



## Privacy Policy

*Last Updated: October 16, 2017*

Consumer welfare is core to our existence, so protecting your privacy is essential. This policy describes the personal data that we collect from users of our website, and through our applications and services. It also describes how the data is used and shared, and explains your own control over the data.

By using our website, applications, or services, you are agreeing to this policy. If you do not consent to this policy, do not use our website or download any materials from it, or access our applications or services. If you don't understand this policy or have any questions, please let us know by sending an email to [info@appesteem.com](mailto:info@appesteem.com). For the purposes of this policy, "personal data," or "PII," includes data that, by itself, could allow someone to identify or contact a person, including one's name, address, email address, or phone number. All references to our collection and use of data through our "website," also includes the collection and use of data through our applications and services.

In addition to our direct collection of data, we may also receive consumer data from certified third-party software products that include our electronic "seal." Vendors may use this seal to notify security companies electronically that their product has been certified by us, and to provide us with data to help monitor the product's usage and to protect the user from fraud and malware. Although we do not have any direct contact with consumers who receive these products, we require that vendors distributing such products give their customers notice about our collection and use of data. We include information in this policy about our data collection through certified apps to help ensure consumers are properly informed.

### **What Information Do We Collect?**

When you visit our website, or use our applications or services, we collect information from that visit, including standard log information and details of your behavior patterns (which we describe below). We collect this information in a way that does not identify you. We will not associate this data with any personal data from any source.

We may, in the future, offer you an opportunity to comment online on a topic of relevance to our company. If you choose to comment in this manner, you are responsible for all the data that you include in your posting. You may also submit information to us regarding any software applications you would like us to review against our Deceptor requirements. We do not require any personal data to submit this information. If we ever need to collect personal data through our website, we will make this clear, and explain both why we need this information and what we plan to do with it.

**Cookies.** A cookie is a small piece of information that a website asks a browser to store on a computer or mobile device. 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 that does not include any personal data. Some cookies may remain on your computer after you leave our website.

We use third-party analytics services, including Google Analytics, to help analyze use of our website, applications, and services. The information generated by the cookies or other technologies about such use is transmitted to these services, which use the analytics information to compile reports on user activity, and may also transfer the information to third parties who are their affiliates, or where required to do so by law. Each analytics 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 data about you by analytics services in the

manner and for the purposes set out above. For a full list of analytics services, please contact us at [info@appesteem.com](mailto:info@appesteem.com).

While we do not offer an opt-out for cookies, your browsers may give you control over cookies used on your computer or mobile device. You can generally set your browser to alert you when a cookie is being used, which will give you a chance to accept or reject the cookie. You may also be able to set your browser to refuse all cookies, or accept only cookies returned to the originating servers. 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 security feature necessary for completing transactions.

Links to websites outside of ours may contain cookies that we do not control. In addition, we may use third-party vendors to provide or track connections to our website, applications, or services. It is possible that such vendors may use cookies, over which we also have no control. Such cookies (if used) would be downloaded once you click on any third-party links on our website, or through our applications, or services. The information collected through these functions is subject to the privacy policies of those third-parties.

### **Embedded URLs and Pixel Technologies**

We may track user behavior without using cookies, but by using embedded URLs. This allows limited information to follow users as they navigate our website, applications, and services, but is not associated with personal data and is not used beyond each session. We may also use embedded pixel technologies for the purposes of identifying unique user visits, as opposed to aggregate hits, and to identify the pages viewed. Or, we may also use embedded pixel technologies to determine whether the recipient of an e-mail has opened a particular message.

### **Log Files**

We may use log files that collect information including IP addresses, electronic communication protocols, web addresses, browser type, internet service provider, platform type, and other network routing information (referrals), equipment information (browser type) and date and time, duration and content of pages accessed. Information about your device may include your device type, screen size, browser type, language, and other settings, memory capacity, plug-ins, Internet domain, TCP configuration parameters, operating system, carrier code, time zone, and the names, versions, and package IDs of software installed on your device. This information helps us use and administer our website, applications and services, track our users' movements in aggregate form, and gather broad demographic information for aggregate use. We use a tracking utility that uses log files to analyze user movement.

### **App Vendor Registration and Do Not Track**

Software vendors may register their apps on our website and provide their contact information, which will allow us to contact such vendors in advance if we determine that their app has violated any of the requirements under our [Deceptor program](#). If a vendor provides its contact information through this registration, we will not share this information with anyone, and will not use it for any purposes unrelated to our Deceptor or Certification programs. A vendor may add new products to its registration or change its contact information at any time through our online portal, and may delete its account by sending an e-mail to [info@appesteem.com](mailto:info@appesteem.com).

We do not currently respond to "do not track" signals from web browsers.

### **How Do We Use This Information?**

We do not rent or sell the information we collect on our website, or through our applications or services, to other companies, but we may use your data in other ways, including to:

- identify you as a user in our system;
- improve the quality of your experience with our website, applications, and services;

- prevent potentially prohibited or illegal activities, comply with applicable law, and enforce our [Terms of Use](#); and
- for any other purposes disclosed to you at the time we collect your information or pursuant to your consent.

Additionally, we may communicate with you about a service, conference, or event hosted or co-sponsored by AppEsteem or a company associated with us. Information that you provide when registering your app, or for a service, conference, or event may be shared with other parties working with us, and treatment of that information is further subject to the privacy policies of those parties.

We may disclose your personal data to comply with laws, court orders, litigation, or other legal process, and/or in response to requests from governmental authorities within or outside of your country of residence. We may also disclose your personal data if we determine that disclosure is reasonably necessary to enforce our rights or protect our operations or users. Additionally, we may disclose your personal data to an affiliate, or a successor or acquiring entity as part of a merger, acquisition, reorganization, or other transaction. We may also share your data with our agents, contractors, and volunteers to perform any of the functions listed above, or as part of our general business operations.

We may create anonymous data records from personal data by excluding such information (such as your name) that makes the data personally identifiable to you. We reserve the right to use this data for any purpose and disclose anonymous data to third parties in our sole discretion.

### **Third-Party Sites**

This Privacy Policy discloses the privacy practices for our website, applications, 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. The privacy policies 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.

### **Transfer of Information to Other Countries**

Our processing of the personal data that we collect may involve the transfer of that information to various countries around the world. By submitting information to us through our website, applications, or services, or through your interactions with us offline, you consent to such transfers and to the processing of this information in various countries around the world.

### **Information about Children Under 13**

We do not intentionally gather PII from visitors who are under the age of 13. If we discover that a child under 13 has submitted personal data, we will attempt to delete the information as soon as possible. If you believe that we might have any PII from a child under 13, please contact us at [info@appesteem.com](mailto:info@appesteem.com).

### **Your Choices Regarding Information.**

You have several choices regarding your Personal Data:

1. **E-mail Communications.** We may periodically send emails to anyone who has an account with us which directly promote the use of our services and conferences and other events they may be interested in. 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 or by contacting us directly.

2. Cookies. 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. Consult your browser's technical information. If you do not accept cookies, however, you may not be able to use all portions or all functionality of the website.

3. Google Analytics. 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/>.

4. Changing or Deleting Your Personal Data. You may change any of your personal data in your account by editing your personal data or sending an e-mail to [info@appesteem.com](mailto:info@appesteem.com). If you request deletion of your personal data by us, we will use commercially reasonable efforts to honor your request, but please note that we may be required to keep certain data and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements).

### **Certified Product Data**

Our company's mission is protecting consumers – we believe that consumers should be able to download and use software products without fear of being deceived or harmed. To help drive this mission, we have developed a comprehensive set of requirements that we use to measure app usage, and we offer certification for products that meet the entire set of these requirements. Evidence has shown that certification alone may not always be sufficient to protect consumers – in some cases, certified products may be altered so they breach requirements. To address this issue, we have developed software code that vendors may embed in certified products that can monitor the product's usage and collect limited user data, described below. By including this code, these vendors are demonstrating a significant commitment to consumers and compliance with our requirements.

Once our code has been installed in a certified product, our data collection will be limited to the following: (i) IP address and other unique device identifiers, including the type and version of the operating system and browsers, and the system language, (ii) the name of any antimalware product that is active on the device, and (iii) other non-PII data that we deem necessary to protect consumers from fraud.

We believe that our use of this data will provide valuable analytics and other information about how software products operate on a customer's device, and certain aspects of customer behavior. Specifically, this data may be used by us to: (i) determine the distribution and usage of certified products; (ii) ensure that our certification requirements are effective in driving improved consumer interaction and protection; (iii) monitor security company interaction with certified products; and (iv) track consumer behavior around certified products. This data may be shared by us – in a form that is anonymized as to end users – with security companies and other organizations to help drive consumer protection and education. We will never sell any PII to any third party for marketing purposes.

We also collect information from other sources about our certified products, including from members of our [Better World Network](#)<sup>®</sup> and other parties that help us monitor and continually evaluate the behavior of such products. We specifically prohibit any third party from providing us with the PII of any user.

We restrict our own use of the data we collect from certified products, and restrict third party use of the data we provide from certified products, through our [Terms of Use](#) and agreements with vendors and securities companies. These agreements are publicly available on our website at [www.appesteem.com](http://www.appesteem.com). If you have any questions or concerns about this data, or its usage, please contact the vendor providing the software product that has been linked to our library, or contact us at [info@appesteem.com](mailto:info@appesteem.com).

### **Website; Privacy Policy Revisions**

We constantly update the features of our website, applications, and services to better serve our business clients and consumers. Accordingly, this policy may be updated from time to time for any reason. We will notify you of any changes to our policy by updating the policy online and changing the “Last Updated” date above. You should consult this policy regularly for any changes.

We regularly review our compliance with this policy. If we ever receive a formal written complaint about this policy, we will contact the person who made the complaint to learn more and address their concerns. We will also work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

#### **Data Controller and Owner**

With regard to the information we collect and use, as described in this policy, the data controller and owner is AppEsteem Corporation, 655 156<sup>th</sup> Ave, SE, Suite 275, Bellevue, Washington, USA 98007. Contact information: [info@appestem.com](mailto:info@appestem.com)