## **Products and Services Privacy Policy**

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

#### Who we are and what we do

Quantcast ("we", "our", or "us") is a global digital advertising technology group of companies. Quantcast offers products and services that help digital advertisers and publishers (collectively, "Clients") understand and grow their audiences (the "Solutions"). 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.

To provide the Solutions, Quantcast collects and uses <u>Personal Information</u> for various purposes, such as measuring and understanding audiences, targeting and delivering ads, measuring ad performance, and similar related purposes. As described in the "<u>Information Collection</u>" section below, we may join or match Personal Information about you, which may include your <u>Online Data</u> from your visits across different digital properties, like websites or mobile apps, 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 "Information use and legal basis" section below, we use the Transparency and Consent Framework ("TCF") standard to facilitate compliance with applicable laws in Europe, primarily in accordance with the EU 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

This Privacy Policy covers Quantcast's use of Personal Information for the Solutions only. This Privacy Policy does not cover:

- Quantcast's privacy management products, which include our TCF consent management platform ("CMP"), Quantcast Choice.
   For more information about Quantcast Choice, please click here.
- Personal Information collected from our website, www.quantcast.com, except to the extent that we use our own Solutions on
  our website. It also does not pertain to the collection and use of Personal Information in connection with our corporate
  functions, such as marketing, recruiting, people management, business-to-business communications, and so forth. For our
  privacy policy relating to our website and our corporate functions, please click here.
- Any third parties' handling of Personal Information, unless explicitly stated otherwise. We encourage you to review the privacy policies of any other companies that you engage or interact with to understand their information handling and privacy practices.

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 "Categories of personal information collected" subsection of the "California privacy rights" section below. As further described in the "Information use and legal basis" section below, we collect this information in order to deliver the Solutions and conduct our business. To learn more, please see the "California privacy rights" section.

## **Self-regulatory standards**

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

- We are members in good standing of the Network Advertising Initiative (NAI) and adhere to the NAI 2020 Code of Conduct.
- 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>TCF</u>, as a vendor. Quantcast's IAB Europeassigned identification numbers are CMP ID #10 (Quantcast Choice) and Vendor ID #11.

Please see the "Your choices and legal rights" 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 or other similar signals at this time, due to the lack of a clear industry standard.

#### Information collection

We collect or receive Personal Information about or relating to you in various ways, including from digital properties, like websites, mobile apps, 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 or other Device Identifiers or Device Configuration/Information.	Pixels, Tags, or SDKs are used for different	Select basic ads (TCF Purpose 2) Create personalised ads profile (TCF Purpose 3) Select personalised ads (TCF	to 13 months each time it's reset Up to 30 days Up to 30 days Up to 13 months	

	a server- to- server connection, such as when receiving a Bid Request.	data sources (TCF Feature 1)  Linking different devices (TCF Feature 2)  Receiving and using automatically sent device characteristics for identification (TCF Feature 3)	will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued	
Imprecise/Approximate Location Information: The time zone and approximate geolocation (e.g., postal code or city) of your device.	Inferred or derived by Quantcast from your device's IP Address or included in Bid	Create personalised ads profile (TCF Purpose 3)	will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued Tup to 30 days Tup to 30 da	
		Requests.	Purpose 7) Measure content performance (TCF Purpose 8)	Up to 30 days
			audience insights (TCF Purpose 9)	
			Ensure security, prevent fraud, and debug (TCF Special Purpose 1)	Up to 30 days
		data sources (TCF Feature 1)	vill depend on the TCF Purpose pursued The retention period vill depend on the TCF Purpose pursued The retention period vill depend on the TCF Purpose pursued Up to 30 days Up to 50 days	
		Feature 2)	will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued Up to 30 days Up to TCF Purpose pursued The retention period will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued Up to 30 days Up to 13 months Up to 13 months	
			will depend on the TCF	
Event Data: Information relating to your Online Data,	Generated when			
which may include Pseudonymous Identifiers, Imprecise/Approximate Location Information, HTTP Request Header Information, Device Information, and	Pixels, Tags or SDKs, installed by a Client on its	Create personali ads profile (TCF Purpose 3)	Up to 30 days	
Browsing Data.	digital property,	Measure ad performance (TCF Purpose 7)	Up to 13 months	
		information to us. Different kinds of	Measure content performance (TCF Purpose 8)	Up to 13 months
	Pixels, Tags or SDKs are used for	Apply market research to generate audience insights (TCF Purpose 9)	Up to 13 months	
	different purposes, but the	Develop and improve products (TCF Purpose 10)	Up to 13 months	

Feature 2)  Will depend on the TCF Purpose pursus Receiving and using automatically sent device characteristics for will depend on the identification (TCF Feature 3)  Bid Request Data: An offer from a digital publisher, like a website or mobile app owner, to show an ad on their property.  Bid Request Data includes information about your visit to the publisher's digital property, which helps us understand where an ad will be displayed, Device Information, and who might see it.  Feature 2)  will depend on the TCF Purpose pursus will depend on the identification (TCF Feature 3)  The retention period will depend on the identification (TCF Feature 3)  The retention period will depend on the identification (TCF Feature 3)  The retention period will depend on the identification (TCF Feature 3)  Select basic ads (TCF Purpose 2)  Up to 30 days  Purpose 3)  Select personalised ads (TCF Up to 13 months Purpose 4)	5	
Feature 2)  Will depend on the TCF Purpose pursus Receiving and using automatically sent device characteristics for will depend on the identification (TCF Feature 3)  Bid Request Data: An offer from a digital publisher, like a website or mobile app owner, to show an ad on their property.  Bid Request Data includes information about your visit to the publisher's digital property, which helps us understand where an ad will be displayed, Device Information, and who might see it.  Feature 2)  will depend on the TCF Purpose pursus will depend on the identification (TCF Feature 3)  The retention period will depend on the identification (TCF Feature 3)  The retention period will depend on the identification (TCF Feature 3)  The retention period will depend on the identification (TCF Feature 3)  The retention period will depend on the identification (TCF Feature 3)  The retention period will depend on the identification (TCF Feature 3)  The retention period will depend on the identification (TCF Feature 3)  Select basic ads (TCF Purpose 2)  Up to 30 days  Purpose 3)  Select personalised ads (TCF Up to 13 months Feature 2)	The retention period will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued  Up to 30 days Up to 30 days Up to 13 months  Up to 13 months  Up to 45 days  Up to 45 days  Up to 30 days  Up to 30 days  The retention period will depend on the TCF Purpose pursued  The retention period will depend on the TCF Purpose pursued  The retention period will depend on the TCF Purpose pursued  F Up to 30 days  Up to 30 days  Up to 30 days  Up to 30 days	
Bid Request Data: An offer from a digital publisher, like a website or mobile app owner, to show an ad on their property.  Bid Request Data includes information about your visit to the publisher's digital property, which helps us understand where an ad will be displayed, Device Information, and who might see it.  Received from a digital publisher.  Received from a digital publisher.  Select basic ads (TCF Purpose 2) Up to 30 days  Create personali ads profile (TCF Purpose 3)  Select personalised ads (TCF Purpose 4)	the	
like a website or mobile app owner, to show an ad on their property.  Bid Request Data includes information about your visit to the publisher's digital property, which helps us understand where an ad will be displayed, Device Information, and who might see it.  Select basic ads (TCF Purpose 2) Up to 30 days  Create personali ads profile (TCF Purpose 3)  Select personalised ads (TCF Purpose 4)  Up to 30 days  Purpose 3)  Select personalised ads (TCF Purpose 2) Up to 30 days  Purpose 3)	the	
their property.  Bid Request Data includes information about your visit to the publisher's digital property, which helps us understand where an ad will be displayed, Device Information, and who might see it.  Select basic ads (TCF Purpose 2)  Up to 30 days  Purpose 3)  Select personali ads profile (TCF  Purpose 3)  Select personalised ads (TCF  Up to 13 months		
Bid Request Data includes information about your visit to the publisher's digital property, which helps us understand where an ad will be displayed, Device Information, and who might see it.  Create personali ads profile (TCF Purpose 3)  Select personalised ads (TCF Purpose 4)  Up to 30 days  Purpose 3)		
understand where an ad will be displayed, Device Information, and who might see it.  Select personalised ads (TCF Purpose 4)		
Rid Request Data also commonly includes a Measure ad performance (TCF Up to 13 months	Up to 30 days  The retention period will depend on the TCF Purpose pursued The retention period will depend on the TCF Purpose pursued  Up to 30 days Up to 13 months  Up to 13 months  Up to 45 days  Up to 45 days  Up to 45 days  Up to 30 days  Up to 30 days  The retention period will depend on the TCF Purpose pursued  The retention period will depend on the TCF Purpose pursued  The retention period will depend on the TCF Purpose pursued  F Up to 30 days  Up to 30 days	
Pseudonymous Identifier (if available), the content  Purpose 7)		
that the ad would serve into, the type of device the ad would be served on, the Imprecise / Approximate  Apply market research to generate up to 45 days audience insights (TCF Purpose 9)		
Location Information of the device, the size of the ad, and consent information. Because Bid Requests  Develop and improve products  (TCF Purpose 10)		
include information about the content you are visiting, over time, accumulated Bid Requests may show your  Ensure security, prevent fraud, and Up to 45 days debug (TCF Special Purpose 1)		
browsing behavior.  Technically deliver ads or content Up to 30 days (TCF Special Purpose 2)		
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Imported Data (Client): Pseudonymised Information, Uploaded to the		
which may include Online Data, and/or Offline Data that may be apportioned by Browsing Data, Attributes, platform or  Quantcast Create personalised ads profile (TCF Up to 30 days		
Segments, Laber Data and interests. provided to us via		
	The retention period will depend on the TCF Purpose pursued Up to 30 days Up to 13 months Up to 45 days Up to 45 days Up to 45 days Up to 30 days	
, .		
Ensure security, prevent fraud, and Up to 30 days debug (TCF Special Purpose 1)		
Imported Data (Third Party/Segment):  Pseudonymised Information, which may include  Uploaded to the  Quantcast		

Online Data, and/or Offline Data that may be apportioned by Browsing Data, Attributes, Segments, Label Data and Interests.	platform or Create personalised ads profile (TCF Up to 30 da provided to us via an API by third-		Up to 30 days		
	party Data Management	Select personalised ads (TCF Up to 30 days Purpose 4)			
	Platforms or Data Providers.	audience insights (TCF Purpose 9)	Up to 30 days		
		Develop and improve products (TCF Purpose 10)	Up to 30 days		
		Ensure security, prevent fraud, and debug (TCF Special Purpose 1)	Up to 30 days		
Inferences/Inferred Data: Information drawn from the above-listed categories of information (i.e., Event	Derived by Quantcast from				
Data, Bid Request Data, Imported Data (Client), and Imported Data (Third Party/Segment)).	previously collected Event	Create personalised ads profile (TCF Purpose 3)	Up to 30 days		
We may, for example, use information that we have collected to infer your interests, age, gender, marital	Data, Bid Request Data, Imported	Select personalised ads (TCF Purpose 4)	Up to 30 days		
status, or income range. These Inferences may include Interests and Attributes.	Data (Client), and/or Imported	Measure ad performance (TCF Purpose 7)	Up to 13 months		
	Data (Third Party/Segment).	Measure content performance (TCF Purpose 8)	Up to 30 days		
		Apply market research to generate audience insights (TCF Purpose 9)	Up to 13 months		
		Develop and improve products (TCF Purpose 10)	Up to 13 months		
		Ensure security, prevent fraud, and debug (TCF Special Purpose 1)	Up to 13 months		
Training Data: Pseudonymous Information used to improve Quantcast's algorithms and measure how					
well they are working.	third-party data providers and matched to	viders and Create personalised ads profile (TCF			
	Pseudonymous Identifiers.	Measure content performance (TCF Purpose 8)	Up to 30 days		
		Apply market research to generate audience insights (TCF Purpose 9)	Up to 30 days		
		Develop and improve products (TCF Purpose 10)	p to 30 days p to 13 months p to 13 months p to 13 months p to 13 months Up to 30 days		
		Ensure security, prevent fraud, and debug (TCF Special Purpose 1)	Up to 30 days		
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.		Carrying out our legitimate business p Retention Period: 18 months	ourposes.		

Additionally, any of the categories of Personal Information described above may be Processed for the following purposes.

Establishing, bringing, or defending against complaints, legal claims (including threatened or

Categories of Personal Information and associated retention periods are determined by the underlying purpose for which the Personal Information is

anticipated legal claims), and regulatory inquiries	Processed.
Responding to legal requests	
Complying with relevant laws and regulations	
Conducting research	
Hosting of Personal Information for above-listed	Technically, all Personal Information is Processed in the course of being
purposes	hosted on a server or in cloud computing service. Retention periods for each
	category of Personal Information Processed are disclosed above.

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. However, as allowed by applicable laws and rules, we may collect and Process non-sensitive health-related information (outside of the EEA, UK, and Switzerland) in connection with the delivery of the Solutions. We provide a list of standard health segments and a representative sample of custom health segments that we use for targeted advertising here. Please note that where we Process any of your sensitive Personal Information, we seek and obtain your consent and/or otherwise Process such information in accordance with applicable laws and rules.

Children's information. We do not seek or permit Personal Information from children under the age of 16. If a parent or guardian becomes aware that his or her child has provided us with Personal Information, that parent or guardian should contact us at privacy [at] quantcast [dot] com. If we become aware that a child has provided us with Personal Information, we will take all reasonable steps to delete such information from our files.

Contractual commitments from our Clients and third-party 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

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),
- 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.

TCF Purpose (where TCF is applicable)		
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 can be stored or accessed on your device for the purposes presented to you.	Consent
Selecting basic ads (TCF Purpose 2)	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 basic ads, 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 a personalised ads profile (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
Selecting personalised ads (TCF Purpose 4)	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 ad performance (TCF Purpose 7)	Quantcast will measure the performance and effectiveness of ads that you see or interact with.  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	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

effectiveness and performance ascertaining, measuring, and improving the effectiveness of their ad campaigns. . 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. The performance and effectiveness of content that you see or Consent or Legitimate Interests, depending interact with can be measured. on the choice of the Client that is using the To measure content performance, Quantcast will: TCF. Where we rely on Legitimate Interests, we Measure and report to Clients on how content was carry out the Processing to help our Clients delivered to and interacted with by you meet their objective of executing their Provide reporting to Clients, using directly measurable or digital content strategies more effectively. 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

Applying market research to generate Purpose 9)

Measuring content

performance (TCF

Purpose 8)

Market research can be used to learn more about the Audiences Consent or Legitimate Interests, depending who visit websites/mobile apps and view ads.

Audience Insights (TCFTo 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

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

Audiences that were served or interacted with content more effectively. 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 **Developing and** Your information can be used to improve Quantcast's existing **Consent or Legitimate Interest, depending** systems and software and to develop new products. on the choice of the Client that is using the improving products (TCF Purpose 10) To develop and improve its products, Quantcast will: Where we rely on Legitimate Interests, we Use information to improve its existing products with carry out the Processing to meet our new features and to develop new products organisational objective of continuously improving the Solutions for our Clients. • Create new models and algorithms through machine learning For example, Quantcast matches its datasets with Training Data, which usually includes Event Data, Bid Request Data, Imported Data (Client), and/or Imported Data (Third Party/Segment). Quantcast primarily uses Training Data to train its algorithms how to infer individuals' Attributes and Interests in the context of the Solutions. **Ensuring security,** Your information can be used to monitor for and prevent **Legitimate Interests** preventing fraud, and fraudulent activity and ensure our systems and processes work We conduct the Processing to meet debugging (TCF properly and securely. organizational objectives such as to Special Purpose 1) To ensure security, prevent fraud, and debug, Quantcast will: maintain our IT systems; to ensure the electronic security of our business; and to detect and prevent against malicious, **Ensure information is securely transmitted** fraudulent, invalid, and illegal activity. Detect and prevent malicious, fraudulent, invalid, or illegal activity Ensure correct and efficient operation of systems and processes, including monitoring and enhancing the performance of systems and processes engaged in permitted purposes Technically deliver ads Your device can receive and send information that allows you to Legitimate Interests or content (TCF see and interact with ads and content. We carry out the Processing to help our Special Purpose 2) To deliver information and respond to technical requests, advertiser Clients meet their objective to ascertain, measure, and improve the Quantcast will: effectiveness of their ad campaigns. Use vour device's IP Address to deliver an ad or content over the internet . Respond to your interactions with an ad or content by

	<ul> <li>Sending you to a landing page</li> <li>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)</li> <li>Quantcast may also match Pseudonymous Identifiers with third parties in order to deliver ads to Audiences.</li> </ul>	
· ·	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.
devices (TCF Feature	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.
automatically sent device characteristics	information it automatically sends, such as IP Address or	The legal basis will depend on the TCF Purpose pursued.
or defending against	We Process, preserve, and share 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.
requests	We preserve and share 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.	We carry out the Processing to meet our
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	Compliance with a legal obligation.

	Information we hold about you are:	
	<ul> <li>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</li> </ul>	
	<ul> <li>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</li> </ul>	
	<ul> <li>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)</li> </ul>	
	<ul> <li>Corporate and taxation matters: to comply with our obligations under company legislation and tax law, such as the Companies Act 2014 or where the Irish Revenue requests information</li> </ul>	
	<ul> <li>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</li> </ul>	
	See <a href="here">here</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**

Personal Information with the categories of third parties described below.

Category of Recipient	Description and Purpose of Sharing	Categories of Personal Information Shared
Quantcast- affiliated companies	We share your Personal Information with Quantcast-affiliated companies in order to provide the Solutions.	All or certain categories of Personal Information are shared only as necessary or appropriate.
Our vendors	We share your Personal Information with vendors who act on our behalf and are subject to	All or certain
(including services providers/data processors) Visit the Quantcast Partners page for a list of our vendors.	binding contractual obligations and restrictions on the Processing of Personal Information we share with them. For example, these companies assist with information hosting, information Processing, database management, and administrative tasks.	categories of Personal Information are shared only as necessary or appropriate.
Our partners, such as Data Management Platforms and Data Providers and Advertising Exchanges Visit the Quantcast Partners page for a list of our Partners	We share Pseudonymous Identifiers with companies that we partner with to support the operation of the Solutions. Specifically, Quantcast shares Pseudonymous Identifiers with 1) data providers via Data Management Platforms for the purpose of performing Cookie Syncing/Matches with Imported Data (Client) and Third Party/Segment Data, and 2) and Advertising Exchanges for the purpose of serving ads.	Pseudonymous Identifiers.
Relevant third parties as part of a corporate transaction	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 share your Personal Information with (or transfer your Personal Information to) certain third parties, 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 shared only as necessary or appropriate.
Competent governmental and public authorities	We may share 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 shared only as necessary or appropriate.
Other third parties	We will share your Personal Information with other third parties at your direction or with your consent.	All or certain categories of

Additionally, we may share 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

Personal Information are shared only as necessary or appropriate.

We also create and share with our Clients insights or reports regarding the makeup of the Audiences that visit their digital properties or the performance of their advertising campaigns. These insights and reports may contain aggregated data from which individual users cannot be uniquely identified or data from which Quantcast has removed Pseudonymous Identifiers.

## Information security

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

We retain your Personal Information for as long as necessary for the purposes for which it was collected, as described in the "Information Collection" section above, 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 CCPA purposes), anonymise it (for GDPR purposes) or permanently delete it.

### **International transfers**

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, vendors, affiliates, or 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@quantcast.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.

# Additional disclosures for EEA, UK, and Switzerland residents

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 Advertisers and Publishers 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 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 request form <a href="here">here</a>.
- **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 request form <a href="here">here</a>.
- **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 request form <a href="here">here</a>.
- **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 request form <a href="here">here</a>.
- 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 opt-out page <a href="here">here</a>. Additionally, as noted in the "Self Regulatory Standards" section above, we are a member of the NAI and a DAA and EDAA participating company. Each of these self-regulatory bodies offers a tool that allows individuals to opt out of receiving targeted advertising from Quantcast and other participating companies. These links will take you to the NAI opt-out page and the DAA opt-out page. If you are located in Europe, you may prefer to visit the EDAA opt-out page.
- 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 "Information Use and Legal Bases" 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 opt-out page <a href="here">here</a>.
- 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
  opt-out page <a href="here">here</a>.
- 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 opt-out page here.

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 "Contact Us" 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:dpo@quantcast.com">dpo@quantcast.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, however, that Quantcast does not make decisions based solely on automated Processing that produce a legal effect or similarly significantly affect individuals.

## California privacy rights

The California Consumer Privacy Act ("CCPA") provides California residents with certain rights. Pursuant to the CCPA, we are providing the following additional details regarding the categories of Personal Information about California residents that we collect, use, and disclose.

Categories of personal information collected. We have collected the following categories of Personal Information from California residents within the last twelve (12) months:

- Identifiers, such as IP Address and other similar Pseudonymous Identifiers.
- Internet or other electronic network activity information, including browsing history and information regarding individuals' interactions with websites or mobile apps or streaming media.
- Geolocation data, such as Imprecise/Approximate Location Information derived from device IP Addresses.
- *Inferences*, which refers to inferences drawn from any of the information in these categories of Personal Information to predict the individual's characteristics.

Categories of sources of personal information. As described in the "Information collection" section above, we collect the above-listed categories of Personal Information directly from individuals; through automated means (e.g. Pixels, Tags and SDKs, Cookies or Bid Requests); and from third parties (e.g., our Clients).

*Disclosures of personal information*: As described in the "<u>Information sharing</u>" section above, in the preceding twelve (12) months, we have disclosed Personal Information about California residents in all of the above-listed categories of Personal Information to our affiliates and vendors. Additionally, in the preceding twelve (12) months, we have disclosed Identifiers to our partners.

Sale of personal information: Quantcast does not "sell" (as defined in the CCPA) Personal Information and has not "sold" Personal Information in the preceding twelve (12) months in relation to operating the Solutions.

Individual rights and requests: If you are a California resident, you have the right to request that we:

- Disclose to you the following information covering the 12 months preceding your request:
  - the categories of Personal Information we have collected about you and the categories of sources from which we collected such information;

- the specific pieces of Personal Information we have collected about you;
- the business or commercial purpose for collecting Personal Information about you;
- o the categories of third parties with whom we shared or to whom we disclosed such Personal Information; and
- o if we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
  - sales, identifying the Personal Information categories that each category of recipient received; and
  - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.
- Delete the <u>Personal Information</u> we have collected from you.

We will not discriminate against you if you decide to exercise your rights under the CCPA.

If you are interested in exercising one or more of the rights outlined above, please click the relevant link in the "Your choices and legal rights" section above. You may also submit requests by contacting us via email at privacy [at] quantcast [dot] com. We will attempt to verify your identity and respond to your request consistent with the CCPA.

If you authorise a natural person or business entity to submit a request on your behalf (an "Authorised Agent"), the Authorised Agent may use the submission methods noted above. As part of our verification process, we will require proof concerning their status as an Authorised Agent, which may include proof of their registration with the California Secretary of State to conduct business in California and/or proof that they have power of attorney in accordance with California probate law. We may also require you to verify your identity directly with us or directly confirm with us that you provided the agent with permission to submit the request.

Information about annual data requests is available here.

#### **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:

Quantcast 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 <a href="mailto:dpom/quantcast.com">dpom/quantcast.com</a>.

If you have contacted us or our DPO about a privacy or information use concern and feel that we have not addressed it satisfactorily, you may contact our US-based third party dispute resolution provider (free of charge) at <a href="https://feedback-form.truste.com/watchdog/request">https://feedback-form.truste.com/watchdog/request</a>.

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 Personal Information 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.

Some of our changes will be minor, but if we make significant changes to how we use or share your Personal Information, we will:

- inform you in advance by posting a notice on our website
- wait for a period of time before implementing the changes

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