

# Privacy Statement

We understand that many of our partners, as well as consumers, are concerned about individual privacy. Q1Media is committed to transparency and protecting the privacy and personal information of individuals.

This statement provides information about some of Q1Media's practices and actions to support this commitment.

The California Consumer Privacy Act (CCPA) becomes effective January 1st, 2020. The CCPA will require businesses to update the information they provide consumers about their collection practices and provide consumers choices about the sale and use of Personal Information.

Q1Media has assembled a team and has been diligently working for months to get ahead of the CCPA compliance deadline and will conform to the CCPA guidelines in advance of the January 1st, 2020 effective date. Much of our planned CCPA implementation initiatives are already in place, with the consumer facing requirements to be made public in mid-December. For this statement, we use the term Personal Information as defined under the CCPA.

Q1Media provides insights to partners to help them understand consumers' interests, trends, and behaviors for use in their business. We create these insights by utilizing technology to provide aggregated and de-identified mobile device information. This process uses Personal Information at a minimal level. We provide insights, patterns, and commonalities to help our partners understand trends and make evaluations about the products and services they offer, such as:

- Informing a partner’s real estate decision about where to locate a store.
- Helping predict if the popularity of a new entertainment venue will be sustainable.
- Report whether an advertising campaign has achieved its goal of driving new customers to retain locations.
- Providing effective and accurate insights about advertising objectives.

The information we share and the output of our analyses allow our partners to understand consumers’ behavior at a comprehensive level. This information is provided in an aggregate and de-identified way. Our technology practices are purposefully designed to try to avoid use of personally identifying information and prevent surveillance of individuals.

Our team is committed to working with our partners as we collectively prepare to comply with CCPA. This statement provides information about some of Q1Media’s practices and actions to support its undertakings to meet CCPA and the important principles that continue to guide our business.

**Notice And Consent.** When collecting information related to mobile devices, Q1Media respects the current laws and guidelines relating to obtaining consent for the collection, use and disclosure of information. We contractually require our providers to obtain explicit consent from individuals whose non-anonymized information is provided to use for our internal purposes and for sharing with third parties. Based on CCPA and NAI standards, before this information is collected, a notice to users should inform them that their information will be shared with partners and include a use case. We recommend the following use case categories: “research, intelligence, and analytics.”

**Anonymizing.** For information we collect, we take a variety of steps to process information in an aggregated and anonymized way. Most notably, we do not collect or store the most sensitive data such as names, home addresses, social security

information, or credit card information. We also do not collect or retain any emails, cell phone numbers or other identifying information tied to device ids. We primarily collect information related to mobile device usage and movement patterns. We aggregate and jitter derived geo-location information so that such information will not be used to identify and individual or an individual's movements.

**Accountability for Onward Transfer.** With respect to the transfer of information to our partners, Q1Media takes steps to ensure appropriate use of all those with access. This includes complying with U.S. applicable privacy laws and the self regulatory practices inherent in the industry. Further, we contractually restrict our partners from utilizing the information for surveillance of individuals, or for employment, credit, health care, or insurance eligibility. Additionally, we do not market or sell to law enforcement agencies.

**Security.** Q1Media takes reasonable and appropriate measures to protect our information from loss, misuse and unauthorized access, discolor, alteration and destruction while taking into due amount the risks involved and the nature of the information. We follow legal and industry best practices for information collection and handling.

**Privacy Statements.** We will update our website and privacy notices to reflect the CCPA requirements and consumer choice options.

**Compliance Audits.** We plan to carry out annual compliance audits with our partners. In an audit, we may ask you to send the privacy policy, in-app notice and consent language, proof of "Do Not Sell" links for other sources and sample contract with your suppliers and/or downstream licenses.

**Contract Amendment.** We will provide an amendment to our contracts with partners that reflect these changes.

Q1Media will continue to accept information and provide products that comply with these privacy updates beginning January 1st, 2020. We continually evaluate our collection and use practices and evolve our procedures and processes to enhance trust in the use and value of information. In order to continue following U.S. Federal and state, as well as international regulations regarding privacy, we also work with outside legal and industry experts to provide on-going updates to privacy laws to remain informed.

Please let us know how we can support you as we all work together to prepare for CCPA and beyond. If you have additional questions, please contact us.