

## **PRIVACY POLICY SUPPLEMENT FOR EUROPEAN ECONOMIC AREA**

Updated as of July 2017

Our data collection, use, and disclosure practices are explained in more detail in the accompanying Website(s) Privacy Policy and Ad Exchange Privacy Policy, available [here](#). The following supplements those privacy policies for our operations within the European Economic Area (EEA).

Your information will be held in a database within or outside the EEA. PulsePoint Ltd, One Euston Square 40, Melton St. London, NW1 2FD, UK, or its affiliate will collect your information as controller of the database and your details may be accessible to and used by other PulsePoint group companies. PulsePoint provides services in the USA and EEA, and your information may be transferred within or outside of the EEA (including to the USA) where privacy laws may differ from those in the European Union (EU). However, we will employ technical security measures designed to protect your personal information as required by EU law.

As explained in our Ad Exchange Privacy, our ad exchange may be used for online behavioral advertising (OBA) and/or interest based advertising (IBA) (collectively, “Targeted Advertising”). In operating our ad exchange, we may collect, use, and disclose for Targeted Advertising purposes personal data, including sensitive personal data. Personal data may include information such as e-mail address, financial account numbers, gender, IP address, location or certain specific demographic and other information, as well as sensitive personal data, including data related to health conditions such as information on certain past, present, or future medical conditions and treatment of those conditions, prescriptions you have filled, laboratory results, information about your health or wellness, or information regarding sexually transmitted diseases.

If personal data is used for Targeted Advertising purposes, we will obtain your consent or, if the data is acquired from a third party, we request in our contract with that third party that they obtain your consent.

In accordance with the Internet Advertising Bureau (IAB) Europe framework for OBA, we do not create segments for Targeted Advertising purposes that are specifically designed to target children age 12 and under.

We retain your information so long as it is used in our business, in accordance with our data retention policies. You may (i) access your information; (ii) request that your information be amended or deleted; (iii) unsubscribe from receiving information from us; or (iv) submit a question or complaint by writing us at PulsePoint Ltd, One Euston Square 40, Melton St. London, NW1 2FD, UK. Alternatively, you may e-mail us at [privacy@pulsepoint.com](mailto:privacy@pulsepoint.com).

## **COOKIE POLICY**

We use cookies as explained in our Website(s) Privacy Policy and Ad Exchange Privacy Policy. This Cookie Policy provides further detail on how and why we use these technologies.

## **What are cookies?**

Cookies are small data files downloaded to your device when you visit a website. Cookies send data back to the originating domain on each subsequent visit to the website, or to another website that recognizes that cookie. Cookies allow us to recognize your device and remember information about you. Cookies are downloaded and communicated through your browser. Your browser usually gives you the ability to manage cookies (though browsers for mobile devices may not offer this possibility).

## **How We Use Cookies**

*Operational and advertising services.* Cookies serve a variety of functions, such as enabling us to remember certain information you provide to us as you navigate between webpages. Cookies are also used for showing ads that are likely to be more relevant to you, which can be based, for example, on your interests or location, or information collected about you. Cookies facilitate showing you ads about a brand or a product that you might need or have an interest in.

*PulsePoint ads.* We may engage third party publishers, ad networks, and service providers to deliver our own ads. We and these third parties may set cookies on your computer or device or use the technologies described below to gather information about your activities on our Website(s) and other websites or mobile applications. For example, if you visit our Website(s) and then visit another website you may see a PulsePoint ad on that website. This is often referred to as “retargeting.” The information we collect from cookies and other technologies discussed below that are placed on your device from visiting our Website(s) is not used with our Ad Exchange platform services.

*Third party advertisers.* Our ad exchange helps third party advertisers, publishers, ad networks, and service providers deliver their own ads and ads for others. These third parties may set cookies on your device or use other technologies to gather information about your activities and then serve ads that may be relevant to you based on the information they have collected about you. The placing of these cookies and other technologies on your device may enable you to be identified across multiple websites and mobile devices. We do not control those third parties’ practices.

## **Duration of Cookies**

Some cookies, known as “session cookies,” will stay on your device only for as long as you are visiting a certain website. Others, known as “persistent cookies,” are stored on your device for longer periods. We, our service providers, and third parties using the ad exchange may collect information from both session cookies and persistent cookies.

## **Other Technologies**

In addition to cookies, we, our service providers, and third party advertisers and advertising service providers using the ad exchange may use other technologies to collect information. For example, pixel tags (which are also called clear GIFs, web beacons, or pixels), are small pieces of code that can be embedded on websites and in e-mail. Pixel tags may be used to learn how

you interact with a website and e-mail. This information helps provide you with a more tailored experience.

## **Opting Out**

You have several choices to opt out of the collection of information by and use of cookies for online behavioral advertising.

*Your browser.* You may delete and/or block cookies using your browser. If you choose to block cookies, certain features of a website may not be available or operate as desired.

*EDAA opt out tool.* PulsePoint is a member of the IAB UK and IAB EU. The IAB collaborates with the Digital Advertising Alliance, which also offers consumers access to an opt out tool. You may opt out of the use of cookies for online behavioral advertising by visiting the European Interactive DAA's (EDAA) Your Online Choices [opt out tool](#). Opting out from an advertiser will not, however, automatically opt you out of receiving targeted ads from our ad exchange. To opt out of our ad exchange, you may go [here](#). We do, however, require advertisers with whom we partner to inform us if you opt-out of receiving their ads so that we do not continue to send you those ads from our ad exchange.

The EDAA's opt out mechanism sets cookies through a browser on your computer or device to signal that you have opted out; if you clear your cookies, or access from a different browser on the same computer or device, or from another computer or device, you will need to opt out again in order to set another opt out cookie.

*Mobile devices.* You may opt out from the collection and use of data for Targeted Advertising through a mobile application on a mobile device by using the opt out features of your device or through the settings function on your mobile browser or device. These are typically located in the settings menu on your device.

## **Privacy Shield**

PulsePoint participates in the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks (collectively "Privacy Shield") regarding the collection, use, and retention of personal data from the European Union member countries. PulsePoint remains responsible for personal data that is shared with third parties under the Onward Transfer Principle. We commit to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and to comply with the advice given by such authorities with regard to human resources data transferred from the EU and Switzerland. PulsePoint may be subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission or another U.S. statutorily authorized body.

To learn more about the Privacy Shield program, and to view our certification, click [here](#). EU and Swiss individuals with inquiries or complaints should first contact PulsePoint at [privacy@pulsepoint.com](mailto:privacy@pulsepoint.com). If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact U.S.-based third party dispute resolution provider

[JAMS](#). An individual may under certain circumstances invoke binding arbitration. Please see the Privacy Shield website for more information on conditions giving rise to binding arbitration.

## **Revisions**

We may make modifications to the above terms from time to time. When we do, any changes will be posted here and the effective date of the changes will be revised accordingly.