data.ai Privacy Policy

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data.ai Inc. and its subsidiaries and affiliated companies, including but not limited to data.ai Europe Limited, App Annie Co. Limited, App Annie Asia Pte Ltd, App Annie Korea Co Ltd, App Annie KK, App Annie Limited, App Annie SAS, App Annie GmbH, Mobidia Technology Inc., and Distimo B.V. (collectively “data.ai”, “our”, “we”, or “us”) are committed to protecting the privacy of individuals who interact with us, such as our mobile application and website users and visitors, customers, business partners, leads and prospects, recipients of marketing communications, end users and event attendees (“you” and “your”).

This privacy policy (“Policy”) specifically explains how we collect, use and share the Personal Information about you when you:

- Visit, interact with or use our website www.data.ai (“Site”) and our data.ai Mobile Performance and data.ai Pulse mobile applications (“Apps”), the social media pages linked therein, and the online advertisements, marketing, or sales communications by data.ai.

- Submit a job application to data.ai through the Site.

- Purchase or use certain data.ai products and services through the Site and Apps.

When we refer to any combination of the above, we use the term “Services”.

This Policy also explains your rights and choices with respect to your Personal Information, and how you can contact us if you have any questions or concerns. No part of the Services is directed to children under the age of 18, nor do we knowingly collect information from anyone under the age of 18.

In connection with the provision of specific Services, we may provide additional “just-in-time” disclosures or additional information about our data processing practices. These notices may supplement this Policy or clarify data.ai’s privacy practices in the circumstances described or may provide you with additional choices about how data.ai processes your data.

This Policy does not apply to other websites, mobile applications and services provided or operated by data.ai or that are operated by companies other than data.ai, or to business activities or practices of third parties that display or link to different privacy policies or statements. Please visit the privacy policy for the respective website, mobile application or service to learn about their data collection and use if you interact with these other services.

When you access or use the Services, you acknowledge that you have read this Policy.
When you access or use the Services, you acknowledge that you have read this Policy and understand its content. Any dispute over privacy is subject to this Policy, the Terms of Service accessible on the Site/Apps and any applicable service terms (including any applicable limitations on damages and the resolution of disputes). If any term of this Policy is unacceptable to you, please do not access or use the Services and do not provide your Personal Information.

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1. About data.ai

data.ai is a global company headquartered in the United States currently with twelve offices throughout North America, Europe and Asia Pacific. data.ai is a provider of Co.
offices throughout North America, Europe and Asia Pacific. data.ai is a provider of a mobile data and analytics platform supporting the entire app lifecycle. Our products amongst other things, aggregate performance data from various different sources, including apps and publisher accounts enabling businesses to track competitive market share across metrics such as downloads, revenue, usage, and engagement metrics, identify emerging players and competitive threats, and optimize advertising and monetization ecosystem. We offer solutions for product management, marketing, growth strategies, advertising platforms, retail, and other mobile and app markets.

2. The Personal Information We Collect

For the purpose of this Policy, “Personal Information” means any information relating to an identified or identifiable individual. We obtain Personal Information relating to you from various sources described below. The Personal Information we collect depends on the context of your interactions with data.ai and the choices you make, the Services and features you use, your location, and applicable laws, but can include the following:

i. Personal Information Provided Directly by You

We collect the Personal Information that you provide directly to us.

Registrations, Orders, Requests, and Other Information You Provide We collect your Personal Information, including your account-creation and sign-in credentials (username and password), contact and professional information (name, employer name, job function, e-mail address, phone number), online content (such as the content, date and time of your communications with us or when you complete an order form, participate in a survey or promotion, or request that we contact you), marketing information (when you subscribe to marketing or one of our newsletters and provide your contact preferences, or register to attend an event or webinar). We may also receive other Personal Information that you may voluntarily choose to provide to us. Please do not provide confidential or sensitive information such as your password in your communications with us.

Providing your Personal Information is optional, but it may be necessary for you to be able to use or access certain features, such as for registration or to register for an event. In such cases, if you do not provide your Personal Information, we may not be able to provide you with your request.

Payment Information
Payment Information
If you pay to access our services, we may collect payment information that you provide, such as bank account information, and other billing details.

Third-Party Account Credentials
You may provide data.ai with credentials (e.g., username and password, first and last name, and phone number) that grant you access to third-party websites and services, such as your developer or advertising account credentials.

As noted above, this Policy does not apply to third-party websites, mobile applications and services. Please visit the privacy policy for the respective website, mobile application or service to learn about their data collection and use if you interact with these other services. We are not responsible for the privacy or data security practices of these third parties, which may differ from those set forth in this Policy.

Applicant Information
If you apply for a job with data.ai through our Site you may provide data.ai with Personal Information such as your resume/CV, desired pay, education and work history, whether you are over the age of 18, and visa status. You also may choose to provide your gender, ethnicity, veteran status, disability status, and links to your website, blog, portfolio, or LinkedIn profile, among other information. We use a third-party provider to collect job applications. Your provision of Personal Information in connection with an online job application is voluntary. You determine the extent to which you provide Personal Information.

ii. Information We Collect Automatically

We automatically collect certain device and usage information when you use or interact with our Services (including the Site, emails we send you, or as a part of your use of our products and services).

Device Information
When you interact with and use our Services, we receive information about your device, which may include, web browser type, operating system version, mobile device model, device manufacturer and model, language and regional settings, your Internet Service Provider (ISP), unique device identifiers.

Usage Information
We automatically receive information about your interactions with our Services, like the pages or other content you view, the dates and times of your interactions, the searches you conduct, or how often you use our Services, and other actions taken through use of the Services such as preferences.

We collect this information through our Site, Services and through other technologies, such as cookies, web beacons, web server logs. For more information, please see...
such as cookies, web beacons, web server logs. For more information, please see “Cookies and Similar Technologies” Section 3 below.

Inferred Location Data
We may collect and use your IP address for different purposes. We infer your location from information we collect (for example, your IP address can be used by us to indicate the general geographic region from which you are connecting to the Internet). We aggregate and anonymize your location data at the regional level. We may use location information to provide you with features, notifications, marketing, or other content that is influenced by your location (such as showing you the Services in your local language).

iii. Information We Obtain from Third Parties

We may receive information about you from our third-party partners, such as business or marketing partners. We may combine this information with the other information we collect about you to provide more useful information to you regarding our Services. For example, we collect Personal Information from joint marketing partners, channel partners, our affiliated companies, recruitment agencies, credit check agencies, lead generation providers, public databases, data providers, and social media platforms. This information may include, for example, first and last name, mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), IP addresses, social media profiles, LinkedIn URLs, resumes, credit history and order information and billing information. We also receive for instance information when you register through a data.ai partner (e.g., a partner who co-hosts an event, webinar, or whitepaper).

3. Cookies and Similar Technologies

The Site
When you use our Site, we and our third-party service providers may collect information from you through cookies, web beacons, web server logs, and similar technologies. Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners like data.ai to make their websites work, better understand how site visitors use the website, and provide more targeted content to its site visitors.

Cookies created and set by the website owner (in this case, data.ai) are called “first party cookies.” Cookies created and set by parties other than data.ai are called “third party cookies.” We use first and third party cookies for several reasons. Some cookies are required for technical reasons in order for our Site to operate and we refer to these
as “strictly necessary” cookies. In addition, third party cookies help us to see which areas and features are popular and to count visits to our Site and particular webpages. We also use third party cookies to display targeted content, promotions.

Note also that we may use both single-session (temporary) and multi-session persistent cookies. Temporary cookies last only as long as your web browser is open and are used for technical purposes such as enabling better navigation on our Services. Once you close your browser, the cookie disappears. Persistent cookies are stored on your computer or device for longer periods and are used for purposes including session management (for example, to recognize you and recall your individual login information and preferences) and tracking the number of unique visitors to our Services and information such as the number of views a page gets, how much time a user spends on a page, and other pertinent web statistics. This information identifies your browser to our servers when you visit the Services and also helps us to remember your preferences from session to session to provide an enhanced user experience.

In conjunction with gathering information through cookies, our web servers may log information such as your device type, operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. We also may record information such as the address of the web page that referred you to our Services and the IP address of your device. We also may log information about your interaction with the Services, such as which pages you visit.

We also collect information using web beacons (also referred to as gifs and pixels), alone or in conjunction with cookies. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular website or service tied to the web beacon, and a description of a website or service tied to the web beacon. For example, we may place web beacons in marketing emails that notify us when you click on a link in the email that directs you to our Site. We use web beacons to understand usage and marketing campaign effectiveness, and to operate and improve our Site, Services, and email communications.

For more information on the cookies and similar technologies we use and how you can manage them, please access our Cookie Preference Center, or manage your preferences on your browser setting. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser’s help menu for more information. Please note that if you disable functional cookies on your browser, some parts of the Services may not work fully.

Analytics
In addition to other third party cookies, we work with analytics providers, such as Google Analytics, which use cookies and similar technologies to collect and analyze information directly from user’s browsers to enable us to better understand your use of our Site in order to diagnose and improve the Services and to fix issues and report on activities and trends. Google Analytics may also collect information regarding the use
activities and trends. Google Analytics may also collect information regarding the use of other Services and online resources. You can learn about Google’s practices by going to www.google.com/policies/privacy/partners and https://developers.google.com/analytics/resources/concepts/gaConceptsTrackingOverview, and opt out of them by downloading the Google Analytics opt-out browser add-on, available at https://tools.google.com/dlpage/gaoptout.

Online Advertising
We partner with third-party advertising partners to manage our advertising on other sites. Our third-party partners may use technologies such as cookies to gather information about your activities on our Services and other sites in order to provide you with advertising based upon your browsing activities and interests. These third-party advertising partners collect and use this information subject to their own privacy policies.

You have choices with respect to the ads you receive from us and third parties. Please see “Your Rights and Choices” Section 11 below.

The Apps
We do not use cookies in our Apps. If you download our Apps by clicking one of our ads, we will collect data through advertising IDs, such as a randomly generated identifier (“IDFA”), which is an identifier that does not contain Personal Information. This technology provides a unique identifier to your device to attribute, or measure, user interactions with ad campaigns, installs, and in-app activity.

You have choices regarding how we collect and use information. For more information, please see “Your Rights and Choices” Section 9 below.

Social media plug-ins
Our Services includes social media plug-ins for companies that may include Facebook, Twitter, YouTube, Instagram, and Weibo. For example, we have Facebook like and share buttons and a tweet button for Twitter, that offer certain interactive features and we and the respective social media company track your interactions with these functions. Additionally, even if you do not choose to use these plug-ins, the relevant company may still collect certain tracking information about you and share it with us.

You can identify the plugins by the respective network’s logo. Details about purpose and extent of data collection, as well as processing and use of the data, by the social media networks can be obtained by reading the privacy policies of the applicable third party (Facebook, Twitter, etc.). We are not responsible for the data protection and use practices of these third-party platforms. Please see their privacy policies to learn how they use your information.

Cross-Device Tracking
We use data analytics companies, advertising networks, or social media companies, as well as features offered by data analytics services, to engage in 'cross-device tracking.' Cross-device tracking occurs when platforms, publishers, and advertising technology companies try to connect a consumer’s activity across smartphones, tablets, desktop
computers, and other connected devices. The goal of cross-device tracking is to enable companies to link a consumer’s behavior across devices. You have choices with respect to cross-device tracking. Please see “Your Rights and Choices” Section 11 below.

4. How We Use Your Personal Information

data.ai uses your information, including your Personal Information, for a variety of purposes and on the legal bases described in this Policy or disclosed to you in our Services, including the following.

If you are located in the European Economic Area (“EEA”), United Kingdom (“UK”), Switzerland, or other countries which restrict the transfer of Personal Information, data.ai is the data controller of your Personal Information. Our legal basis for collecting and using the Personal Information will depend on the Personal Information concerned and the specific context in which we collect it. However, we will normally collect Personal Information only where we have your consent to do so, where we need the Personal Information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect Personal Information from you.

Providing the Services
We use data to operate and provide our Services and to tailor our Services to your needs and preferences to perform our contract with you. Where we have not entered into a contract with you, we process your Personal Information in reliance on our legitimate interests in operating and improving our internal operations, systems and Services, and to provide you with the content, products or services you access and request (e.g., to download content from our Site).

Improving and Developing the Services
We use data to understand and analyze trends to identify future opportunities for the development, promotion and improvement of our Services, in reliance on our legitimate interest in developing and improving our Services, or where required, with your consent. For example, we use data, often in a de-identified form, to develop new features, capabilities, or products, improve the user experience, assess capability requirements, and identify customer opportunities. We also may send push notifications to your device. You have choices with respect to the communications you receive from us. Please see “Your Rights and Choices” Section below.

Facilitating Transactions
Your payment information to facilitate your transactions and payments.

Analytics
To understand and analyze how you use our Services.
To understand and analyze how you use our Services.

**Providing Customer Support**
To communicate with you, including to respond to your inquiries and to send e-mails to an e-mail address you provide to us for customer-service or technical-support purposes, to troubleshoot and diagnose technical problems and provide our customer care and support services, including to help us provide, improve, and secure the quality of our products, services, and training, and to investigate security incidents to perform our contract with you or if we do not have a contract directly with you, in reliance on our legitimate interests.

**Securing the Services**
We process data by tracking use for the purposes of maintaining the safety and security of our Services, including detecting, preventing, or otherwise addressing fraud, verifying accounts and activity, investigating suspicious activity, and enforcing our terms and policies, in reliance on our legitimate interest in promoting the safety, integrity and security of our Services, systems and applications and in protecting our rights and the rights of others.

**Legal Obligations**
We process your Personal Information when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws, to the extent this requires the processing or disclosure of Personal Information to protect our rights, or is necessary for our legitimate interest in protecting against misuse or abuse of our Services, protecting personal property or safety, pursuing remedies available to us and limiting our damages, complying with judicial proceedings, court orders or legal processes, or to respond to lawful requests.

**Marketing**
We use your Personal Information to send promotional communications, including product recommendations, and other non-transactional communications (e.g. marketing newsletters or push notifications) about data.ai according to your marketing preferences. This may include information about our products as necessary for our legitimate interest in conducting direct marketing, or to the extent you have provided your prior consent. Please see Section 9 below to learn how you can control the processing of your Personal Information by data.ai for marketing purposes.

**Advertising**
We use your Personal Information to send you relevant advertisements, provide personalized information about us on and off our Services, and to provide other personalized content based on your activities and interests to the extent it is necessary for our legitimate interest in advertising our Services, or where necessary, to the extent that you have provided your prior consent. Please see Section 9 below to learn how you can control the processing of your Personal Information for personalized advertising. For these purposes, we may link or combine information about you with other personal information we get from third parties, to help understand your needs and provide you with better and more personalized service or content.
Career Opportunity
To consider an application for employment, including review of your supplied resume/CV, to evaluate your application and make hiring decisions, communicate with you and inform you of current and future career opportunities (unless you tell us that you do not want us to keep your details for such purposes), manage and improve our recruiting and hiring processes, or to conduct reference and background checks where required or permitted by applicable local law. We perform this processing to the extent that it is necessary to comply with our legal obligations, for our legitimate interest in assessing the suitability of our candidates and managing our recruiting process, or, where required by applicable law, with your consent. The Personal Information may be saved in our files for future review and consideration, subject to applicable law. The Personal Information will be shared internally on a need-to-know basis and may be given to our service providers who process this Personal Information for the indicated purposes on our behalf.

For our business purposes
We may use data for other legitimate business purposes in reliance on our legitimate interests, such as to update, expand, and analyze our records, identify new customers, data analysis, to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity, developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns, free trials and operating and expanding our business activities.

Other Reasons
data.ai may also use your Personal Information for any purpose where you have given your consent (where legally required).

In carrying out these purposes, we combine data we collect from different contexts (for example, from your use of different Services) or that we obtain from third parties to give you a more seamless, consistent, and personalized experience, to make informed business decisions, and for other legitimate purposes. We do not engage in general profiling or automated decision-making practices.

If you have questions about the legal basis for processing or want to find out more, please contact us using the details at the end of this Policy in “How to Contact Us’ Section 14 below.

5. How We Disclose Your Personal Information

We do not sell or share your Personal Information with third parties, other than as follows:
Corporate Affiliates
data.ai may share your information, including your Personal Information within the
data.ai corporate group and companies we may acquire in the future when they become part of the data.ai corporate group in the ordinary course of business, and for the purposes of the Services as set forth in this Policy.

Service Providers
We may share your Personal Information with our vendors, service providers, and other third parties that perform services on our behalf. This includes our payment processing service and data analytics service providers, providers that help us deliver and help us track our marketing and advertising content provider, and customer-service support. We enter into confidentiality and data processing terms with our service providers to provide appropriate and suitable safeguards for their processing of your Personal Information.

Advertising Partners
data.ai may work with and share your Personal Information with our third-party advertising partners to provide you with advertisements regarding data.ai’s services. For more information about our advertising and marketing practices and those of the third-party advertising partners, please (see the “Cookies and Similar Technologies” Section 3 above).

As Required by Law and Similar Disclosures
We may disclose Personal Information we have about you: (i) if we are required to do so by law, regulation, or legal process, such as a court order or subpoena; (ii) in response to requests by government agencies, such as law enforcement authorities; (iii) when we believe disclosure is necessary or appropriate to protect against or respond to physical, financial or other harm, injury, or loss to property; or (iv) in connection with an investigation of suspected or actual unlawful activity.

Merger, Sale, or Other Asset Transfers
data.ai may disclose your Personal Information to a potential or actual acquirer, successor, or assignee as part of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in bankruptcy or similar proceedings).

Consent
data.ai may further disclose your Personal Information with your consent, for example, when you agree to our sharing your information with other third parties for their own marketing purposes, subject to their separate privacy policies.

We do not sell your Personal Information.

Aggregated Information
We may also share aggregated or deidentified usage data with third parties to help us perform analysis and make improvements. Additionally, we may share anonymous usage information with our advertising and marketing partners. This may include anonymous data collected through cookies, pixel tags, and related technologies.
usage data on an aggregate basis in the normal course of operating our business; for example, we may share information publicly to show trends in the use of the Services.

For further information on the recipients of your Personal Information, please contact us (see the “How to Contact Us” Section 14 below).

6. Transfers to Other Countries

The Services are provided from the United States and other locations, and we may transfer your Personal Information to multiple countries throughout the world where we or our service providers maintain facilities, including the United States, in accordance with applicable local laws and regulations. We maintain primary data centers in the United States.

These countries may not have the same high level of data protection as the data protection laws in the country where you are located. We take steps designed to ensure that the data we collect under this Policy is processed as described in this Policy and according to applicable law wherever the data is collected.

If you are located in the EEA, UK, Switzerland or other countries which restrict the transfer of Personal Information, we comply with applicable data protection laws when transferring your Personal Information outside of these areas. In particular, we may transfer your Personal Information to countries for which adequacy decisions have been issued; implement appropriate and suitable safeguards such as the European Commission’s Standard Contractual Clauses for the transfer of Personal Information to our U.S. headquarters, other offices or third parties, where applicable, or where required, we will ask you for your prior consent. You may contact us as specified in the “How to Contact Us” Section 14 below to obtain a copy of the clauses, relevant data transfer agreements or safeguards we use to transfer Personal Information outside of these countries/regions.

7. Data Retention

Personal Information will be stored and kept as long as needed to carry out the purposes described in this Policy or as otherwise required by applicable law. Because these needs can vary for different data types in the context of different services, actual retention periods can vary significantly.

When determining the retention period, we take into account various criteria, such as the type of products and Services requested by or provided to you, the nature and length of our relationship with you, possible re-enrollment with our products or
length of our relationship with you, possible re-enrollment with our products or Services, the impact on the Services we provide if we delete some Personal Information from or about you, mandatory retention periods provided by law and the statute of limitations.

Unless we are required or permitted by law to keep this information for a longer period of time, when this information is no longer necessary to carry out the purposes for which we process it, we will delete your Personal Information or keep it in a form that does not permit identifying you. If there is any data that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further use of that data.

For further information on applicable data retention periods, please contact us (see “How to Contact Us” Section 14 below).

8. Our Commitment to Security

data.ai cares about the security of your information, and employs physical, technological and administrative measures to protect the information you submit via the Services against loss, theft, and unauthorized access, use, disclosure or modification. However, we cannot ensure or warrant the security of any information you transmit to us or guarantee that information on the Services may not be accessed, disclosed, altered or destroyed. No security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your personal information, we cannot guarantee absolute security. Electronic communications sent to or from the Services may not be secure. You should use caution whenever submitting information online and take special care in deciding what information you send to us. You are solely responsible for protecting your password, limiting access to your devices, and signing out of websites after your sessions. If you have reason to believe that your Personal Information is no longer secure or if you have any questions about the security of our Services, please notify contact us at the e-mail address provided in the “How to Contact Us” Section 14 below.

9. Children’s Privacy

Our Services are not intended for children under 18 years of age. We do not knowingly collect, maintain, or use Personal Information from children under 18 years of age, and no part of the Services is directed to children under the age of 18. If you learn that your child has provided us with Personal Information without your consent, then you may alert us at privacy@data.ai. If we learn that we have collected any Personal Information from children under the age of 18, then we will take steps to delete such information.
10. Do Not Track

Some web browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. Because there is not yet an accepted standard for how to respond to Do Not Track signals, our Services do not currently respond to such signals. If you want to restrict ads in general on your devices you may opt out from ad tracking by enabling “Limit Ad Tracking” or “Opt Out of Ads Personalization” (as applicable to your device) in your device settings.

11. Your Privacy Rights and Choices

i. Global Rights & Choices

We provide you with certain choices with respect to your Personal Information, our use of cookies, and marketing activities, with respect to our Services:

- **Cookies:** You can manage your preferences related to our use of cookies and similar technologies - please see our Cookie Preference Center for further information.

- **Online Advertising.** Some of our advertising partners are members of the Network Advertising Initiative or the Digital Advertising Alliance. If you do not wish to receive our ads in our third-party advertising partners sites or platforms, please visit their opt-out pages available at www.networkadvertising.org/managing/opt_out.asp and www.aboutads.info/choices to learn about how you may opt out of receiving web-based personalized ads from member companies (or if located in the European Union, additional information on how our advertising partners allow you to opt out of receiving ads based on your web browsing history is available via the European Interactive Digital Advertising Alliance available here https://www.youronlinechoices.eu/). We do not guarantee that all of the third parties we work with will honor the elections you make using those options, but we strive to work with third parties that do. You can also access any settings offered by your browser or mobile operating system to limit ad tracking. Please note you may continue to receive generic ads.
• **IDFA**: To limit add tracking, you can reset the advertising identifier randomly assigned to your device at any time and can opt out of personalized ads by enabling “Limit Ad Tracking” or “Opt Out of Ads Personalization” (as applicable to your device) in your device settings. When you disable “Limit Ad Tracking” or “Opt Out of Device Personalization” (as applicable to your device), advertisers and their measurement solutions will receive a blank device ID in place of a device-specific ID.

• **Push notifications**: You can opt out of receiving push notifications using your mobile application or device settings. Opting out of push notifications may impact the functionality of our Services.

• **Cross-device tracking**: You can access any settings offered by your browser or mobile operating system or device settings to limit cross-device tracking or visit and employ the controls described on the NAI’s Consumer Opt Out (please visit their opt-out pages available at www.networkadvertising.org/managing/opt_out.asp and www.aboutads.info/choices).

In addition, upon request, you may exercise certain rights as described below:

• **Access**: data.ai will provide you with access to your Personal Information, which includes the right to obtain confirmation from us as to whether Personal Information concerning you is being processed, and where that is the case, access to the Personal Data and information related to how it is processed.

• **Rectify**: You can update or correct your Personal Information (e.g., your e-mail address) by accessing your account. You can also access or rectify your information by reaching out to us via our [web form](#).

• **Erasure**: You may request that we delete any or all of your Personal Information by submitting a Data Deletion request via our [web form](#).

• **Opt-Out From Marketing Communications**: You may opt out of receiving our newsletters or marketing e-mails. To unsubscribe, follow the unsubscribe instructions included in the e-mail communications you receive, access the e-mail preferences in your account settings page, or contact us at the e-mail address in the “How to Contact Us” Section 14 below. Please note that even if you unsubscribe from commercial e-mail messages, we may still e-mail you non-commercial (transactional) e-mails related to your account and your transactions via the Services.

Please note that we have the right to reject access or erasure requests that are unduly burdensome or repetitive, or that cannot be honored in light of legal obligations or ongoing disputes, or where retention is necessary to enforce our agreements or protect our or another party’s rights, property, safety, or security, or other reasons under the
To make a request to exercise your rights or if you have any questions about exercising your rights and choices, please contact us using the information listed in the “How to Contact Us” Section 14 below.

ii. For Residents in the EEA, UK and Switzerland

When data.ai is the controller of your Personal Information as described in this Policy, in addition to the global rights above, the GDPR or other applicable laws provide you with additional rights regarding your Personal Information, as follows:

- **Data Portability:** You may have the right to exercise your right to data portability to easily transfer your Personal Information to another company.

- **Object:** You may also object to the processing of your Personal Information under certain circumstances, including objecting to processing your Personal Information for direct marketing purposes, or when it is done based upon legitimate interest.

- **Restrict:** You may restrict us from continuing to process your Personal Information under certain circumstances (e.g., where you contest the accuracy of your Personal Information, for a period enabling us to verify the accuracy of the Personal Information).

- **Consent Withdrawal:** You may withdraw the consent that you might have given with respect to the processing of your Personal Information at any time with future effect. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

- **Complaint:** If you are not satisfied with data.ai’s response or believe that your Personal Information is not being processed in accordance with the law, you may also have the right to lodge a complaint with the competent supervisory authority in your country of residence, place of work or where the incident took place, or seek other remedies under applicable law, but we encourage you to first contact us with any questions or concerns. For more information on how to lodge a complaint, please see [https://edpb.europa.eu/about-edpb/board/members_en](https://edpb.europa.eu/about-edpb/board/members_en).

- data.ai does not engage in any automated decision making with your personal
If you would like to exercise your rights (for which we reserve the right to charge you a fee, where permitted by applicable law), please contact us by using the information listed in the “How to Contact Us” Section 14 below. We will review and process your request in accordance with our obligations under applicable law.

iii. For Residents of California

The California Consumer Privacy Act (“CCPA”) provides you with additional rights regarding your Personal Information.

Collection of Personal Information

In the preceding twelve (12) months, we may have collected categories of Personal Information as defined under the CCPA, which includes the following:

- Identifiers, such as your first and last name, address, unique personal identifier, online identifier, Internet Protocol address, cookie ID, advertising Other
  Categories of Personal Information, such as your financial information or
  payment information

- Internet or Other Similar Network Activity, such as your browsing history, search
  history, and information about your interaction with our Services

- Sensory data, such as audio recordings when you call our customer service line

- Inferred location data: such as your IP address deriving approximate physical
  location. For more information please see the “inferred location data” subsection
  in the “How data.ai Collects your Personal Information” Section 2 above.
  Employment or Other Professional Information, such as your title and company,
  or your resumé or CV

- Protected classifications, such as gender or ethnicity

- Inferences Drawn from Personal Information, such as a profile reflecting your
  preferences, characteristics, trends, predispositions, behavior, attitudes,
  intelligence, abilities and aptitudes.

We collect this Personal Information directly from you, your devices, third party sources as described in the “How data.ai Collects your Personal Information” Section 2 above.

Purposes

In the preceding twelve (12) months, we may have used and disclosed the categories of
Personal Information from the sources described in Sections 2 and 3 above, for business purposes, including:

1. Auditing consumer interactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.

2. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.

3. Debugging to identify and repair errors that impair existing intended functionality.

4. For our short-term, transient use.

5. Providing services (including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, analytic, or providing similar services on behalf of the business or service provider.

6. Undertaking internal research for technological development and demonstration (i.e., to develop new products or features).

7. Undertaking activities to maintain the quality or safety of the Services and to improve, upgrade, or enhance the Services.

We also may have used and disclosed the Personal Information we collect for commercial purposes to provide you with our Services, as described in Sections 2 and 3 above.

Disclosure of Personal Information
In the preceding twelve (12) months, we may have disclosed your Personal Information for a business purpose, including to the following categories of third parties:

<table>
<thead>
<tr>
<th>Categories of Personal Information</th>
<th>Categories of Third Parties with Which We Share Your Personal Information</th>
</tr>
</thead>
</table>
| Identifiers such as your first and last name, address, e-mail address, telephone number, or other similar identifiers | Our corporate affiliates  
Agrigators (such as analytics services)  
Payment Processors |
| Other Categories of Personal Information, such as your financial information or payment information | Our corporate affiliates  
Payment processors |
| Internet or Other Similar Network Activity, such as your browsing history, search history, and information about your interaction with our Services | Our corporate affiliates
Data analytics providers |
|---|---|
| Inferred location data | Our corporate affiliates
Advertising networks
Data analytics providers
Social network |
| Inferences drawn from Personal Information, such as a profile reflecting your preferences, characteristics, trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes | Our corporate affiliates
Data analytics providers |

**California Resident Privacy Rights**

If you are a California resident, in addition to the rights described above under this “Global Rights & Choices” section, you have the following rights. Our business customers are afforded certain rights under the CCPA identified with an asterisk (*) below.

- **Right to Access Specific Information.** You may request access to the categories and specific pieces of Personal Information we have collected, used, and disclosed about you in the twelve (12) months preceding your request.

- **Right to Know Personal Information.** You may request to know the categories of Personal Information we have collected about you and the purposes for doing so; the categories of sources of that data; the categories of third parties with whom we shared it for a business purpose and our purposes for doing so.

- **Right to Opt Out of Sale of Personal Information***. The term “sale” is defined broadly under the California Consumer Privacy Act. To the extent that “sale” under the CCPA is interpreted to include interest-based advertising or other data uses described in the “Cookies and Similar Technologies” section above, we will comply with applicable law as to those activities. To opt out of receiving interest-based advertising, you can exercise your choice by using your account privacy settings or to opt-out of cookies and similar technologies you can see our Cookie Preference Center.

- **Right to Delete your Personal Information.** You may request the deletion of your Personal Information, subject to certain limitations under applicable law.

- **Non-Discrimination***. We will not discriminate against you for exercising any of your privacy rights under CCPA or applicable law, including by denying you goods
your privacy rights under CCPA or applicable law, including by denying you goods or services, charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties, providing you a different level of quality of goods or services, or suggesting that you will receive a different price or rate for goods or services or a different level of quality of goods or services.

Submission of Requests, Verification and Authorized Agent
To exercise your rights, please follow the instructions above and the contact information in the “How to Contact Us” Section 14 below. We will confirm receipt of your requests and respond within 30 calendar days, unless additional time is needed, in which case we will provide notice and an explanation of the reason. Also, to respond to your request to right to know and/or delete, we must verify your identity or authority to make the request and confirm the Personal Information relates to you, or others. To do so, we collect your name, e-mail address, phone number to verify your identity. We also may contact you by e-mail or by telephone to verify your identity and ask you additional questions so that we can match your identity with the data we have about you. In some instances, we may ask you to declare under penalty of perjury that you are the consumer whose Personal Information is the subject of the request. If we cannot verify your identity, we may reject your request in whole or in part.

You also may designate an authorized agent to make a request for you. To use an authorized agent, we may require: (1) your signed permission designating the authorized agent; (2) evidence that the authorized agency has power of attorney under the California Probate Code; or (3) proof that the authorized agent is registered with the California Secretary of State and that you have authorized such authorized agent to be able to act on your behalf. We may deny a request from an authorized agent who does not submit sufficient proof.

Shine the Light Law
If you are a California resident, California Civil Code § 1798.83 permits you to request information regarding the disclosure of your Personal Information by us to third parties for the third parties’ direct marketing purposes (as those terms are defined in that statute). To make such a request, please contact us at the contact information in the “How to Contact Us” Section 14 below.

12. Third-Party Platforms

Our Services may contain links, features, components or other interactive tools supplied by third parties, such as the Facebook “Like” button. Please be aware that you are providing your Personal Information to these third parties and not to data.ai. Such third parties may have information practices different than those set forth herein and their use of cookies and similar technologies is not covered by this Policy. We do not have access to or control over such third parties and encourage you to consult the privacy
access to or control over such third parties and encourage you to consult the privacy notices provided by those third parties. PLEASE EXERCISE CAUTION AND CONSULT THE PRIVACY POLICIES POSTED ON EACH THIRD-PARTY WEBSITE FOR FURTHER INFORMATION.

13. Updates to this Policy

We reserve the right to change this Policy from time to time. We will post any adjustments to this Policy on this page, and the revised version will be effective the date it is posted, which is identified at the top of the page (see “Last Updated” date above). If we materially change the ways in which we process your Personal Information previously collected from you, we may notify you through our Site, Services, or e-mail or any other means prior to the update taking effect. We encourage you to review the Policy periodically, which may be updated from time to time. You are responsible for ensuring we have an up-to-date, active, and deliverable e-mail address for you, and for periodically monitoring and reviewing any updates to the Policy. Your continued use of our Services after such amendments will be deemed your acknowledgement of these changes to this Policy.

14. How to Contact Us

If you have any questions or concerns about data.ai’s privacy practices or about this Policy, or would like to exercise your rights in relation to your Personal Information, or if you wish to lodge a complaint about our privacy practices, you may contact data.ai via e-mail at privacy@data.ai or write us by registered mail at:

data.ai Legal Department  
44 Montgomery Street, 3rd Floor  
San Francisco, CA 94104

data.ai’s Data Protection Officer may be contacted via e-mail (dpo@data.ai) or at the following address:

data.ai Legal Department  
ATTN: Data Protection Officer  
44 Montgomery Street, 3rd Floor  
San Francisco, CA 94104

Our EEA representative may be reached by contacting: via e-mail dpo@data.ai or at the following address:
Our UK representative may be reached by contacting: via e-mail dpo@data.ai or at the following address:

data.ai Legal Department
ATTN: Data Protection Officer
data.ai Europe Limited
7 Albemarle Street
London W1S 4HQ
England

data.ai Inc. is the entity responsible (data controller) for the processing of your Personal Information.