

## Privacy Policy

Last Updated: February 2022

### 1. Introduction

Information Clearinghouse, LLC dba F&D Reports, is a Delaware limited liability company with offices at: 310 East Shore Road, Suite 309, Great Neck, NY (“**F&D Reports**”). This policy explains our approach with respect to data we receive from our third party resources, such as mobile application (“App”) developers and publishers, data aggregation services, and providers of location supporting technologies (the “**Resources**”). The technologies utilized by the Resources interact with mobile devices in the physical world through Apps, GPS, mobile device Bluetooth connections, and Wi-Fi connections. In this policy, we also provide information on some of the methods available to individual users of mobile devices (“**you**” or “**user**”) to limit the collection of data from or about their mobile devices by the Resources.

F&D Reports is committed to transparency regarding our data and privacy practices. Our privacy program covers personal and location data obtained directly or through third parties, from sourcing of the data through our implementation of our customer-facing products.

**Changes** We may change this policy from time to time. If we make changes, we will notify you by revising the date at the top of this policy, and in some cases, we may provide you with additional notice (such as by adding a statement to our website homepage or by sending an email notification). We encourage you to review this policy whenever you access the Services to stay informed about our information practices and the choices available to you

**Business to Business:** We are a business-to-business service and aggregated, anonymized data provider. The limited personal information we received is either regarding our own personnel, or points of contact provided to us by our business customers and businesses interested in learning about our resources. While we use reasonable efforts to protect the information you provide to us, as discussed further below, we cannot guaranty your privacy. Accordingly, we ask that you not share with us any unnecessary personal information, and instead limit the information you share with us to your business contact information, and contact us through your company-issued devices, and not through personal devices.

**Geographic Considerations:** We are based in the United States, as are the majority of our customers. We do not actively market to business outside the United States. Our services and practices are evaluated and based on United States’ laws, rules and regulations. When you access this Site from outside the United States, you are doing so at your own choice; and when you choose to share your information with us to receive information, you understand and consent to our use of your information consistent with the purpose for which it was collected. **If you do not wish us to store your information**

**and to use it for the purposes indicated at the time of collection, then please do not provide it to us.**

2. How Does F&D Reports Obtain Data from our Resources And What Data Do We Obtain?

**All of the data that we collect from our Resources is anonymized and obfuscated when received.** Further, we contractually bind our Resources to require that when they collect information from you they provide:

- Proper disclosures relating to the collection of location data
- User opt-in consent for the collection of location data from mobile devices
- Respect mobile device users' choices and device settings

In addition, we require that our customers only process location data received from us in compliance with applicable privacy laws, industry standards, and their own privacy policies. Our internal policies prohibit our personnel from using any tools or resources to re-identify any data we receive from our Resources.

Finally, while we do not directly collect any location data, we are mindful about the privacy concerns that the users of mobile devices may have about location technologies. We provide here information for you, as a mobile device user, to understand what you can do with interacting with our Resources and other third parties. These do not apply to our practices, as we do not, as noted above, directly collect any such data.

The data provided by our Resources may include:

- IDFA and/or advertising identifier ("Advertising ID"), or an obfuscated version of same.
- Location of the mobile device expressed as the latitude, altitude, and longitude of the mobile device
- Mobile device operating system and operating system version
- Mobile device make and model
- The App's Publisher ID
- GPS horizontal and vertical accuracy value
- If the App was in active use or in the background when data was collected
- The speed at which the device was traveling

- If the device is connected to a WiFi or cellular network
- WiFi SSID (network name) or BSSID (MAC address for the router)
- **To be clear, the data provided by our Resources does not include data that directly identifies you, and is provided on an aggregated, anonymized basis.**

### 3. What Do We Do With Resource-Provided Data And For What Purposes Is It Used?

We analyze and contextualize the data provided by our Resources for the purpose of providing foot traffic, visitation and people-based movement measurements for accurate location intelligence to our clients.

This location intelligence can be used by our clients for investing purposes, advertising, audience segmentation, people-based movement analytics, improving business decision-making by better understanding of customer movement patterns, assisting municipalities in urban planning by enhanced understanding of movement patterns, or similar purposes.

The data may also be used for the purpose of improving and analyzing the various services provided by us.

### 4. In What Ways Can I Control the Collection of Mobile Device Data from Resources and other Third Parties?

**To be clear, we do not, ourselves, collect any data from your mobile device. The information presented below is to educate you, as the owner of a mobile device, how you can control your interaction with third party applications, some of which may be our Resources.**

#### ➤ PRIVACY POLICIES:

- Familiarize yourself with the privacy policy of any App you download on your mobile device, checking in particular what types of data the App collects from or about your device(s).
- Do not download an App if you do not feel comfortable with the data collection practices described in the applicable privacy policy. If you have already downloaded such an app, delete it.

#### ➤ DEVICE SETTINGS

- All major mobile device operating systems enable the users of mobile devices to control the types of data collected in and through Apps.
- iOS: Apple instructions on how to control iOS device location settings can be found here: <https://support.apple.com/en-us/HT203033>.

- Apple instructions on how to limit ad tracking on iOS devices can be found here: <https://support.apple.com/en-us/HT202074>. For other privacy-related settings on iOS, please go to Settings from your mobile device's home screen, and select "Privacy."
- Android: Android instructions on how to control device location settings can be found here: [https://support.google.com/nexus/answer/6179507?hl=en&ref\\_topic=6179522](https://support.google.com/nexus/answer/6179507?hl=en&ref_topic=6179522).
  - Android instructions on how to limit ad tracking on Android devices can be found here: <https://support.google.com/nexus/answer/3118621?hl=en>.
- Data Collected Via Bluetooth
  - All major mobile device operating systems enable the users of mobile devices to disable Bluetooth from functioning.
  - iOS: You can disable Bluetooth by going to "Settings" from your Device's home screen; select "Bluetooth"; and turn Bluetooth off.
  - Android: You can disable Bluetooth by going to the Settings app, then "Wireless and networks," where you can disable Bluetooth.

## 5. How Does F&D Reports Disclose the Resource-Provided Data to Third Parties?

We may disclose the data provided by the Resources as part of the market intelligence we provide to our subscribers and purchasers of our reports, in accordance with the terms of the agreements, and only for the purposes of performing such agreements, that we have in place with such third parties. **Such disclosures do not include any data that can directly identify a user of a mobile device, such as a name, mobile phone number, or an email address.**

We may also disclose data provided by our Resources to:

- Our service providers, such as data storage providers;
- Public authorities, such as law enforcement, if we are legally required to do so or if we need to protect our rights or the rights of third parties; and
- Our subsidiaries and affiliates; or a subsequent owner, co-owner or operator of our services and their advisors in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of our stock and/or

assets, or in connection with bankruptcy proceedings, or other corporate reorganization.

## 6. How Do I Check Whether F&D Reports Has the Advertising ID of My Mobile Device and Can I Block It From Further Use by F&D Reports?

You can find your mobile device's Advertising ID on iOS by going to Settings, General, and by clicking on "About", and on Android by going to Settings, then selecting "Ads". **You can email F&D Reports at [privacy@fdreports.com](mailto:privacy@fdreports.com), including the Advertising ID in your email, and request the blocking of the Advertising ID from further use or disclosure by F&D Reports.** If we have that Advertising ID, once we have blocked the Advertising ID, you will receive a confirmation email from us. Please bear in mind that the blocking of the Advertising ID by F&D Reports following your request to that effect **will not have an impact on any uses or disclosures that have already taken place.**

- If you choose to reset your mobile device's Advertising ID, you will have to request blocking of the Advertising ID from further use or disclosure by F&D Reports once again.
- Please also bear in mind that any additional devices you may possess have other Advertising IDs.
- Finally, please be aware that the use of any of the measures enlisted in this policy does not mean that no advertising will be directed at your mobile device.

## 7. Site Visitors, Business Inquiries and Business Customers

### Personal Information You Provide Directly to Us

We collect personal information you provide directly to us. For example, we collect information when you create an account to access or use the Services, access or use any collaboration tools or participate in any interactive features of the Services, send us an email, fill out a form, or otherwise communicate with us.

The types of personal information we may collect include your:

- Contact information, such as name, email address, postal address, and phone number; **but PLEASE only provide to us business points of contact**
- Employment information, such as business unit/division, company name, job title, and office location; and
- Any other information you choose to provide.

## Personal Information We Collect Automatically

We automatically collect personal information when you access or use the Services. The types of information we collect may include:

- Log Information:** We collect log information about your use of the Services, including your browser type and language, app version, access times, pages viewed, Internet Protocol (“IP”) address, approximate geographic location, and the webpage or online service you visited before navigating to the Services.
- Device Information:** We collect information about the device you use to access our applications, including the hardware model, operating system and version, unique device identifiers, and network information.
- Information Collected by Cookies and Other Tracking Technologies:** We and our service providers use various technologies to collect information, including cookies and web beacons (or pixel tags). Cookies are small data files stored on your hard drive or in device memory that help us to, among other things, improve the Services and your experience, see which areas and features of the Services are popular and count visits. Web beacons are clear, electronic images that may be used on the Services or in our emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine if an email has been opened and acted upon.

## Personal Information We Derive

We may derive information or draw inferences about you based on the other types of personal information we collect. For example, we may infer your location based on your IP address, or that you are participating in an event based on your browsing behavior on our Services.

## Use of Personal Information

We use personal information for various purposes, including to:

- Operate and improve the Services;
- Respond to your questions, comments and requests;
- Provide the information or services you request and send you related information, including confirmations and receipts;
- Send you newsletters and updates;
- Communicate with you about our services, programming and events;
- Monitor and analyze usage, trends, and activities related to the Services;

- Manage your online account(s) and send you technical notices, updates, security alerts, and support and administrative messages; and
- Notify you about any changes to the Services.

We may process and store your personal information in the United States, which may have less-protective data protection laws than the region in which you are situated.

#### Disclosure of Personal Information

We may share your personal information as follows or as otherwise described in this Privacy Policy:

- With vendors, consultants, professional advisors, and other service providers (collectively, "Service Providers") working on our behalf and needing access to your personal information to carry out their work for us.
- In connection with, or during negotiations of, any merger, sale of Information Clearinghouse's assets, financing or acquisition of all or a portion of our business to another company;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, and safety of us or any third party; and
- With your consent or at your direction, including if we notify you that your personal information will be shared in a particular manner and you provide such personal information. We may also share your personal information with third parties when you direct us to do so or when you use our Services to interact with third parties. We may also share aggregated or de-identified, aggregated, anonymized information, which cannot reasonably be used to identify you.

#### 8. Other Rights You Have

We take steps to help you exercise your rights regarding the limited personal information we collect about you (your name, business email address, business phone number, IP address or other business points of contact you choose to provide to us ("**Personal Data**") in accordance with applicable law. If you would like to access, erase, or object to, or restrict the processing of Personal Data we collect, **you may submit a request to [privacy@fdreports.com](mailto:privacy@fdreports.com)**. We will promptly review all such requests in accordance with applicable laws.

If you believe that we have violated any of the rights concerning Personal Data about you, we encourage you to first reach out to us at [privacy@fdreports.com](mailto:privacy@fdreports.com), so we have an opportunity to address your concerns directly.

## 9. California Consumers

Unless you have responded to an employment advertisement and submitted your application through this Website, or requested us to remove your Advertising ID as provided above, your communications with us should be strictly in relation to business-to-business transactions, and not consumer transactions.

That said, California consumers have the following rights with respect to Personal Data we may have collected about them. We never collect, nor do we receive (i) any sensitive personal information about our customers and/or site visitors, or (ii) any personal information about any individual from resources except in aggregated, anonymized format. Please note, however, that if you or your company has a business transaction with us, these rights do not apply to data collected in those transactions. Nevertheless, where reasonable, and not interfering with our rights and obligation in those business transactions, we endeavor to honor these requests.

### (i) Requests to Know

You have the right to request that we disclose:

- The categories of Personal Data we have collected about you;
- The categories of Personal Data about you we have sold or disclosed for a business purpose;
- The categories of sources from which we have collected Personal Data about you;
- The business or commercial purposes for selling or collecting Personal Data about you;
- The categories of Personal Data sold or shared about you, as well as the categories of third parties to whom the Personal Data was sold, by category of Personal Data for each party to whom Personal Data was sold; and
- The specific pieces of Personal Data collected.

You may submit a request to know via email to [privacy@fdreports.com](mailto:privacy@fdreports.com). The delivery of our response may take place electronically or by mail. We are not required to respond to requests to know more than twice in a 12-month period.

### (ii) Requests to Delete



You have the right to request that we delete any Personal Data about you that we have collected. Upon receiving a verified request to delete Personal Data, we will do so unless otherwise authorized by law. You may submit a request to delete Personal Data via this form.

(iii) Right to Opt Out of the Sale of Personal Data

**WE DO NOT SELL ANY PERSONALLY IDENTIFIABLE PERSONAL DATA.** The only data that we sell is aggregated, anonymized and de-identified.

(iv) Authorized Agents

You may designate an authorized agent to make requests on your behalf. You must provide an authorized agent written permission to submit a request on your behalf, and we may require that you verify your identity directly with us. Alternatively, an authorized agent that has been provided power of attorney pursuant to Probate Code sections 4000-4465 may submit a request on your behalf.

(v) Methods for Submitting Consumer Requests and Our Response to Requests

You may submit a request for access and requests to delete Personal Data about you via this form. Upon receipt of a request, we may ask you for additional information to verify your identity. Any additional information you provide will be used only to verify your identity and not for any other purpose. We will acknowledge the receipt of your request within ten (10) days of receipt. Subject to our ability to verify your identity, we will respond to your request within 45 days of receipt. In order to protect your privacy and the security of Personal Data about you, we typically verify your request by requesting additional identifying information relating to you and/or you're your mobile device. Note, however, that where your Personal Data relates to business transactions and/or disputed business transactions, we may not be able to honor your request.

(vi) Categories of Personal Data the We Have Sold in the Last 12 Months

**WE DO NOT SELL ANY PERSONALLY IDENTIFIABLE PERSONAL DATA.** The only data that we sell is aggregated, anonymized and de-identified.

(vii) The Right to Non-Discrimination

You have the right not to be discriminated against for the exercise of your California privacy rights described above.

## 10. Advertising and Analytics Services Provided by Others

We may allow others to provide analytics services and serve advertisements on our behalf across the web and in applications. These entities may use cookies, web beacons, device identifiers, and other tracking technologies which collect information about your use of the Services and other websites and applications. This information may be used by Information Clearinghouse and others to, among other things, analyze and track data, determine the popularity of certain content, and better understand your online activity.

If you would like more information about this practice or to opt-out of this use of your anonymous information, please visit <http://www.networkadvertising.org>. Your device may also include a feature (“Limit Ad Tracking” on iOS or “Opt Out of Interest-Based Ads” or “Opt Out of Ads Personalization” on Android) that allows you to opt out of having certain information collected through apps used for behavioral advertising purposes.

## 11. Security.

We have implemented reasonable technical and organizational security measures designed to protect the security of any Personal Data we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we use reasonable measures to protect your personal information, the transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment. You are responsible for keeping your access credentials to our Services secure and you are responsible for all activity using your credentials.

## 12. Children's Privacy

The data provided by our Resources does not include Personal Data relating to children younger than sixteen (16) years of age. Please see the privacy policies of your application provider for more information.

We do not knowingly solicit data from children under 18 years of age (or the age of majority in your jurisdiction). By using the Website, you represent that you are at least 18 (or the age of majority in your jurisdiction) or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Website. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from

our records. If you become aware of any data we may have collected from children under age 18 (or the age of majority), please contact us at [privacy@fdreports.com](mailto:privacy@fdreports.com).

### 13. Questions or Concerns?

Should you have any questions regarding this policy or your privacy, please contact our Data Protection Officer at [privacy@fdreports.com](mailto:privacy@fdreports.com). We will seek to promptly resolve any questions or concerns you may have.