# **Products and Services Privacy Policy**

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## **Changes to this Privacy Policy**

Capitalised terms used in this Products and Services Privacy Policy (the "Privacy Policy") are defined in <u>Key Terms</u> unless otherwise defined herein.

To exercise your Data Subject Rights (described in the <u>Your choices and legal rights</u> below), please visit the <u>Quantcast Privacy Choices</u> page.

## Who we are and what we do

Quantcast ("we", "our", or "us") is a global digital advertising technology group of companies. Quantcast offers Solutions that help digital advertisers and publishers (collectively, "Clients" or "clients") understand and grow their client base. Through Quantcast Advertise Solutions, advertiser Clients can plan, activate, and measure the performance of their advertising campaigns seamlessly in a single audience platform, which helps them to place their ads to maximise results. Through Quantcast Measure Solutions, digital publisher Clients leverage insights to better understand the makeup of their audiences, how audiences spend their time across their digital properties, and what audiences care about, all of which help these digital businesses better connect their content and Audiences with the right advertising. We will refer to all of these services as "Solutions."

To provide the Solutions, Quantcast collects and uses Personal Information for various purposes, such as measuring and understanding audiences, targeting and delivering ads, measuring ad performance, and similar related purposes. As described in the <a href="Information Collection">Information Collection</a> section below, we may join or match Personal Information about you, which may include your Online Data from your visits across different digital properties, like websites, mobile apps, or streaming media devices (such as connected TVs ("CTVs")),

that have implemented Quantcast Pixels, Tags or SDKs (which is sometimes called "tracking" in the industry) or Offline Data . This allows us, for example, to enrich our existing data sets and provide meaningful reports for our Clients regarding the effectiveness of their ads or content. We may also combine Personal Information that we collect in order to probabilistically link media consumption to a single user, which is sometimes called Cross-Media Matching/Linking. To the extent that we combine Personal Information that we collect from and about you in connection with our performance of the Solutions, we will use such combined information only as described in this Privacy Policy.

This Privacy Policy describes in more detail how we collect, use, disclose, and protect Personal Information, otherwise obtain and Process it in connection with the delivery of the Solutions, and the controls we provide you to manage such information and exercise your choices and legal rights. As noted in the <u>Information use and legal basis</u> section below, we use the <u>Transparency and Consent Framework</u> ("TCF") standard to facilitate compliance with applicable laws in Europe, primarily in accordance with the EU and UK General Data Protection Regulation ("GDPR"). Because the TCF is one means of explaining Processing activities, and because our Processing activities are consistent globally, the TCF Purposes are applicable to all Personal Information that we Process (regardless of the information's country of origin).

In the United States, the Solutions are provided by Quantcast Corporation, located at 795 Folsom Street, San Francisco, CA 94107. Personal Information relating to individuals located within the United States provided to or gathered by us in connection with the delivery of the Solutions is controlled by Quantcast Corporation.

Outside of the United States, the Solutions are provided by Quantcast International Limited, located at Beaux Lane House, Lower Mercer Street, Dublin 2, Ireland. In so far as Quantcast acts as a "controller" (as defined under applicable law), Quantcast International Limited is the controller of your Personal Information if you reside in the European Economic Area (EEA), United Kingdom (UK), Switzerland, or any other jurisdiction outside of the United States.

# Scope of this Privacy Policy

See Key Terms for definitions of capitalized terms.

This Privacy Policy covers Quantcast's use of Personal Information as a data controller for the Solutions only. For example, this Privacy Policy does not cover:

- Quantcast's collection and handling of Personal Information as a processor/service provider for its Clients.

We use some phrases in this Privacy Policy that are unique to our business and/or the digital advertising industry. For a list of defined terms that you should familiarise yourself with to make it easier to review this Privacy Policy, please review the <u>Key Terms</u>.

California Notice at Collection: We collect the categories of Personal Information listed in the <u>Additional information for residents of certain U.S. states</u> section below. As further described in the <u>Information use and legal basis</u> section below, we collect this information in order to deliver the Solutions and conduct our business. To learn more, please see the <u>Additional information for residents of certain U.S. states</u> section.

# Self-regulatory standards

See Key Terms for definitions of capitalized terms.

Quantcast supports and participates in several digital advertising self-regulatory organisations, as further described below.

• We are members of the Network Advertising Initiative (NAI).

- We participate in the Digital Advertising Alliance (DAA) and adhere to the <u>DAA Self-Regulatory Principles</u>.
- We participate in the European Interactive Digital Advertising Alliance (EDAA) and are certified under the EDAA Principles.
- We participate in, and comply with, the policies and technical specifications of the <u>IAB Transparency and Consent Framework</u>
   (TCF) as a vendor. Quantcast's IAB Europe-assigned identification number is Vendor ID #11.

Please see the <u>Your choices and legal rights</u> section of this Privacy Policy for more information about the opt-out tools offered by the NAI, DAA, and EDAA.

Do Not Track ("DNT") is a preference that you can set in certain web browsers to inform the websites you visit that you do not want information about your online activity collected over time and across third-party websites or online services. We do not honor DNT at this time, due to the lack of a clear industry standard. Please visit the <a href="Quantcast Privacy Choices">Quantcast Privacy Choices</a> page for your opt-out options.

## Information collection

See Key Terms for definitions of capitalized terms.

We collect or receive Personal Information about or relating to you in various ways, including from digital properties, like websites, mobile apps, or streaming media devices (such as connected TVs ("CTVs"), and other sources of digital content. Details about the categories of Personal Information we collect and receive, the source or manner in which we obtain each category of Personal Information, the purpose(s) for which we Process each category of Personal Information, and the retention period for each category of Personal Information we Process can be found in the table below. As described in the Who we are and what we do section, where applicable the Processing purposes identified in the table below are tied to the TCF Purposes outlined in the Information use and legal bases section.

Category and Description of Personal Information	Source of Personal Information	Purpose for Processing (including where relevant the TCF Purpose) and Retention Period
Pseudonymous Identifiers: unique values that distinguish your browser profile(s) or device(s).  Examples include a Cookie ID, device IP Address, hashed email addresses, 3rd party identifiers, or other Device Identifiers or Device Configuration/ Information.	Usually generated when Pixels, Tags, or SDKs are loaded by a Client on its digital property (i.e., website, mobile app, or device) and sends information to us. Different kinds of Pixels, Tags, or SDKs are used for different purposes, but the types of information generated are the same.  Such information may also be received through a server- to- server connection, such as when receiving a Bid Request.	will be retained for up to 13 months for the following purposes (NOTE: storing/accessing data on a device is the cookie lifespan - up to 13 months each time the cookie is reset):  Store and/or access

(TCF Purpose 4) Measure advertising performance (TCF Purpose Measure content performance (TCF Purpose **Understand audiences** through statistics or combinations of data from different sources (TCF Purpose 9) **Develop and improve** services (TCF Purpose 10) Ensure security, prevent and detect fraud, and fix errors (TCF Special Purpose 1) **Deliver and present** advertising and content (TCF **Special Purpose 2)** Save and communicate privacy choices (Special Purpose 3) Match and combine data from other data sources (TCF Feature 1) Link different devices (TCF Feature 2) Identify devices based on information transmitted automatically (TCF Feature 3) **Recording consent choices** made by users Imprecise/Approximate Location Information: The time zone Inferred or derived by Quantcast from Imprecise/Approximate and approximate geolocation (e.g., postal code or city) of your device's IP Address or included in **Location Information will be** your device. **Bid Requests.** retained for up to Up to 13 months for the following **Purposes:** Use limited data to select advertising (TCF Purpose 2) **Create profiles for** 

advertising (TCF Purpose 3)

Use profiles to select personalised advertising (TCF Purpose 4)

Measure advertising performance (TCF Purpose

Measure content performance (TCF Purpose 8)

**Understand audiences** through statistics or combinations of data from different sources (TCF Purpose 9)

**Develop and improve** products (TCF Purpose 10)

Ensure security, prevent and detect fraud, and fix errors (TCF Special Purpose 1)

**Deliver and present** advertising and content (TCF **Special Purpose 2)** 

Save and communicate privacy choices (Special Purpose 3)

Match and combine data from other data Link different devices (TCF Feature 2)

Identify devices based on information transmitted automatically (TCF Feature 3)

**Event Data: Information relating to your Online Data, which** may include Pseudonymous Identifiers, Imprecise/Approximate Location Information, HTTP Request property, loads and sends information to following Purposes: Header Information, Device Information, and Browsing Data. us.

Generated when Pixels, Tags or SDKs, installed by a Client on its digital

**Different kinds of Pixels, Tags or SDKs** are used for different purposes, but the types of information generated are the same.

**Event Data will be retained** for up to 13 months for the

**Create profiles for** advertising (TCF Purpose 3)

Use profiles to select personalised advertising (TCF Purpose 4)

Measure advertising performance (TCF Purpose 7)

Measure content performance (TCF Purpose 8)

Understand audiences through statistics or combinations of data from different sources (TCF Purpose 9)

Develop and improve products (TCF Purpose 10)

Ensure security, prevent and detect fraud, and fix errors (TCF Special Purpose 1)

Deliver and present advertising and content (TCF Special Purpose 2)

Save and communicate privacy choices (Special Purpose 3)

Link different devices (TCF Feature 2)

Identify devices based on information transmitted automatically (TCF Feature 3)

Bid Request Data: A bid request is an offer from a digital inventory provider (e.g., a publisher or Exchange),, to show an provider. ad on a digital property. Bid Request Data includes information about your visit to the digital property, which helps us understand where an ad will be displayed, Device Information, and who might see it.

Bid Request Data also commonly includes a Pseudonymous Identifier (if available), the content that the ad would serve into, the type of device the ad would be served on, the Imprecise / Approximate Location Information of the device, the size of the ad, and consent information. Because Bid Requests include information about the content you are visiting, over time, accumulated Bid Requests may show your browsing behavior.

Received from a digital inventory provider.

Bid Request Data will be retained for up to 13 months for the following Purposes:

Use limited data to select advertising (TCF Purpose 2)

Create profiles for advertising (TCF Purpose 3)

Use profiles to select personalised advertising (TCF Purpose 4)

Measure advertising performance (TCF Purpose 7)

Understand audiences through statistics or combinations of data from different sources (TCF Purpose 9)

Develop and improve products (TCF Purpose 10)

Ensure security, prevent and detect fraud, and fix errors (TCF Special Purpose 1)

Deliver and present advertising and content (TCF Special Purpose 2)

Save and communicate privacy choices (Special Purpose 3)

Link different devices (TCF Feature 2)

Identify devices based on information transmitted automatically (TCF Feature 3)

Imported Data (Client): Pseudonymised Information, which may include Online Data, and/or Offline Data that may be apportioned by Browsing Data, Attributes, Segments, Label Data and Interests.

Uploaded to the Quantcast platform or provided to us via an Application Programming Interface ("API") by a particular Client for use on its behalf.

Imported Data (client) will be retained for up to 30 days for the following Purposes:

Create profiles for advertising (TCF Purpose 3)

Use profiles to select personalised advertising (TCF Purpose 4)

Understand audiences through statistics or combinations of data from different sources (TCF Purpose 9)

Develop and improve products (TCF Purpose 10)

Ensure security, prevent and detect fraud (TCF Special Purpose 1)

(For clarity, Quantcast may

		retain data for a different period if instructed by a Client for which Quantcast is acting as a service provider/processor.)
Imported Data (Third Party/Segment): Pseudonymised Information, which may include Online Data, and/or Offline Data that may be apportioned by Browsing Data, Attributes, Segments, Label Data and Interests.	Uploaded to the Quantcast platform or provided to us via an API by Data Management Platforms or Data Providers.	Imported Data (Third Party/Segment) will be retained for up to 30 days for the following Purposes: Create profiles for advertising (TCF Purpose 3) Use profiles to select personalised advertising (TCF Purpose 4) TUnderstand audiences through statistics or combinations of data from different sources (TCF Purpose 9) Develop and improve products (TCF Purpose 10) Ensure security, prevent and detect fraud, and fix errors (TCF Special Purpose 1) (For clarity, Quantcast may retain data for a different period if instructed by a Client for which Quantcast is acting as a service provider/processor.)
Inferences/Inferred Data: Information drawn from the above-listed categories of information (i.e., Event Data, Bid Request Data, Imported Data (Client), and Imported Data (Third Party/Segment)).  We may, for example, use information that we have collected to infer your interests, age, gender, marital status, or income range. These Inferences may include Interests and Attributes.	collected Event Data, Bid Request Data, Imported Data (Client), and/or Imported Data (Third Party/Segment).	Inferences/Inferred Data will be retained for up to 13 months for the following Purposes:  Create profiles for advertising (TCF Purpose 3)  Use profiles to select personalised advertising (TCF Purpose 4)  Measure advertising performance (TCF Purpose 7)

		Measure content performance (TCF Purpose 83)
		Understand audiences through statistics or combinations of data from different sources (TCF Purpose 9)
		Develop and improve products (TCF Purpose 10)  Ensure security, prevent and detect fraud, and fix errors
		(TCF Special Purpose 1)
Training Data: Pseudonymous Information used to improve Quantcast's algorithms and measure how well they are working.	Received from Data Providers and matched to Pseudonymous Identifiers.	Training Data will be retained for up to 30 days for the following Purposes:
		TCF Purpose 3: Create profiles for advertising (TCF Purpose 3)
		TCF Purpose 8: Measure content performance (TCF Purpose 8)
		TCF Purpose 9: Understand audiences through statistics or combinations of data from different sources (TCF Purpose 9)
		TCF Purpose 10: Develop and improve products (TCF Purpose 10)
		TCF Special Purpose 1: Ensure security, prevent and detect fraud, and fix errors (TCF Special Purpose 1)
Information you provide: This may include your contact details, (e.g., name, email address, or phone number) and any commentary or other information you provide when you contact Quantcast.	Provided by you when you contact y Quantcast.	Carrying out our legitimate business purposes.  Retention Period: up to 18
Additionally approfiles to the Co. 11		months
Additionally, any of the categories of Personal Information des	cribed above may be Processed and retair	ned for the following purposes.

Establishing, bringing, or defending against

Retained as needed for these purposes, including as required by applicable law.

complaints, legal claims (including threatened or anticipated legal claims), and regulatory inquiries	Otherwise, categories of Personal Information and associated retention periods are determined by the underlying purpose for which the Personal Information is Processed.
Responding to legal requests	
Complying with relevant laws and regulations	
Conducting research	Categories of Personal Information and associated retention periods are determined by the underlying purpose for which the Personal Information is Processed.
Hosting of Personal Information for above- listed purposes	Categories of Personal Information and associated retention periods are determined by the underlying purpose for which the Personal Information is Processed.

#### Sensitive information

We generally do not seek or permit sensitive Personal Information (e.g., information revealing an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; genetic or biometric data that is Processed for the purpose of uniquely identifying an individual; information concerning an individual's health, sex life, or sexual orientation; and information relating to criminal convictions and offenses) to be used in the Solutions without your consent or by otherwise ensuring that such Processing is in accordance with applicable laws and rules.

#### Children's information

We do not Process Personal Information about data subjects whom we know to be under the age of 18 via our Solutions.

Contractual commitments from our Clients and Data Providers:

We contractually require other companies that provide or make available to us Personal Information to take steps to ensure that we can lawfully Process such information, which include: (i) posting complete and accurate privacy policies that comply with applicable laws and rules and describe their Personal Information collection, use, and sharing practices; (ii) obtaining all legally-required consents and necessary permissions; and (iii) providing individuals with appropriate choices and the ability to opt out of the Processing of their Personal Information, where necessary or appropriate.

# Information use and legal basis

See Key Terms for definitions of capitalized terms.

As described in the Who we are and what we do section, we generally use the TCF as the mechanism for describing our Processing activities, and in Europe specifically for establishing our legal basis for Processing and managing users' preferences for online personalised advertising and related activities. The TCF is designed to allow a digital business to present information and choices to users on its website relating to the Processing of their Personal Information.

We Process Personal Information for the purposes for which it was collected or provided to us. The table below describes the specific purposes for which we Process the Personal Information we collect or otherwise obtain about you. This table includes:

- the purposes for which Quantcast Processes Personal Information, which are tied to the defined purposes for Processing, special purposes, and features set forth in the <u>TCF Policies</u> and official technical documentation disseminated by IAB Europe where applicable (see Appendix A of the <u>TCF Policies</u> for examples and illustrations of the purposes, special purposes and features)
- a description of each Processing activity using TCF-specific terminology (to the extent applicable), and

• the legal basis that we rely on to perform each of our Processing activities.

Please note that in Europe, where we indicate that "Legitimate Interests" in accordance with the GDPR is the legal basis for Processing, we carry out the Processing in reliance on our legitimate interests or those of a third party (e.g., our Clients), provided that such interests are not outweighed by your interests or fundamental rights and freedoms.

Processing Purpose / TCF Purpose (where TCF is applicable)	Description of Processing Activity (using TCF Purpose terms)	Legal Basis for Processing for EU/UK
Storing and/or accessing information on a device (TCF Purpose 1)	Cookies, Device Identifiers, or other information more fully described in association with the purposes below and in the tables above can be stored or accessed on your device for the purposes presented to you.	Consent
	Ads can be shown to you based on the content you're viewing, the app you're using, your device's Imprecise/Approximate Location Information, or your device type.  When selecting "Use limited data to select advertising", Quantcast will:  • Use real-time information about the context in which the ad will be shown, including information about the content and your device, such as: device type and capabilities, User Agent, URL, and IP Address  • Use your device's Imprecise/Approximate Location Information  • Control the frequency of ads shown to you  • Sequence the order in which ads are shown to you  • Prevent an ad from serving in an unsuitable editorial (brand-unsafe) context	Consent or Legitimate Interests, depending on the choice of the Client that is using the TCF.  Where we rely on Legitimate Interests, we carry out the Processing to help our advertiser Clients meet their objectives of finding new customers and growing their brands through the delivery of relevant ads.
Creating profiles for personalised ads (TCF Purpose 3)	A profile can be built about you and your Interests to show you personalised ads that are relevant to you.  To create or edit a profile for use in personalised advertising, Quantcast will:  Collect information about you, including your activity, visits to websites or mobile apps or streaming media, or Imprecise/Approximate Location Information  Aggregate Attributes and Interests and Panel-based demographic information,  Combine information with other information previously collected, including from across websites or mobile apps or streaming media	Consent

Using profiles to select personalised ads (TCF personalise from or about to websites Imprecise/

When serving personalised ads, Quantcast will select personalised ads based on Personal Information collected from or about you, such as your prior activity, Interests, visits to websites or mobile apps or streaming media, Imprecise/Approximate Location Information, demographic information or Inferences.

#### Consent

Measuring advertising performance (TCF Purpose 7)

Quantcast will measure the performance and effectiveness of ads that you see or interact with.

Consent or Legitimate Interests, depending on the choice of the Consent or Legitimate Interests,

In particular, to measure whether and how ads were delivered to you and how you interacted with them, Quantcast will:

- Provide reporting to Clients about ads, including their effectiveness and performance
- Provide reporting to Clients about your interactions with ads using data observed during your interaction with the ad
- Provide reporting to Clients about the ads displayed on their properties
- Measure whether an ad is serving in a suitable editorial environment (brand-safe) context
- Determine the percentage of the ad that had the opportunity to be seen and the duration of that opportunity
- Combine this information with other information previously collected, including from across websites or mobile apps or streaming media

In the provision of the Solutions to some Clients, Quantcast may correlate information between entries within its own datasets that have the same Pseudonymous Identifier or with information obtained from Ad Serving, Ad Verification, or Data Management Platforms/Data Providers. We do this to provide aggregated reporting to Clients about the number of visitors to their digital properties.

Quantcast does not apply Panel or similarly derived Audience Insights data to ad measurement data without a separate legal basis to apply market research to generate Audience Insights.

Consent or Legitimate Interests, depending on the choice of the Client that is using the TCF.

Where we rely on Legitimate Interests, we carry out the Processing to help our advertiser Clients meet their objective of ascertaining, measuring, and improving the effectiveness of their ad campaigns.

Measuring content performance (TCF Purpose 8)

The performance and effectiveness of content that you see or interact with can be measured.

Consent or Legitimate Interests, depending on the choice of the Consent or Legitimate Interests,

To measure content performance, Quantcast will:

- Measure and report to Clients on how content was delivered to and interacted with by you
- Provide reporting to Clients, using directly measurable their digital content strategies more

Consent or Legitimate Interests, depending on the choice of the Client that is using the TCF.

Where we rely on Legitimate Interests, we carry out the Processing to help our Clients meet their objective of executing their digital content strategies more

	or known information about your interactions with the content  Combine this information with other information previously collected, including from across visits to websites or mobile apps or streaming media	effectively.
Understanding audiences through statistics or combinations of data from different sources i.e., applying market research to generate Audience Insights (TCF Purpose 9)	Market research can be used to learn more about the Audiences who visit websites, mobile apps, or streaming media, and view ads.  To generate Audience Insights, Quantcast will:  Provide aggregate reporting to advertisers or their representatives (such as advertising agencies) about the Audiences reached by their ads, through Panel- based and similarly derived insights  Provide aggregate reporting to Clients about the Audiences that were served or interacted with content and/or ads on their properties by applying Panel-based and similarly derived insights  Associate Offline Data with you for the purposes of market research to generate Audience Insights (if we have declared that we will match and combine Offline Data sources)  Combine this information with other information previously collected, including from visits to websites or mobile apps or streaming media	Consent or Legitimate Interests, depending on the choice of the Client that is using the TCF.  Where we rely on Legitimate Interests, we carry out the Processing to help our Clients meet their objectives of finding new customers and growing their brands through the delivery of relevant ads and/or executing their digital content strategies more effectively.
	Your information can be used to improve Quantcast's existing systems and software and to develop new products.  To develop and improve its products, Quantcast will:  Use information to improve its existing products with new features and to develop new products  Create new models and algorithms through machine learning  Quantcast primarily uses Training Data to train its algorithms how to infer individuals' Attributes and Interests in the context of the Solutions.	on the choice of the Client that is using the TCF.  Where we rely on Legitimate Interests, we carry out the Processing to meet our organisational objective of continuously improving the Solutions for our Clients.
Ensuring security, preventing and detecting fraud, and fixing errors (TCF Special Purpose 1)	Your information can be used to monitor for and prevent fraudulent activity and ensure our systems and processes work properly and securely.  To ensure security, prevent fraud, and debug, Quantcast will:  • Ensure information is securely transmitted	Legitimate Interests  We conduct the Processing to meet organisational objectives such as to maintain our IT systems; to ensure the electronic security of our business; and to detect and prevent against malicious,

	<ul> <li>Detect and prevent malicious, fraudulent, invalid, or illegal activity</li> <li>Ensure correct and efficient operation of systems and processes, including monitoring and enhancing the performance of systems and processes engaged in permitted purposes</li> </ul>	fraudulent, invalid, and illegal activity.
Technically deliver ads or content (TCF Special Purpose 2)	Your device can receive and send information that allows you to see and interact with ads and content.  To deliver information and respond to technical requests, Quantcast will:  Use your device's IP Address to deliver an ad or content over the internet  Respond to your interactions with an ad or content by sending you to a landing page  Use information about your device type and capabilities for delivering ads or content (e.g., to deliver the right size ad creative or video file in a format supported by your device)	Legitimate Interests  We carry out the Processing to help our advertiser Clients meet their objective to ascertain, measure, and improve the effectiveness of their ad campaigns.
Save and communicate privacy choices (Special Purpose 3)	The consent choices you make on a digital property regarding the use of your information and profiles for the purposes listed above are saved and made available to Quantcast. This is necessary to allow Quantcast to respect your choices.	Legitimate Interests  We carry out the Processing to meet our requirements to respect your consent choices.
_	Offline Data can be combined with your online activity in support of one or more purposes or special purposes outlined in this table.	The legal basis will depend on the TCF Purpose pursued.
Linking different devices (TCF Feature 2)	Different devices can be determined as belonging to you or your household in support of one or more purposes.  Through Cross-Media Matching/Linking, Quantcast will:  Deterministically determine that two or more devices belong to you or your household  Probabilistically determine that two or more devices belong to you or your household	The legal basis will depend on the TCF Purpose pursued.
Receiving and using automatically sent device characteristics for identification (TCF Feature 3)	Your device will be distinguished from other devices based on information it automatically sends, such as IP Address or browser type.  In particular, Quantcast will:	The legal basis will depend on the TCF Purpose pursued.

	<ul> <li>Create an identifier using information collected automatically from your device for specific characteristics (e.g., IP Address or User Agent information)</li> <li>Use such an identifier to attempt to re-identify your device</li> </ul>	
Establishing, bringing, or defending against complaints, legal claims (including threatened or anticipated legal claims), and regulatory inquiries	We Process, preserve, and disclose Personal Information when we seek legal advice or seek to protect ourselves in the context of litigation and other disputes.	Legitimate Interests  We carry out the Processing to meet our objective of protecting ourselves and others, including in connection with investigations, litigation, and regulatory inquiries.
Responding to legal requests	We preserve and disclose Personal Information in response to legal requests from law enforcement and other government officials, to comply with a subpoena or similar legal process, and when we believe in good faith that disclosure of such information is necessary to comply with a judicial proceeding or court order.	Legitimate Interests  We carry out the Processing to meet our objective of protecting ourselves and others, including in connection with investigations and regulatory inquiries.
Complying with relevant laws and regulations	We Process Personal Information to comply with our legal obligations under applicable law.  Examples of Irish and EU laws enforceable in Ireland that could give rise to an obligation requiring us to Process Personal Information we hold about you are:  • Civil and commercial matters: where we are in receipt of a court order to disclose information for the purposes of court proceedings, such as under Regulation (EU) No 1215/2012 on jurisdiction and the recognition and enforcement of judgments in civil and commercial matters  • Criminal matters: to comply with requests from Irish law enforcement to provide information in relation to an investigation, such as under Section 10 of the Criminal Justice (Miscellaneous Provisions) Act 1997 as amended by 6(1)(a) of the Criminal Justice Act 2006 or to take steps to report information to law enforcement where required  • Consumer matters: to comply with our obligations under consumer law, such as the Competition and Consumer Protection Act 2014 (e.g., where the Irish Competition and Consumer Protection Commission requests information)  • Corporate and taxation matters: to comply with our	Compliance with a legal obligation.

	obligations under company legislation and tax law, such as the Companies Act 2014 or where the Irish Revenue requests information  • Regulatory matters: to comply with our obligations under data protection laws, including to engage with regulators, such as the Data Protection Commission under the GDPR and the Data Protection Act 2018  See <a href="https://legal.quantcast.com/#laws">https://legal.quantcast.com/#laws</a> for the current list of laws which are enforceable in Ireland that give rise to a legal obligation for Quantcast which results in the Processing of Personal Information. As new laws may be enacted or other obligations may require us to Process your Personal Information, we will update this list from time to time.	
Conducting research	We use Personal Information to conduct research, surveys, product testing, and troubleshooting to help us operate and improve our products and services.	Legitimate Interests  We carry out the Processing to meet our organisational objective of delivering and continuously improving the Solutions for our Clients.
Hosting information	We Process Personal Information to manage our business, which includes hosting Personal Information in our on-premise data centers and/or cloud computing services.	Legitimate Interests  We carry out the Processing to meet our organisational objective of delivering the Solutions to our Clients.

# Information sharing

See <u>Key Terms</u> for definitions of capitalized terms.

We disclose Personal Information as follows:

Category of Recipient	Description and Purpose of Disclosure	Categories of Personal Information Disclosed
Quantcast- affiliated companies	To provide the Solutions.	All or certain categories of Personal Information in order to provide the Solutions.
Our clients and their designees	As determined by our clients.	Personal Information that belongs to our

		clients
Our service providers/data processors	To assist us with providing the Solutions, on our behalf. For example, these companies assist with information hosting, information Processing, database management, and administrative tasks.	All or certain categories of Personal Information in order to provide the Solutions.
•	In the event of a reorganisation, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with a bankruptcy or similar proceeding), we may disclose your Personal Information with (or transfer your Personal Information to) certain entities, such as the acquiring entity and its advisors. We may also make certain information available to a potential investor or purchaser (and their advisers) in advance of any such transaction's completion.	All or certain categories of Personal Information are disclosed only as necessary or appropriate.
Competent governmental and public authorities	We may disclose your Personal Information with governmental and law enforcement authorities, in each case to comply with legal or regulatory obligations or requests.	All or certain categories of Personal Information are disclosed only as necessary or appropriate.
Other entities	We will disclose your Personal Information with other entities at your direction or with your consent.  Additionally, we may disclose your Personal Information as necessary or appropriate or where otherwise permitted by law to:  Enforce our agreements  Protect our operations  Protect our rights, privacy, safety, property, and/or those of other persons  Allow us to pursue available remedies or limit damages that we may sustain	All or certain categories of Personal Information are disclosed only as necessary or appropriate.

# Information security

See Key Terms for definitions of capitalized terms.

We employ appropriate organisational and technical security safeguards designed to keep Personal Information secure when it is transmitted to us and once we receive it. These measures may include encryption and employment of information storage security technologies to restrict access to our network. However, please be aware that no method of transmitting information over the internet or storing information is completely secure.

## Information retention

## See Key Terms for definitions of capitalized terms.

We retain your Personal Information for as long as necessary for the purposes for which it was collected, as described in the <u>Information Collection</u> section above and in the tables below, except where we are required to retain the information for a longer period of time. Once Personal Information has reached its retention period, as applicable, we may either de-identify it (for State Privacy Law purposes, defined below), anonymise it (for GDPR purposes), or permanently delete it. We will not attempt to re-identify de-identified information, except as permitted by law.

Category of Personal Information	Maximum retention period for all TCF Purposes as a Controller	
Pseudonymous Identifiers	Up to 13 months (NOTE: storing/accessing data on a device is the cookie lifespan - up to 13 months each time the cookie is reset)	
Imprecise/Approximate Location Information	Up to 13 months	
Event Data	Up to 13 months	
Bid Request Data	Up to 13 months	
Imported Data (Client)	Up to 30 days	
Imported Data (Third Party/Segment)	Up to 30 days	
Inferences/Inferred Data	Up to 13 months	
Training Data	Up to 30 days	
Information you provide	Up to 18 months	
Processing Purpose / TCF Purpos	e Categories of Personal Information Maximum retention period for the TCF	

Processing Purpose / TCF Purpose	Categories of Personal Information used for this purpose	Maximum retention period for the TCF Purpose as a Controller  Individual categories of data may have a shorter retention period as shown above.
Store and/or access information on a device (TCF Purpose 1)	Pseudonymous Identifiers	Cookie life span is up to 13 months each time it's reset
Use limited data to select advertising (TCF Purpose 2)	Pseudonymous Identifiers Imprecise/Approximate Location Information Bid Request Data	Up to 13 months
Create profiles for personalised advertising (TCF Purpose 3)	Pseudonymous Identifiers Imprecise/Approximate	Up to 13 months

	Location Information  Event Data  Bid Request Data  Imported Data (Client)  Imported Data (Third Party/Segment) Inferences/Inferred Data  Training Data	
Use profiles to select personalised advertising (TCF Purpose 4)	Pseudonymous Identifiers Imprecise/Approximate Location Information Bid Request Data Imported Data (Client) Imported Data (Third Party/Segment) Inferences/Inferred Data	Up to 13 months
Measure advertising performance (TCF Purpose 7)	Pseudonymous Identifiers Imprecise/Approximate Location Information Event Data Bid Request Data Inferences/Inferred Data	Up to 13 months
Measure content performance (TCF Purpose 8)	Pseudonymous Identifiers Imprecise/Approximate Location Information Event Data Inferences/Inferred Data Training Data	Up to 13 months
Understand audiences through statistics or combinations of data from different sources (TCF Purpose 9)	Pseudonymous Identifiers Imprecise/Approximate Location Information Event Data Bid Request Data Imported Data (Client) Imported Data (Third Party/Segment) Inferences/Inferred Data	Up to 13 months

	Training Data	
Develop and improve services (TCF Purpose 10 )	Pseudonymous Identifiers Imprecise/Approximate Location Information Event Data Bid Request Data Imported Data (Client) Imported Data (Third Party/Segment) Inferences/Inferred Data Training Data	Up to 13 months
Ensure security, prevent and detect fraud, and fix errors (TCF Special Purpose 1)	Pseudonymous Identifiers Imprecise/Approximate Location Information Event Data Bid Request Data Imported Data (Client) Imported Data (Third Party/Segment) Inferences/Inferred Data Training Data	Up to 13 months
Deliver and present advertising and content (TCF Special Purpose 2)	Pseudonymous Identifiers  Event Data  Bid Request Data	Up to 13 months
Save and communicate privacy choices (Special Purpose 3)	Pseudonymous Identifiers Imprecise/Approximate Location Information Event Data Bid Request Data	Up to 13 months
Match and combine data from other data sources (TCF Feature 1)	Pseudonymous Identifiers Imprecise/Approximate Location Information	The retention period will depend on the TCF Purpose pursued.
Link different devices (TCF Feature 2)	Pseudonymous Identifiers	The retention period will depend on the TCF

	Imprecise/Approximate Location Information Bid Request Data	Purpose pursued.	
Identify devices based on information transmitted automatically (TCF Feature 3)	Pseudonymous Identifiers Imprecise/Approximate Location Information Bid Request Data	The retention period will depend on the TCF Purpose pursued.	
Additionally, any of the categories of Personal Information described above may be Processed and retained for the following purposes.			
Establishing, bringing, or defending against complaints, legal claims (including threatened or anticipated legal claims), and regulatory inquiries	Retained as needed for these purposes, including as required by applicable law.  Otherwise, categories of Personal Information and associated retention periods are determined by the underlying purpose for which the Personal Information is Processed.		
Responding to legal requests			
Complying with relevant laws and regulations			
Conducting research	Categories of Personal Information and associated retention periods are determined by the underlying purpose for which the Personal Information is Processed.		
Hosting information	Categories of Personal Information and associated retention periods are determined by the underlying purpose for which the Personal Information is Processed.		

## International transfers

See Key Terms for definitions of capitalized terms.

Quantcast operates a global service, and we engage vendors located around the world to help us deliver the Solutions. Accordingly, your Personal Information may be transferred outside of the country or region in which you reside, including to the United States and other countries where either our data centers, affiliates, or other partners are located. Where we transfer your Personal Information internationally, we do so in accordance with applicable law.

If you are based in the EEA, UK, or Switzerland, please note that we may need to transfer your Personal Information to countries that have not been recognised by the <u>European Commision</u> and/or the <u>UK government</u> as providing an adequate level of protection for Personal Information. We generally use EU Standard Contractual Clauses (to facilitate both controller-to-controller and controller-to-processor transfers) or other government-approved contracts that provide appropriate safeguards for Personal Information that is transferred to countries that have not been recognised as providing an adequate level of protection. You can contact us at privacy[at]quantcast[dot]com to request a copy of our Standard Contractual Clauses.

In certain limited circumstances, we rely on other lawful mechanisms for international transfers of Personal Information or rely on derogations, such as the contractual necessity derogation.

# Your choices and legal rights

See Key Terms for definitions of capitalized terms.

Under applicable law, you may have certain rights in relation to your Personal Information. Additional details about the rights that you may have and how to exercise such rights can be found below.

- **Right of access**: The right to request access to your Personal Information and receive certain information, including the categories of your Personal Information we collect and disclose. To exercise this right, see our **Data Subject Request Form**.
- Right of rectification/correction: The right to request that we rectify (or correct) inaccurate Personal Information about you. In
  practice, if you seek to exercise your right of rectification/correction, due to the limited Personal Information we Process, we
  satisfy this right by providing you with the option to request deletion of your Personal Information. To request the deletion of
  your Personal Information, see our <u>Data Subject Request Form</u>.
- Right of erasure/deletion: The right, in certain cases, to request that we delete your Personal Information, provided there are
  valid grounds for doing so and subject to applicable law and exceptions. To exercise this right, see our <u>Data Subject Request</u>
  <u>Form</u>.
- Right to data portability: The right, in certain cases, to receive a copy of your Personal Information in a structured, commonly
  used, and machine-readable format and transmit such information to another controller. To exercise this right, see our <u>Data</u>
  Subject Request Form.
- Right to object (marketing): The right to object to the Processing of your Personal Information for direct marketing purposes. In
  practice, we satisfy this right by providing you with the option to opt out of our Processing of your Personal Information for
  advertising purposes. To exercise this right, see our <u>Privacy Choices Page</u>.
- Right to object (legitimate interests): The right to object to the Processing of your Personal Information where we Process it on the basis of our legitimate interests, as described in the <u>Information Use and Legal Bases</u> section above. Unless we have compelling legitimate grounds or the information is needed for the establishment, exercise or defense of legal claims, we will cease Processing your Personal Information when you object. To exercise this right, see our <u>Privacy Choices Page</u>.
- Right to restrict Processing: The right, in certain cases, to temporarily restrict our Processing of your Personal Information, provided there are valid grounds for doing so. In practice, if you seek to exercise your right to restrict the Processing of your Personal Information, we will treat it as an exercise of the right on an ongoing, rather than temporary, basis (i.e., the request will be treated as you exercising the right to object to the Processing of your Personal Information). To exercise this right, see our Privacy Choices Page.
- **Right to withdraw your consent**: The right to withdraw the consent you have provided at any time, where we Process your Personal Information on the basis of your consent. Please note that the lawfulness of any Processing undertaken prior to your withdrawal of consent shall not be affected by the withdrawal. To exercise this right, see our <u>Privacy Choices Page</u>.
- Right to lodge a complaint: The right to complain to the relevant authority regarding the Processing of your Personal
  Information by us or on our behalf. In the EU, the lead supervisory authority is the <u>Irish Data Protection Commissioner</u>. See the
  section <u>Contact Us</u> below.

Please note that the rights listed above may not be exercised in certain circumstances, such as when the Processing of your Personal Information is necessary to comply with a legal obligation to which we are subject or for the exercise or defense of legal claims. Additionally, in order to protect your privacy, we may require proof of your identity before we can act on your request but only where it is necessary and proportionate to request this information.

If you are based in the EEA, UK, or Switzerland and have issues or questions about the above-listed rights, you may contact our European Data Protection Officer via <a href="mailto:dpc [at] quantcast [dot] com">dpc [at] quantcast [dot] com</a>.

If certain jurisdictions, including the EEA, UK, or Switzerland, you also generally have the right not to be subject to a decision when it is based on automated Processing (i.e., an operation that is performed without any human intervention), if it produces a legal effect (i.e., impacts your legal rights) or significantly affects you in a similar way (e.g., significantly affects your financial circumstances or ability to access essential goods or services). Please note that Quantcast does not make decisions based solely on automated Processing

that produce a legal effect or similarly significantly affect individuals.

We will not discriminate against you for exercising your privacy rights.

# Additional information for EEA, UK, and Switzerland residents

See Key Terms for definitions of capitalized terms.

If you are located in the EEA, UK, or Switzerland, please note that the Solutions are provided by our European entity, Quantcast International Limited. In Processing Personal Information in the context of providing the Solutions to our Clients, Quantcast Internal Limited generally acts as a data controller. More specifically, Quantcast International Limited is a joint controller along with its Client when we jointly determine the purposes for which your Personal Information will be Processed. For example, we are joint controllers with Clients for Personal Information that is collected as Quantcast Cookies, or using Pixels, Tags and SDKs deployed by our Clients on their digital properties, and for the Processing of other Personal Information introduced into the Solutions directly by the Client. This is because both Quantcast and the Client have influence over whether and how we collect and Process the Personal Information. In limited situations, Quantcast is the sole data controller of Personal Information when we are Processing it for our own independent purposes, for instance when we use a Quantcast Pseudonymous Identifier or we derive aggregated analytics for modeling, developing our algorithms, or improving the Solutions.

### Your choices and legal rights

Under applicable law, you may have certain rights in relation to your Personal Information. Additional details about the rights that you may have and how to exercise such rights can be found in the <u>Your choices and legal rights</u> section above.

If you are based in the EEA, UK, or Switzerland and have issues or questions about the above-listed rights, you may contact our European Data Protection Officer via <a href="mailto:dpc [at] quantcast [dot] com">dpc [at] quantcast [dot] com</a>.

If you are based in the EEA, UK, or Switzerland, under applicable law, you also generally have the right not to be subject to a decision when it is based on automated Processing (i.e., an operation that is performed without any human intervention), if it produces a legal effect (i.e., impacts your legal rights) or significantly affects you in a similar way (e.g., significantly affects your financial circumstances or ability to access essential goods or services). Please note that Quantcast does not make decisions based solely on automated Processing that produce a legal effect or similarly significantly affect individuals.

## Additional information for residents of certain U.S. states

See Key Terms for definitions of capitalized terms.

Certain U.S. states\* have enacted consumer privacy laws that grant their residents certain rights and require additional disclosures ("State Privacy Laws"). If you are a resident of one of these states, this section applies to you.

\*Including California, Colorado, Delaware, Iowa, Connecticut, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Texas, Utah, Virginia

## **Additional Disclosures**

Above, in the <u>Information Collection</u>, <u>Information Use and Legal Basis</u>, <u>Information Sharing</u>, and <u>Information Retention</u> sections, we explain how we collect, use, disclose, and retain information about you. We are providing the table below to present some of the same information as required by certain State Privacy Laws. The table explains our practices today and over the preceding 12 months as to Personal Information.

Category of Personal Information Use of Personal Inform	ation Categories of Recipients
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We collect <del>.</del>	We use Personal Information	We may disclose Personal Information to:
<ul> <li>Identifiers, such as IP Address, Hashed Email Address, and other similar Pseudonymous Identifiers.</li> <li>Internet or other electronic network activity information, including browsing history, information regarding your interactions with websites or mobile apps or streaming media, and Bid Request Data.</li> <li>Geolocation data, such as Imprecise/Approximate Location Information derived from device IP Addresses.</li> <li>Inferences, which refers to inferences drawn from any of the information in these categories of Personal Information to predict the individual's characteristics, such as about your age, gender, marital status, income range or other Attributes or Interests.</li> </ul>	<ul> <li>reporting our findings to our Clients.</li> <li>To develop and improve the Solutions and our services, and develop new products, including by creating new AI models and algorithms through machine learning and conducting research.</li> <li>To detect, investigate, and prevent security incidents and other malicious, deceptive, fraudulent, or illegal activity and protect the rights and property of Quantcast and others.</li> <li>To comply with relevant laws and regulations, respond to legal requests, and establish, bring, or defend legal</li> </ul>	Relevant entities as part of a

#### **Other Details About Our Information Practices**

- We do not "sell" Personal Information as that term is defined in State Privacy Laws.
- We do not engage in "sharing" or "targeted advertising," as those terms are defined in State Privacy Laws, using Personal Information about consumers we know to be under the age of 18.
- Where we Process information that may be "sensitive" under the State Privacy Laws, we do so with your consent or by otherwise assuring that such Processing is in accordance with applicable laws and rules.

## **Your Privacy Rights**

## Opting Out of Targeted Advertising and Sharing

Some of the activities described in this Privacy Policy may be considered processing of your information for "targeted advertising" purposes or "sharing" under the State Law that applies to you. You can opt out of Quantcast identifier/cookie-based ad targeting by following the prompts at our <u>Privacy Choices Page</u>. You may also opt out of web-based ad targeting by enabling legally-recognized opt-out preference signal, such as the Global Privacy Control ("GPC"), a preference that you can set in certain web browsers to inform the websites you visit that you do not want information about your online activity sold, shared, or used for targeted advertising as such terms are defined under State Privacy Laws. Please visit our <u>Privacy Choices Page</u> for more information about GPC.

#### Access, Deletion, Correction

Depending on your state of residence, you may have the right to request access to, or deletion or correction of, your Personal Information. If you are interested in exercising one or more of the rights outlined above, please click the relevant link in the <u>Your choices and legal rights</u> section above. You may also submit requests by contacting us via email at <u>privacy [at] quantcast [dot] com</u>.

We will attempt to verify your identity and respond to your request consistent with the State Privacy Laws.

Appeals

If we deny your request, you may have the right to appeal our decision by contacting us at <u>privacy [at] quantcast [dot] com</u>. If you have concerns about the result of an appeal, you may contact the attorney general in the state where you reside.

Authorized Agents

Depending upon where you reside, you may work with a natural person or business entity (an "Authorized Agent") to submit rights requests on your behalf.

If you are an authorized agent seeking to make an opt-out request on behalf of a consumer, please visit our Privacy Choices Page.

If you are submitting a rights request as an Authorized Agent, you may be required to submit proof of your authorization to make the request, such as a valid power of attorney or signed permission from the individual who is the subject of the request. We may also require you to verify your identity directly with us. If you are an authorized agent seeking to make an access, correction, or deletion request on behalf of a consumer, please [contact us via email at privacy [at] quantcast [dot] com].

Nondiscrimination

We will not discriminate against you for exercising your privacy rights.

CCPA Annual Report

The California Consumer Privacy Act (CCPA) Regulations require businesses such as Quantcast to disclose metrics regarding the number of requests to know, delete, and opt-out. Information about annual data requests is available in the <u>CCPA Annual Report</u>.

## Contact us

If you have any questions about this Privacy Policy or our information handling practices, please feel free to contact us.

Individuals located in the United States, please contact us at:

Quantcast Corp.

795 Folsom Street

San Francisco, CA 94107

Email: privacy[at]quantcast[dot]com

Individuals located outside of the United States, please contact us at:

**Ouantcast International Limited** 

Beaux Lane House

Lower Mercer Street

Dublin 2, Ireland

Email: privacy.qil [at] quantcast [dot] com

The Data Protection Officer (DPO) for Quantcast International Limited can be contacted at:

HelloDPO Law Limited

23 Cottingham Way

Thrapston, Northamptonshire

#### NN14 4PL

If you are a resident of the EEA, UK, or Switzerland, you also have the right to lodge a complaint against us with our lead supervisory authority, the <u>Irish Data Protection Commission</u>, or the <u>supervisory authority</u> in your country of residence.

# **Changes to this Privacy Policy**

We may revise this Privacy Policy from time to time to reflect changes in our practices with respect to the collection, use, and/or disclosure of <u>Personal Information</u> or changes in applicable law. The "Last Updated" date at the top of this page indicates when this Privacy Policy was last updated. Any changes will become effective when we post a revised version of this Privacy Policy unless otherwise specified.

We encourage you to review this Privacy Policy periodically to remain informed about our information handling and privacy practices.