



## Privacy Policy

*Last Updated: May 24, 2018*

Consumer welfare is core to our existence, therefore, protecting your privacy is essential to us at AppEsteem. This Privacy Policy describes our practices relating to the personal information that we collect and process from users of our website, applications (apps), and services, and explains some of the rights you have over your personal information. In this Privacy Policy, we use the term “personal information” to include any information that can identify you personally, including contact information, such as your name, address, email address, or phone number.

By using our website, apps, or services, you consent to the data practices described in this Policy. If you do not agree with these data practices, you should not use our website or download any materials from it or access our apps or services. All references in this Policy to our collection and use of data through our website, also includes the collection and use of data through our apps and services.

We are the data controller with respect to the information we collect, as described in this Policy. We do not rent or sell this data to any other companies for marketing purposes. You can contact us with any questions about this Policy by sending an email to [privacy@appesteeem.com](mailto:privacy@appesteeem.com), or by mail to AppEsteem Corporation, 655 156<sup>th</sup> Ave, SE, Suite 275, Bellevue, Washington, USA 98007.

### INFORMATION WE COLLECT

#### Information You Voluntarily Provide to Us.

*When You Register for a Service or Contact Us:* Most of our services do not require any form of registration, allowing you to visit our website, review our Deceptor and Certification lists, blog postings, and other information, without providing us with any information about who you are. However, to use some of our services, such as app certification, or Deceptor notification, we require that you provide us with basic contact information for your business, including your company name and address, and a contact within your company, including an email address and phone number. We also ask you to create a password to secure your account, and manage this process using Microsoft Azure, which is a cloud-based service we use to collect and store user log-in data.

We use your contact information to reply to your requests and perform our services. You may provide us with this information by filling in forms on our website, or by corresponding with us by phone, email, or otherwise. If you contact us, we will have access to the information you provide in your correspondence, which will generally include your email address, name, phone number, and any other information included in the signature block to your email or letter. If you use our online contact link, we will have access to any information you include with your message, such as your company name, contact name, telephone number, email address, and any information you include in the text of your message. If you contact us by telephone, your phone number, and the date and time of your call may be processed by our third-party telephone service provider, located in the United States. **By providing us with your information, as described above, you expressly consent to our use of your personal information in accordance with this Privacy Policy.** In some situations, if you choose to withhold personal information requested by us, it may not be possible for you to gain access to certain parts of our website (such as the customer portal), or for us to respond to your inquiry or provide you with certain services.

*When You Register for a Conference or Event.* From time to time, we may provide an opportunity for you to register on our website for a conference or event that may be relevant to your business. If you choose to register for any such conference or event, you will be asked to provide personal information, which may include your name, email address, company name, street address, phone number, and, as relevant, your dietary restrictions

(for meals at the conference) or clothing size (for conference-branded clothing). This information may be shared with other parties working with us, and therefore may be transferred and stored outside of the United States (for example, if you register for a conference that will be held outside of the United States), and treatment of that information is further subject to the privacy policies of those parties.

#### Information We Collect Automatically.

*When You Use Our Services or Visit Our Website:* When you use our services or visit our website, we may collect information about your usage of the services, visit to our website, and your web browsing. This may include information that identifies your IP address, operating system, browser, browsing activity, geographical indicators, referral source, length of visit on our website, and pages viewed. We refer to this information collectively in this Policy as “navigational information.” We may collect navigational information as part of log files, or through the use of cookies and other tracking technologies discussed in more detail below under “Navigational Information.”

*When You Receive Our Email Communication.* We use certain third-party technologies, such as cookies and pixel technologies, which allow us to statistically analyze the success or failure of our online marketing campaigns. Based on this navigational information, we may see if and when an email was opened, and which links in the email were clicked on. For more information, please see “Navigational Information” and “HubSpot,” below.

#### Information from Other Sources.

*Collection of Publicly Available Information for Marketing.* We may review publicly accessible sources, such as your website, to derive information about businesses that we believe may be interested in our apps and services. We will collect and store this information to aid in our marketing efforts. Our contact with any such business regarding our services and potential contractual relationship will be governed by this Policy, including the right of any such party to be deleted from our records.

*Requesting Information from Our Network.* From time to time, we may ask a member of our Better World Network, a vendor, or a security company we work with to provide information to augment data we have about a current or potential customer or a business that is a registered user of our services. We may request this information if, for example, we need to better understand the customer’s business, or if we have a legitimate interest in contacting a particular business or person but do not have accurate contact information. We will not collect or use any personal information relating to any end users of either our current or potential customers or registered user of our services.

### **HOW WE USE YOUR INFORMATION**

To Provide Requested Information Regarding Our Programs and Services. You may sign up on our website to receive information from us about our programs, services, and business, or the businesses of third parties we are associated with (e.g., members of our Better World Network or security companies). Information about our services and business may include blog posts, emails, and information about apps and services that we currently offer, or new programs and services we may develop and offer over time. In addition, our programs may include conferences or events hosted or co-sponsored by AppEsteem or a third party we are associated with. At your option, you may receive this information by post, email, or other means.

- We provide this information to you based on your consent, your potential or actual contractual relationship with us, or our legitimate interests to register and administer your accounts on our website, so that you can receive the services you have registered for, and we can run our business operations. You may review or update your personal information or unsubscribe from receiving this information at any time. Please see “Your Rights Regarding Your Information,” below.

To Provide Unsolicited Information About Our Programs and Services. If you provide us with personal information when you visit our website, and you do not sign up for any of our services, we may send you an email providing

you with information about our services and inviting you to sign up. If you use any of our services and we think you may benefit from using another service we offer, we may send you an email about that as well. In addition, if we independently find a business that we believe may have a legitimate interest in our programs or services, we may use information from other sources (described above) to communicate with it. We include an “unsubscribe” option in every promotional email we send.

- Our unsolicited contact with any business regarding our services and potential contractual relationship is based on our legitimate interests to protect consumers by expanding the breadth of our programs, and our belief that such businesses may be interested in the opportunity to use our services. Any party we contact in this manner has the rights to control our use of their personal information, as described in this Privacy Policy, including the right to be deleted from our records.

To Enable Use of Our Apps and Services. We use information provided by you in downloading our apps, or registering for our services, to communicate with you about our apps or services, respond to your information or support requests, and otherwise to fulfill our obligations as necessary under our legal agreements with you.

Although many of our apps and services are free, if you agree to purchase any paid apps or services from us, we may collect payment from you through your use of a personal check, wire transfer, or a credit card. If you pay by credit card, we use a third-party service provider to manage this processing. This provider has been contracted by us to process your information on our behalf, and will collect, use, and process your information in accordance with their privacy policy, found here: <https://www.bill.com/privacy/>.

We may also use your contact information to provide you with system alert messages, such as if there are any changes to our services, Certification Requirements, policies, or agreements. In addition, we may communicate with you about your account, to provide customer support, to enforce our agreements with you, and to protect the rights and safety of consumers, our customers, and ourselves.

- Our use of your personal information to enable use of our apps and services is based on our legal agreement with you regarding the terms of such apps or services, including for us to provide the services, and for you to pay for the services, as applicable. You can terminate your use of our apps and services pursuant to the applicable agreement which governs such services, including our [Terms of Use](#) and [Master Services Agreement](#).

To Reply to Your Contact. We may use your email address, phone number, or other information, that you provide to us when you contact us, to respond to your questions or comments, and to maintain records of our correspondence. In our reply email, we will generally include certain navigational information to help us identify if our email has been opened by you, and to know if any links in our email have been clicked on. Please see “[Navigational Information](#)” and “[HubSpot](#)” below for more information. If you contact us without providing information on how to reply, we will be unable to respond to your questions or comments.

- We process this information based on our legitimate interests in being responsive and providing information to consumers, and potential customers. We may also process this information based on your consent, or as required to carry out our obligations under a current or pending contact with you. You can terminate further contact with us as described in this Privacy Policy.

To Help Secure Our Website. We, and the third-party host of our website, use navigational information to provide IT and network security, by reviewing log files for access breaches, violations of our Terms of Use, and other security threats. We collect navigational information in a way that does not identify you and we will not associate this data with any personal information from any source with the limited exception if we, or our third-party server, finds potentially suspicious or criminal activity associated with your usage.

- We process navigational information in this way to fulfill our legal obligation to implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk of our

information processing, and for the legitimate interests of using this information to ensure the security of our network and information.

To Operate and Improve our Website, Apps, and Services. We use personal and navigational information to operate and improve our website, apps, and services, and to improve the quality of your experience with our website, apps, and services. In connection with this, we use the following third-party data processors to help collect and review our website data:

*Google:* We have integrated the component of Google Analytics on our website through use of a cookie (described in more detail under “Navigational Information,” below), placed on the information technology system of our website users. Google Analytics collects, gathers, and analyzes data about the behavior of visitors to our website by collecting data about the website a person came from, which subpages were visited, or how often or for what duration a subpage was viewed. Google Analytics uses the collected information, among other reasons, to evaluate the use of our website and provide online reports to us, which show the activities on our website and to provide other services concerning the use of our website for others. We use this information to better understand our website usage, and to help us optimize our website. Google’s services are provided through its Terms of Service with us, and are subject to Google’s [Privacy Policy](#). The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States. You may prevent your data from being collected and used by Google Analytics by opting out through the use of the Google Analytics Opt-out Browser Add-on available at <https://tools.google.com/dlpage/gaoptout/>.

*HubSpot:* We use the services of HubSpot in the context of sending out electronic mail and other communication, and HubSpot uses cookies and tracking pixels (described in more detail under “Navigational Information,” below) to collect anonymized navigational information on our behalf. We use this information to better understand the success of our marketing efforts (such as when an email is opened, and whether any links in an email were clicked), and to optimize our communication efforts. More information can be found here: <http://www.hubspot.com/security>, and in HubSpot’s [Privacy Policy](#). The operating company for HubSpot is 25 First Street, 2nd Floor Cambridge, MA 02141 United States. To terminate our use of HubSpot in this capacity, please see “Your Rights Regarding Your Information,” below.

*Microsoft Azure Active Directory (Azure AD):* We use Azure AD as an identity and access management cloud solution to help provide secured access to our services, and also for our internal operations through Office 365. Azure AD provides the platform through which our users sign up for and access their accounts with us, and enables a single sign-on process, which simplifies access to user account on our website. Azure AD protects user data by using multi-factor authentication and other security measures. More information about Microsoft’s privacy practices can be found here: <https://privacy.microsoft.com/en-us/PrivacyStatement>. The operating company for Microsoft is 1 Microsoft Way, Redmond, WA 98052. If you cancel your account with us, your account information will be deleted, subject to Azure AD’s privacy practices.

- We process navigational information, which may include personal information, in this way based on our legitimate interests of understanding the effectiveness of our marketing efforts, and to improve the quality of our website, apps, and services. We also may process navigational information when we obtain consent for a specific processing purpose. If the processing of personal information is necessary for performance of a contract to which you are (or may be) a party, for example, if you have registered for services from us, the processing is based on our current or potential contractual relationship.

To Compile Statistical and Research Information. We may create anonymous data records that are derived from personal information by excluding any information that could make the data personally identifiable to you. This usage may provide us with statistical information to better understand the market and our services. We reserve the right to use this data for any purpose and disclose anonymous data to third parties in our sole discretion.

To Make Necessary Disclosure. We may disclose your personal information to comply with laws, court orders, litigation, or other legal processes, and/or in response to requests from governmental authorities within or outside of your country of residence. We may also disclose your personal information if we determine that disclosure is reasonably necessary to enforce our rights or protect our operations or users. Additionally, we may disclose your personal information to a successor or acquiring entity as part of a merger, acquisition, reorganization, bankruptcy, or other transaction. In such event, you will be notified via email or a notice on our website, and this notification will include any change in usage of your personal information. We may also share your personal information with our agents, contractors, and employees to perform any of the functions listed above, or as part of our general business operations; though in all such cases, we require the agent, contractor, or employee to acknowledge and adhere to this Privacy Policy regarding the use of your personal information.

- We process information based on these necessary disclosures to comply with the legal requirements of jurisdictions to which we are subject, and in our legitimate interests to resolve disputes, effect corporate events, protect consumers, and manage our operations.

Legal Basis for Processing Your Personal Information. With regard to each item above, we have summarized the legal basis we anticipate having for processing any of your personal information. However, we reserve the right to process your personal information based on any other legal right we have under applicable law. We do not use your personal information in connection with any automatic decision-making or profiling.

Questions and Comments About Our Use of Collected Information. If you do not want us to use your personal information in any of the ways described above or have questions about our use or the security of your personal information, please contact us using the information below under, "How to Contact Us."

## **NAVIGATIONAL INFORMATION**

We collect navigational information through our website to help improve your experience, and to better understand our users. This information is generally collected through third-party analytics tracking programs, which include Google analytics and HubSpot, as described above. Through these services, we collect and analyze the following navigational information:

Cookies. A cookie is a small piece of information that a website asks a browser to store on your information technology system. We use cookies to enhance your usage of our website by "remembering" your actions or preferences. We may also use cookies to collect general usage and statistical information, including the access time and location from which you accessed our website, and the frequency of visits to our website. Some cookies may remain on your computer after you leave our website, generally as a text file that is placed on your hard disk by a web server. Cookies are not used to run programs or deliver viruses to your computer. They are uniquely assigned to each user and can only be read by a web server in the domain that issued the cookie to you.

We use third-party analytics services and other technologies to help analyze use of our website, applications, and services. These services use cookies to collect information on our website, which is then used to compile reports on user activity. These services may also transfer the information to third parties who are their affiliates, or where required to do so by law. Each service's ability to use and share analytics information is restricted by their own terms of use and privacy policy. By using our website, applications, or services, you consent to the processing of Personal Data about you by these services in the manner and for the purposes set out above.

While we do not offer an opt-out for cookies, your browsers will generally give you control over cookies used on your computer or mobile device. If you decide at any time that you no longer wish to accept cookies for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting cookies, or to prompt you before accepting a cookie from the websites you visit. You can also opt out of collection of data from Google Analytics by downloading a browser add-on from <https://tools.google.com/dlpage/gaoptout>.

You can generally disable the cookie feature in your browser without affecting your ability to access our website, except in some cases where cookies are used as an essential feature necessary for completing transactions.

Embedded URLs and Pixel Technologies. We may track user behavior without using cookies, but by using embedded URLs and pixel technologies. This allows limited information to follow users as they navigate our website, communications, and services. A tracking pixel is a miniature graphic embedded in a webpage to enable log file recording and analysis, to subsequently perform statistical analysis. We use HubSpot's services, which utilize embedded pixel technologies and cookies to help us identify unique user visits to our website, identify the pages viewed, and determine which emails have been opened by recipients. This information allows us to better understand the effectiveness of certain communications and our marketing efforts. We generally connect information gathered by these technologies with personal information of our customers. If you would like to opt-out of these emails, or withdraw your consent for this usage, please see "[Your Rights Regarding Your Information](#)" below.

Log Files. We may use log files that collect information (including demographic information, and information about your computer hardware and software) that is not associated with your name or other personal information. This demographic information may include your ZIP code, age, and gender, and computer information may include your IP address, browser type, domain names, internet service provider (ISP), files viewed on our website, operating system, clickstream data, access times, and referring website address. This information helps us use and administer our website and services, track our users' movements in aggregate form, and gather broad demographic information of aggregate use of our website and services.

Single Sign-On. You may have the option to log in to our website using a single sign-on service, as described above under "[Microsoft Azure AD](#)." This service will authenticate your identity and provide you the option to share certain information with us, such as your name and email address, to pre-populate our sign-in form. Any use of a single sign-on service is at your option and will be based on your agreement with such third-party service.

Do Not Track. We do not currently respond to "do not track" signals from web browsers but will reevaluate this policy if a "do not track" standard becomes finalized in an applicable jurisdiction.

Other Websites. This Privacy Policy discloses the privacy practices for our website, apps, and services; however, we may provide links to other websites. If you go to sites that are beyond our control, these sites may send their own cookies to your computer, collect data, or solicit personal information. Our data practices and procedures described here for AppEsteem do not apply to any external links. You are encouraged to read the privacy policies of any site linked through our website, applications, or services, especially if you share any personal information.

## **HOW WE SECURE, STORE, & RETAIN YOUR PERSONAL INFORMATION**

Storage and Security of Personal Information. We are concerned with protecting your privacy and data, and we take measures we believe are reasonable and appropriate to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. No method of transmission over the Internet or method of electronic storage is 100% secure, however. Therefore, we cannot guarantee its absolute security. If there is a breach of our security and we believe that your personal information has been unlawfully accessed by a third-party, we will notify you in compliance with applicable laws. If you have created an account with us, we require that you provide a username and password to log in. You must keep your username and password secure, and never disclose it to a third party. We do not have access to your password, as it is created and managed through Azure AD.

Retention of Personal Information. In general, we do not set specific timeframes for deletion of data but will retain personal information only for as long as necessary to achieve the purpose of storage. Thus, we will retain such data as long as your account is active, as long as needed to provide you with our services, and as long as necessary to comply with our legal obligations, resolve disputes, prevent abuse, or enforce our legal agreements. We

conduct an annual review of the personal information we are holding and determine whether to retain that information based on the foregoing, and further considering: the current and potential future value of the information; the costs, risks, and liability associated with retaining the information; our ability to ensure the information is accurate and up to date; and the interests of the data holder in having the information deleted. After we no longer need personal information, we will delete it. We will also delete such Information at an earlier date if the data holder requests it, as described under “Your Rights Regarding Your Information” below, unless there is a reasonable basis for retaining such information as described in this Section.

#### **TRANSFER OF INFORMATION TO OTHER COUNTRIES**

The offices and servers we use are located in the United States, so if you are visiting our website or using our services from a different country, please be aware that you are sending information (which may include personal information) to the United States. That information may then be transferred within the United States or back out of the United States to other countries outside of your country of residence, depending on the type of information and how it is stored by us. These countries (including the United States) may not necessarily have data protection laws as comprehensive or protective as those in your country of residence; however, our collection, storage, and use of your personal information will at all times continue to be governed by this Privacy Policy.

#### **INFORMATION ABOUT CHILDREN**

Our website, apps, and services, are not intended for or targeted at children under age 16, and we do not intentionally gather any information about children who are under this age. If we discover that a child under 16 has submitted personal information to us, we will attempt to delete the information as soon as possible. If you believe that we might have personal information from a child under 16, please contact us at [privacy@appesteem.com](mailto:privacy@appesteem.com), so we may delete the information.

#### **YOUR RIGHTS REGARDING YOUR INFORMATION.**

You have several choices regarding your personal information, including the rights to:

- Review the personal information you have provided us. You have the right to request access to the personal information we have on you. You can do this by contacting us at [privacy@appesteem.com](mailto:privacy@appesteem.com). We will make sure to provide you with a copy of the personal information we process about you in a structured, commonly used, and machine-readable way. To comply with your request, we may ask you to verify your identity. We will fulfill your request by sending your copy electronically, unless the request expressly specifies a different method.
- Request that we correct any errors, outdated information, or omissions in your personal information that you have provided us. If you believe that any of the Information we have about you is incorrect, you are welcome to contact us so we can update it and keep your personal information accurate. Any personal information that is no longer needed for the purposes specified in “How We Use Your Information,” above, will be deleted. If at any point you wish for us to delete information about you, you can simply contact us at [privacy@appesteem.com](mailto:privacy@appesteem.com).
- Request that we use your personal information differently that we are currently using it. For example, you can request that your Information not be used to contact you, or that it be removed from any marketing list that we use.
- Right to opt-out of being solicited by us, including through email communications. When you receive communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive, by unsubscribing on our website, or by contacting us directly.

- Right to request that all of your personal information be deleted from our records. This right is often referred to as the “right to be forgotten,” in that you may request that we delete all personal information from our records, which we will do without undue delay, subject to this Privacy Policy and applicable law and contract.
- Right to object. You have the right to object to how we process your information, and we ask that you contact us directly if you have any concerns or questions about our control or processing to help ensure you are comfortable with, and consent to, all of the ways we may use your personal information – as set forth in this Privacy Policy.

We are privileged to have customers and website users from all over the world. As such, you may have certain other rights regarding protection of your personal information that are specific to your jurisdiction. If you believe you are entitled to additional rights outside of the ones listed in this Policy, please contact us at [privacy@appesteem.com](mailto:privacy@appesteem.com).

### **TERMINATED DATA COLLECTION**

We provide an electronic “certification seal” to certain vendors of products that have been certified by us. This certification seal will electronically identify the product as being in current compliance with our Certification Requirements and can be “read” by security companies to help those companies provide consumer protection. Prior to May 25, 2018, we offered a feature of the certification seal that allowed a vendor to collect anonymized consumer data for monitoring purposes through a system called SRCL (Self-Regulating Client Library). Any vendors that included this feature in a product were contractually obligated to obtain consent from any end user prior to collecting any data through SRCL. In early May 2018, we instructed all vendors to remove any code with this capability from their products, terminated all data collection through SRCL, and deleted all previously collected data. Despite this action, some vendors may retain a historical reference to SRCL in their Privacy Policy or Terms of Use and may not update the certification seal to remove the relic SRCL code. To ensure that no data is collected through SRCL, our systems will block any communication from a vendor app that attempts to provide us with any data through this feature.

### **AMENDMENTS**

We constantly update the features of our website and services to better serve our customers and consumers. Accordingly, this Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to our Privacy Policy by updating the policy online and changing the “Last Updated” date above. You should consult this Privacy Policy regularly for any changes. Your continued use of our website, and any apps or services, or continued provision of personal information to us, will be subject to the terms of the then-current Privacy Policy.

### **HOW TO CONTACT US**

If you have any questions about our collection and use of your personal information, or to request that we take one of the actions listed above under “Your Rights Regarding Your Information,” please contact us by email at [privacy@appesteem.com](mailto:privacy@appesteem.com), or by post at our corporate address, located at:

**AppEsteem Corporation**  
655 156<sup>th</sup> Ave, SE, Suite 275  
Bellevue, Washington, USA 98007  
Attention: Privacy