

Services Privacy Notice

Last modified on ~~July 1~~December 29, 2023 (~~previous versions~~)

This Services Privacy Notice (this “**Notice**”) describes how Lotame receives, handles, and processes your ~~Personal Data~~**Personal Data** on behalf of our Business Customers and Data Partners. We receive Personal Data from our Business Customers in connection with their use of our Services and from Data Partners ~~from~~, which we license ~~Personal Data. Except for the limited purposes of advertising and marketing our Services and for our own recruiting purposes, to Business Customers.~~

Lotame does not ~~generally~~ interact directly with individuals like you ~~unless you are interested in using our Services, are an employee of a Business Customer, Data Partner, or Service Provider, applying for employment with Lotame, are an employee of Lotame, or interact with Lotame for other internal business operations.~~ This Notice does not cover any ~~Personal Data~~**Personal Data** we collect or process through our corporate website or ~~as part of our human resources functions for the reason specified in the previous sentence,~~ which is covered by our ~~Corporate Privacy Policy~~**Corporate Privacy Policy**.

In the sections below we describe:

1. **Our Services** – the services we offer and to whom we provide those services.
2. **Our Collection of Personal Data** – the types of Personal Data that we collect, the types of sources we collect it from, and how we collect Personal Data.
3. **Our Sale, Sharing, and Disclosure of Personal Data** – the types of recipients to whom we ~~may~~ disclose, share, or sell ~~your~~ Personal Data.
4. **Our Purposes for Collecting, Selling, Sharing, and Disclosure of Personal Data** – our business purposes for ~~collecting and sharing processing your~~ Personal Data.
5. **Retention Periods for Personal Data** – for what periods of time we retain ~~personal information~~**your Personal Data**.
6. **Your Privacy Rights and Choices** – what rights you have under Data Protection and Privacy Laws, for instance, to request that we not sell or share your Personal Data, and how to exercise your right to opt out of sale or sharing, right to request access or correction, and right to request deletion.
7. ~~Specific Country or U.S. State Privacy Notice Supplements~~–**Country-Specific Privacy Notice Supplements** – ~~additional information that is specific to the country in which you reside.~~
8. **Contact Us** – how you may contact us.

1. Our Services

Lotame operates ~~an audience management and identity~~**a** platform ~~for the digital advertising industry~~ (“**Spherical Platform**”). ~~Our Spherical Platform~~) ~~that~~ provides ~~the~~ technology, services, and tools to provide audience management ~~services~~, identity ~~services~~, and data monetization services (our “**Services**”) to our Business Customers (and their customers) and Data Partners.

- Our Audience Management Services facilitate the delivery of personalized marketing, advertisements, and content to you by Publishers and Advertisers.

Publishers and other operators of Digital Properties that have space to show an ad want those ads to be relevant to their readers, which helps them to offer content to you for no cost or lower cost. Advertisers, advertising agencies, and others that want to show an advertisement want to use their advertising dollars efficiently by reaching the right individuals, and by measuring the effectiveness of their ad campaigns. To accomplish those goals, our Business Customers use our Services to ~~efficiently and effectively~~ recognize and

organize their customers or visitors to their Digital Properties, and to help them personalize advertisements and content to ~~you~~their customers or visitors, such as through website and email personalization or dynamic marketing and advertising optimization.

Our Services are also used for the analytics and measurement of advertising campaign performance of our ~~Business Customers' advertising campaigns~~Business Customers. For example, our Services can help analyze how many ads were viewed and clicked, and if the consumer purchased any of the advertiser's products.

- Our ~~Panorama~~ Identity Services enables our Business Customers to connect ~~you~~an individual's preferences across the various browsers and Devices ~~you use. If you use multiple Devices (such as your desktop, your smartphone, and your tablet) to visit or use Digital Properties.~~ Our Identity solutions allow our ~~Panorama Graph and Panorama ID~~ allows our Business CustomersBusiness Customers to display targeted advertisements and other personalized content of interest to you no matter what Device you use.
- Our Data Monetization Services enables our Business Customers and Data Partners to extract value from the Personal Data they collect about you.

The Lotame Data Exchange is one of the world's largest marketplaces for third-party data and the standard for premium quality data at flexible and fair pricing, and scale that is unmatched in the industry. This data is cultivated from industry leading branded and unbranded

Data Partners giving our Business Customers access to over a billion profiles across 30,000 Behavior categories that can be leveraged for Tailored Advertising, site optimization, custom segmentation and more to deliver the most relevant experiences to individuals at every touch point.

~~The Lotame Private Data Exchange (PDX) Collaborate~~ is a service that allows our Business Customers to sell or share ~~their First Party Data with other Business Customers within the Spherical Platform or to sell or share their~~ Audiences creating/created using their First Party Data with other companies on other ~~Third Party AdTech~~ Platforms.

Some of Lotame's Services ~~are also hosted on Third Party~~ can be enabled through AdTech Platforms and MarTech Platforms that offer online marketplaces for on-demand web applications that run on or are offered through that platform (for example, Adobe Connections Manager). In cases where our Services are provided through ~~those Third Party Platforms~~ such platforms, this Notice applies; however, those ~~Third Party Platforms~~ platforms may also collect Personal Data from you, in which case the privacy policy, notice, or statement of ~~the Third Party Platform~~ those platforms will apply.

2. Our Collection of Personal Data

The table below lists the categories of Personal Data that Lotame collects in the course of operating the Spherical Platform and providing our Services, and the sources from which we obtain that Personal Data. Please refer to Section 4 for details about the purposes for which we collect Personal Data.

Lotame Personal Data Categories	Sources
Pseudonymous IDs	Business Customers, Data Partners, <u>and</u> Graphing Partners
Declared IDs	Business Customers, Data Partners, <u>and</u> Graphing Partners
Behaviors	Business Customers <u>and</u> Data Partners
Internet Log Data	Business Customers <u>and</u> Data Partners
Event Data	Business Customers <u>and</u> Data Partners
Non-Precise Geolocation Data	Business Customers <u>and</u> Data Partners

How We Collect Personal Data

We collect Personal Data for or from our Business Customers and Data Partners using the following methods:

- Tags and Pixels
- ~~SDK~~Software Development Kit
- Server-Side Data Transfer
- Application Programming Interface

For web-based Digital Properties, we use Cookies in conjunction with Tags and Pixels to store certain information necessary to provide our Services. These Cookies contain our Cookie ID and other information that does not identify you or allow you to be identified without additional information. Our use of Cookies on the Digital Properties of our Business Customers and Data Partners is governed by the~~their~~ cookie or privacy policy, notice, or statement ~~of our Business Customers and Data Partners.~~

~~Our Privacy Manager includes information on how you can remove Cookies and stop further collection of your Personal Data using Cookies.~~

~~Please visit Cookies & You to learn more about cookies and how to control and disable the cookies you don't want.~~

Collection of Sensitive Personal Data

Lotame does not knowingly collect or process Sensitive Personal Data and contractually prohibits its Business Customers and Data Partners from providing Lotame with any Sensitive Personal Data.

Collection of Personal Data of Minors

~~We do~~Lotame does not knowingly collect Personal Data of minors under 16 years of age: (18 in India). Lotame contractually prohibits its Business Customers and Data Partners from providing Lotame with any Personal Data of minors under 16 years of age: (18 in India).

3. Our Sale, Sharing, or Disclosure of Personal Data

~~We sell~~Lotame sells or ~~disclose~~discloses Personal Data to or ~~share~~shares Personal Data with the following categories of third parties. Please refer to Section 4 for details about the purposes for which we sell, disclose, or share Personal Data with third parties.

Lotame Personal Data Categories	Third Parties
Pseudonymous IDs	Advertising <u>AdTech</u> Platforms , <u>MarTech Platforms</u> , Business Customers, Data Partners, Graphing Partners , <u>and</u> Service Providers [†]
Declared IDs	Advertising <u>AdTech</u> Platforms, MarTech <u>Platforms</u> , Business Customers, Data Partners , <u>Graphing Partners</u> , and <u>Service Providers</u> [†]
Behaviors	Business Customers <u>Business Customers</u> and <u>Service Providers</u> [†]
Internet Log Data	<u>Service Providers</u> [†]
Event Data	Business Customers, Graphing Partners , <u>and</u> Service Providers [†]

Non-Precise Geolocation Data	Business Customers, Data Partners, <u>and</u> Service Providers [‡]
------------------------------	--

[‡] Lotame uses Amazon Web Services (AWS) for its production infrastructure; however, AWS is unable to access or view your Personal Data.

4. Our Purposes for Collecting, Selling, Sharing, and Disclosure of Personal Data

~~In general, we~~We collect, sell, share, and disclose your Personal Data to deliver our Services. The purposes for which we collect, use, sell, or share Personal Data depends on, among other things, our relationship or interaction with our Business Customers, Data Partners, AdTech Platforms, and ~~or third party~~MarTech Platforms to which we sell or share Personal Data. The table below lists and describes the purposes for which we collect, use, sell, or share Personal Data.

Purpose	Explanation
Audience Analytics	Discovery, segmentation, and optimization of First Party Data <u>Audiences</u> to understand and develop insights about customers and visitors to/users of Digital Properties to increase reach for Tailored Advertising and improve Content Personalization.
Audience Creation	Creation of Audiences using First Party <u>Business Customer</u> Data and Third Party Data, including Modeled Audiences.
Campaign Analytics	Measuring and reporting on how advertisements and content was delivered and interacted with by individuals to understand the individual's path to conversion and facilitate smarter marketing spend decisions.
Content Personalization	Tailoring and delivery of content based on an individual's profile or preferences.
Cross-ID/Device Linking	Determining probabilistically, and in certain cases, deterministically that two or more Pseudonymous IDs, Declared IDs, or Devices belong to the same individual or household.
Profile Creation	The creation or editing of a personalized advertising and content profile by combining it with Behaviors previously collected, including from across unaffiliated Digital Properties and <u>Devices</u> , for use by third parties (such as our Business Customers) in Tailored Advertising and Content Personalization.
Tailored Advertising	See Tailored Advertising on our <u>Privacy</u> -Definitions page for further information about Lotame's role in Tailored Advertising. Lotame itself does not engage in Tailored Advertising or Content Personalization.

We also may share any of the Personal Data we collect as follows:

Sharing With Service Providers: We share your Personal Data with our Service Providers ~~whoso that we can provide our Services to our Business Customers. Our Service Providers process it~~the Personal Data we share with them on our behalf and in accordance with our instructions. Service Providers are contractually prohibited from using the ~~Personal Data~~Personal Data we provide to them for purposes outside of our instruction or contract. ~~Our Service Providers may include, for instance, providers involved in tech or customer support, operations, web or data hosting, billing, accounting, security, marketing, data management, validation, or otherwise assisting us to provide, develop, maintain and improve our Services.~~

Sharing for Legal Purposes: We may share Personal Data with third parties in order to: (a) comply with legal processes or a regulatory investigation (e.g. a subpoena or court order); (b) enforce our agreements; and (c) respond to claims that any content violates the rights of third parties.

Sharing In Event of a Corporate Transaction: We may also share Personal Data in the event of a corporate transaction, for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets, or for purposes of due diligence connected with any such transaction.

5. Retention Periods for Personal Data

The retention periods for your Personal Data that we process varies based on the type of Personal Data and who provided your Personal Data to us. As such, we are unable to list a precise retention period in this Notice; ~~however,~~ However, in general, the retention periods for your Personal Data are specified in the table below.

Lotame Personal Data Type	
Pseudonymous IDs	90 days after the Pseudonymous ID is no longer associated with any Behaviors or Event Data.
Declared IDs	13 months measured from the time the Declared ID was last received.
Behaviors Campaign Data Non-Precise Geolocation Data	When provided by Business Customers, configurable <u>Configurable</u> by Business Customer: default is 9 months, maximum can be set to 13 months. When provided by a Data Partner: 9 months. Retention period is measured from the time the Behavior/ <u>Campaign Data</u> /Non-Precise Geolocation was last received.
Event Data	No longer than 40 <u>12</u> weeks. Retention period is measured from the time the Event Data was received.
Internet Log Data	No longer than 2 weeks.

6. Your Privacy Rights and Choices

You may have the right to obtain access, rectification, erasure, restriction of Personal Data, portability of Personal Data and to object to the processing of Personal Data (“**Privacy Rights**”) under Data Protection and Privacy Laws in various countries and jurisdictions. You can make a request to exercise your Privacy Rights by submitting your request using our Privacy Manager. ~~You can also make a request to exercise your Privacy Rights~~ Privacy Manager, by using the alternative methods identified below, or by contacting us at privacy@lotame.com; ~~however,~~ due privacy@lotame.com. Due to the nature of the Personal Data we process and the need to verify certain types of Privacy Rights requests, ~~using email is not the best method to submit your Privacy Rights request. Using the alternative methods identified below are the easiest ways to exercise your Privacy Rights and using our Privacy Manager instead~~ of our Privacy Manager email is the best way to submit your request.

If you are not a resident of a country or local jurisdiction that currently has an effective Data Protection and Privacy Law that offers you Privacy Rights, you may submit a request and we may process it as described in our Privacy Manager even though no Data Protection and Privacy Law requires us to do so. However, we reserve the right to change or stop the practice of accepting requests from individuals who are not resident of a country or local jurisdiction that does not have a Data Protection and Privacy Law in effect that provides for Privacy Rights.

Alternative Methods to Exercise Your Rights

Browser Opt-Outs

[In the United States, you can use the Digital Advertising Alliance's WebChoices Tool or the Network Advertising Initiative's \(NAI\) Browser Opt-Out Tool.](#)

[In Europe, you can use the opt-out tool available at the European Interactive Digital Advertising Alliance's Your Online Choices.](#)

[In Canada, you can use the tools available at Digital Advertising Alliance of Canada's AdChoices.](#)

[If you would like to opt-out of the collection or use of your Personal Data with respect to non-cookie IDs, for example, a mobile advertising ID or a connected TV ID, you can use the procedures described below.](#)

Mobile Applications Opt-Out

[To opt-out of the collection and use of Personal Data for interest-based advertising on your mobile device, you can modify the settings on your mobile device. Please note that the specific opt-out instructions for each device may differ depending on which version of the operating system software you are running. Instructions on how to opt-out from many mobile operating systems are available at the NAI's Learn About Mobile Device Opt-Outs.](#)

[Alternatively, you may wish to download the TrustE mobile application or the Digital Advertising Alliance "AppChoices" mobile application and follow the instructions provided. You may opt-out of the collection and use of data by Lotame specifically, or by all companies that offer a mobile application opt-out via the TrustE or AppChoices app. Your opt-out choice is applied only to the collection of data from applications on the device from which you opt-out.](#)

Television Opt-Out

[Lotame licenses television viewership data from third parties that offer smart TVs and video streaming devices. Instructions on how to opt-out from many popular smart TVs and video streaming devices are available at the NAI's Learn About Internet Connected TV Choices.](#)

7. ~~Country-Specific~~ ~~Country or U.S. State~~ Privacy Notice Supplements

Certain countries or local jurisdictions have requirements for us to provide you with information specific to that country or local jurisdiction. Additionally, your Privacy Rights may vary within these areas based on the Data Protection and Privacy Laws in effect. Where required, we maintain the following privacy notice supplements for those countries and or local jurisdictions.

~~Brazil Privacy Notice Supplement~~

GDPR Countries

The United Kingdom Privacy Notice Supplement

U.S. Privacy Notice Supplement

8. Contact Us

You can contact us via email at privacy@lotame.com or regular mail to the address below:

Lotame Solutions, Inc.
c/o Privacy Team
8890 McGaw Road, Suite 250
Columbia, MD 21045