。

The Services do not track user behavior over time and across other third-party websites or online services. The Services do not respond to “do not track” browser signals.

服务不会跟踪用户在一段时间内和其他第三方网站或在线服务中的行为。服务不会响应“不跟踪”的浏览器信号。

C. Information We Obtain from Third Parties

C. 我们从第三方获得的信息

IBAO® may collect information from various third parties about you, such as any third-party service providers who we use to provide our Services to you. For example, we may obtain information about you from our third party payment providers related to your purchasing access to and use of our Services.

IBAO®可能会从各种第三方收集有关您的信息，例如我们用来向您提供服务的任何第三方服务提供商。例如，我们可能从我们的第三方支付提供商那里获得与您购买访问和使用我们的服务有关的您的信息。

3. Why We Use and Share Information

3. 我们为什么使用和分享信息

As detailed in this Policy, we will primarily use, share, and/or disclose information we obtain to provide you access to, and facilitate your use of, our Services. This includes the following instances:

如本隐私权政策所述，我们将主要使用、分享和/或披露所获的信息，让您能够访问我们的服务并促使您使用这些服务。这包括以下情况。

When you consent for us to do so. We may also ask for your consent to process your personal information for a specific purpose that we communicate to you, for instance, to receive our newsletter and other such mailings you may be interested in. When you consent to our processing your Personal Information for a specified purpose, you may withdraw your consent at any time and we will stop processing of your data for that purpose.

您同意我们如此行事。我们也可能事先征求您的同意，出于我们告知于您的特定目的处理您的个人信息，例如，接收我们的通讯和您可能感兴趣的其他此类邮件。当您同意我们出于特定目的处理您的个人信息时，您可以随时撤回同意，我们将停止出于该目的处理您的数据。

To fulfill a contractual obligation that we have with you, where applicable. This includes providing you access to and use of our Services.

履行我们与您的合同义务（如适用），包括为您提供我们服务的访问权和使用权。

To fulfill another legitimate interest. For instance, in responding to an email from you with comments or questions about our Services.

为了实现另一合法利益。比如说，在回复您对我们的服务提出的意见或问题的电子邮件时。

To comply with a legal or statutory requirement or obligation. This may include responding to a lawful and enforceable request by law enforcement, judicial body, or other public authorities, or in connection with a legal obligation, or reporting unlawful activity to law enforcement.

遵守法律或法定要求或义务。这可能包括回应执法部门、司法机构或其他政府部门的合法且可执行的要求，或涉及法律义务，或向执法部门举报违法活动。

4. How We Use the Information We Collect

4. 我们如何使用收集到的信息

Except as otherwise outlined in this Policy, IBAO® only uses Personal Information for internal purposes. For instance, we will primarily use your information to provide you access to, and facilitate your use of our Services. We may also use the information provided to customize the content we provide to you.

除本政策另有规定外，IBAO®仅将个人信息用于内部用途。比如说，我们将主要使用您的信息以提供访问权，并促使您使用我们的服务。我们也可能将所提供的信息用于实现提供的内容的定制化。

All Personal Information beyond name, address, email address, and phone number will be used solely for IBAO®'s internal purposes, or companies providing IBAO® support and assistance in processing of financial transactions, fulfilling orders, and administration of the Services. Such instances include but are not limited to: order account processing and activation, processing of financial transactions, administration of our Services, account maintenance, technical and product development, customer support, and/or sales' history, billing purposes, and construction of personalized pages for each user. More information on how IBAO® shares or discloses information is outlined below.

除姓名、地址、电子邮件地址和电话号码之外的所有个人信息仅限于 IBAO®或支持和协助 IBAO®处理财务交易，履行订单和管理服务的公司的内部用途。此等情况包括但不限于：订单账户的处理和激活，财务交易的处理，本方服务的管理、账户维护、技术和产品开发、客户支持和/或销售历史、开具账单，以及为每个用户构建个性化的页面。关于 IBAO®如何分享或披露信息的详细内容概述如下。

We may also ask for your consent to process your Personal Information for a specific purpose that we communicate to you. When you consent to our processing your Personal Information for a specified purpose, you may withdraw your consent at any time and we will stop processing of your data for that purpose.

我们也可能征求您的同意，出于我们事先告知的特定目的处理您的个人信息。在征得您相关同意的前提下，您可以随时撤回同意，我们将停止出于该目的处理您的数据。

5. How We Disclose or Share Information

5. 我们如何披露或分享信息

A. Information Sharing with Other Users – Personal Information

A. 与其他用户共享信息--个人信息

IBAO® only shares Personal Information with other users when we have your consent. We require opt-in consent for the sharing of any user or account information.

IBAO®仅在征得您同意的情况下与其他用户共享个人信息。在分享任何用户或账户信息之前，我们都需要征得您的同意。

B. Disclosure of Information to Third Parties

B. 对第三方披露信息

We do not sell, trade, or rent your Personal Information to others, except in the limited ways outlined in this Policy. As outlined elsewhere in this Policy, IBAO® may release or disclose your information to our subsidiaries, affiliated third-party service providers or agents who perform functions on our behalf or who facilitate the provision of our Services to you. However, we limit sharing Personal Information to those third party companies that assist IBAO® in administering the Services, as well as companies that assist it in processing and fulfilling its orders.

除本政策所述的个别途径外，我们不会将您的个人信息出售、交易或租给他人。如本政策其他部分所述，IBAO®可能会向我们的子公司、附属的第三方服务提供商或代表我们履行职能或协助我们为您提供服务的代理人发布或披露您的信息。但是，我们仅对协助 IBAO®管理服务的第三方公司以及协助其处理和履行订单的公司分享个人信息。

IBAO® requires that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

IBAO®要求这些第三方同意依照我们的指示，并且在遵守本隐私政策和其他相关保密和安全措施的前提下处理这些信息。

In addition IBAO® may share aggregate-level user information that it has obtained from users of the Services (such as age, gender or location) to share with third parties. The aggregate-level user information shared will not contain any Personal Information and cannot be tied to any individual user.

此外，IBAO®可能会与第三方分享其从服务用户那里获得的汇总用户信息（如年龄，性别或位置）。共享的总体用户信息将不包含任何个人信息，也不能与任何个人用户相联系。

IBAO® may share information with other IBAO® entities. We may also share your information and information collected in relation to a merger, sale, financing, acquisition, or other transaction involving all or part of IBAO® with another company.

IBAO®可能与其他 IBAO®实体共享信息。我们还可能与另一家公司分享您的信息以及因合并、变卖、融资、收购或其他涉及 IBAO®全部或部分的交易而收集的信息。

We may also be required to disclose information in response to a lawful request by law enforcement, judicial, or other public authorities, or in connection with a legal obligation. In such instances, we will disclose your Personal Information upon receipt of a court order, subpoena, or other lawful process, or where otherwise required by law. We also reserve the right to report to law enforcement any information related to the use of our Services used to further any unlawful activity or activity we in good faith believe to be unlawful. It is IBAO®' policy to cooperate fully with any law enforcement officials or agencies in the investigation of any violation of any applicable laws.

我们也可能被要求根据执法、司法或其他政府部门的合法要求，或在履行法律义务时披露信息。在这种情况下，在收到法院命令、传票或其他合法程序时，或在法律要求时，我们会披露您的个人信息。我们还可能有权向执法部门报告使用我们的服务时涉及的信息，以推进任何违法活动或我们基于善意原则认为是非法的活动。BAO®遵循的政策是与任何执法官员或部门开展密切合作，调查任何违反任何相关法律的行为。

IBAO® reserves the right to use or disclose information - including Personal Information - if IBAO® reasonably believes that the use or disclosure is necessary to protect IBAO®' rights. For instance, we may disclose information when have a good-faith belief that access, use, preservation or disclosure of such information is reasonably necessary to enforce our Terms of Service, including investigation of potential violations thereof; detect, prevent, or otherwise address fraud, security or technical issues; or protect against imminent harm to the rights, property or safety of IBAO®, or the registered users of our Services.

如果 IBAO®有充分理由认为使用或披露信息（包括个人信息）是保护 IBAO®的权利所必需的，则 IBAO®保留使用或披露此类信息的权利。比如说，当我们有充分理由相信访问、使用、保存或披露这些信息对于执行我们的服务条款是合理且必要的，包括调查潜在的违规行为；检测、预防或解决欺诈行为、安全或技术层面的问题；或保护 IBAO®或我们服务的注册用户的

权利、财产或安全免受损害时，我们可能会披露信息。

6. Your Access to and Choices About Your Personal Information

6. 您对个人信息的访问和选择

IBAO® provides its users with the ability to view, update and edit, any Personal Information stored on the Services. You may view, update, edit, your Personal information on the Services by using the “Account” link to make updates or changes to your account preferences, contacting your internal Organization administrator user, or using the internal contact form found at www.theibao.com. To protect your privacy and security, we will take reasonable steps to verify your identity before making corrections, changes, or updates.

IBAO®赋予其用户查看、更新和编辑存储在服务上的任何个人信息的能力。您可以通过使用“账户”链接对您的账户偏好进行更新或更改，联系您的内部组织管理员用户，或使用www.theibao.com的内部联系表，查看、更新和编辑您在服务上的个人信息。为了保护您的隐私和安全，我们将采取合理的步骤，在进行更正、更改或更新之前核实您的身份。

IBAO® also offers individuals the opportunity to choose or “opt-in” to receive emails or other communications we feel may interest you. We will ask you if you want to receive such emails before we begin sending them to you. If have opted in to receive such communications from us but later decide you do not want to receive solicitations from us or our partners related to your account with us, you always can “opt-out” by accessing and editing your account information to no longer receive such offers and mailings, or by following the “unsubscribe” directions attached to such emails.

IBAO®还为个人提供机会，选择或“选择加入”接收我们认为您可能感兴趣的电子邮件或其他通信。在发送此类电子邮件之前，我们会询问您的接收意愿。如果您最开始选择接收此类通信，但后来决定不愿接收我们或我们的合作伙伴与账户创建有关的邀约，您可以通过访问和编辑您的账户信息来“选择退出”，不再接收此类邀约和邮件，或者依照此类电子邮件所附的“取消订阅”指示行事。

7. Your Privacy Rights

7. 您享有的隐私权

We will ensure that you can exercise your rights pertaining to your Personal Information, including rights as provided by various data protection laws. IBAO® therefore informs you that, where applicable under relevant law, you are entitled:

我们将确保您能够行使与个人信息相关的权利，包括各种数据保护法规定的权利，因此，IBAO®通知您，在相关法律适用的情况下，您有权：

to have access to your Personal Information upon simple request – that is, you may receive a copy of such data (if requested), unless such data is made directly available to you, for instance within your personal account;

根据简单要求访问您的个人信息—即您可以收到这些数据的副本（如要求），除非这些数据是直接提供给您，例如在您的个人账户中。

to have access upon simple request, and free of charge, the categories and names of addresses of third parties that have received Personal Information for direct marketing purposes;

根据简单要求，免费获得为直接营销目的收到个人信息的第三方的类别和地址名称。

to obtain a rectification of your Personal Information should it be inaccurate, incomplete or obsolete;

如果您的个人信息不准确、不完整或已过时的，您可以更正所涉的信息。

to obtain the deletion of your Personal Information in the situations set forth by applicable data

protection law (the “right to be forgotten”).

在相关数据保护法规定的情况下，获得删除您的个人信息（“被遗忘权”）。

to withdraw your consent to the data processing without affecting the lawfulness of processing, where your Personal Information has been collected and processed on the basis of your consent; 如果您的个人信息是在经您同意的前提下收集和处理的，您可以撤回对数据处理的同意，但不影响信息处理的合法性。

to object to the processing of your Personal Information (where it has been collected and processed on the basis of our legitimate interests) in which case we may ask you to justify your request by explaining to us your particular situation;

反对对您的个人信息进行处理（如果是基于我们的合法利益而收集和处理的），在此情况下，我们可能会要求您通过向我们解释您的特殊情况来证明所提出请求的正当性。

to request a limitation of the data processing in the situations set forth by applicable law;

在适用法律规定的情况下，要求对数据处理施加限制。

to have your Personal Information directly transferred by IBAO® to a third-party processor of your choice (where technically feasible and when processing is based on your consent); and

要求 IBAO®将您的个人信息直接转移到您指定的第三方处理机构（在技术上可行，且处理过程已征得您的同意时）；和

to non-discrimination, as defined under relevant law, in the Services or quality of Services you receive from us for exercising your rights.

根据相关法律的规定，因行使您的权利而从我们这里获得的服务或服务质量方面不受歧视。

Under certain laws, you may also have the right to “opt-out” of having your Personal Information sold to a third party. However, IBAO® does not sell your Personal Information to any other party. Only in the case of a merger, sale, financing, acquisition, or other transaction involving all or part of IBAO® may your information be involved in a transaction, as noted above.

根据某些法律，您还有权对将个人信息出售给第三方“选择退出”。但是，IBAO®不会将您的个人信息出售给任何其他方。当且仅当涉及 IBAO®全部或部分的合并、出售、融资、收购或其他交易的情况下，您的信息才可能涉及上述交易。

For deletion/ “right to be forgotten” requests, we will undertake a good faith effort to accommodate requests for access to or deletion of Personal Information. However, these requests may be subject to the evaluation of additional factors, including disproportionate burden or expense, or the risk to the rights, including the privacy rights, of others.

对于删除/“被遗忘权”的要求，我们将作出善意努力满足访问或删除个人信息的要求。但是，此等要求可能需要评估其他因素，包括不相称的负担或费用，或对他人的权利（包括隐私权）的风险。

We will strive and work to resolve any inquiry you may have regarding our privacy practices. If you have any questions, would like to exercise any of these rights, or if you need any assistance with privacy related matters, please contact us as described in the “Contact Us” section below.

We will take the necessary steps to respond to you as soon as possible.

我们将尽力解答您对我们的隐私保护做法提出的任何询问。如有任何问题，欲行使任何这些权利，或者需要任何与隐私有关的协助，请按照下节“联系我们”所述的联系方式与我们联系。我们将采取必要的措施尽快答复。

8. Retention of Collected Information

8. 保留收集的信息

We keep your Personal Information and all other information provided to IBAO® to enable the continued use of our Services and other users, for as long as it is required in order to fulfill the relevant purposes described in this Privacy Policy, as may be required by applicable law, as necessary to protect our rights and interests, or as otherwise communicated to you.

我们保留您的个人信息和提供给 IBAO® 的其他信息，以便您和其他用户能够继续使用我们的服务，只要是实现本隐私政策所述的相关目的所需的，相关法律可能要求的，为保护我们的权利和利益所必需的，或以其他方式通知您的。

9. Children

9. 儿童

All of our Services are for adult use only, and are not intended for those under 18 years of age. Similarly, our Services are not intended for or geared towards individuals under 18 years of age. Minors (individuals under the age of 18) are not eligible to use our Services. Further, by completing the registration process, during which personal identification information is collected, each authorized user verifies he or she is at least 18 years of age. All Student Information provided to IBAO® may only be provided by individuals over 18 years of age.

我们的所有服务仅限于成年人使用，禁止不满 18 岁者使用。同样，我们的服务非为不满 18 岁者准备的。未成年人（不满 18 岁的个人）没有资格使用我们的服务。此外，完成收集个人身份信息的注册过程后，每个授权用户都已证明自己年满 18 岁。凡提供给 IBAO® 的学生信息，只能由年满 18 岁者提供。

10. Third Party Sites

10. 第三方网站

Our Services may contain links to other websites such as [accredible.com](https://www.accredible.com), [stripe.com](https://www.stripe.com), etc. IBAO® makes no representations about, and is not responsible for, the user data collection practices and uses of such other websites. Your interaction with all third party service providers' websites is governed by the applicable third party privacy policies. We encourage you to review the privacy policies of such third party providers before using their sites or services.

我们的服务可能包含 [accredible.com](https://www.accredible.com)、[stripe.com](https://www.stripe.com) 等其他网站的链接。IBAO® 对其他网站的用户数据的收集和使用情况不作任何陈述，也不负责。凡您与所有第三方服务提供商网站的交互，均受相关第三方隐私政策之约束。我们建议您事先查阅隐私政策，再使用这些第三方供应商的网站或服务。

11. Security

11. 安全

At IBAO®, we take reasonable and appropriate security measures to protect your information from loss, misuse, and unauthorized access, alteration, disclosure, and destruction. While we strive to make your information as secure as possible, no transmission system or data network can be guaranteed to be 100% secure. As a result, visitors and users must be aware and by using the Services acknowledge, that there are data security and privacy limitations inherent to the Internet, and that the security, integrity, and privacy of any and all information cannot be guaranteed. If you are not comfortable risking the inadvertent disclosure of your private information, please do not use the Services.

在 IBAO®，我们采取妥当合理的安全措施来保护您的信息不被丢失、滥用和擅自访问、更改、披露和破坏。尽管我们尽力保证您的信息安全，但没有任何传输系统或数据网络可以保证绝对安全。因此，访问者和用户必须意识到并通过使用服务确认，互联网存在固有的数据安全

和隐私限制，任何信息的安全性、完整性和隐私都无法得到绝对保证。如果您不愿意冒私人信息被无意披露的风险，请勿用本服务。

12. User Communications

12. 用户通信

We may retain any communications you send to us, including emails, in order to process your inquiries, respond to your requests, and improve our Services.

我们可能会保留您发送给我们的任何通信，包括电子邮件，以便处理您的询问，响应您的要求，并改善我们的服务。

13. Changes to Our Privacy Policy

13. 调整我们的隐私政策

IBAO® reserves the right to change this Privacy Policy at any time and at our sole discretion. The most current version of our Policy is accessible through our Services at all times. We encourage you to review the Policy from time to time to ensure that you are familiar with our practices, and aware of any changes. IBAO® will provide notification of material changes to this Privacy Policy through our Services at least thirty (30) days prior to the change taking effect. Your continued use of our Services after any change in Privacy Policy will constitute your acceptance of such change.

IBAO®有权自行调整本隐私政策。最新版政策可通过我们的服务随时查询。我们建议您关注本政策的实时动态，保证您熟悉我们的隐私保护做法，并掌握任何变化。IBAO®将在变更生效前至少三十（30）天通过我们的服务发出本隐私政策的重大变更通知。如遇调整隐私政策的情形，一旦您选择继续使用我们的服务，即默认您接受此等调整。

14. How to Contact Us

14. 如何联系我们

Should you have other questions or concerns about this Privacy Policy or our practices, please contact us at:

您对本隐私政策或我们的具体做法有其他问题或疑虑的，请通过以下方式联系我们。

IBAO 大中国地区总代理

宁波飞拉蝶飞教育科技有限公司

宁波市江北区北岸财富中心 7 号楼 5-2-4 室

法人：谢文政

INFO@IBAO-ABA.CN

所有在华隐私权政策，与中国政府法律规定抵触者，以中国法律为准。

所有隐私权政策条款文字，中英文不符处，以英文为准。

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