



PRIVACY POLICY

## Privacy at MiQ

At MiQ, privacy is a top priority and we provide the below Privacy Policies to outline our practices and procedures to enable you to make an informed decision about sharing information with us.

We have 2 separate policies, depending on your country of residence:

## PRIVACY FOR ONLINE USERS IN THE EU

EU privacy notice for visitors to our website, users of third-party websites, our business contacts and visitors to our premises.

**Effective Date: January 1, 2020**

MiQ Digital Limited ("MiQ" or "we" or "us" or "our") is committed to protecting the personal data of individuals whose personal data we process. Please take the time to read this privacy notice, since it contains important information about how we collect, use, disclose and otherwise process personal data concerning the following types of data subjects: individuals who use this website; visitors to other publishers' websites whose browsing activities we analyse as part of digital advertising campaigns; business and marketing contacts; and visitors to our physical premises.

### 1 Who is responsible for processing your data?

For the purpose of the General Data Protection Regulation 2016/679 and any implementing legislation (the "GDPR"), MiQ Digital Limited is the data controller responsible for any personal data we process, 6th Floor Charlotte Building, 17 Gresse Street, London, United Kingdom, W1T 1QL, UK, registration number (07321732). MiQ is part of the MiQ group of companies with offices in India, US, Germany, UK, and Canada (please see the list of affiliates in Annex 1).

### 2 Data Protection Officer

MiQ has appointed a Data Protection Officer ("DPO"), who may be contacted as follows:

via post: ePrivacy GmbH, represented by Prof. Dr. Christoph Bauer, Grosse Bleichen 21, 20354 Hamburg, DE

via email: [privacy@miqdigital.com](mailto:privacy@miqdigital.com) (which will reach representatives from our DPO)

Questions, comments and other communications regarding this privacy notice, or our privacy practices in general, should be directed to our DPO.

### 3 Categories and Sources of Personal Data and Purposes and Lawful Basis for Processing

MiQ is a technology company operating in the digital advertising ecosystem. We use data analytics to help our clients (advertisers, media agencies, brands) to advertise their ads on various websites that allow third party advertising, so called 'publishers'.

We develop insights into the browsing behaviour of website users for our clients or for publishers in order to develop targeted digital advertising campaigns for our clients that create a better user experience.

We participate in various industry schemes that are designed to ensure that any user-level personal data we process for these purposes is collected and processed on the basis of the user's consent.

We also collect and process personal data about visitors to our own website ([www.wearemiq.com](http://www.wearemiq.com)), as well as business contact data relating to the account representatives of our customers and vendors, and visitors to our physical premises.

## 3.1 Visitors to publishers' websites

The following content is prohibited: hate speech, defamation, tobacco, explosives and weapons, nudity, pornography, obscenity, references to sex or sexuality, illegal and recreational drugs, illegal pharmaceuticals or paraphernalia, illegal activities, violence, profanities, morally reprehensible content, piracy, misappropriation of copyright, trademark, trade secret, or patent, counterfeit goods, government forms or services, dangerous or derogatory content, shocking content, sensitive events, animal cruelty, malware, spyware, auto-downloads, auto-redirect, content that interferes with navigation or with other ads, unusual CTR, deceptive content that intends to, or does, induce user action through misleading appearance or behaviour, fake hyperlinks, content resembling Windows, Unix or Mac dialogue boxes, fake interactivity, free gifts, links to quizzes and surveys, misleading claims, content enabling dishonest behaviour, content which attempts to reveal a user's sensitive characteristics and/or attempts to exploit these, or which could be viewed to discriminate, embarrass, offend or otherwise cause a legal or significant impact on a user.

- A – Sources of personal data
- B – Personal data that we collect and process
- C – Why do we collect your personal data and what are our lawful bases for it?
- D – How long do we keep your personal data?

MiQ analyses web browsing usage in order to provide our clients (advertisers and media agencies) with the ability to improve returns on their digital advertising spend by enabling them to serve ads that are relevant to website visitors. We use cookies and similar applications to develop marketing insights about user preferences, sometime in combination with other data sets, in order to better match ad content with user interests.

### A – Sources of personal data

The websites that users visit may allow third parties, such as MiQ, to set cookies or similar applications on user devices or browsers when they visit the websites. We collect and analyse the data obtained via these applications. We may combine this data with aggregate data obtained from social media companies and market research firms, and user-level data from other advertising technology companies that support our services in various ways, such as fraud prevention through the detection of "bots."

### B – Personal data that we collect and process

MiQ collects various categories of personal data at the user level, including the following:

- IP address, which helps us to understand the broad location of a user Device ID (when users access websites on mobile devices), such as IDFA, AAID, SHA1
- User ID stored in a cookie placed on a user's browser
- Latitude-longitude location data
- Timestamp on accessing the website and the website URL
- Enrichment data collected about you from third parties, such as Nielsen & Eyeota.
- Tweets & Twitter handles, made publicly available via the Twitter platform

User interactions with the ad placed, i.e. we will know if a user clicks on it or the user's browser & operating system type. Sometimes advertisers may provide us with information on what users have previously purchases from them and when, in order to make our predictions more accurate.

Cookie technology is placed on devices to assist with the ad delivery process. This includes:

1. A user ID cookie to support ad personalisation, which lasts for 90 days
2. An opt-out cookie to store your opt-out and consent preferences, which lasts for 90 days
3. A session cookie to see if a browser supports cookies, which lasts for 1 browsing session
4. A cookie which limits the number of ads which a given user sees, which lasts for 90 days
5. A cookie which denotes whether a user ID is synced with other partners in the ad-serving chain
6. A cookie which supports billing and reporting.

Although we do not collect information that directly identifies individual users by name or physical address, we collect your IP address and other information about you which may make this information personal data. For example, based on a user's historic browsing behaviour,

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we may map an IP address to a city or a geographical region and other information such as weather in that region, in order to predict users' future buying decisions.

However, we never make decisions or predictions based on the characteristics of one individual. Instead we usually only target population segments or groups of individuals. These segments involve aggregated user data of no less than 1,500 users, but more typically hundreds of thousands of users who may share common characteristics, such as demographics and specific interests, such as preferences for particular types of cars.

## C – Why do we collect your personal data and what are our lawful bases for it?

We collect user-level personal data so that users can see ads displayed on the websites they visit which we think are most relevant to them based on their browsing behaviour and interests. This enhances the user experience while at the same time making our clients' advertising campaigns more efficient and effective.

We use data analytics to predict user interests based on machine-learning techniques involving the use of algorithms. Our data scientists regularly review the algorithms that we use in order to ensure they are properly adjusted and error-free. MiQ has approved an "Pixel Implementation" policy which provides, among other things, that we will not target children or vulnerable adults or collect any special categories of personal data about users. MiQ's "Creative Guidelines" prohibit any discriminatory messages and place restrictions on advertising related to gambling, health & politics.

### Consent

MiQ has joined a number of industry schemes including the IAB Transparency & Consent Framework (<http://advertisingconsent.eu/>) and Your Online Ad Choices (<http://www.youronlinechoices.com>) that have been developed to ensure that users are in a position to decide whether and how they want their web browser data used for digital advertising purposes. MiQ's Vendor Identification number within the transparency and consent framework is 101.

As a result, MiQ will not process personal data unless it can be evidenced that their publisher & advertiser partners have first obtained the users' permission to do so. This is usually done by means of a pop-up window that enables users to manage their preferences in regard to cookie application and related data processing.

When a user visits a website with which MiQ is associated, they will see a message asking them if they agree to allow the website publisher's and third-party cookies to be set on their device and collect information from it when they first visit it. If the user agrees to the application of cookies, they will then be asked whether they consent to the processing of the information collected for each of the following purposes:

#### Ad personalisation

The personal data We collect is used to personalise ads that you see over time on other sites. We will use the personal data We collect to infer your interests and place ads that we believe may of interest to you.

#### Ad selection, reporting and delivery

We collect information about what ads were shown, how often and when and where they were shown, whether the user clicked on them and made a purchase. This information is used to measure the effectiveness of the ads presented.

#### Content delivery, selection and reporting

We collect and analyse information about the user's interests and what content was shown, how often, when and where, and whether the user clicked on what was shown. This is done to adjust the content displayed to the user to be most relevant.

#### Measurement

We collect information on web visitors' use of content in combination with previously collected information. We use this data to understand and report on their use of content to our advertising clients or for MiQ's internal quality assurance purposes.

In the process of using data for the above purposes, MiQ also employs the following technical features: i) matching data to offline sources, ii) linking devices and iii) precise geographic location data.

When a user agrees to the placement of cookies by Us and one or more of the identified processing activities, we will receive a message from the website where the visitor's selection has been made, notifying Us that We have permission to set a cookie, collect information on the user's device and use it for the agreed purposes. A user may withdraw consent at any time on the websites visited or by changing their preferences on [www.youronlinechoices.eu](http://www.youronlinechoices.eu). They can do this by finding the reference to MiQ and withdrawing their consent.

## MiQ's legitimate interest in preventing fraudulent website traffic

We also process personal data in order to detect the use of internet "bots" or similar functionality intended to distort the popularity of websites and digital ads by simulating human browsing activity. If a user agrees to the placement of a cookie and accepts the processing of their personal data for one or more of the purposes described above, our ability to detect this type of fraudulent behaviour is important to ensure that the data we rely on to cater to user preferences is not distorted by false inputs. We therefore use a third-party vendor to assess whether the IP addresses that we are processing are associated with fraudulent activity.

## MiQ's legitimate interest in analysing social trends

We also process personal data in order to analyse trends in social media activity. This involves analysing common keywords that appear in public posts made available on the Twitter platform and producing aggregated insights from these to inform our advertisers about current social trends. We may use Twitter handles to identify trends relating to companies and popular personalities. Should a user wish to object to our processing of their personal data for these purposes, they may do so by contacting our DPO as indicated in Section 2 above.

## D – How long do we keep your personal data?

MiQ minimises the personal data it collects about users and retains the data for only limited periods.

Raw data that MiQ collects about user online activities is kept for no longer than 180 days from the date collected and is stored in a secure environment. The user-level data is either anonymised or aggregated after 180 days, which means the information is expressed only in a summary form about user behaviour representing large groups of individuals. Anonymous data may be kept at MiQ for 2 years and aggregated information relating to financial performance stored for up to 7 years for accounting and audit purposes. During the initial 180-day period, the information about user online behaviour is used to better target the ad campaigns and adjust the audience to ensure the ad is displayed to user groups that may be most interested in the product or service advertised. The data collected as part of the ad campaign may be used to develop insight reports for MiQ clients concerning advertising trends and campaign results. These reports are based on data that is provided in an aggregated form and does not allow for the identification of individuals.

## 3.2 Visitors to this MiQ Website

- A – Sources of personal data
- B – Personal data that We collect and process
- C – Why do We collect your personal data?
- D – How long do we keep your personal data?

### A – Sources of personal data

We may obtain your personal data from the following sources:

- from you directly (for example, through subscribing to any services offered on our website ([www.wearemiq.com](http://www.wearemiq.com)), including but not limited to email mailing lists, interactive services, posting material or requesting services);
- from your device or browser; and/or
- if you contact us, we may keep a record of that correspondence.

## **B - Personal data that we collect and process**

- name;
- username;
- email address
- operating system;
- browser type;
- cookie data (for more information please see the Cookie Notice ; and/or
- IP address.

## **C - Why do we collect your personal data?**

We process your personal data for the following purposes:

- To allow you to participate in interactive features of Our service when you choose to do so;
- to ensure that content from Our website is presented in the most effective manner for you and for your device;
- to allow Us to share information in order to provide any product or service you have requested;
- for the provision of support services;
- for the management of Our customer records;
- for system administration purposes;
- for monitoring statistical data about Our users' browsing actions and patterns, the number of visitors to Our website, the pages visited and how long they stayed; and/or
- to exchange personal data with MiQ group of companies for the purpose of reporting, global management, carrying out monitoring, analysing business, and any other purposes that is incidental to or connected with the foregoing purposes.

It is in Our legitimate interests to promote Our services via Our website and to process your information for the purposes listed above. Please do not submit your information to via Our website, if you would not like Us to process your personal data for the above purpose.

If you would prefer Us not to process your personal data for the purposes above, please contact our DPO using the details set out in section 2 above.

## **D - How long do we keep your personal data?**

We will keep and process your personal data only for as long as is necessary for the purposes for which it was collected in connection with your use of our website, unless there is a legal requirement for us to keep it for longer or the data is necessary for the establishment, exercise or defence of legal claims.

## **3.3 Representatives of our existing or prospective customers and vendors and marketing contacts**

We may collect personal data related to employees, directors, authorised signatories and other representatives of MiQ's existing and prospective customers or vendors as well as other marketing contacts.

Our existing or prospective customers are typically media agencies or advertisers that engage MiQ to help them improve the performance of their advertising campaigns. Our vendors include service providers that supply us with services that we use to deliver or enhance our ad personalisation and placement services.

- A – Sources of personal data
- B – Personal data that we collect and process
- C – Why do we collect your personal data and what are our lawful bases for it?
- D – How long do we keep your personal data?

## A – Sources of personal data

We may obtain these types of personal data from the following sources:

- from the individual directly,
- from a company that employs the individual if they are an employee of an existing or prospective MiQ customer or vendor, from MiQ's affiliates (please see Annex 1 for a list of our affiliates);
- during networking events that we have either hosted, sponsored or attended;
- and/or from publicly available sources (for example, your company website or social media sites)

## B – Personal data that we collect and process

We may collect the following categories of personal data relating to our existing or prospective customers' or vendors' employees, officers, authorised signatories, and other associated individuals:

name;

- business address;
- business email address;
- business telephone number; and/or
- job title.

## C – Why do we collect your personal data and what are our lawful bases for it?

The purposes for which we collect and process the above-referenced categories of personal data about our business contacts, and the lawful basis for doing so, are set out in the table below.

<b>REPRESENTATIVES OF OUR EXISTING OR PROSPECTIVE CUSTOMERS AND VENDORS</b>		
<b>We may use personal data to:</b>	<b>Our lawful basis for doing so is:</b>	<b>Our business purpose for doing so are:</b>
Provide our services to clients or receive products or services from vendors	Legitimate Interest of MiQ or our Clients	Efficiently fulfil our contractual and legal obligations Management Reporting (including at an intra-group level)
Establish and manage our relationship		Efficiently fulfil our contractual and legal obligations Account Management Understand the market in which we operate Management Reporting (including at an intra-group level) Exercise or defend legal claims
Learn about how our products and services are or may be used		Understand the market in which we operate Management Reporting (including at an intra-group level)
Security		Managing security, risk and fraud prevention Management Reporting (including at an intra-group level)
Let clients and potential clients know about our products, services and events that may be of interest to you by letter, telephone, email or other forms of electronic communication		Promote our goods and services Management Reporting (including at an intra-group level)

If you object to our using your personal data for these purposes, including direct marketing, please contact our DPO as indicated in Section 2 above. Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

## D - How long do we keep the personal data of our business contacts?

We will keep and process your personal data only for as long as is necessary for the purposes for which it was collected. We will keep your personal data for the duration of our business relationship and once it ends, we will delete it securely unless there is a legal requirement for us to keep it for longer or the data is necessary for the establishment, exercise or defence of legal claims.

## 3.4 Visitors to Our Premises

- A – Sources of personal data
- B – Personal data that we collect and process
- C – Why do we collect your personal data and what are our lawful bases for it?
- D – How long do we keep your personal data?

### A – Sources of personal data

We may obtain your personal data from you directly via registration and CCTV placed at our offices.

### B – Personal data that we collect and process

- name;
- business contact details;
- organisation;
- image, from CCTV cameras at our premises.

### C – Why do we collect your personal data and what are our lawful bases for it?

VISITORS TO OUR PREMISES		
We may use personal data to:	Our lawful basis for doing so is:	Our business purpose for doing so are:
Security	Legitimate Interest of MiQ	Managing security, risk and crime prevention
Maintain records of visitors to our premises		Management Reporting

If you object to us using your personal data for these purposes, please contact our DPO as indicated in Section 2 above.

## D - How long do we keep the personal data of visitors to our premises?

We keep our visitors' personal data for as long as necessary to ensure security of our office visitors and as soon as it is no longer necessary. CCTV footage is stored in back-up for 30 days, unless there is a legal requirement for us to keep it for longer or the data is necessary for the establishment, exercise or defence of legal claims.

## 4. Who we share your personal data with

We do not sell your personal data to third parties.

### MiQ's Affiliates

We may share your personal data with MiQ's affiliates (see the list in Annex 1).

### Our Partner Organisations and Service Providers

We may disclose information about you to organisations that provide a service to us, on the understanding that they will keep the information confidential and will comply with the GDPR and other relevant data protection laws.

We may share your information with the following types of service providers:

- technical support providers such as Appnexus & Google who assist with placement of cookies, collection of data from them and IT infrastructure;
- providers that help us generate an ad image and content and collate information on viewing the ad on the web such as Sizmek, Jivox & Appnexus;
- ad verification partners, in particular Integral Ad Science (IAS), that help us to verify that users are genuine and not fraudulent 'bots' through analysis of browsing information they have on your IP address, which ensures that the data we rely on to cater to user preferences is not distorted by false inputs;
- professional advisers such as solicitors, accountants, tax advisors, auditors and insurance brokers; and/or
- third party software providers, including 'software as a service' solution providers, where the provider hosts the relevant personal data on our behalf;
- providers that help us store, collate and organise information effectively and securely, both electronically and in hard copy format, and for marketing purposes.

### Company Mergers and Takeovers

We may transfer your personal data to potential purchasers and their advisors, subject to appropriate confidentiality obligations, in the event we decide to dispose of all or parts of our business.

## 5. Transfers of personal data outside the EU/European Economic Area

If and when transferring your personal data outside the EEA, we will only do so using one of the following safeguards:

- the transfer is to a non-EEA country which has an adequacy decision by the EU Commission;
- the transfer is covered by a contractual agreement, which covers the GDPR requirements relating to transfers to countries outside the EEA;
- the transfer is to an organisation which has Binding Corporate Rules approved by an EU data protection authority; or
- the transfer is to an organisation in the US that is EU-US Privacy Shield certified.

International transfers between MiQ affiliates are governed by EU Commission-approved Standard Contractual Clauses for Controllers and, where relevant, for Processors.

*We may also transfer your data to third-party vendors outside the EU, such as our customer relationship management systems providers and partner organisations. Where we do so, the Standard Contractual Clauses or other safeguards approved by the European Commission are in place to safeguard that personal data.*

*You may request a copy of these agreements by contacting our DPO as indicated in Section 2 above.*

## 6 Your Rights

### EU PRIVACY RIGHTS

The GDPR provides you with certain rights in relation to the processing of your personal data, including to:

- Request access to personal data about you (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you, and to check that we are lawfully processing it.
- Request rectification, correction, or updating to any of the personal data that we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Request personal data provided by you to be transferred in machine-readable format ("data portability").
- Request erasure of personal data. This enables you to ask us to delete or remove personal data.

Where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove personal data where you have exercised your right to object to processing (see below).

- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you (e.g. if you want us to establish its accuracy or the reason for processing it).
- Object to the processing of your personal data in certain circumstances. This right may apply where the processing of your personal data is based on the legitimate interests of MiQ or our clients, as explained in Section 3 'Categories and Sources of Personal Data and Purposes and Lawful Basis for Processing' above, or where decisions about you are based solely on automated processing, including profiling.

These rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation and other relevant legislation.

If at any time you decide that you would like to exercise any of your rights as set out above, please contact our DPO as indicated in Section 2 above.

### CHOICES RELATED TO COOKIES AND INTEREST-BASED ADVERTISING

We adhere to the European Interactive Digital Advertising Alliance ("EDAA") Self-Regulatory Principles for Online Behavioral Advertising. Visit [www.youronlinechoices.com](http://www.youronlinechoices.com) to exercise choice with respect to EDAA participants, including opting out of Online Behavioral Advertising.

#### Web Browser Opt-Out

MiQ serves cookies, and works with partners to serve cookies, in order to provide relevant advertising. View the chart below for additional opt-out options for MiQ targeting.

SERVED BY	OPT-OUT OPTIONS
Trade Desk/Adsrvr	<a href="#">Click here</a>
Google	<a href="#">Click here</a>
Jivox	<a href="#">Click here</a>
Amazon	<a href="#">Click here</a>
Xandr/MiQ	<a href="#">Click here</a>
Liveramp	<a href="#">Click here</a>

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Please note that opting out does not block ads, rather it stops tracking.

If you have multiple internet browsers or users on the same computer or device, you will need to perform the opt-out operation for each browser, device, and/or user. If you or your privacy software deletes the opt-out cookie from your computer, browser, or device, you will need to repeat the process.

### Mobile Application Opt-Out

Mobile devices allow users to opt-out of the collection of usage information within their mobile apps. To opt-out of personalized interest-based advertising on your mobile device(s), please take the following steps:

- On Android devices, go to Settings, and then select the option Google. On the resulting screen, select Ads, and you will see the option to opt-out of ads personalization.
- On Apple devices, go to Settings, and then select the option Privacy. On the resulting screen select Advertising, and you will see the option to turn on limited ad tracking.

### Location Opt-Out

By updating the location preferences on your device, or by updating the settings for individual apps, you can block the collection of location data.

### Multiple Devices and Browser Opt-Out

We may use cross-device mapping services in order to link devices that belong to the same user or household. Users can opt-out of the collection of information for each device and browser by taking the steps mentioned above. However, opting out of the collection of information for one device or browser will not result in you being opted-out of the collection of information for other devices or browsers. As such, you may need to opt-out of multiple devices and browsers.

Please note that use of the opt-out cookie will affect our ability to provide you content and advertisements that will more effectively match your interests and may prevent us from controlling the frequency with which you may view any particular advertisement. Please report any problems related to the opt-out process, or any complaints with regard to Online Behavioral Advertising data and its use, to [privacy@miqdigital.com](mailto:privacy@miqdigital.com).

### Annex 1 – MiQ Affiliates

- MiQ Digital USA, Inc.
- MiQ Digital Canada, Inc.
- MiQ Digital India Private Limited
- MiQ Digital Commercial Private Limited
- MiQ Digital (Shanghai) Co. Ltd.
- MiQ Digital Singapore PTE Ltd.
- MiQ Digital Australia PTY Ltd.
- Media iQ Digital India Pvt Ltd.

# PRIVACY FOR ONLINE USERS OUTSIDE THE EU

**Effective Date: January 1, 2020**

## PRIVACY STATEMENT/YOUR PRIVACY RIGHTS

If you are a California resident, you have the right to request access to certain Personal Data MiQ has about you. You also have the right to request that certain Personal Data be deleted.

Please [click here](#) for more information about your specific privacy rights.

This Privacy Statement ("Statement") contains details about how we collect, use, and share with third parties any information relating to an identified or identifiable natural person ("Personal Data") that we obtain or collect. Please read this Statement carefully.

## 1 – Applicability

This Statement applies to information we collect about individuals who interact with MiQ, such as through our website, [www.wearemiq.com](http://www.wearemiq.com) (our "Site"), applications, platforms, email, or in other ways (collectively, our "Systems"); visitors to other publisher's websites and digital properties, including advertiser sites, third party sites, and Internet-connected devices whose browsing activities we analyze as part of digital advertising campaigns; business and marketing contacts; and visitors to our physical premises. This Statement does not apply to information about job applicants or MiQ employees. This Statement also does not apply to, and we do not control the privacy practices, of third-party sites that may be accessible through hyperlinks on our website, which have their own privacy statements. Linking to a third-party site does not mean that we endorse the site, any products or services described on the site, or any other material contained in that site.

Whenever you interact with MiQ or provide information to us on behalf of another individual or entity, such as by providing or accessing Personal Data about another individual, you represent that you have the authority to do so.

If you do not agree with our policies and practices, do not access, use, or otherwise interact with our Systems. You can also exercise certain choices about how we handle your information in the [Choices section](#) below.

## 2 – Changes

We may update or modify this Statement from time to time. The current Statement will be posted at the bottom of the home page of the Site and will be effective when posted. We encourage you to visit this Statement frequently to stay informed, as your continued use of our Systems following the posting of changes to these terms means that you consent to such changes. If any of the changes are unacceptable to you, you should cease using the Systems. When required under applicable laws, we will seek your consent to use or share Personal Data we have already collected about you in a materially different manner than described in this Statement.

## 3 – Sources and Categories of Personal Data, and How We Use It

MiQ is a technology company operating in the digital advertising ecosystem. We use data analytics to help our clients (advertisers, media agencies, brands) to advertise their ads on websites or web properties that allow third party advertising ("Publishers")

We develop insights for our clients or for Publishers into the browsing behavior of visitor's to Publisher's websites and users of digital properties (for example, consumers that visit or otherwise interact with websites, mobile apps, and other Internet-connected properties (like Internet-connected TVs)) that advertisers use to deliver, measure or track advertising and obtain other insights in order to develop targeted digital advertising campaigns for our clients that create a better user experience.

We collect and process Personal Data about visitors to our own website [www.wearemiq.com](http://www.wearemiq.com) as well as business contact data relating to the account representatives of our customers and vendors, and visitors to our physical premises.

We may source, use and otherwise process Personal Data in different ways in regard to each of these data subject categories, as explained in the following sections:

We may combine information that we receive from the various sources described in this Statement, including third party sources, and use or disclose it for the purposes identified below.

## MiQ Privacy Policy

### A. Visitors to Publishers' Websites and Users of Digital Properties

We may collect information about consumers that visit and otherwise interact with websites, mobile apps, and other Internet-connected properties that publishers, advertisers, and other third parties (or companies acting on their behalf) use to deliver, measure, or track advertising and obtain other insights.

#### i. Sources of Personal Data

We generally obtain information about you from third parties.

- We obtain information about you and your use of the Systems from MiQ Affiliates.
- We obtain information about you from our clients seeking to place advertisements.
- We obtain information about you from our service and content providers that help us place advertisements or measure effectiveness.
- We obtain information about you from companies that provide or sell information we use to target advertising or measure effectiveness.
- We obtain information about you from parties that place cookies or advertisements on their websites.
- We obtain information about you from other users of the Systems.

#### ii. Information We Collect

MiQ may collect the following types of Personal Data about visitors to Publisher's sites and digital properties such as:

- Device Identifying Information and Other Identifiers, such as data that identifies you like a user ID, cookie ID, hashed email address, registration ID or segment ID, and data that identifies your device or web browser like user agent, device ID, cross-device ID, hashed TV identification, device type, URL, IP address, location address, browser information or other similar identifiers.
- Commercial information, such as customer ID, products or services purchased, obtained, or considered and associated timestamps, or other purchasing or consuming histories or tendencies.
- Demographic information, such as your age, ethnicity, gender, marital or familial status, or education.
- Household information, such as household income, presence of children in the household, or TV commercial and program viewing history (tied to devices in the house).
- Internet or other electronic network activity information, such as your browsing behavior, search behavior within websites and applications, or information regarding your interactions with an Internet-connected website, application, or advertisement.
- Geolocation information, such as zip code, your precise location based on your device's global position systems (GPS) signal, truncated latitude and longitude, and approximate location data from your IP address.
- Inferences drawn from any of the information we collect to create a profile about you reflecting your preferences, characteristics, behavior, or attitudes.
- Non-sensitive health information, in the US, based on visits to the websites or mobile applications of select health-related advertisers (retargeting) and standard audiences from 3rd party data providers. A full list of standard health categories used can be found [here](#).
- Example retargeting segments would include visitors to websites of MiQ clients promoting over-the-counter drugs, generalist hospitals and health centers, or prescription drugs and medical devices for common conditions such as high cholesterol or type-2 diabetes.
- Political information, in the US, we may use data from 3rd party data providers that is based on political information or interests such as party membership, political affiliation and voter registration. A list of standard political segments used can be found [here](#). We also may work with some political campaigns to utilize their data (e.g., voting history, registration status, etc.).
- Viewed content information, we collect information about the video content you view on certain smart TVs or connected devices.

#### iii. Purposes for Collecting Your Information

MiQ does not place ads targeted to the characteristics of any particular individual. Instead, we generally target population segments or groups of individuals. These segments generally involve aggregated groups of users, typically thousands or hundreds of thousands of users who may share common characteristics. MiQ may use your information in the following ways:

- **To provide our services to clients or receive products or services from vendors:**
  - to deliver or assist our clients and business partners to deliver targeted ads;
  - to enable service and content providers to assist or facilitate our provision of advertising and other services to our clients;
  - to measure and analyze the effectiveness of the ads presented and trends in social media activity;
  - to more effectively match advertisements and website content with users' interests; and
  - to provide customer service, process transactions, verify customer information, manage customer records, or similar services.

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- **For internal business purposes:**

- to diagnose, repair and track service and quality issues;
- to help us maintain the quality of our services;
- to detect and manage security incidents and protect against malicious activity;
- for system administration purposes;
- to research technological developments;
- to monitor statistical data about users' browsing actions and patterns;
- to assist us in improving the operation of our services and to enhance our services; or
- to respond to your requests and choices (as described in the [Choices section](#) below).

- **For legal, safety, or security reasons:**

- to comply with applicable laws and regulations or to respond to a subpoena, search warrant, or other lawful request for information received by us, whether or not a response is required by applicable law;
- to enforce the [Terms of Use](#) or to protect our rights; or
- to protect the safety of members of the public and users of the Systems.

- **For any other purpose for which you provide consent.**

### iv. How Long We Keep Your Information

Data that MiQ collects about users' activities and interactions with digital properties is generally kept for no more than 2 years, after which it is anonymized or aggregated. Anonymous and aggregated information may be stored for up to 7 years for internal business purposes.

## B. Visitors to our Site

### i. Sources of Personal Data

We may collect information about you in the following ways:

- Information you provide to us directly, such as when you register on our Site; sign up for offers or purchase services or otherwise communicate with us.
- Information collected or inferred from your use of the Site, such as when and how often you visit or otherwise interact with the Site, through the use of Cookies or Web Trackers as described in [Section 5](#) of this policy.

### ii. Information We Collect

The types of information that MiQ may collect about visitors to our website ([www.wearemiq.com](http://www.wearemiq.com)) or other digital properties managed by MiQ include:

- Identifiers, such as name, postal address, telephone number, unique personal identifier, user name, email address, account name, or other similar identifiers.
- Device identifying information, such as IP address, location address, browser information, device type, or cookie IDs.

### iii. Purposes for Collecting Your Information

MiQ collects your information and may use for the following purposes:

- **To provide you with services if you interact with MiQ directly:**

- to provide you with products or services you request;
- to provide customer support, process transactions, verify your information; or
- to communicate with you.

- **For internal business purposes:**

- to diagnose, repair, and track service and quality issues;
- to help us maintain the quality of our services;
- to detect and manage security incidents and protect against malicious activity;

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- to manage customer records;
- for system administration purposes;
- to research technological developments;
- to research for marketing purposes;
- to monitor statistical data about users' browsing actions and patterns;
- to assist us in improving the operation of our services and to enhance our services; or
- to respond to your requests and choices (as described in the [Choices section](#) below).

- **For legal, safety, or security reasons:**

- to comply with applicable laws and regulations or to respond to a subpoena, search warrant, or other lawful request for information received by us, whether or not a response is required by applicable law;
- to enforce the [Terms of Use](#) or to protect our rights; or
- to protect the safety of members of the public and users of the Systems.

- **For any other purpose for which you provide consent.**

### iv. How Long We Keep Your Information

We will keep and process your Personal Data only for as long as necessary for the purposes for which it was collected in connection with your use of our Site, unless there is a legal requirement for us to keep it for longer or the data is necessary for the establishment, exercise, or defense of legal claims.

## C. Business and Marketing Contacts

### i. Sources of Personal Data

We may collect business contact data related to the account representatives of our customers and vendors in the following ways:

- Information you provide to us directly, such as when you register on our Site; sign up for offers or purchase services; attend networking events that we host, sponsor or attend; or communicate with us.
- Information from your employer, such as when your employer provides us information related to its use of or interaction with our services or products.
- Information from publicly available sources, such as your company website or social media sites.
- Information from MiQ Affiliates (please see Annex 1 for a list of our Affiliates).

### ii. Information We Collect

The types of information that MiQ may collect about you include:

- Identifiers, such as name or user name.
- Professional or employment-related information, such as business postal address, business telephone number, business email address, job title, organization, and other information you provide when purchasing our services.
- Payment Information, such as bank information, credit card details or other data necessary for MiQ or its service providers to process payments.

### iii. Purposes For Collecting Your Information

MiQ may use your information in the following ways:

- To provide our services to clients or receive products or services from vendors.
- To provide you with services if you interact with MiQ directly, including establishing and managing our relationship.
- For marketing to let clients and potential clients know about our products, services, and events that may be of interest.
- For internal business purposes:
  - to learn about how our products and services are or may be used; or
  - for security, risk, and fraud prevention management and reporting.
- For legal, safety, or security reasons:
  - to comply with applicable laws and regulations or to respond to a subpoena, search warrant, or other lawful request for information received by us, whether or not a response is required by applicable law;
  - to enforce the [Terms of Use](#) or to protect our rights; or
  - to protect the safety of members of the public and users of the Systems.
- For any other purpose for which you provide consent.

### iv. How Long We Keep Your Information

We will keep and process your Personal Data only for as long as is necessary for the purposes for which it was collected. We will keep your information for the duration of our business relationship and once it ends, we will delete it securely unless there is a legal requirement for us to keep it for longer or the data is necessary for the establishment, exercise, or defense of legal claims.

## D. Visitors to Physical Premises

### i. Sources of Personal Data

We may collect information about you directly, such as when you register at a MiQ facility and from CCTV cameras at our offices.

### ii. Information We Collect

The types of information that MiQ may collect about you include:

- Identifiers, such as name or other similar identifiers you provide when signing in at a facility.
- Professional or employment-related information, such as business postal address, business telephone number, business email address, job title, or organization.
- Visual information such as images of you collected via CCTV cameras at our premises.

### iii. Purposes for Collecting Your Information

- For internal business purposes to maintain records of visitors to our premises.
- For legal, safety, or security reasons:
  - to comply with applicable laws and regulations or to respond to a subpoena, search warrant, or other lawful request for information received by us, whether or not a response is required by applicable law;
  - to enforce the [Terms of Use](#) or to protect our rights; or
  - to protect the safety of members of the public and users of the Systems.

### iv. How Long We Keep Your Information

We keep your Personal Data for as long as necessary for security purposes. CCTV footage is stored in back-up for 30 days, unless there is a legal requirement for us to keep it longer or the data is necessary for the establishment, exercise, or defense of legal claims.

## 4 – With Whom Does MiQ Share Your Information?

We do not sell your Personal Data to third parties for commercial purposes. We may share your Personal Data with other entities for the purposes disclosed below. We may also share information that has been anonymized or aggregated with third parties for any purpose.

### A. Affiliates and Subsidiaries

We may share your Personal Data within the MiQ family of companies, which includes parents, corporate affiliates, subsidiaries, business units and other companies that share common ownership. We share the information for the purposes disclosed in Section 3 above. See Annex 1 for a list of MiQ Affiliates.

### B. Service Providers

We may share your Personal Data with service providers working on behalf of MiQ for purposes such as placing ads and activities related thereto (such as fraud prevention), assisting with our internal business functions, or supporting our relationship with you. Examples include IT providers, professional advisors (such as accountants), ad verification partners, software providers, analytics companies that assist with cross-device tracking, technical support providers that assist with placement and tracking of cookies and collection of data (including information about preferences and other online activities), service providers that process credit card transactions with our customers, and marketing providers.

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### C. Our Clients

We may share information with our clients who have hired us to perform, measure, or analyze advertising related services such as to optimize advertising, measure effectiveness, conduct market research, or provide other insights and reporting.

### D. For Legal, Security, and Safety purposes

We may share your Personal Data with third parties such as law enforcement or other government agencies to comply with the law or legal requirements, to enforce or apply our [Terms of Use](#) and other agreements, and to protect our rights and the property or safety of MiQ, our users, or third parties.

### E. Transaction Partners

If we, or some or all of our assets, are acquired by another entity, including through a sale in connection with bankruptcy, we will share your Personal Data with that entity.

## 5 – Cookies and Other Tracking Technologies

MiQ may use cookies, web beacons, pixels, tags or other tracking technologies to collect, use, and disclose information about you and how you interact with our Systems, third parties, and other digital properties. Some cookies exist only during a single session (“session cookies”) and some are persistent over multiple sessions over time (“persistent cookies”). Some cookies are placed by MiQ (“first-party cookies”) while other cookies are placed by others (“third-party cookies”). We use these technologies for the purposes disclosed above, such as to remember user preferences, maximize the performance of our Systems and services, provide you with offers that may be of interest to you, measure the effectiveness of advertising campaigns and to personalize online content. These cookies and other technologies may be used to track individuals across different devices.

## 6 – Security

MiQ will take reasonable security precautions to protect the Personal Data that we handle from accidental or unlawful destruction, loss, disclosure, misuse, or alteration.

## 7 – Information About Children

MiQ does not intentionally collect information from children under 16 years of age, and children under age 16 should not submit any information to us. MiQ Systems are neither developed for, nor directed at, children. If we become aware that a child has provided us with information without parental consent, or a parent or guardian of a child contacts us through the contact information provided below, we will use reasonable efforts to delete the child’s information from our databases.

## 8 – Your Choices

### A. California Privacy Rights

If you are a California resident, you have the right to request access to the Personal Data we have about you. With certain legal exceptions and limitations, you also have the right to request that MiQ delete your Personal Data. You may exercise the following rights by emailing us at [privacy@miqdigital.com](mailto:privacy@miqdigital.com) or learn more by calling (800) 756-8340. Exercising these rights will not cause MiQ to treat you or the data we have about you in any manner prohibited by applicable law.

#### i. Right to Know

You have the right to request information about the categories and specific Personal Data we have collected about you, the sources of Personal Data, the purposes for collecting the Personal Data, and the third parties to whom we have sold your Personal Data or shared it for a business purpose and the types of Personal Data sold or shared. You may also specifically request information about any third parties with whom we have shared your Personal Data for those third parties’ direct marketing purposes. You may request this information by emailing us at [privacy@miqdigital.com](mailto:privacy@miqdigital.com).

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In order to verify your identity, we may ask for some additional information from you (e.g., your email address or your country or state of residence.) In most cases, we do not store your email address or other identifiable elements. To verify your identity, we may ask you to provide some additional information about your device or web browser.

Note that you may only request access to your data twice per 12-month period.

### ii. Right to Request Deletion

You have the right to request that MiQ delete your Personal Data. Subject to certain legal exceptions and limitations, MiQ will delete the data it has about you. To request that your data be deleted, please email us at [privacy@miqdigital.com](mailto:privacy@miqdigital.com).

In order to verify your identity, we may ask for some additional information from you (e.g., your email address or your country or state of residence.) In most cases, we do not store your email address or other identifiable elements. To verify your identity, we may ask you to provide some additional information about your device or web browser.

### iii. Requests through an authorized agent

You have the ability to designate an authorized agent to make requests on your behalf. We may ask for additional information from you or your agent to confirm that they are authorized to make access and deletion requests on your behalf.

## B. Choices Related to Cookies and Interest-Based Advertisings

We adhere to the Digital Advertising Alliance (“DAA”) Self-Regulatory Principles for Online Behavioral Advertising. Visit [www.aboutads.info](http://www.aboutads.info) to exercise choice with respect to DAA participants, including opting out of Online Behavioral Advertising. MiQ is also a member of the Network Advertising Initiative (“NAI”) and adheres to the NAI Code of Conduct for providing notice and choice with respect to Interest-Based Advertising and related activities. Visit [www.optout.networkadvertising.org](http://www.optout.networkadvertising.org) to opt out of Interest-Based Advertising. Opting out of Interest-Based Advertising will not opt you out of all advertising, but rather only Interest-Based Advertising from MiQ or its agents or representatives.

Some browsers have incorporated Do Not Track (“DNT”) preferences. Most of these features, when turned on, send signals to the website you are visiting that you do not wish to have information about your online searching and browsing activities collected and used. As there is not yet a common agreement about how to interpret DNT signals, we do not honor browser DNT signals from website browsers at this time. However, you may refuse or delete cookies or use the “opt out” option available through the DAA or NAI. If you refuse or delete cookies, some of our website functionality may be impaired. If you change computers, devices, or browsers, or use multiple computers, devices, or browsers, and delete your cookies, you may need to repeat this process for each computer, device, or browser. Please refer to your browsers’ Help instructions to learn more about how to manage cookies and the use of other tracking technologies.

### i. Web Browser Opt-Out

MiQ serves cookies, and works with partners to serve cookies, in order to provide relevant advertising. View the chart below for additional opt-out options for MiQ targeting.

SERVED BY	OPT-OUT OPTIONS
Trade Desk/Adsvr	<a href="#">Click here</a>
Google	<a href="#">Click here</a>
Jivox	<a href="#">Click here</a>
Amazon	<a href="#">Click here</a>
Xandr/MiQ	<a href="#">Click here</a>
Liveramp	<a href="#">Click here</a>
Vizio	<a href="#">Click here</a>

Please note that opting out does not block ads from appearing, rather it stops tracking your activity and providing interest-based advertisements.

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If you have multiple internet browsers or users on the same computer or device, you will need to perform the opt-out operation for each browser, device, and/or user. If you or your privacy software deletes the opt-out cookie from your computer, browser, or device, you will need to repeat the process.

### ii. Mobile Application Opt-Out

Mobile devices allow users to opt-out of the collection of usage information within their mobile apps. To opt-out of personalized interest-based advertising on your mobile device(s), please take the following steps:

- On Android devices, go to Settings, and then select the option Google. On the resulting screen, select Ads, and you will see the option to opt-out of ads personalization.
- On Apple devices, go to Settings, and then select the option Privacy. On the resulting screen select Advertising, and you will see the option to turn on limited ad tracking.

[Click here](#) for NAI mobile opt out.

### iii. Location Opt-Out

By updating the location preferences on your device, or by updating the settings for individual apps, you can block the collection of location data.

### iv. Multiple Devices and Browser Opt-Out

We may use cross-device mapping services in order to link devices that belong to the same user or household. Users can opt-out of the collection of information for each device and browser by taking the steps mentioned above. However, opting out of the collection of information for one device or browser will not result in you being opted-out of the collection of information for other devices or browsers. As such, you may need to opt-out of multiple devices and browsers.

Please note that use of the opt-out cookie will affect our ability to provide you content and advertisements that will more effectively match your interests and may prevent us from controlling the frequency with which you may view any particular advertisement. Please report any problems related to the opt-out process, or any complaints with regard to Online Behavioral Advertising data and its use, to [privacy@miqdigital.com](mailto:privacy@miqdigital.com).

[Click here](#) for NAI web browser opt out.

## 9 – How Can You Contact MiQ

If you should have any questions about this Privacy Statement or our information collection, retention, use and sharing practices, please contact us at [privacy@miqdigital.com](mailto:privacy@miqdigital.com).

### ANNEX 1: MIQ AFFILIATES

- MiQ Digital USA, Inc.
- MiQ Digital Canada, Inc.
- MiQ Digital India Private Limited
- MiQ Digital Commercial Private Limited
- MiQ Digital (Shanghai) Co. Ltd.
- MiQ Digital Singapore PTE Ltd.
- MiQ Digital Australia PTY Ltd.
- Media iQ Digital India Pvt Ltd.

MIQ