



PRIVACY STATEMENT

Last Updated: May 23, 2018

The privacy of all of our User(s) “app user, an authorized person(s)/App-owner/Client, you, your” (as defined below) is very important to AppGirl, LLC “us, our, we” (as defined below). When you, as an App-user and/or owner of app-content, use the Service we (the App-developer AppGirl, LLC) process your Personal Data. This Privacy Statement is to be used for our websites, mobiles apps we’ve published in Google Play and in the Apple App Store and any other products and service we offer to you. This Privacy Statement describes how we safeguard and process your Personal Data.

We recommend you to read it carefully. You acknowledge and agree that it is your responsibility to review this Privacy Statement periodically and familiarize yourself with any updates. You agree to be bound by any of the changes made to this Statement. Your continued use of the App after the changed take effect will indicate your acceptance of the amended Statement. If you do not agree with the amended Statement, you must uninstall the App and avoid any further use of it. Read More Below (11)

1. What is stated in this Privacy Statement and Cookie Statement?

AppGirl informs you in this Privacy Statement about:

- The kinds of Personal Data processed;
- Permissions
- Cookies and similar technologies;
- The purposes for which Personal Data is processed;
- Where the Personal Data are processed;
- The security measures in place to protect Personal Data;
- AppGirl Limits of responsibility concerning third parties;
- Use of push messages within the app.
- Viewing, changing and deleting your Personal Data;
- Changes to this Privacy and Cookie Statement;
- What to do if you have any questions or remarks.



2. The kinds of Personal Data processed

A. Personal Data by using our Service In order to improve the Service, we use anonymous Data. This information will not go public through the Service.

- Essential Personal Data to create your Account When you create an Account, you have to provide some Personal Data. When registering, AppGirl asks you to provide your email address, your full name, password and optionally your phone number. AppGirl stores these Personal Data as well as other Personal Data provided by you when you use the Service (as defined below).
- App-owner "An authorized person(s) for your organization(s)" In order to use our Services, you have to provide additional Personal Data. This information will not go public through the Services. You can also provide your financial information to AppGirl and third-party payment provider, such as your financial information to make payments. All credit card details you fill in while using our Services will under no circumstances be processed or stored by AppGirl. All processing of this information will be handled by the payment provider. - When AppGirl publishes your app we need and store your App store (Apple and Google) developer account credentials.

B. Automatically generated information Like most other websites and online services, we gather and process automatically generated information about how you use the App. Automatically generated information does not include name, email address, age range, gender, phone number, Additional profile information returned by an external provider such as Facebook or LinkedIn. The information gathered includes your IP-address and/or a unique device ID. If you specifically opt-in, the App may collect your geo-location information. In any event, you can block geo-location collection through the settings of your mobile device. If you specifically opt-in to permit access and collection of information from your social network account, then your basic personal information in your social network account will be collected (such as your name and email address) as well as your social network user id (but not your password) and parameters related to the posts you shared the App. Please refer to the social network's privacy policy for more details on how you can set the privacy preferences of your account to control the information that may be accessed and retrieved. This also occurs with regard to the automatically generated information about how you use the App. This kind of information helps us to better understand how the App is used, and how we can improve the service to suit the need of you as a user.

To provide the App-owner with information about the usage of the app we collect the following (anonymous) information:

- The moment you open the app;
- The tabs you've opened inside the app and the amount of time you've spent in this tab;
- Actions such as music playback, opening URLs etc.
- The moment you leave the app;

Note: if the user authorization features are enabled we are able to link the anonymous information to you once you log in.



If you enable the user authorization features inside the App, the following additional information will be stored:

- Name;
- Email address;
- Age range (optional);
- Gender (optional);
- Phone number (optional);
- Additional profile information returned by an external provider such as Facebook or LinkedIn.

Information we collect when creating your back office account.

- username
- password
- email
- phone number (optional)
- age (optional)
- gender (optional)

By using the Service you can also provide other Personal Data to ApGirl and third parties, such as Personal Data for inclusion in or to be processed within the App. ApGirl is not the controller of these Personal Data, but a processor.

3. The purposes for which Personal Data is processed?

A. Purposes

Parties processes Personal Data for the following purposes:

- to enable you to use the Service;
- to keep you updated with relevant information about our Service;
- to improve and/or customize the Service;
- to identify you/or customize the Service;
- to identify you and to prevent fraud;



- to provide support;
- to pass your Personal Data to third parties, if you requested us to do so or if we are legally obliged to do so.

B. Transmission of Personal Data to third parties. We do not sell, trade or rent your Personal Data to third parties. However, we can provide your Personal Data to third parties, when this is essential for providing the Service to you or for carrying out your instructions, such as for making payments by means of payment providers for Paid Services. We may provide “aggregated anonymous data” about the usage of the Service to third parties for such purposes as well, as it deems to be appropriate. “Aggregated anonymous data” is data that cannot be traced back to you and which therefore does not count as Personal Data. For instance, we may use aggregated anonymous data to better understand how Users use the Service. In the event that we are transferred to a third party, or that we merge with a third party, or undergoes a reorganization, your Personal Data may also be disclosed and/or transferred to that third party. This third party will have the right to continue to use Personal Data and other information that you provided to us. We only contract with future companies that are consistent with our privacy policy or allow users a choice to send information to the future entity. We may disclose your Personal Data where it believes, in good faith, that it is necessary to comply with a court order, ongoing judicial proceeding, criminal or civil subpoena, or other legal process or request by law enforcement authorities in the USA or to exercise its legal rights or defend itself against legal claims.

4. Where is the Personal Data processed

We do not retain student personal information for longer than necessary to deliver services or for school purposes.

The Service is provided by using hosting services of Microsoft Azure, in the US Area. The Personal Data processed by AppGirl may be transferred to, and stored on, servers maintained by Microsoft Azure located in or outside a country in the European Economic Area (EEA), such as the United States of America. MS Azure states that it shall adhere to the EU-US Privacy Shield. This means that there should be an adequate level of protection for the processing of Personal Data by Microsoft Azure. You agree to this transfer and processing outside the EEA. AppGirl will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this privacy policy. For more information about Microsoft Azure and the EU-US Privacy Shield look at <https://privacy.microsoft.com/en-us/microsoft-eu-us-privacy-shield>

5. What are security measures in place to protect Personal Data?

The security of your data and that of other Users is very important to us. We have implemented technical and organizational measures to protect your Personal Data against loss or any form of unlawful processing. We implemented the following measures: protection of our servers by firewalls, SSL connections, and encryption of sensitive data. This list is not exhaustive.



6. Limits of responsibility concerning third parties

Our Service may contain services and products offered by third parties, and/or hyperlinks to the websites or services of sponsors, partners, advertisers, and other third parties. Parties have no control or influence over the content, websites or services of these third parties. Different privacy policies may apply to the use of third-party websites and services. This Privacy Statement only relates to Personal Data which have been obtained by parties through your use of the Service for its own purposes. We only share data with third parties that are consistent with our Privacy Policies.

7. Third-Party Websites and Services:

We do not permit behavioral targeting of advertisements. We do not use any behavioral information to provide targeted advertisements to users. From time to time, AppGirl may provide links to third party websites and/or advertisements, and third party websites may link to AppGirl ("Third Party Websites") for the purpose of providing you services and/or products that may be beneficial to you. We only share data with third parties that are consistent with our Privacy Policies. AppGirl is not required to give prior notification of, nor will AppGirl be obliged to pay any compensation whatsoever to the Users and or app-owner for links to third party websites and/or advertisements. App-owner(s) may not provide links to third party websites for advertisements to users of this app. Clients may not remove links to third party websites and/or advertisements provided by AppGirl. AppGirl is not responsible, nor does it have any control, over the information, content, accuracy, products, services, advertising, or other materials that may or may not be provided by or through Third Party Websites, even if said Third Party Website is run or owned by one of our affiliates. Third Party Websites are not investigated, monitored or checked for accuracy or completeness by us. Linking to, or being linked from, Third Party Websites does not constitute, nor should it be construed to imply, AppGirl's approval or endorsement of the Third-Party Website. AppGirl cannot and will not guarantee the standards of any Third-Party Website to which links are provided, nor shall AppGirl be held responsible for the materials and content on such websites, or any subsequent links. Any reliance on or use of the materials or content found on or by way of Third-Party Websites is done solely at your own risk, and you assume all responsibilities and consequences resulting from such reliance.

8. Viewing and Deleting Personal Data

You may send a request to access or delete the personal information collected through your use of the App, by contacting us via email. You may be asked to provide additional information to verify your identity.



9. Minors

Personally, Identifiable Information and Aggregate Information about minors is not knowingly or intentionally collected. AppGirl does not solicit any information from any minors regardless of how provided to us except as disclosed in this Privacy Policy to a parent, legal guardian, eligible student or administrator at a school, district or other public education entity. If you are a minor, we strongly recommend that you obtain consent from a parent or guardian before using our Services. If you are under the age of 18, you may not place orders for our Services.

10. Security

Measures are implemented to secure your personal information, to minimize the risks of damage, loss of information and unauthorized access or use of information. However, these measures are unable to provide absolute information security. Therefore, although efforts are made to secure your personal information, it is not guaranteed and you cannot reasonably expect that the App and its related databases will be immune from any wrongdoings, malfunctions, unauthorized interceptions or access, or other kinds of abuse and misuse.

11. Changes to this Privacy Statement

AppGirl may update this Privacy and Cookie Statement at any time. AppGirl will publish an updated version of the Privacy Statement via the website and apps. We encourage you to check your email, this is the way AppGirl will notify you of any changes to this Privacy Statement. Also, please check this page from time to time to be aware of any changes to this Privacy Statement and to stay informed about how we protect your Personal Data.

You acknowledge and agree that it is your responsibility to check your email or website to review this Privacy Statement periodically and familiarize yourself with any updates. You agree to be bound by any of the changes made to this Statement. Your continued use of the App after the changed take effect will indicate your acceptance of the amended Statement. If you do not agree with the amended Statement, you must opt-out and/or stop using our services/uninstall the app and avoid any further use of it.

12. What to do if you have any questions or remarks

If you have any questions or remarks about this Privacy Statement, please contact us by sending an email or call us.



13. HIPAA Compliance

Certificate of Completion: App Girl, LLC has participated in and successfully completed the educational activity titled (HIPAA) EDI Standards.