

## Privacy Policy

Aspen Youth Services, Inc.

Aspen Education Group, Inc. ("AEG") created this Privacy Policy to demonstrate our commitment to fair information practices and the protection of privacy of visitors to our site. This Privacy Policy will sometimes refer to visitors to the Site as "you" or "your." The following discloses our practices for gathering, storing, disseminating and using information gathered through the web sites operated by AEG and its divisions and subsidiaries (which shall be collectively referred to in this Privacy Policy as the "Site"). The home page to AEG' main web site can be found on the World Wide Web at <http://www.aspeneducation.com>.

### 1. Types of Information Collected and Uses.

- a. Traffic Data Collected. We automatically track and collect the following information when you visit our Site: (i) IP address (which indicates the location of your computer on the Internet); (ii) domain server; (iii) type of computer; and (iv) type of web browser (collectively "Traffic Data"). Traffic Data is anonymous information that does not personally identify you but is helpful for us to know because it helps us learn or verify what search engines and other links led you to our Site and allows us to ensure effective technical operations. This can help us to improve your experience on the Site.
- b. Automatic Information Collected; Cookies. We automatically send, receive and store certain types of information whenever you interact with the Site. For example, like many web sites, we use "cookies." "Cookies" are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser to enable our systems to recognize your browser during your visit to the Site and when you return to the Site. We may also use cookies to provide information to us that will permit us to personalize information for you on the Site, and track demographics and links to our Site. We will use a cookie to track visitors who arrive at the Site as a result of clicking on a link on an affiliate's web site. The electronic code in such cookies is designed to expire thirty (30) minutes after the Visitor leaves the Site. Its purpose is to permit us to compensate affiliates that recommend our programs and place links to the Site on their web sites. If the visitor completes an online application during the visit to the Site that originated from a link from an affiliate's site, the code is linked to that online application. This permits us to track whether compensation is owed to the affiliate in connection with the application. A number of companies offer utilities designed to help you

visit web sites anonymously or refuse to accept cookies. Although we will not be able to provide you with a personalized experience at the Site or reward affiliates for helping to promote our services and programs if we cannot recognize you, we want you to be aware that these tools exist.

- c. Personal Identification Information Collected. When you use the Site's "Contact Us" feature, request our e-mail or printed newsletter or other publications, cassettes or videos offered through our Site, or complete a survey or poll on the Site, you will give us "Contact Information" such as your name, phone number, e-mail and possibly your mailing address. These features also require or permit you to submit "Demographic Information," which includes, among other things, your street address, city, state, zip code, income, your child's age, your child's behavior patterns, and solutions you have tried in dealing with your child. The "Contact Us" and Survey features also permit you to submit additional information designed to give us a better understanding of features that visitors would like to see on the Site or to request information from us. This feedback can help us improve the overall experience of visiting our Site and using the products, services and programs that we offer. If you communicate with us by e-mail, post any messages or information in any chat groups or bulletin boards that may exist on the Site from time to time, any information from that communication may be collected as Contact Information, Demographic Information and feedback.
- d. Admissions Information Collected. When you submit online a Placement Questionnaire or an Application Form to request admission of your child to an AEG program, you will give us Contact Information, Demographic Information, and "Placement and Application Information." The Placement and Application Information will require you to submit medical information and other information that you may consider sensitive or highly personal, such as social security number; height, weight, and other physically identifiable information; parent contact information and marital status; parent / child relationship information; academic information; emotional and behavioral concerns; history of substance abuse; treatment history; and medical history and medications. If your child is placed in an AEG Program, the information from both the Placement Questionnaire and the Application will be placed in the child's permanent file. AEG does not currently maintain electronic files of a child's entire permanent file, but may do so in the future. A child's permanent file is made available to AEG personnel, contractors and clinicians involved in any program for which admission is sought, in the evaluation of an application for admission, or in the care

for the child once enrolled, and otherwise in accordance with AEG' policies and procedures in effect from time to time.

- e. E-mail Communications. To help us make e-mails more useful and interesting, we may receive a confirmation when you open e-mail from us if your computer supports such capabilities. We may also compare our customer list to lists received from other companies, in an effort to avoid sending unnecessary messages to our customers. If you do not want to receive e-mail or other mail from us, please notify us at opt-out@aspenseducation.com.
  - f. Information from Other Sources. For reasons such as improving personalization of our service (for example, providing subject specific content or special offers that we think will interest you), we might receive information about you from other sources and add it to our account information. We also sometimes receive updated delivery and address information from other sources (such as change of address information) so that we can correct our records and deliver your next communication more easily.
2. Other Uses of Personal Identification Information Collected. We will store and update the Contact Information, Demographic Information, Placement and Admission Information and other information collected from visitors to the Site. We may use your Contact Information to send you information about AEG, its programs, services and products, partners, affiliates or new or updated features on the Site or AEG programs, to contact you when necessary, or to request you to participate in an online survey or poll. We also use the Contact Information to send you a complimentary parenting cassette if you complete the survey found on the Site. We may use the Traffic Data, Demographic Information and automatically collected data from cookies and tracking codes to track and analyze demographics of visitors to our Site, links to our Site and how visitors use various features of the Site. We may also use Demographic Information and automatically collected data to customize and tailor your experience on the Site, to display content and features that we think may be of interest to you, and in combination with your Contact Information, to send you information about products, services and programs that may be of interest to you, and to contact you to request you to complete online surveys or polls.
3. Sharing and Release of Information. We share Traffic Data, Demographic Information, automatically collected data, and feedback with affiliates, partners and other third parties generally on an aggregate basis. We may share Contact Data among Aspen Education Group programs, or companies AEG may invest in, who may want to send you information about their products or services. If

you do not want us to share your Demographic Information or Contact Data with any third parties, please email us at [optout@aspendeducation.com](mailto:optout@aspendeducation.com).

4. We employ other companies and individuals to perform functions on our behalf. Examples include fulfilling requests for cassettes, delivering cassettes and other information, sending postal mail and e-mail, removing repetitive information from mailing lists, analyzing data, providing marketing/sales assistance, providing customer service for the Site, evaluating enrollment applications, and carrying out duties in the operation of our Programs. They have access to Traffic Data, Contact Information, Demographic Information, automatically collected data, feedback and Placement and Admissions Information needed to perform their functions, but may not use it for other purposes.

As we continue to develop our business, we might sell or buy web sites, divisions, companies or assets. In such transactions, Traffic Data, Contact Information, Demographic Information, automatically collected data, feedback and Placement and Admissions Information related to the web site, division, company or asset being sold generally are among the transferred business assets. Also, in the unlikely event that Company, or substantially all of its assets, are acquired, all the Traffic Data, Contact Information, Demographic Information, automatically collected data, feedback and Placement and Admissions Information will of course be among the transferred assets.

We will release your Traffic Data, Contact Information, Demographic Information, automatically collected data, feedback and Placement and Admissions Information when we believe such disclosure is appropriate to: (a) comply with law or a court order or other legal process; (b) protect the rights, property or safety of Company, the Site, our users, enrollees in our programs, employees, contractors, agents or others; or (c) enforce our terms of service.

5. Security. We work to include security measures in this Site to protect the loss, misuse and alteration of the information within our control that you provide to us. However, we cannot ensure or warrant the security of the information. It also is important for you to protect against unauthorized access to your computer. Be sure to sign off when finished using a shared computer or one that is otherwise accessible to third parties.
6. Links to Other Sites. The Site contains links to other Web sites. We are not responsible for the privacy practices or the content of such Web sites.
7. Public Forums. The Site may make chat rooms, forum facilities, message boards and e-groups, news groups available to you. Please understand that any information that is disclosed in these areas becomes public information. We

have no control over its use and you should exercise caution when deciding to disclose your Contact Information or any other information about yourself. The information presented in these areas reflect the views of the individual users or hosts and do not necessarily reflect the views of AEG, or any of its subsidiaries or affiliates.

8. Updates and Changes to Privacy Policy. We reserve the right to add to, change, update or modify this Privacy Policy. Any such change, update or modification will be effective without prior notice and immediately upon posting on the Site.
  
9. Conditions of Use, Revisions. By using our Site, you consent to the collection and use of information described above. Your visit and any dispute over privacy is subject to this Privacy Policy and our Terms and Conditions of Usage (<http://www.aspeneducation.com/terms.html>), including limitations on damages and application of the law of the state of California. If you have any concern about privacy at AEG or any of its subsidiaries, please send us a thorough description to [info@aspeneducation.com](mailto:info@aspeneducation.com), and we will try to resolve it. This Privacy Policy and our Terms and Conditions of Usage may change frequently, and use of information that we gather now is subject to the Privacy Policy and Terms and Conditions of Usage in effect at the time of use. We may e-mail periodic reminders of our notices and conditions, unless you have instructed us not to, but you should frequently check our Site and the page where this Privacy Policy is posted to see recent changes.