

## Privacy and Security Policy

**This Privacy and Security Policy (“PSP”) applies to Customer’s use of the Services offered by AppCentrics Inc., DBA BlueTreeApps.**

### Definitions

The following Privacy and Security Notices (“the Policy” or “Policy” or “Policies”) are provided by AppCentrics, Inc. d/b/a BlueTreeApps (“we”, “us”, “our” “BTA”, “BlueTree”, “BlueTreeApps”), a Colorado corporation. BlueTreeApps operates several websites including bluetreeapps.com (collectively, the “Websites”), as well as a number of mobile applications on behalf of our customers (collectively, the “Applications”, “App” or “Apps”). It is BlueTreeApps’ policy to respect your privacy regarding any information we may collect while operating our Websites and Applications.

The term “you” refers to any user (individually, “you” or “User”; collectively, “you” or “Users”) of our websites and mobile apps (“Service” or “Services”). If you are using any of the Services through an educational institution, governmental entity, or other entity that is a customer of AppCentrics, the Policy does not supersede the terms of any agreements between AppCentrics and any other party, nor does it affect the terms of any agreement between any Users of the Services and their employer, their educational institution, government entity, or any other third party. By using the Services you understand and hereby agree to comply with the Policy.

### Website Visitors and Application Users

BTA collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. BTA purpose in collecting non-personally identifying information is to better understand how BTA visitors use its Websites and Applications. From time to time, BTA may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its Websites or Applications. BTA reserves the right to collect potentially personally-identifying information like Internet Protocol (IP) addresses. BTA does not use such information to identify its visitors, however, and does not disclose such information, other than under the same circumstances that it uses and discloses personally-identifying information, as described below.

### Gathering of Personally-Identifying Information

We will collect only as much Data as we need for specific, identified purposes, and we will not use Personal Data or User Data for other purposes without obtaining prior consent. Certain visitors to BTA’s Websites and users of BTA’s Applications choose to interact with BTA in ways that require BTA to gather personally-identifying information. The amount and type of information that BTA gathers depends on the nature of the interaction. For example, when completing a student enrollment form, we ask visitors questions like name and email address per our customer’s direction. In each case, BTA collects such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor’s interaction with BTA’s customers. BTA does not disclose personally-identifying information other than as described below. And visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from engaging in certain Website-related and Application-related activities.

## Aggregated Statistics

BTA may collect statistics about the behavior of visitors to its Websites and users of its Applications. For instance, BTA may monitor the most popular pages on the BlueTreeApps.com site. BTA may convey this aggregate information publicly or provide it to others. BTA gathers aggregate App download information such as the number of downloads, number per country, number per date range, and revenue from downloads for paid apps. Google and Apple do not disclose any personal account information about the App Users including, but not limited to name, demographic information, email address, financial and billing information, to App Developers such as BTA.

## Protection of Certain Personally-Identifying Information

BTA discloses potentially personally-identifying and personally-identifying information only to those of its employees, contractors and affiliated organizations that (i) need to know that information in order to process it on BTA's behalf or to provide services available at BTA's Websites and Applications, and (ii) that have agreed not to disclose it to others. BTA will not rent or sell potentially personally-identifying and personally-identifying information to anyone. BTA discloses potentially personally-identifying and personally-identifying information only when required to do so by law, or when BTA believes in good faith that disclosure is reasonably necessary to protect the property or rights of BTA, third parties or the public at large. If you are a registered user of BTA Websites or Applications and have supplied your email address in the account set up process, BTA may occasionally send you an email to tell you about new features, solicit your feedback, or just keep you up to date with what's going on with BTA and our products. We primarily use our various product blogs to communicate this type of information, so we expect to keep this type of email to a minimum. If you send us a request (for example via a support email or via one of our feedback mechanisms), we reserve the right to publish it in order to help us clarify or respond to your request or to help us support other users. BTA takes all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of potentially personally-identifying and personally-identifying information.

## Security

We will take appropriate physical, technical, and organizational measures to protect your Data from loss, misuse, unauthorized access or disclosure, alteration, and destruction. For Data that traverses the Internet to or from BTA's servers, BTA uses the most current SSL (Secure Socket Layer) technology with 128-bit encryption for Data transferred over the public Internet. SSL provides a mechanism that encrypts all of the Data transferred between BTA and an Internet web user. Any Data accessed by the Services are stored in Application Service Provider ("ASP data") centers located in the United States of America. These data centers provide power-conditioned, climate-controlled server space. Three-tier physical security restricts physical access only to authorized personnel. All attempts to access Services are logged. The servers are connected to the Internet behind a pair of dual, redundant, stateful firewall systems and are configured with redundant, fault-tolerant hardware and software. These firewalls are monitored and maintained with the latest security updates.

## Cookies

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. BTA uses cookies to help BTA identify and track visitors, their usage of the BTA Websites, and their website access preferences. BTA visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using BTA's Websites, with the drawback that certain features of BTA's Websites may not function properly without the aid of cookies.

## Ads

Some clients wish to incorporate Ads into the Services we provide including banner ad placements on Websites. Ads appearing on any of our Websites or Applications may be delivered to users by advertising partners, who may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies by BTA and does not cover the use of cookies by any advertisers.

## Family Educational Rights and Privacy Act (FERPA)

BTA asserts its compliance with the Family Educational Rights and Privacy Act (FERPA) as set forth by the U.S. Department of Commerce with respect to data collection, retention, and use of student data for students residing in the United States. BTA complies with FERPA by strict adherence to its policies. Most importantly, BTA does not collect any student record information.

## Children's Online Privacy Protection Act (COPPA)

BTA complies with the Children's Online Privacy Protection Act (COPPA), as set forth by the U.S. Federal Trade Commission, with respect to any personal information received from children under the age of 13 residing in the United States. Some of the Services provided by BTA have a form feature such as the Absentee and Enrollment Form that allow users to submit student information. BTA presumes that schools and other organizations which service children under the age of 13 will obtain the consent of parents of children under the age of 13 before children under the age of 13 use BTA's apps and websites. If a child under the age of 13 submits personal information, the information will not be used for commercial purposes and will only be provided to the organization that the child requests the information be sent to, in most cases the school or district.

## Privacy Policy Changes

Although most changes are likely to be minor, BTA may change its Privacy Policy from time to time, and in BTA sole discretion. BTA encourages visitors to frequently check for any changes to its Privacy Policy. Your continued use our Services after any change in this Privacy Policy will constitute your acceptance of such change.