

BLOCKSINFORM PRIVACY POLICY

Last Update: October 14th, 2022

Privacy Policy:

BlocksInform, together with its Affiliates (“**Blocksinform**”, “**we**”, “**us**”, or “**our**”), recognizes the importance of your privacy. In this privacy policy (“Privacy Policy”) we describe how we collect, process, use, and disclose information that we obtain through our website, blocksinform.com, any BlocksInform website displaying this Privacy Policy (collectively, the “**Sites**”), our content-discovery platforms, feeds, widgets, analytics tools, and other technical applications that we provide on third-party websites (collectively, the “**Content Discovery Platform**”), and the BlocksInform News suite of content-discovery tools available on mobile devices and operating systems (including the Start line of products, collectively “**BlocksInform News**”) (all collectively, the “**Services**”).

When you visit the Sites, or use or interact with any of our Services, we will collect information from or about you or your device, which may include personal information or personal data as defined by applicable privacy laws (“**Personal Information**” or “**Personal Data**”) (collectively, the “**Information**”), and this Information will be handled as described in this Privacy Policy.

We may use Information collected through the Sites and Services in various ways, depending on whether you are (i) a publisher, advertiser, or other content provider that has a contractual relationship, with BlocksInform (a “**Customer**”); (ii) a visitor to our Customers’ websites and digital properties who interacts with our Services (a “**User**”); or (iii) a visitor to the BlocksInform Sites (a “**Site Visitor**”), which may include Customers and prospective customers. Therefore, this Privacy Policy outlines specific provisions for each of these categories in Sections 1 – 3, and outlines provisions that apply to all three categories in Section 4 below.

1. Customers

1.1 Information We Collect from Customers (“**Customer Information**”)

We collect Customer Information directly from our Customers. For example, we will collect a Customer’s contact details when a Customer enters a contractual relationship with BlocksInform and we will collect a username and password when a Customer creates an account on any of our Sites. When a Customer sends us an email asking a question, or signs up to receive our email newsletters, we will collect the Information that the Customer submits to us. We will also collect other Information that Customers choose to provide to us, such as the contents of a message or form that a Customer submits through our Sites or via email. We may also collect Information from prospective customers through publicly-available sources.

When a Customer signs up to use our Services or uses BlocksInform’s analytics dashboard “BlocksInform Network”, we collect Information such as the Customer’s name, email address, and any other Information the Customer may choose to provide to us on the platform. We may also work with third party vendors to process payments to or from our Customers on our behalf. We do not have access to the Information that you provide to these third parties, and we encourage you to visit their privacy policies to understand their practices.

1.2 How We Use Customer Information

We use Customer Information for the following purposes:

- ***Providing our Service.*** We use Customer Information to provide our Sites and Services and for other customer service purposes in relation to Customer accounts.
- ***Communicating with you about your BlocksInform Partnership.*** We use Customer Information to communicate, via email or otherwise, about Customers’ accounts; to contact Customers about BlocksInform’s products or services that we think may interest you; to respond to Customer inquiries, requests, or complaints; and to provide Customers with product updates, news, best practices, and other helpful or interesting information that can enhance your use of BlocksInform’s Services, in accordance with their communications preferences. When we communicate in this way, our emails may deploy a cookie that tracks when the emails are opened to measure Customer engagement.
- ***Marketing and advertising.*** We use Customer Information to provide Customers with newsletters, special offers, and promotions, including via email; and for other marketing, advertising, and promotional purposes, including general updates about BlocksInform. These communications will be sent in accordance with our Customers’ communications preferences.

1.3 How We Disclose Customer Information

We may disclose Customer Information as follows:

- ***BlocksInform Affiliates.*** We may disclose Customer Information to any of BlocksInform’s current or future affiliates (affiliates are companies controlling, controlled by, or under common control with us, including, for example, BlocksInform), parent companies, or subsidiaries to process for the purposes described in this Privacy Policy.
- ***BlocksInform service providers.*** We may disclose Customer Information to vendors, service providers, agents, contractors, or others who perform functions (e.g., maintenance, data analysis, customer relationship management, email marketing, surveys, credit card processing, data hosting, fraud detection) on our behalf.

- **Customers.** We may disclose Customer Information to other Customers where relevant to the Service we provide. For example, we may provide publishers with information about what advertisers may appear on their network or advertisers with information about which publisher websites their campaigns have appeared on.

1.4 Customer Choices

Customers may access, correct, or update the Information that they have provided to us by either updating the Information in their account, by emailing their dedicated account manager, or by emailing us at hello@blocksinform.com. We may send periodic promotional or informational emails to Customers in accordance with their communications preferences. At any time, Customers may opt out of such communications by following the opt-out instructions contained in the email. Please note that it may take up to ten (10) business days for us to process opt-out requests. If you opt out of receiving marketing and advertising emails from BlocksInform, we will still send you emails about your account and any Services that you have requested or received from us.

2. Users

2.1 Information We Collect from Users (“User Information”)

We automatically collect User Information when Users interact with our Services that appear on our Customers’ websites and digital properties. Like most other web-based services, we collect this User Information through cookies and other technologies. BlocksInform collects only pseudonymized data, which means we do not know who you are because we do not know or process your name, email address, or other identifiable data. User Information that we collect includes, but is not limited to, Information about a User’s device and operating system, IP address, the web pages accessed by Users within our Customers’ websites, the link that led a User to a Customer’s website, the dates and times a User accesses a Customers’ website, event information (e.g., system crashes), general location information (e.g., city and state), hashed email addresses (when made available by the User), and gender (when made available by the User). In the BlocksInform News suite of tools, we also collect in-app User behaviors (e.g. online status, browsing activity, and clicks) and implicit non-precise device location inferred from search queries (when enabled by the User). We ask our Customers to obtain consent on our behalf, where required by applicable data protection laws, for us to collect this User Information.

2.2 How We Use User Information

We use User Information for the following purposes:

- **Providing our Service.** We may use User Information to provide our Services to Users and our Customers.
- **Tailoring content.** We may use User Information to tailor the content and information that we may send or display to Users; to retarget content to Users through our Services and elsewhere; and to otherwise personalize your experiences while using our Services
- **Tailoring content across multiple devices.** We may use User Information to improve a unique User's experience across multiple browsers and devices (such as smartphones, tablets, or other viewing devices) by providing better targeted ad campaigns to that User. For instance, should we recognize a User on a web browser, we may want to provide that User similar or personalized content on mobile apps, as well. To do this, we identify unique Users across devices, or we may sync cookies and identifiers with our service providers or Customers that do this, to help our Customers enhance their own data and data segments, or to help them target the right audience.
- **Offering our Customers data segments that help target content and advertisements for topics, products, and services that may interest you.** A data segment is a grouping of users who share one or more attributes (e.g., travel enthusiasts). to our Customers so that they may better target Users who are more likely to be interested in their content and advertisements. BlocksInform does not knowingly create segments that are based upon what we consider to be sensitive information (for example, Personal Data revealing your racial or ethnic origin or your religious affiliations, or Personal Data concerning your sensitive health information, sex life or sexual orientation, or genetic or biometric data). In connection with our Services, our Customers may use non-sensitive conditions such as an inferred interest in health and wellness or over the counter medications. In addition, BlocksInform offers our Customers **standard political-related segments** that may indicate general political sentiment, interest in specific political issues, and political party affiliation.

2.3 How We Disclose User Information

We may disclose User Information as follows:

- **BlocksInform Affiliates.** We may disclose User Information to any current or future Affiliates, parent companies, or subsidiaries to process for the purposes described in this Privacy Policy.
- **BlocksInform service providers.** We may disclose User Information to vendors, service providers, agents, contractors, or others who perform functions (e.g., maintenance, data analysis, customer relationship management, email marketing, surveys, credit card processing, data hosting, or fraud detection) on our behalf.
- **Unaffiliated third parties.** We may disclose User Information to other unaffiliated third parties, specifically with (i) our **data partners**, so that we can connect you with relevant content by allowing our advertisers to target specific

audience segments, and (ii) our programmatic demand and supply partners, so that we can serve you with tailored advertisements.

- **Customers.** We may disclose User Information to Customers where relevant to the Service we provide those Customers. For example, we may provide publishers with information about the viewing and click-through patterns of the content they publish and may provide advertisers with information about conversion rates for analytics purposes.

2.4 Accessing Your User Information From BlocksInform

You have the right to request that BlocksInform provide you with access to the Personal Data we hold about you, correct your Personal Data, delete your Personal Data, and cease or restrict processing of your Personal Data.

2.5 Interest-Based Advertising

Through our Services, including our Services on Customer websites, we may provide advertisements to you based on your recent browsing behavior across different Customer websites, browsers, or devices. For example, if on a first online visit, you browse on website A, then on a subsequent visit to website B, you may see content personalized based on your browsing history on website A. For example, if a user visits a clothing retail site, she might see clothing-related ads on another site she visits.

In order to target advertisements to you for products and services that may interest you, we may use cookies, JavaScript, web beacons (including clear GIFs), HTML5 local storage, and other technologies. We may also work with third parties such as ad networks, which are third parties that display advertisements based on your visits to websites that you have visited in the past. These advertisers will deliver you targeted advertisements for products and services that may interest you. Third-party ad networks, our advertiser Customers (and their content providers and agents), and/or traffic measurement services may also use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs, and other technologies to measure the effectiveness of their ads and to personalize advertising content to you. These **third-party cookies and other technologies** are governed by each third party's specific privacy policy, not this one.

If you have questions about our collection and use of data for interest-based advertising purposes, please contact us at: hello@blocksinform.com.

2.6 User Choices and Opting Out

BlocksInform supports initiatives to offer our Users greater transparency and control over the uses of their Information. Therefore, we offer the following options for controlling the interest-based content and ads you receive.

- ***If you do not want to receive interest-based ads from BlocksInform, you can disable the display of such ads by clicking on the opt-out link below.*** Please note that an opt out will not prevent

you from seeing BlocksInform's content recommendations. Rather, the opt out will prevent BlocksInform from using your Information to tailor these recommendations to your interests. You will continue to receive recommendations that are selected based on the particular website that you are viewing (i.e., contextually based ads).

You are currently: Not Opted Out **Opt Out**

- **Not Opted Out:** BlocksInform will serve you personalized recommendations based on your history.
- **Opted Out:** You have opted out of tracking, BlocksInform will no longer serve you with personalized content recommendations based on your Internet use history.

Please also note:

- Because our tracking mechanisms operate at the device and browser level, to fully opt-out across devices, you will need to do so on each device and browser individually.

If your browsers are configured to reject cookies, your opt-out may not be effective, since we identify your choice to opt-out based on an opt-out cookie we deliver to you. In this case, you will need to confirm that your browser is configured properly in order for the opt-out to be effective. If you are using a Safari browser on iOS11 or macOS High Sierra, you must first adjust your Privacy and Security Settings to turn off both "Prevent Cross-Site Tracking" and "Block All Cookies", and then return to this privacy policy or your preferred opt out platform to reset your opt out preferences.

- BlocksInform may use non-cookie technologies in limited cases. Like cookies, these technologies allow BlocksInform to recommend ads that are tailored to your interests and to remember whether you have chosen to opt-out from our Services. Please note that some web browsers may not permit you to block the use of non-cookie technologies, but you can do so by simply clicking on the Opt Out feature above in this Section 2.6.
- ***You can also opt-out of receiving targeted ads served by BlocksInform and other advertising companies.***
- You may also visit one of the Digital Advertising Alliance affiliate websites to learn more about User choices and opting out of interest-based advertising displayed by the many member companies.

2.7 Data Retention

We retain User Information, which is directly collected for purposes of serving ads, for at most thirteen (13) months from the User's last interaction with our Services (often for a shorter period of time), after which time we de-identify the data by removing unique identifiers or aggregating the data.

We retain deidentified or aggregated data, which cannot identify an individual or device and is used for purposes of reporting and analysis, for as long as

commercially necessary. We keep opt-out information for longer than this period so that we can continue to honor your opt-out requests.

2.8 Children

We do not knowingly collect any data or target any advertisements on websites directed to children under the age of sixteen (16). If you are the parent or guardian of a child under the age of sixteen (16) and have a concern regarding the Information we collect, please contact us at hello@blocksinform.com.

3. Site Visitors

3.1 Information We Collect from Site Visitors

BlocksInform collects Site Visitor Information either directly from you or from third parties that collect this Information during your use of our Sites. We may combine all the Information that we collect from various sources.

- **Information we collect directly from you.** We may collect Site Visitor Information directly from you. For example, when you send us an email asking a question, or submit a form on our Sites to receive marketing materials or email newsletters, we will collect the Information that you submit to us. We may also collect any other Information that you choose to provide to us, such as the contents of a message that you submit through our Sites.
- **Information we collect from third parties.** We may collect Site Visitor Information about you from third parties that collect information on our behalf through your use of the Site, such as web analytics companies. Such information may include, without limitation, information about your operating system, IP address, settings and system configurations, device model, device ID and other unique device identifiers, mobile related information, the web pages you access within our Sites, the website that led you to our Sites, the website to which you go after leaving our Sites, the dates and times that you access our Sites, event information (e.g., system crashes) and web log data.

3.2 How We Use Site Visitor Information

We use your Site Visitor Information for the following purposes:

- **Providing our Service.** We use Site Visitor Information to provide and manage our Sites and Services.
- **Tailoring content.** We use Site Visitor Information to tailor the content and information that we send or display to you on our Sites, and to otherwise personalize your experiences while using our Sites.
- **Communicating with you.** We use Site Visitor Information to communicate with you, including via email, about our Services; to respond to your inquiries via our website request forms; and to answer any questions or

complaints you submit; to provide you with news, best practices or other information that we think may interest you.

- **Marketing and advertising.** We use Site Visitor Information to provide you with newsletters, special offers, and promotions, including via email; to contact you about products or services we think may interest you; and for other marketing, advertising, and promotional purposes. These communications will be sent in accordance with your communications preferences.
- **Analyzing use of our Sites.** We use Site Visitor Information to better understand how individuals access and use our Sites, both on an aggregated and individualized basis; to honor their requests and preferences; and for other research, analytical or statistical purposes.

3.3 How We Disclose Site Visitor Information

We may disclose Site Visitor Information as follows:

- **BlocksInform Affiliates.** We may disclose Site Visitor Information to any current or future Affiliates, parent companies, or subsidiaries to process for the purposes described in this Privacy Policy.
- **BlocksInform service providers.** We may disclose Site Visitor Information to vendors, service providers, agents, contractors, or others who perform functions (e.g., maintenance, data analysis, customer relationship management, email marketing, surveys, credit card processing, data hosting, fraud detection) on our behalf.

3.4 Third-Party Online Advertising

To understand your interests and deliver advertisements that are tailored to your interests, we may work with service providers or third parties that use their own **cookies, web beacons, and other technologies** to collect Information about Site Visitors' online activities, either on our Sites and/or other websites across the Internet ("**BlocksInform Ad Partners**"). These BlocksInform Ad Partners include advertisers and ad networks that may collect Information about when you view or interact with one of their advertisements and may collect information regarding your activities on our Sites and your online activities over time and across different websites. Like most advertisers, BlocksInform works to place our advertisements where we think they will be most interesting and relevant to the recipient. One way we do this is by allowing ad networks to place their own cookies when an individual visits our Sites. This enables the ad network to recognize individuals who have previously visited the BlocksInform Sites. Then, if the ad network has purchased ad space on a third-party website, and recognizes that same individual visiting that third-party website, the ad network can deliver a BlocksInform advertisement, knowing that this individual has already expressed interest in BlocksInform by visiting the BlocksInform Sites.

3.5 Site Visitor Choices

Site Visitors may opt out of the BlocksInform Ad Partners that collect information on the Sites to serve ads about BlocksInform. By visiting one of the Digital Advertising Alliance affiliate websites, you can learn more about User choices and opting out of interest-based advertising displayed by the many member companies.

For Site Visitors who have subscribed to receive emails from us, you can manage your subscription by clicking your unique link that appears at the bottom of each of these emails.

4. General Provisions Applicable to Customers, Users, and Site Visitors

4.1 How We Use Your Information

We use the Information that we collect from Customers, Users, and Site Visitors for the purposes respectively set forth in Sections 1-3 above, as well as for the following purposes:

- **Analyzing use of our Services.** We use the Information that we collect to better understand how Customers, Users, and Site Visitors access and use our Site and Services, both on an aggregated and individualized basis; to respond to Customers', Users', and Site Visitors' requests and preferences; and for other research, analytical, and statistical purposes.
- **Legal compliance.** We use the Information that we collect to comply with applicable legal obligations, including requests from law enforcement or other governmental entities.
- **Protecting our rights and interests.** We use the Information that we collect to protect our rights and interests and the rights and interests of our Customers, Users, Site Visitors, and the general public, as well as to enforce this Privacy Policy and our Terms of Use.

4.2 Disclosing Your Information

When we share your Information with third parties as specified above, we require such recipients to agree to only use the Information we share with them in accordance with this Privacy Policy and our contractual specifications and for no other purpose than those determined by us in line with this Privacy Policy.

In addition to the disclosures detailed above, we may also disclose Information for the following purposes:

- **Business transfers.** We reserve the right to disclose and/or transfer Information to another entity if we are acquired by or merged with another company, if we sell or transfer a business unit or assets to another company,

if we undergo a bankruptcy proceeding, or if we engage in any other similar business transfer.

- **Legal compliance.** We may disclose Information in order to comply with the law, regulation, a judicial proceeding, subpoena, court order, or other legal process.
- **Protecting rights and interests.** We may disclose Information where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our **Terms of Use** or this Privacy Policy, or as evidence in litigation in which we are involved.
- **Aggregate and de-identified Information.** We may disclose to our Customers and other third parties aggregated or de-identified information about users for marketing, advertising, research, or other purposes.

4.3 Cookies and Other Tracking Mechanisms

For more information about how we use cookies and other tracking mechanisms on the Sites and when providing our Services, please refer to our **Cookie Policy**

4.4 Third-Party Links

Our Sites and Services may contain links to our **third-party partners'** websites. Any access to and use of such linked websites is not governed by this Privacy Policy but instead is governed by the privacy policies of those third-party websites. We are not responsible for the information security nor privacy practices of such third-party websites.

For example, our Sites include features from third-party social networking platforms, such as the Facebook "Like" button. These features may collect certain information, such as your IP address or the page you are visiting on our Sites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or directly on our Sites. Your interactions with these features are governed by the privacy policy of the company providing such features. As another example, our Services link to Customer websites, which are also not governed by this Privacy Policy but by the applicable Customers' privacy policy.

4.5 Security

We value the security of your Information, including but not limited to the Information collected via the Sites or Services. Please be aware, however, that no data security measures can guarantee 100% security.

4.6 International Data Transfers

We may transfer your Information outside the country in which it is collected, including to a country that may not offer the same level of protection for Information as the country in which you reside. Rest assured however, that

BlocksInform has arranged all contractual safeguards to ensure your Information is processed in a way that offers an adequate level of protection when it is shared between or among BlocksInform Affiliates, subsidiaries, and/or parent companies.

5. Regional Privacy Rights

5.1 Legal Basis for Processing Personal Data

If we ask you to provide Personal Data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Data is mandatory or not (as well as of the possible consequences if you do not provide your Personal Data).

Similarly, if we collect and use your Personal Data in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Data, including if you would like to better understand how our legitimate interests to process your data are balanced against your data protection rights and freedoms, please contact us as specified in Section 6 below.

5.2 Why BlocksInform Collects your Personal Information

BlocksInform processes your Personal Information in order to provide personalized content and advertisements to you.

5.3 Where BlocksInform Collects Your Personal Information

We automatically collect User Information when Users interact with our Services that appear on our Customers' websites and digital properties. Like most other web-based services, we collect this User Information through cookies and other technologies. We may also obtain Information about you from our data partners.

BlocksInform collects Information either directly from you during your use of our Sites and Services or from third parties that independently collect this Information from you, and we may combine the Information that we collect from these various sources. For more information about these collection methods, please see Sections 2.1 and 3.1 above.

5.4 How BlocksInform Shares Your Personal Information

BlocksInform may disclose or make available your pseudonymous Personal Information to our trusted partners. In most cases when we do so, we have contractually restricted their uses of this data for only BlocksInform's business purposes. Under the CCPA, such disclosures of Personal Information to

service providers are not deemed to be a “sale” and thus are not prohibited after you exercise your right to cease or restrict disclosures or sales of your Personal Information to third parties. In any instances where we have not entered into a service provider relationship with such third parties, we will stop sharing your Personal Information when you instruct us not to “sell” your Personal Information.

6. Contact Us

If you have questions about the privacy aspects of our Sites or Services, please contact us at hello@blocksinform.com.

The names and contact details of our Affiliates which may process your

7. Changes to This Privacy Policy

This Privacy Policy is current as of the Effective Date set forth above.

We may change this Privacy Policy from time to time, so please be sure to check back periodically. We will post any changes to this Privacy Policy on our Sites.

If we make any changes to this Privacy Policy that materially affect our practices with regard to the Information we have previously collected from you, we will endeavor to provide you with notice in advance of such change by highlighting the change on our Sites. We will seek your prior consent to any material changes, if and where this is required by applicable data protection laws.