



## Plain English Privacy Policy.

### OUR APPROACH TO PRIVACY

Reveal Mobile provides mobile audience data to improve product and advertising performance. Traditionally, website advertising relies upon the “cookie” which requires no opt-in from end users for tracking. Because cookies do not function in mobile apps, we build audiences by measuring real-world and digital behaviors from mobile devices by evaluating lat/long, device details, and which beacons (small Bluetooth low energy devices) a smartphone encounters in the real world.

We are thought-leaders not only in the development of our technology, but also in maintaining and protecting end user privacy.

### PROTECTING END USER PRIVACY

- We publicly post a “plain English” privacy policy that lists all data collection practices upfront: [revealmobile.com/privacy](http://revealmobile.com/privacy)
- Use of Reveal Mobile data requires a three level opt-in from the end user, which is 3x more privacy controls than desktop advertising's cookie based approach.
  - User must download the app
  - User must accept to share location
  - User must have Bluetooth enabled
- Reveal Mobile collects no 1st party data nor any Personally Identifiable Information from end users.
- We collect no data from end users who disable ad tracking at the Operating System level.
- Reveal Mobile never provides the ability to view a single device's characteristics, only aggregated anonymous audience segments such as “Business Traveler”.
- Consumers may also contact us directly to opt-out by providing us with the device's advertising identifiers

### WHAT DATA IS COLLECTED?

Our full privacy policy can be found here: [revealmobile.com/privacy](http://revealmobile.com/privacy). Here, in plain English and at the top of the page, we explain exactly what data we collect and why.

### WHO CAN VIEW THIS DATA?

Reveal Mobile's customers can view aggregated, anonymized data about only their mobile audience, and no one else. They can not view individual characteristics for a single device. Reveal Mobile employees can view individual records of a device, but to do so requires programming and database expertise. There is no front-end user interface to view this information. The use case for viewing a specific device is to debug the product or code to ensure it's working appropriately.



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### **HOW LONG DOES REVEAL MOBILE STORE DATA?**

If a device is inactive for a period of 6 months, it is purged from our database. Data from devices is stored indefinitely as long as it remains active and in-use. When a user requests to be removed from data collection, we flag that device in our database as "Do Not Track". With the flag enabled, no new information is recorded about that device.

### **DOES REVEAL MOBILE TRACK HOME ADDRESS?**

Using a patent-pending algorithm, we infer a home latitude/longitude coordinate for that device. Those coordinates may then be converted into a ZIP code or home address for the purpose of matching US Census Data. This device-level data is never publicly visible to Reveal Mobile customers individually, and may only be viewed in aggregate data segments.

### **HOW DOES REVEAL MOBILE PROTECT THE PRIVACY OF MINORS?**

The Reveal Mobile SDK does not ask for nor require any Personally Identifiable Information (PII). If we can statistically infer with enough confidence that a device belongs to a person under 18 years of age, we flag that device as ineligible for targeting. This device is removed from all audience groups and can not be served targeted advertisements as a result of the Reveal Mobile SDK.

### **HOW DOES REVEAL MOBILE IDENTIFY DEVICES AS UNIQUE?**

Reveal Mobile uses the standard identifiers allowed by Apple and Google for the purposes of advertising. This is the IDFA for iOS devices or the Google Advertising ID for Android devices.

### **PRIVACY LEADERSHIP**

Reveal Mobile is a member of the Mobile Marketing Association, which leads the mobile industry in thought-leadership across many topics, including privacy. Our employees serve on multiple MMA committees including the Mobile Privacy committee. Additionally Reveal Mobile is a member of the Internet Advertising Bureau, serving on their Public Policy Committee, which keeps track of industry best practices on location data collection, sharing, and consumer privacy.

Members of these groups include other mobile technologies, as well as representatives from legal and government. We play an active and early role in shaping the privacy dialogue across the United States. Additionally, Reveal Mobile conducts at minimum quarterly privacy reviews, ensuring adherence to CA Attorney General, COPPA, and federal best practices.



## HOW DOES REVEAL MOBILE RANK WITH INDUSTRY BEST PRACTICES?

In this section, we evaluate Reveal Mobile's privacy practices against the recommendations of the National Advertising Initiative (NAI), the Mobile Marketing Association (MMA), the Children's Online Privacy Protection Act (COPPA), and the California Attorney General's Privacy Guidelines (CA).

BEST PRACTICE	WHO'S ASKING	DOES REVEAL MOBILE COMPLY?
<b>Provide to end users:</b>		
The types of interest based advertising offered	NAI, CA	YES
Types of data collected	NAI, CA, MMA	YES
How the data is used	NAI, CA, MMA	YES
How 3rd parties use the data	NAI, CA, MMA	YES
Technologies used to gather data	NAI, CA	YES
How long the data is stored	NAI, CA, MMA	YES
A link, email, or address to opt-out	NAI, CA, MMA	YES
Easy-to-read privacy policy	NAI, CA	YES
Reasonable access to their own data	NAI, CA	YES
A place to view their data	NAI	NOT YET, done via email
<b>Encourage other companies you work with to:</b>		
State that data is collected for advertising	NAI	YES
Describe the types of data used	NAI	YES
Explain why the data is used	NAI	YES
Provide a conspicuous opt-out link	NAI	YES

## HOW DOES REVEAL MOBILE RANK WITH INDUSTRY BEST PRACTICES?

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BEST PRACTICE	WHO'S ASKING	DOES REVEAL MOBILE COMPLY?
<p><b>Don't use data from interest based advertising</b> to determine eligibility for employment, credit, health care, insurance</p>	NAI	YES
<p><b>Data Security</b></p>		
Provide reasonable security for data	NAI, CA	YES
Keep data only as long as to fulfill a business need or required by law	NAI, MMA, CA	YES
<p><b>Marketing to ages &lt;13</b> Requires parental consent</p>	NAI, MMA, CA, COPPA	N/A - Reveal does not market to anyone under 13 years of age