

## **Privacy Policy**

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### **1. INTRODUCTION**

InMobi is a marketing platform solution provider which provides advertising and monetization services/products including through digital media (whether owned or through its third party publishers), surveys, owned and operated application(s)/widgets, exchange(s) for demand/supply (owned or through its third party partners), marketing automation solutions and other services, such as, fraud detection, reporting, audiences, attribution, analytics, modeling, segments, measurement (“Marketing Platform”).

### **2. SCOPE OF THIS PRIVACY POLICY**

**2.1 APPLICABILITY.** This Privacy Policy explains how InMobi collects, uses and shares information from individuals that interact with its services, offering or platforms comprising its Marketing Platform (“Marketing Platform Services”) and its website. (“InMobi” means InMobi Pte. Ltd, its subsidiaries and affiliated companies).

**2.2 NON-APPLICABILITY.** This Privacy Policy does not apply to the data platform services (including profiles, statistical analytics, audience segments, insights, data modeling, location analytics etc. as part of data platform services) offered under the **TruFactor** brand. Please review the TruFactor privacy policy available at the [www.trufactor.io/privacy-policy](http://www.trufactor.io/privacy-policy) for a description of data collection by and processing practices of TruFactor. Additionally, from time to time, InMobi may offer mobile applications and software features for mobile devices which may be preloaded or downloaded on a mobile device related information when (i) you view ads served by InMobi on third party websites or mobile apps (including Glance (personalized content-discovery through lock-screen), 1Weather (Weather app), BaconReader (Reddit notification management app), TweetCaster (app offering customized Twitter notifications) and Blink (app discovery widget/app)) (“Owned Apps”). This Privacy Policy does not apply to the collection by or processing practices of each of the Owned Apps, respectively. Please refer to the respective privacy policies of the Owned Apps for a description of their data collection and data use practices. We may at our discretion operate other Owned Apps; if You are a user of the same, please see the section below called “InMobi Ad Network”), and (ii) you visit the InMobi website at [www.inmobi.com](http://www.inmobi.com) (see section below called “InMobi Website”). applicable privacy policy made available to You. Any content aggregation services or feature (such as displaying of stories, articles, pictures, blogs etc.) (whether through an app or other software integration) provided by InMobi on a device will not be covered under this Privacy Policy, except to **2.3 CLARIFICATION.** To the extent the app or software promotes digital inventory of such Owned Apps are used to promote any interest-based advertising by InMobi. We urge you pursuant to Marketing Platform Services, the terms of this policy would apply to such Marketing Platform Services.

Marketing Platform Services, Owned Apps and ~~when made available~~. TruFactor are collectively referred to as “Services”.

### **3. INMOBI ADVERTISING MARKETING PLATFORM SERVICES**

#### **2.1 WHAT IS THE INMOBI AD NETWORK?**

InMobi is a global ad network with a suite of ad tech products. We partner with third party mobile website publishers and mobile app developers to serve ads on their sites and in their apps, and InMobi may also serve ads on the site and mobile applications that InMobi owns. These ads may be customized to their users' interests and geographic locations, which we may derive or infer from information that we collect about how those users interact with such sites and apps (this type of advertising is often called "interest-based advertising" or "targeted advertising"). This enables our partnering publishers and developers to provide content-rich services that are more relevant to their users, often using the advertising revenues they generate to offer their services for free or at a subsidized cost. Further, we may also obtain user data from our data partners, advertisers and/or advertisers' partners for optimizing digital advertising and/or analytical purposes including to provide relevant advertising and reporting. Please note that collection, use or storage of such data is governed by the privacy policy of such third-party partners and/or advertisers providing the same.

~~InMobi may engage in cross device data collection, which refers to the process of collecting data from devices that have been determined through statistical analysis to be linked or related. We, or third parties whom we engage to provide this service, may use cross device data to provide interest based advertising services and to deliver tailored ads to users across multiple devices.~~

InMobi engages with third party publishers and app developers to serve ads on their digital properties on behalf of its demand side advertising partners through various channels of advertising solutions including exchanges, network, off-network etc. InMobi may also serve ads on Owned Apps. InMobi also engages in campaign planning, measurement (e.g. whether an advertisement was viewed, its timestamp etc.) and attribution of advertisements, whether by itself or through third party measurement partners.

InMobi provides Marketing Platform Services, including optimization of advertising campaigns, data analytics/enrichment, segment creation, user acquisition or re-engagement through various digital advertising channels. InMobi receives data into its Marketing Platform from various sources, including end user information collected by our systems, applications, partners or customers (“Sources”), which may include third party apps and services that you use. Please refer to the privacy policies of the apps and services you use to understand how those apps and services collect, use and share data from your interactions with them. InMobi is not responsible for how those third-party apps and services collect and use data.

#### **4. WHAT INFORMATION DO WE COLLECT?**

When you view an advertisement distributed through InMobi on a site, app or other digital media, we may collect information about your device and your interaction with the advertisement. This information enables us to serve advertisements to you, improve our Services including to recognize your device when you use other sites and applications that have partnered with us. InMobi may also collect information about you when you elect to interact with our surveys or opinion-based applications.

(a) Device identifiers. Device identifiers are alphanumeric strings that are unique to your device. These include:

- iOS devices' Identifier for Advertising (IDFA) and iOS Identifier for vendors
- Google Advertising ID (GAID), or Android ID for Android devices
- Identifier for Advertising on OTT platforms
- International mobile equipment identity (IMEI), in certain jurisdiction as permitted by applicable law

(b) Location information, including:

- Geo-location or precise location of your device if you have given the app or site permission to collect your location information
- Location information we infer based on data collected through a WiFi identifier that your device is connected to, in accordance with applicable law and provided location access is permitted
- Location information we infer from your device's IP address

(c) Network information, including

- Mobile carrier
- Network provider or ISP
- Network type (e.g., WiFi or cellular)
- IP address
- IDs of WiFi access points to which your device is connected
- Date and time of connection

(d) Information about the app or site and our Software Development Kit (SDK), including:

- App or site name or version
- App identifier

- SDK version
- API key identifier

(e) Other information about your device, including:

- Device type (e.g., make and model)
- Screen size
- Operating system (e.g., iOS, Android, Windows, Blackberry)
- Mobile browser used (e.g., Chrome, Safari, Firefox)
- Language settings and time zone

(f) Advertisement information. We collect information about the ad presented on your device, including: The content type of the ad (the advertiser and category, e.g. games, finance, entertainment, news)

- The ad type (e.g. whether the ad is a text, image, video or other format based)
- Where the ad is being served (e.g. the site, digital media or app on which the ad appears)
- Whether you viewed, clicked or otherwise interacted with the ad

(g) Survey information. We may ask users to voluntarily participate in online surveys. These surveys help brands improve their products and services offered to you. If you fill out a survey, we may collect your device information described above and information you provide, including your:

- Age
- Name
- Email address
- Phone number
- Gender
- Occupation and income range
- Family size and other demographic information
- Preference for brands, modes of travel, and other consumer choices.

(h) Other marketing information:

- In the context of our Marketing Platform Services, our customers, partners or vendors may also disclose to us certain personal or non-personal information they have separately collected about you during your interaction with their apps or services so that we can effectively provide our Services. They do this in accordance with their own specific privacy policies and subject to their own applicable legal requirements. We do not use the information they provide to us for any purpose other than as permitted by third parties or for providing or improving our Services.

#### **4. HOW DO WE USE YOUR INFORMATION?**

We use the information that we collect about your device to:

- Display advertisements on your device, which may include interest-based advertising customized to your interests, preferences, locations;
- For bidding to serve advertisements and to determine which ads are most effective;
- To analyze and provide our demand partners or advertisers reports on the effectiveness of advertisements and campaigns, including across different types of devices based on our determination of devices that are related to the same person. We, or third parties whom we engage to provide this service, may use cross-device data to provide interest-based advertising services and to deliver tailored ads to users across multiple mobile devices including over the top applications and smart televisions;
- To avoid showing you the same ads too many times;

- To build custom audience segments to enable our customers and partners better target their advertisements and offers;
- To improve our Services and assist our customers and partners in improving their products and services;
- To detect, deter and prevent fraud, fraudulent traffic or to protect the security of our systems;
- We may process your survey responses and share the response data with the brands who are our customers/marketers.

## **5. WHO DO WE SHARE YOUR INFORMATION WITH?**

InMobi may share the information we collect or receive about you as described in this Policy as follows:

- Publishers and Supply Partners. We may share your information with publishers (the app or site publishers) to help them understand how users interact with their apps and sites and advertisements on their apps and sites;
- Demand Partners and Advertisers. We may share your information with demand partners, brands and advertisers who use our Marketing Platform, to allow them to understand the performance of their campaigns; and to help them better target their campaigns, products or offerings;
- Marketing Partners. We may share your information with data partners who help us with better understanding your preferences by providing data enrichment services and measurement companies who help us with attribution and tracking of advertisements distributed through us (“**Marketing Partners**”).
- Service Providers. We may share personal information we collect about you with our third- party service providers. The categories of service providers (processors) to whom we entrust personal information include: IT and related services; fraud detection, information and services; payment processors; customer service providers; and vendors to support the provision of the Services;
- Affiliates. We may share personal information with our affiliates so that the Services of InMobi and/or its Affiliates may be improved and otherwise to serve you and/or our customers better with all our offerings including effective content management;
- Disclosures to Protect Us or Others. We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.
- Disclosure in the Event of Merger, Sale, or Other Asset Transfers. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.
- International Data Transfers. Where applicable, we will protect information through other legally valid methods, including international data transfer agreements. You agree that all information processed by us may be transferred, processed, and stored anywhere in the world, including but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We have taken appropriate safeguards to require that your personal information will remain protected and require our third-party service providers and partners to have appropriate safeguards as well. Further details can be provided upon request.

## **6. HOW DO WE KEEP INFORMATION SECURE?**

InMobi uses reasonable technical and organizational measures to protect the information it collects about you in **compliance with its legal and privacy requirements and contractual obligations**. We also seek appropriate contractual protection from our partners regarding **their collection, use or** treatment of user data.

## **7. HOW LONG DO WE KEEP YOUR INFORMATION?**

InMobi retains information collected in the context of our Marketing Platform for a period of up to thirteen (13) months, unless otherwise required by law or applicable contract.

InMobi may retain the information it obtains about you as per the instructions of its customers or partners who provide such information or as required to fulfil our contractual obligations. In case any information is provided by you in participation of a survey or opinion-based application by InMobi, we will only retain your personal data or personal information for as long as necessary to fulfil the purposes we collected it for.

After the applicable retention period, InMobi may only retain and use your data: (i) in an aggregated or anonymized format; (ii) to comply with its legal obligations; (iii) to resolve disputes and enforce agreements. Please note that the use cases stated in this provision will apply as an exception to your data subject or consumer rights related requests.

## **8. OPTING OUT OF INTEREST BASED ADS**

*Opting out of interest-based advertising:* If you prefer not to receive interest-based advertising from InMobi, you can opt out at any time by going to the InMobi [Opt Out](#) page and submitting your device ID or any other listed identifier. If you opt-out of interest-based advertising, you will still receive "generic" ads from InMobi. To opt-out of our cross-device ad targeting, you must opt-out on every device browser and device using the appropriate opt-out methods.

*Opting out of surveys:* Each survey that you participate in will provide opt-out instructions, including an option to skip questions, which if elected will ensure that we do not include your device for that survey. Please note that if you opt-out of a survey you may still receive other survey requests. If we reach out to you through marketing communication modes such as emails, you will have the option to unsubscribe from such marketing communications through links provided in such emails.

*General Data Protection Regulation (GDPR):* If you are an EEA data subject, kindly refer our EEA Privacy Policy <https://www.inmobi.com/privacy-policy-for-eea/> to see your data subject rights under GDPR

California Residents: Additional rights for residents of the State of California (in the United States) effective the later of (i) January 1, 2020 or (ii) the date on which CCPA comes in effect:

- You have a right to exercise certain consumer rights such as request to know/ disclose/ access/ delete your data, collected in the last 12 months, by writing to us at [privacy@inmobi.com](mailto:privacy@inmobi.com).
- You have the right to opt out of selling of your data by clicking on the following link: - Do not sell my data.

InMobi will ensure that appropriate data subject or consumer rights that you enjoy under applicable privacy laws will be made available to you as and when and to the extent required under such applicable laws.

## **9. INTERNATIONAL TRANSFERS**

InMobi may share your information with clients, customers, partners, affiliates and other third parties described above who are based in countries outside of your country of residence (for example, if you are an EEA resident, we may share your information with our non-EEA clients or affiliates), subject to any contractual or legal requirements.

While some countries may not have data protection laws that are equivalent to those of the country in which you reside, we will take reasonable measures to protect your information in accordance with this Privacy Policy.

## **10. LEAD GENERATION CAMPAIGNS**

InMobi may offer form-based advertising solutions to marketers that include the collection of voluntary information from you as part of an advertisement that contains a questionnaire. Such information may consist of personal information/personal data, non-personal information or data, or both. All the information that you voluntarily provide in response to such form or questionnaire is typically forwarded directly to the relevant marketer's servers or their landing page and in such cases will be governed by such marketer's privacy policies in place at the time of transfer.

**In the event any personal information or personal data is directly processed by InMobi, you acknowledge that InMobi may be required to store such information for the period during which it continues to manage the**

applicable lead-generation campaign for its marketer on whose behalf the information is collected. This information may be temporarily stored by InMobi solely for running such form-based campaigns and will be used only for the purpose of optimization of such campaigns, subject to applicable legal/privacy and contractual requirements. For more information see InMobi has implemented internal safeguards to protect the temporary storage of this information and uses reasonable technical and organizational measures to protect the same. InMobi has mechanisms to delete or anonymize any personal information or personal data after the said campaign is concluded or within a period thirty (30) days from the same. Pursuant to the conclusion of the applicable campaign, InMobi may retain and use your Information only to the extent necessary for it to create reports for its client, comply with its legal obligations, resolve disputes and enforce agreements and no other purpose. Any non-personal information or data submitted by you may be used for improving our Services.

If you have any questions about InMobi lead generation campaigns, please contact us at: [privacy@inmobi.com](mailto:privacy@inmobi.com). InMobi will refer any enquiries or complaints to the relevant marketer responsible for the processing of data provided as part of lead generation campaigns.

## **11. COOKIES**

We use cookies and beacons to help us collect some of the information we have described above. This may be done when you interact with us or our third-party partners who enable InMobi to collect data related to your interaction with their apps or sites for the purpose of serving relevant Ads to you and/or improve our services. We may also use cookies to provide website functionality and advertising to you, and to save you having to provide the information you have already given us on subsequent visits to our site.

For more detailed information about the technologies we use and your ability to control those cookies, please visit our [cookie policy](#). We recommend that you review the privacy policies of the third-party apps, services or sites that you directly interact with to learn how those third parties use cookies.

## **12. PRIVACY OF CHILDREN**

InMobi complies with the age-gating requirements under applicable privacy laws such as Children's Online Privacy Protection Act (COPPA) and California Consumer Privacy Act (CCPA) in the U.S. and GDPR in EEA and does not knowingly collect personal information or personal data about users of sites or apps directed to children. Please also visit our [COPPA](#) policy.

## **13. OTHER WEBSITES**

Our website and the ads we service may contain links to other websites. You should be aware that we are not responsible for the privacy practices of such other websites as those may have different privacy policies and terms of use and are not associated with us. You agree that we cannot control these links and we shall not be responsible for any use of such websites.

## **14. CHANGES TO THIS PRIVACY POLICY**

We may amend this Privacy Policy at any time. The amended Privacy Policy will be displayed on our site. If we make any material changes, we will notify you by means of a notice on this site prior to the change becoming effective. Please check our Privacy Policy regularly to ensure you have read the latest version.

## **15. YOUR INTERACTION WITH INMOBI WEBSITE AS A BUSINESS PARTNER**

### **15.1 WHAT INFORMATION DO WE COLLECT?**

If you choose to create an account on the InMobi website to conduct business with us, we collect your username, password, email address, country, and preferred account type when you register.

You may also be redirected to our website by our partners or you may be sharing your data with such partners who may, in turn, provide your data to us (which may consist of your username, password, email address, country

etc.) to enable you to engage with us as a business partner. We urge you to refer such partner's privacy policy and terms of any forms provided, separately.

We wish to clarify that, in this context, your information may be used by InMobi to contact you for the only purpose of engaging with InMobi or its affiliates as a business partner. This data is not shared by InMobi with any third parties.

You can also provide us with other optional information, such as your name, picture, postal address, phone number, social network profiles, questionnaire responses, general business information, and other personal, biographical, or demographic info. This optional information is not necessary for you to use the InMobi site or to maintain an account with us, but by sharing this information we can better serve you and improve your overall website experience.

If you provide the name and email address of a friend or colleague, we may use that information to send the individual an invitation to visit or register with our site or become a business partner with us. Please do not share any personal or sensitive information with us if you do not have the right to share the same or if you are not interested in conducting business with us. Kindly note that this Section 15 is solely intended for business communications.

## 15.2 THE USAGE INFORMATION WE COLLECT

In addition to the personal information described above, we also collect certain information about your usage of the site. Specifically, our servers collect the following information automatically about your usage of the site:

1. the type of web/mobile browser you use (e.g. Internet Explorer, Mozilla Firefox, Google Chrome or another);
2. where you navigate within the site (e.g. the pages that you visit within the InMobi site);
3. your browsing preferences, such as your screen size, resolution and other viewing preferences;
4. the links and advertisements that you click on;
5. information about how you arrived at our site (e.g. whether you were directed to our site by a search engine or another third-party website); or
6. information about how you leave our site (e.g. which website you visit immediately after visiting our site).

We may use cookies to help us collect and store this information, as described in more detail in our [cookie policy](#).

## 15.3 HOW DO WE USE THE INFORMATION WE COLLECT?

We use the account information and other information you provide to manage your account, communicate with you, conduct business with you (e.g. reporting and payment), personalize the InMobi website, comply with your requests, and inform you about products and services in accordance with your marketing preferences for business purposes.

We use your usage information to analyze our traffic, to figure out how often business partners use parts of the site, to improve the site and generally to make it appealing.

## 15.4 WHO DO WE SHARE INFORMATION WITH?

We will share your personal information or personal data only in ways that are described in this Section 15.

From time to time, we may need to disclose your information to third parties such as to law enforcement authorities or our legal advisers, where it is necessary to comply with the law or regulation; enforce or apply our user terms

and conditions; to protect our rights, or to preserve the safety of our users. This may include exchanging information with other companies and organizations for fraud protection.

We may also share your personal information with companies that provide services to help us with our business activities (e.g. processing payments or submitting emails to you on our behalf), in connection with any merger, a sale of InMobi assets, or a financing or acquisition of all or a portion of our business to another company. Whenever we share your personal information or personal data for this reason, we will ensure that the recipient is bound by all appropriate confidentiality obligations and that it is committed to using your personal information only for the purposes for which you originally provided it.

You should also be aware that the information submitted to public areas, such as our blogs, may be read, collected, and used by others who access them.

If you interact with social media features on our site, such as the Facebook Like button, or use your social network credentials to comment on our blog, these features may collect information about your use of this site as well as post information about your activities on this site to your profile page. Your interactions with these features are governed by the privacy policy of the company providing it.

## 15.5 INTERNATIONAL TRANSFERS

We may share your information with our Affiliates and other third parties described above who are based in countries outside of your country of residence (for example, if you are an EU resident, we may share your information with our non-EU clients or Affiliates). While some countries may not have data protection laws that are equivalent to those of the country in which you reside, we will take all reasonable measures to protect your information in accordance with this Privacy Policy and all applicable legal requirements.

## 15.6 HOW DO WE KEEP INFORMATION SECURE?

We use appropriate technical and organizational security measures to protect the information we collect. We use multiple electronic, procedural, and physical security measures to protect against unauthorized or unlawful use or alteration of information, and against any accidental loss, destruction, or damage to information. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure.

## 15.7 HOW LONG DO YOU KEEP INFORMATION?

Considering this Section 15 is intended for business communications and business engagement only, we retain information for as long as it is necessary to fulfil the purposes outlined in this Section 15 and/or for engaging with you as a business partner, unless otherwise required by law.

## 16. CONTACTING US

If you have any questions about this Privacy Policy, please contact us at [privacy@inmobi.com](mailto:privacy@inmobi.com).