

SIMPLEPATH SERVICES PRIVACY POLICY

Effective Date

January 1, 2020

This Privacy Policy describes how Simplepath, a division of Front Porch, Inc. (“Simplepath,” “we” or “us”) collects, receives, uses, retains, processes, discloses, transfers, and secures Personal Information through our suite of advertising services (“Advertising Services”). It also describes your choices regarding use, access, deletion, and correction of your Personal Information. Our clients, including advertisers or publishers, are referred to in this Policy as “Advertising Customers.” All references to “you,” “your” or “user” apply to consumers whose Personal Information we collect for our Advertising Services. Please review our website Privacy Policy for information about our data practices on our website located at <http://www.simplepath.com>.

“Personal Information,” in this Policy is information about you that is personally identifying, such as your name, email address, or telephone number, and that is not otherwise publicly available. The definition of Personal Information depends on the laws that apply in your location and may include other types of information as well, such as location data (including precise geo- location data), your Internet Protocol (IP) address, your mobile advertising identifier, or another unique identifier. This Privacy Policy covers information we collect online only, unless local law requires otherwise.

CHANGES TO THIS POLICY

This Privacy Policy may change from time to time, so please check back periodically for any changes. If we make any material changes, we will notify you by means of a notice on this Platform prior to the change becoming effective.

INFORMATION WE COLLECT

Simplepath provides its online Advertising Services to Advertising Customers through site retargeting, search retargeting, contextual retargeting, Facebook API, and location-based services including (“GeoFencing”) of Internet users. These services are generally provided through third-party websites owned and/or operated by our Advertising Customers who publish their own content on the Internet.

We may receive Personal Information such as physical addresses from our Advertising Customers, which we de-identify and use for GeoFencing and to provide analytical reports to our Advertising Customers. We may also obtain information from third-party data providers, such as physical addresses (including precise geo-location data), information about physical locations of a device over time, and information about consumer characteristics such as demographics and predicted interests.

Through our Advertising Services, we collect information about users’ online activities over time and across non-affiliated web sites, mobile applications, or online services, as applicable, and across multiple devices. We collect information about your device and your visit(s) to websites, apps, and online

services, such as browser type and version, Internet service provider (ISP), mobile operating system, referring/exit pages, operating system, date/time stamp, responses by a web visitor to an advertisement delivered by us or a third party, and/or clickstream data.

We also collect information that identifies your devices, which may be considered Personal Information. This information can include, for example, IP addresses, mobile advertising identifiers, and cookie identifiers.

Simplepath collects Precise Location Data (as defined by the NAI) for your device when, for example, a user makes such information available through a third-party mobile application or webpage on a particular device. Simplepath also engages in cross-device linking.

We may combine all the information that we collect to provide our Advertising Services.

HOW WE COLLECT AND USE INFORMATION

We use cookies, JavaScript, and similar technologies to provide our Advertising Services. We employ a software technology called clear gifs that help us better manage the advertising content on our network of third-party sites. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We do not tie the information gathered by clear gifs to personally identifiable information.

In performing our Advertising Services, we collect information in multiple ways, including:

on our own websites, on the websites of publishers or Advertising Customers that call our pixels when we serve online advertisements, and from third party providers.

The collection of this data about your online activities across non-affiliated properties and linked devices allows us and our Advertising Customers to better target advertising to user interests. This process is called interest-based advertising. The Advertising Services include various analytics and measurement services as well. The data also allows us to improve our services, for example, improving the effectiveness of the advertisements delivered to users and limiting the number of times a person sees a given advertisement.

INFORMATION SHARING AND DISCLOSURE

We may share the information we collect with other parties for other reasons, including the following:

We share your Personal Information with our affiliates and third-party vendors who provide services on our behalf.

We can disclose Personal Information to provide our Advertising Services, including disclosures to our Advertising Customers to enable them to serve interest-based advertisements to user devices based on the user's browsing history and online activities.

Simplepath may also disclose any information if required to do so by law or in the good faith belief that such action is necessary to: (1) comply with legal process served on Simplepath, (2) protect and defend the rights or property of Simplepath; (3) protect the personal safety of users of Simplepath, its Platform or other services; (4) provide updates and services that may be of interest to the user; or (5) prevent online fraud or other cyber threats, for example through an online threat exchange, or to report, detect and/or prevent security events.

Simplepath is required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Simplepath may disclose Personal Information with notice or with your consent, as permitted by law.

We may disclose Personal Information with your consent.

SALE OF ASSETS

In the event that Simplepath is involved in a merger, acquisition, or sale of all or a portion of its assets, including in bankruptcy, we reserve the right to include, disclose and transfer any or all stored Personal Information and other data among the assets transferred to the acquiring company. If this occurs, you will be notified via email and/or a prominent notice on our Site of any change in ownership or material changes in uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

YOUR CHOICES

Opting Out of Simplepath Targeted Advertising on Your Browser

Simplepath engages in interest-based advertising activities, including cross-device linking, as described above. If you would like to stop receiving interest-based advertising from Simplepath on your browser, [click here](#). By doing so, Simplepath will replace your unique cookie with an “opt-out” cookie that will prevent us from serving you interest-based advertising. An opt-out choice means that we no longer use or transfer data from the opted out device for targeted advertisements, and we no longer use data collected on other devices to inform advertisements on that device. We will still collect and store information through such cookies for other purposes such as metrics and analytics and we may still serve you advertising, but it will not be tailored for you. Because cookies are browser specific, if you use more than one browser or device, you will need to make your opt-out choice on each browser or device that you use. To do so, point each browser that you use to this page, and click on the disable link above. Please note that you will need to set the Simplepath opt-out cookie again in some cases, for example, under the following circumstances: You buy a new computer, delete cookies from your browser, or upgrade the browser of your existing computer.

To opt-out of interest-based advertising by other companies participating in the following consumer choice mechanisms, please visit:

— Digital Advertising Alliance (DAA)'s self-regulatory opt-out page (<http://optout.aboutads.info/>) and mobile application-based “AppChoices” download page (<https://youradchoices.com/appchoices>)

— European Interactive Digital Advertising Alliance (EDAA)'s consumer opt-out page (<http://youronlinechoices.eu>)

— Network Advertising Initiative (NAI)'s self-regulatory opt-out page (<http://optout.networkadvertising.org/>).

DO NOT TRACK

We currently honor Do Not Track signals transmitted by browsers by treating this signal as an opt out of interest-based advertising.

OPTING OUT FROM SIMPLEPATH'S LOCATION-BASED ADVERTISING

You may opt out of our collection, use, and transfer of precise location data for location-based advertising purposes, by using the location services controls in your mobile device's settings.

ACCESSING YOUR INFORMATION

You may request to access your Personal Information that we hold, as well as to correct, amend or delete information when it has been processed in violation of the Privacy Shield Principles or when otherwise required by law. To make such requests, please contact us at privacy@frontporch.com. We will respond to these requests in accordance with the laws that apply to you and within a reasonable timeframe. You can help us maintain the accuracy of your information by notifying us of any changes to your information. We may deny a request in some cases when permitted by law, such as when the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated.

INTERNATIONAL OR CROSS-BORDER TRANSFER OF YOUR PERSONAL INFORMATION AND YOUR EXPRESS AGREEMENT

By providing Personal Information and/or by communicating with us by email, you acknowledge and expressly consent to our processing and disclosure of your Personal Information outside your country. The Personal Information of users who are located outside the U.S. may be transferred outside of each eligible country to the U.S., where our servers are located and where it will be processed and stored on servers in the U.S.

EU DATA SUBJECTS: PROCESSING OF PERSONAL INFORMATION

We process Personal Information with your consent. On other occasions, we may process Personal Information when we need to do so to fulfill a contract (for example, for billing purposes) or where required to do this by law. If necessary, we may also process Personal Information when it is in our legitimate interests to do this (e.g., for auditing purposes or for fraud detection) and when these interests are not overridden by your data protection rights.

EU data subjects may have rights to access, portability, to revoke consent, to correct, delete, and/or object to or restrict processing of the Personal Information you provide to us. You can email a request to us at privacy@frontporch.com. We will respond to your request in a reasonable timeframe and in accordance with the law that applies to you. Sometimes a request in relation to your Personal Information may not apply to certain information, such as information we may keep to comply with legal requirements.

Additionally, you have the right to lodge a complaint against us. To do so, contact the supervisory authority in your country of residence.

DATA RETENTION

We retain the information we collect through our Advertising Services for a minimum of 30 days, or longer if needed for auditing purposes.

SECURITY

Simplepath uses commercially reasonable physical, managerial, and technical safeguards designed to preserve the integrity and security of your personal information and to protect it against loss or unauthorized use or disclosure.

CHILDREN'S PRIVACY

Our Advertising Services are not directed to children and we do not knowingly collect Personal Information from users who are under age 16. If you believe that a child under 16 has provided Personal Information to us, please contact us at privacy@frontporch.com.

CONTACT US

Simplepath commits to resolving requests or complaints about your privacy and our collection, use or transfer of your Personal Information. Users with inquiries or complaints regarding this Privacy Policy should first contact Simplepath at:

privacy@frontporch.com

or:

Privacy Officer
c/o Jim Owen, General Manager of SimplePath
Front Porch, Inc.
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