

AutoCoach App Privacy Policy

Introduction

Shepherd Center, Inc. (“Shepherd,” “we,” or “us”) cares about protecting your privacy and maintaining the security and privacy of personal information. This notice (this “Privacy Policy”) describes: (i) what information we collect about parents or legal guardians who register for the App (“you” or “user”) and your teen whom you will be teaching how to drive using the AutoCoach App as a tool, (ii) how we collect such information, (iii) how we use such information, (iv) with whom we may share such information, and (v) what choices you have regarding information we collect from you. This Privacy Policy applies to information that we collect through the AutoCoach application, or other services that otherwise link to or reference this Privacy Policy (the “App”). We encourage you to become familiar with the terms and conditions of this Privacy Policy. This Privacy Policy is incorporated into our **Terms and Conditions** for the App. **By accessing and using the App, you acknowledge and agree that you have read and understand this Privacy Policy and you accept and consent to the privacy practices (and any uses and disclosures of information) regarding the App that are described in this Privacy Policy.**

Information We Collect

Certain aspects of the App may allow or require you to submit information to us or to request information from us. For example, if you register as a user of the App, you will be required to submit certain data about yourself and your teen, including your email, your teen’s first name and age, and the state in which you reside. We will also ask you to provide your teen’s state issued learner’s permit number. If you reside outside of Georgia, we will ask you to provide the gender of your teen.

The App may also allow you to submit or create other information. For example, our App allows you, as a registered user, to create Driving Logs for sharing with others, such as the requisite department of motor vehicles (or applicable office of Highway Safety). This Driving Log will calculate the start time of the drive, the average speed, the top speed, and weather conditions. The Driving Log also allows you to rate, and enter information regarding the particular skills practiced on, a particular drive with your teen (e.g. finding the ignition, buckling up, and starting and stopping). We also have access to all of the data that you submit or create in the App.

The App also provides driving lesson activities that are to be used by you to teach your teen appropriate techniques. The App tracks the progress of such lessons. We have access to the progress statistics. For example, our App allows you, as a registered user, access to content designated by driving skills (such as preparing to drive or turning). We will be able to see which skills lessons are completed.

The App may also use global positioning system (“GPS”) data from your applicable mobile devices to enhance the App’s capabilities and your experience. Your location will only be tracked while the App is running. If you allow us to track your GPS, during the “Drive” functionality, a list of locations is accumulated in order to determine the distance traveled. When a drive is complete, only the distance is retained and uploaded to the server, the actual latitude/longitude coordinates are never saved. The App, in such a case, will provide you with a choice regarding the use of GPS data. You may either agree to such use by clicking “OK” or disallow such use by clicking “Don’t Allow.” The GPS functionality may be turned off by going to your settings on your device and turning it off at any time. However, if you choose to turn off the GPS functionality, the “Drive Tracking” functionality of the App will not perform correctly.

The App may also use motion tracking or motion sensing (“Motion Permission”) to determine drive stops and starts precisely. The Motion Permission grants the App the ability to record how your mobile device is tilting, the vibration or short motions of your mobile device, the direction your mobile device is pointed (i.e. pointed north), and the barometric pressure your mobile device is experiencing. The App, in such a case, will provide you with a choice regarding the Motion Permission. You may either agree to such use by

clicking “OK” or disallow such use by clicking “Don’t Allow.” The Motion Permission may be turned off by going to your settings on your device and turning it off at any time.

The App also provides the capability for you to request information from us, respond or ask questions, or seek help or support regarding the use of the App. You may also choose to contact us, and to provide us with information about yourself, other than through the capabilities of the App. While we will use any personal information you submit to us only as described in this Privacy Policy, you should be mindful of the information that you choose to provide to us, and any information that you do provide to us must be complete, truthful, and accurate. Except as expressly provided in the functionality of the App, please do not share personal or individually-identifiable information with us about anyone other than yourself or your teen, or make requests on behalf of others, on or through the App, unless you have obtained all appropriate authorization to do so from the applicable third parties.

We may retain the content of, and metadata regarding, any correspondence you may have with us or our representatives, regardless of the subject matter or the mode of communication by which such correspondence is made. This information helps us to more effectively and efficiently respond to inquiries and to improve our capabilities, products, and services, as well as the App, and the content, materials, and opportunities that we include or make available through the App.

When you register as a user of an App, you will be required to create a password for your account. It is your responsibility to choose secure passwords and to maintain the confidentiality of your passwords and not share them with others.

As with many other Web sites, the Web servers used to operate the App may automatically collect some information about registered users of the App. The data collected by our Web servers includes “clickstream” data, such as the domain name of your Internet service provider, the Internet protocol (“IP”) address assigned to the device by which you are connected to the Internet, your device’s operating system and platform, the amount of time you spend on the App, pages viewed on the App, information that you search for on the App, and other relevant statistics regarding your use of the App. In some cases, this information may possibly personally identify you, or we may combine this information with other sources of information so as to personally identify you. However, we collect and use this information only for our internal business purposes, such as facilitating App operation and system administration, performing problem diagnosis and resolution for the App, monitoring and analyzing traffic and usage patterns, generating aggregated statistical or demographic information that is not personally identifiable, and improving content and content delivery with regard to the App.

Our policy is not to store unencrypted personally or individually identifiable information in cookies or other mobile device identifiers.

Similarly, while entering certain data into your profile in the App may be optional, not entering certain data into the Apps, or agreeing to certain functionality (such as GPS tracking or Motion Permission) may prevent you from taking full advantage of the capabilities of the App.

How We Use Information We Collect

We have created this App as a teaching mechanism with the goal of reducing fatalities and severe injuries among teen drivers. Thus, we will use the information that you submit to us through use of the App for research related to this general purpose. We also use information that you submit to us through use of the App or that we collect in your use of the App, as necessary to realize or fulfill the intended purpose and functionality of the App and to assist with future development of similar apps for teens with cognitive and physical disabilities. To help foster and develop the App for these overarching purposes, information in your profile (as described in this Privacy Policy) is shared and made available to the relevant department of highway safety and to the Children’s Hospital Injury Prevention Program.

In addition, we use information we collect through the App in a limited number of other ways. We may use, disclose, and keep on file any information that you submit or provide to us through or in connection with the App as necessary and appropriate to respond or communicate with you, to provide you with the information, products, and services that you request, or as otherwise necessary to fulfill the purpose for which any given information was provided. If you request information or materials from us about our products or services, we may use the email that you provide to contact you and to deliver the requested materials to you. However, we will not use, disclose, sell, lease, or license personally or individually identifiable information that you provide or we collect from you through the App for any other purposes besides those described in this Privacy Policy, or as otherwise required by law.

We may use de-identified data to perform research on driving patterns and to determine other driving related patterns and insights. We may also create and sell reports based on aggregated and de-identified data, but these reports will not contain your or your teen's personally identifying information.

We may use the information that we collect through the App to analyze and improve the content, features, materials, and opportunities that we make available, to evaluate your needs and preferences and to customize the content delivered to you accordingly, to send you information and materials that you request from us, for research related to teen driving, and for other legitimate and lawful business purposes. If you contact us for support or assistance in connection with using the App, we may use information about you or your device for purposes such as verifying whether your device meets the minimum requirements needed to use the App, and any capabilities or functionality that we make available. In addition, we may use information that we collect or obtain about you through the App to, from time to time, send you announcements, updates, newsletters, and notices about us, the App, and our services.

With Whom Do We Share Information We Collect?

In addition to the uses and disclosures described above, we may, in the course of conducting our business and providing you with any information, materials, and services that you request on or through the App, share certain personal or individually-identifiable information that we collect or that you submit to us, whether solicited or unsolicited, to the trusted business partners and service providers that we utilize in operating, maintaining, and further developing the App, and in delivering the content and materials that we make available. We share such information only to the extent necessary and appropriate for the purposes for which the information was collected or submitted (such as, for example, as necessary for purposes of communicating with you and fulfilling your requests, and for purposes of maintaining the App). We provide our business partners and service providers with only such information as is necessary to complete their duties, and we require our business partners and service providers to be subject to obligations of confidentiality and to use and disclose personal information only for the purposes described in this Privacy Policy.

We may share aggregated information that does not personally identify any individuals with our marketing and other business partners, in order to provide more targeted advertising, products, and services. We may also produce reports on traffic or usage patterns for the App and share these reports with our business partners and others, but the information contained in these reports is also anonymous and does not allow identification of individuals. Other than as expressly provided in this Privacy Policy, any personal information that we obtain on or through the App will not be shared with third parties in a manner that identifies or is attributable to any particular individual.

We may share information in our App to local or state traffic agencies (including, but not limited to, the requisite Department of Motor Vehicles or Office of Highway Safety) in order to track safety progress.

We may disclose information (including personal and individually identifiable information) about you or in connection with your use of the App if we become subject to a subpoena or court order or if we are otherwise legally required to disclose such information. We may also use and disclose information about you or in connection with your use of our products or services to establish, exercise, enforce, or protect our legal rights, to assert and defend against legal claims, or if we believe such disclosure is necessary to

investigate, prevent, or take other action regarding actual or suspected illegal or fraudulent activities or potential threats to the physical safety or well-being of any person.

As we continue to grow and develop our business, it is possible that our organizational structure may change, that we might merge or otherwise combine with another company, or that we, or portions of our business, might be acquired by another company. In any such transactions, customer information generally is, will most probably be, and should be expected to be, one of the transferred business assets.

What Choices Do You Have?

As noted above, the App allows you to manage and update (or correct) at any time the data stored in your profile. You choose and control how you use the App, for example, by choosing which driving lessons to complete, and by determining when to turn on the Driving Log functionality. You also determine when to pause a drive and when to end it, as well as, when to save the data to the Driving Log. You also control the rating for the drive and the skills practiced during such drive. In all of these actions, you should be aware of the information that you are sharing and with whom, as described in this Privacy Policy, it will be shared.

If you choose to request information, materials, or services from us, or to make a purchase through us, whether through the App, or otherwise, we need certain information about you (generally including your name, your relevant contact information, and, for purchases, your billing and credit card information and related authentication information) to fulfill your request. In other cases, such as when corresponding or otherwise interacting with us in connection with the App, you choose what information to supply, what questions to pose and comments to make, whether you wish to receive further information, etc. In all cases, please take care to share only such information as you believe is appropriate and for which you have all appropriate consent and authorization, and please make sure that any information you submit or provide to us is complete, truthful, and accurate.

Features of the App may allow you to either opt-in or opt-out of certain capabilities or functionality, such as the GPS functionality and Motion Permission. Many of your choices as to whether to opt-in or opt-out of any particular capabilities or functionality of the App are handled immediately and automatically within the App, and may be changed from the "Settings" function of your device. We will appropriately address, within a reasonable period of time after receipt, any other available opt-in or opt-out choices that you inform us of that are not automatically handled in the App, to the extent such choices are available on or through, or otherwise supported by, the App.

You may also cancel or withdraw your registration as a user of the App, at any time, and thereafter no longer be able to, as applicable, interact and share information as a user on the App. However, in such a case, we may continue to, as described in this Privacy Policy, use and share information that you previously provided to us. For example, any Driving Log data or information related to your teen's permit, that you provided or submitted prior to cancelling your registration as a user of the App will continue to be available to us, as described above in this Privacy Policy, after your registration has been cancelled.

You must be at least 18 years old to use the App, and our other products and services. If you are not yet 18, do not continue to use App, or our other products and services, except through and with the consent of your parent or guardian. If you become aware that a child under age 18 has provided us with personal information without parental consent, please let us know. If we become aware that a child under age 18 has provided us with personal information without parental consent, we will take steps to remove such information and terminate the child's account.

How Do We Protect Information Collected About You?

We use industry standard, commercially reasonable measures and technology to secure and protect information stored on, or transmitted through, the App. However, no security measures are impenetrable,

and we cannot and do not guarantee that our systems, or that any such transmissions or information, will be totally secure. You agree to notify us immediately of any breach of security of the App, or this Privacy Policy, of which you become aware.

Linked Sites

For your convenience, some hyperlinks to other Web sites not under our control may be made available through the App. We are not responsible for, and this Privacy Policy does not apply to, the privacy practices of those linked sites or of any companies that we do not control or that we are not controlled by or under common control with. We encourage you to seek out and read the privacy policy of each Web site that you visit and each mobile application that you use. In addition, if you submit information to or through, or otherwise initiate a transaction on, a Web site that our App links to, even if you reached that site through our App, the information that you submit on that linked site becomes subject to the privacy practices of the operator of that site. You should read that site's privacy policies to understand how personal information that is collected on that site is used and protected.

Changes to this Privacy Policy

From time to time, we may change our privacy practices and this Privacy Policy, because of changes in the App we make available or otherwise in our business or services, in relevant and applicable legal or regulatory requirements, or in our attempts to better serve the needs of our customers and business partners. In the event of any changes to our privacy practices, a revised version of this Privacy Policy will be made available through the App (and such changes will become effective upon the posting or making available of the revised version of this Privacy Policy, unless otherwise indicated therein). Your continued use of the App after a revised version of this Privacy Policy is posted or made available signifies your acceptance of the revised policy.

California Residents

If you are a California resident, you can request a notice disclosing the categories of personal information we have shared with third parties for direct marketing purposes. To request a notice, please submit your request by postal mail: **[INSERT ADDRESS]**. We will make every effort to promptly respond to your request.

How to Contact Us

If you have any questions or comments concerning this Privacy Policy, our privacy practices, or any other questions about us, App, or our products and services, please contact us at the numbers or addresses given below.

[INSERT INFORMATION]

Attn: Privacy Officer

Fax:

Email:

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