

My6sense Privacy Policy

Last Revised: March 27, 2017

My6sense Inc. and its subsidiaries and affiliates (collectively, “**My6sense**”, “**Company**” “**we**” or “**us**”) respect the privacy of our customers and their customers and authorized customers, including without limitation any publisher, advertiser, demand side partner, supply side partner, or any other person or entity with whom My6sense may have a contractual relationship or which otherwise obtains access to or uses My6sense's proprietary native advertising and ad-exchange platform or any other solution offered by My6sense from time to time (collectively, the “**My6sense Platform**”) and any related services provided by My6sense (respectively, the “**Services**” and the “**User**” or “**you**”). My6sense is committed to protect the personal information that is collected by it with respect to its Users and/or End-Users (as defined below) while using the My6sense Platform and/or Services. We believe that you have a right to know our practices regarding the information we may collect and use when you visit and/or use the My6sense Platform and/or use our Services. To the extent you are an End-User, this Privacy Policy provides information regarding My6sense's privacy practices, including details with respect to the information that may be collected about you during your use of the publisher's Properties (as defined below).

1. Your Consent (PLEASE READ CAREFULLY!)

BY ENTERING, CONNECTING TO, ACCESSING OR USING THE MY6SENSE PLATFORM AND/OR BY USING THE SERVICES, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY (THE “**PRIVACY POLICY**”), INCLUDING TO THE COLLECTION AND PROCESSING OF YOUR AND YOUR END-USERS’ PERSONAL INFORMATION (AS DEFINED BELOW). IF YOU DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MAY NOT ACCESS OR USE THE MY6SENSE PLATFORM OR SERVICE.

FOR AVOIDANCE OF DOUBT, YOU HEREBY CONSENT TO THE COLLECTION, PROCESSING, TRANSFER AND USE OF YOUR AND/OR YOUR END-USERS’ PERSONAL INFORMATION. YOU ALSO ACKNOWLEDGE AND CONFIRM THAT YOU ARE NOT REQUIRED TO PROVIDE US WITH YOUR AND/OR YOUR END-USERS’ PERSONAL INFORMATION AND THAT SUCH INFORMATION IS *VOLUNTARILY* PROVIDED TO US.

2. Which information we may collect on our Users?

We may collect two types of data and information from our Users:

- a. Non-identifiable and anonymous information (“**Non-personal Information**”). **We are not aware of the identity of the User from whom we have collected the Non-personal Information.** Non-Personal Information is any unconcealed information which does not enable identification of an individual User, and which is available to us while such User is entering into and/or using the My6sense Platform. Non-personal Information which is being gathered consists of technical information, behavioral information and aggregated information, and may contain, among other things, the activity of the User on the My6sense Platform, type of operating system, type and version of browser, keyboard language, screen resolution, etc.
- b. Personally identifiable information (“**Personal Information**”). **This information may identify an individual or may be of a private and/or sensitive nature.**
 - Users of the My6sense Platform and/or the Services automatically provide their IP address or other unique identifier (if applicable) mainly for enhancing the User’s experience and for geo-location and security purposes as further detailed below.
 - When opening an account, You may be required to provide the following registration details, for the purposes of opening an account and logging in to My6sense Platform: full name, e-mail address, company name, website, phone number and a password.

For avoidance of doubt, any Non-Personal Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists.

We do not collect any Personal Information from you or related to you without your approval, which is obtained, *inter alia*, through your active acceptance of this Privacy Policy or any other agreement or policy, which incorporates the provisions of this Privacy Policy.

3. How Do We Collect Information on Our Users?

There are a few methods that we use:

- a. **We collect information through your entry and use of the My6sense Platform or Services.** In other words, when you are using the My6sense Platform and Services we are aware of it and may gather, collect and store the information relating to such usage.
- b. **We collect information which you decide to provide us voluntarily.** For example, we collect Personal information when you contact us through the contact form or when you open an account.

We may gather, collect and store such information either independently or through the help of our authorized third-party service providers as detailed below.

4. What are the Purposes of the Collection of Information?

Non-personal Information is collected in order to:

- Use it for statistical and research purposes and for customization and improvement of the My6sense Platform and Services.
- Enhance the User's experience while using the My6sense Platform and Services.

Personal Information is collected in order to:

- Facilitate the general operation of the My6sense Platform and Services.
- Provide and personalize our Services to our Users.
- Verify the User's identity when he/she signs in through his/her account.
- Provide Users with updated information regarding our products and services.
- Be able to contact Users for the purpose of providing them with technical assistance, billing for their use of the Services and support.
- Determine general geolocation information (i.e., country) from which the User's computer is connected to the Internet in order for us to know the general location of the My6sense Platform's Users as well as in order to safeguard the My6sense Platform.

5. Sharing Information with Third Parties

My6sense will not share any Personal Information it collects with any third party, other than in the following circumstances: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy Policy, including investigation of potential violations thereof; (c) to detect, prevent, or otherwise address security or technical issues; (d) to respond to claims that contact information (e.g. name, e-mail address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment; (e) to protect the rights, property, or personal safety of the Company, its Users or the general public; (f) by virtue of undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of the assets of the Company, so long as such acquirer maintains the same privacy terms hereunder; or (g) pursuant to your explicit approval prior to the disclosure. Note, that we collect, hold and/or manage Personal Information through My6sense's authorized third parties vendors of certain products or services (such as hosting cloud services) (including, as applicable, their affiliates) solely and limited to providing us with such requested services, and not for any other purposes. Such vendors may be located in a country that does not have the same data protection laws as your jurisdiction.

For avoidance of doubt, My6sense may transfer and disclose **Non-personal Information** to third parties at its sole discretion, and for any purpose, including without limitation for statistical, analytical and research purposes and for customization, development and improvement of the My6sense Platform and Services.

6. Deletion or Modification of your Personal Information

In any event, if for any reason you (or any person) wish to delete or modify Personal Information, you can do so within your account. Otherwise, please send us an e-mail with adequate detail of your request to: support@my6sense.com and we will make reasonable efforts to modify or delete any such Personal Information pursuant to any applicable privacy laws. Note that unless otherwise explicitly specified herein and/or unless you instruct us otherwise we may retain your Personal Information for as long as reasonably

required for the purposes of which such Personal Information was collected and/or when necessary to comply with My6sense's legal obligation, dispute resolutions and the enforcement of My6sense's agreements, all as permitted under any applicable privacy laws. Please note that we are not obligated to store Personal Information for perpetuity and disclaim any liability arising out of, or connected to the destruction of Personal Information. You should be aware that it is not always possible to completely delete or remove your information from our databases due to the conduction of backups.

Aggregated and/or anonymous information derived from your use of the My6sense Platform or Services may remain on our servers indefinitely.

7. What is our Privacy Policy with respect to the Publisher's End-Users?

In order to provide you with our Services and, *inter alia*, serve advertisements to publisher's websites, application or other properties (including without limitation, any content contained therein) (collectively, the "**Properties**"), and in order to constantly improve our Services, we and our advertisers may collect, use and disclose certain data related to the end-users of the publisher's Properties (the "**End-User(s) Data**" and the "**End-Users**", respectively).

- **Which information we may collect on Publisher's End-Users?**

End-User Data consists of the following types of information:

- **End-Users Non-personal Information:** Non-personal Information is any unconcealed information which does not enable identification of an individual End-User. Non-personal Information is available to us and may be available to our advertisers while End-Users are accessing or using the publisher's Properties. Non-personal Information which is being gathered may consist of technical information, behavioral information or aggregated information, and may contain, among other things: technical data, e.g. type of operating system and configuration, screen resolution, screen density, web browser software, the activity of the End-User on the Properties, End-User's 'click-stream', usage patterns and other statistical data, the time the End-Users were engaged with the advertisements in the publisher's Properties, etc.
- **End-Users Personal Information:** We and our advertisers may collect the following Personal Information: the End-User's IP address, geo-location (country, region, city) and/or other behavioral information related to a particular End-User's engagement with advertisements on the Properties. **However, please note that the IP address collected by My6sense on behalf of our customers, is converted on "real time" basis (by means of geo-resolution) to a persistent identifier. Behavioral information and geo-location information are linked to such persistent identifier, and cannot identify a specific End-User.**

It should be noted, however, that such information is not used by us in order to personally identify a specific End-User. Instead, we use such information in a way that indicates that a specific browser tends to be used in ways that suggest certain types of advertisements would be relevant to the browser's End-User.

For avoidance of doubt, any Non-personal Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists.

- **How Do We Collect End-User Data?** We and our advertisers may collect End-User Data once the publisher displays on its Properties advertisements which were delivered through the My6sense Platform and/or Services. The End-User Data is collected by use of common web tracking methods (e.g., cookies, web beacons, etc.) and measuring time intervals. When End-Users interact with advertisements on the Properties which are served through the My6sense Platform and/or Services, the advertiser sponsoring the promoted advertisements may implement such web-based tracking methods, in which case the End-User will be also subject to the advertiser privacy policy. We and our advertisers may gather, collect and store the information either independently or through the help of our authorized third-party service providers as detailed below.
- **What are the Purposes of the Collection of End-User Data?** We and our advertisers may use the End-User Data in order to provide the publisher the Services, i.e., for the purpose of displaying advertisements of our advertisers on the publisher's Properties and for facilitating the general operation of the My6sense Platform, including without limitation the recommendation engine

included in the My6sense Platform that matches native ads to both page content and End-Users, in real-time. For example, we will collect Personal Information in order to determine geo-location information from which the End-User is connected to the Internet in order to serve advertisements through the My6sense Platform and/or Service based on such End-User's location. We may use the web browsing information in order to show the End-User specific advertisements that we or our advertisers think will be of interest for the End-User (i.e., to match relevant advertisement to End-Users). In addition, we and our advertisers may collect End-User Data in order to (i) create statistics and other aggregate information and analysis with respect to the publisher's End-User's engagement with advertisements which are served to the Properties through the Service; (ii) use it for statistical, analytical and research purposes and for customization, developing and improvement of our Services; (iii) for general campaign performance in order to report to advertisers and demand side partners; (iv) to determine the amounts to bid, pay or offer for impressions, clicks or units of ad-inventory; and/or (v) detect fraudulent activities that occur while the publisher's End-Users are engaging with advertisements on the Publisher's Properties.

- **Sharing End-User Data with Third Parties.** We share End-Users Data in order to fulfill the purposes mentioned above.
- **Deletion or Modification of End-User Data.** We usually have no direct relationship with the publisher's individual End-Users and we do not send communications to the publisher's End-Users. We will comply with all applicable laws with respect to deletion and modification of personal information. PLEASE BE ADVISED THAT THE END-USER DATA STORED ON OUR SYSTEMS CANNOT BE CORRELATED TO A SPECIFIC END-USER. Aggregated and/or anonymous data may remain on our servers indefinitely.
- **Children/Minors End-User Data.** The publisher agrees that it will not use the My6sense Platform and/or Services in connection with any Properties directed to Minors. The term "Minor" shall mean a Child as such term is defined under the *Children's Online Privacy Protection Act* of 1998 and the rules promulgated by the Federal Trade Commission (FTC) under that Act, including but not limited to the *Children's Online Privacy Protection Rule* 16 C.F.R. Part 312 (the "COPPA") or any other under-age individual as defined by applicable children protection legislation in any relevant jurisdiction. The publisher will (i) notify My6sense in writing of any Properties which are or may be considered as a "Child Property" under the COPPA, and (ii) to the extent required by applicable laws, implement reasonable commercial means within the Properties for identifying Minors when the Properties are not primarily directed at children under such age; all in order to enable My6sense to block collection of information from Minors. If the publisher learns that any information transferred to us via the Services includes Personal Information collected from Minors, the publisher is hereby requested to inform us immediately and we will delete that information as quickly as possible.
- **Tracking Methods with respect to End-Users.** When the publisher's End-Users are engaging with advertisements that are served to the publisher's Properties via the My6sense Platform and/or Services, My6sense and/or third party advertisers or DSPs may use industry-wide tracking methods (e.g., cookies, web beacons, etc.) which store certain information on the Properties ("**Methods**") and which allow us or such third parties to collect certain data for the purpose of serving advertisements through the use of the My6sense Platform and/or Services (including without limitation, serving advertisements that may be of interest to End-Users). The Methods may store non-personal information as well as the user's persistent identifier. In such case, End-Users will be subject to such third party advertisers' privacy policy.
- **Third Party Service Providers.** In order to provide our Services and/or fulfill the purposes mentioned in above, we may make use of third party service providers in the course of collecting, storing and/or processing the End-User Data. My6sense uses commercially reasonable efforts to engage with third parties that post a privacy policy governing their collection, processing and use of non-personal and personal information. Please note, however, that we do not control such third party service providers.
- **"Do Not Track" and Opt-out of Certain Third Parties' Interest-Based Services.** We may provide advertisements to publisher's End-User's based on their browsing behavior. The publisher should notify its End-Users that we and our authorized third party advertisers may serve the publisher's End-Users behavioral advertisements. Please note that activation of any applicable "Do-not-track" settings on the End-Users' web browser will normally cease all tracking activities by My6sense Platform and

Services, depending however on the type and functionality of this browser's option, and may not cease all tracking activities by all our authorized third party advertisers. My6sense is not responsible for effectiveness of, or compliance with, any third-parties' opt-out options or programs or the accuracy of their statements regarding their programs.

8. Minors

The My6sense Platform and/or the Service are intended for Users over the age of thirteen (13). My6sense does not intend and does not knowingly collect Personal Information from children under the age of thirteen (13) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of thirteen (13) are not using the My6sense Platform. If we learn that we unlawfully collected Personal Information from children under the age of thirteen (13) we will delete that information as quickly as possible. Please contact My6sense at support@my6sense.com if you have reasons to suspect that My6sense collected Personal Information from children under the age of thirteen (13) and will delete that information as quickly as possible. It is hereby clarified that the documents you provide us access to may include information regarding children under the age of thirteen (13) only in the event that the legal guardian of such child has agreed to such use, all as required under any applicable laws.

9. Security

We take reasonable measures to maintain the security and integrity of the My6sense Platform, Services and End-User Data that we collect and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures. The Personal Information is hosted on the Amazon hosting servers, which provide advanced strict security standards (both physical and logical). In addition we employ highly secure services design and implementation using encryption and architectures mechanisms. Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use will never occur. MY6SENSE SHALL NOT BE RESPONSIBLE OR LIABLE FOR UNAUTHORIZED ACCESS, HACKING, OR OTHER SECURITY INTRUSIONS OR FAILURE TO STORE OR THE THEFT, DELETION, CORRUPTION, DESTRUCTION, DAMAGE, OR LOSS OF ANY DATA OR INFORMATION.

10. Third Party Service Providers

In order to provide the My6sense Platform and/or Services we may be using third party service providers, who may collect, store and/or process the information detailed herein. My6sense uses commercially reasonable efforts to engage with third parties that post a privacy policy governing their collection, processing and use of non-personal and personal information. Such services may include without limitation, Amazon cloud services which its privacy policy can be found at: <http://aws.amazon.com/privacy/>; Google Analytics, which its Privacy Policy can be found at: <http://www.google.com/intl/en/policies/privacy/>. Please read such third party service providers' terms of use and privacy policies to understand their privacy practices.

11. Links to Third Party Websites

Certain links provided through the My6sense Platform and/or Services permit our Users to enter non-My6sense sites or services. My6sense is not responsible or liable for such linked sites and services' privacy practices and/or any other practices. Your access to, use of and reliance upon any such sites, services and content and your dealings with such third parties are at your sole risk and expense. Those linked sites and services are provided solely as a convenience to you. Most of such linked sites and services provide legal documents, including terms of use and privacy policy, governing the use thereof. It is always advisable to read such documents carefully before using those sites and services, *inter alia*, in order to know what kind of information they are collecting.

12. Cookies and Other Tracking Methods.

When you access or use the My6sense Platform, we or our third party service providers may use industry-wide tracking methods such as "cookies" or other similar technologies (such as web beacons) which store certain information on your computer or browser ("**Cookies**"), which will allow us to enable automatic activation of certain features and make your experience much more convenient and effortless. We or our authorized third party service providers may use both session cookies (which expire once you close the My6sense Platform) and persistent cookies (which stay on your system until you delete them). In addition, when interacting with the Service, if the End-User clicks on an advertisement, the advertiser sponsoring the

promoted advertisement may place a cookie on the End-User browser, in which case the End-User will be subject to the advertiser privacy policy. It is easy to disable or delete Cookies. Most browsers will allow you and the publisher's End-User to erase cookies from your or his/her computer's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you or the publisher's End-User disable or erase cookies, your online experience may be limited and we and the advertisers may not be able to tailor the advertisements properly. My6sense does not control such third party service providers.

13. International Data Transfer

In order to facilitate the operation of the My6sense Platform and to provide the Service, we may transfer and/or disclose information collected about you and the publisher's End-User, including Personal Information, to affiliated entities, or to other third party service providers (as provided herein) across borders and from your country or jurisdiction to other countries or jurisdictions around the world. Please note that we may transfer such information to a country and jurisdiction that does not have the same data protection laws as your and the publisher's End-Users' jurisdiction, and you and the publisher's End-Users consent to such transfer of information.

14. Changes to the Privacy Policy

My6sense reserves the right to change this policy at any time, so please re-visit this page frequently. We will provide notice of substantial changes of this policy on the homepage of our website at <http://www.My6sense.com> and/or we will send you an e-mail regarding such changes to the e-mail address that you may have provided us with. Such substantial changes will take effect seven (7) days after such notice was provided on the My6sense Platform or sent by e-mail, whichever is the earlier. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" date and your continued use of the My6sense Platform after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes. In the event that the Privacy Policy should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by law and without any prior notice.

15. Got any Questions?

If you have any questions (or comments) concerning this Privacy Policy, you are most welcome to send us an email to the following address: support@my6sense.com.