

This Privacy Policy is effective as of July 11, 2017

Welcome and thank you for visiting the [Code3 website](#). This Privacy Policy describes Code3's practices for the collection and use of the information we receive about you and other consumers in connection with the digital advertising services and tools we provide to our Customers (as defined below). We refer to these services and tools in this Privacy Policy as our "Solutions." You may know our Customers as the consumer brands whose products and services you use, or learn about when you visit their websites, or whose marketing information you look at on social media sites or other online services you may visit.

Code3's Solutions help our customers to deliver and improve their platforms. In order to do this, we may receive information about consumers from our Customers and from third-party data suppliers. We analyze and use this information in order to design, implement and monitor our Customers' ad campaigns through the ad tools provided by social media platforms in which you may participate. Any consumer information that is given to us by users of the Code3 website who are affiliated with one of our Customers ("Customer Users") will be treated as described in this Privacy Policy and as may be directed by the Customer providing the information. To learn more about the choices and requests you can make about your information with our Customers and ads that are displayed to you by our Customers, including how you may opt-out of receiving certain ads based on your online activity and interests, please refer to the privacy policies of our customers, as well as the sites or services through which their ads or content are displayed to you.

This Privacy Policy also describes how Code3 handles information we collect from users of the Code3 website(s) that link to this policy. Our use of information collected from Customer Users will additionally be governed by our contract with that Customer.

If you are a consumer, please be sure to read the following sections of this Privacy Policy to understand how we use information that we receive about you and other consumers in connection with providing our Solutions to Customers:

- Some Terms We Use in This Policy
- Our Solutions
- How We Use Information Collected through Our Solutions
- General Policies and Practices for Our Solutions and Our Website

If you are visiting the Code3 website, please be sure to read the following sections of this Privacy Policy before using our website or submitting information to us:

- Some Terms We Use in This Policy
- Information Collected from Visitors to Our Website
- General Policies and Practices for Our Solutions and Our Website

By using our website or submitting information to us, you consent to our use of this information in accordance with this Privacy Policy. If you provide information to us through use of our website, you agree that such information, including Personally Identifiable Information (defined below), may be transferred from your current location to the offices and servers of Code3 located in the United States and the authorized third parties referred to in this Privacy Policy.

### **Some Terms We Use in This Policy**

“Affiliate” is a corporation, partnership, limited liability company, or other legal entity controlling, controlled by, or under common control with Code3.

“Agent” is a third party that provides services on our behalf in connection with our Solutions or the operation of our business generally, such as cloud service vendors, companies that facilitate or assist with mailing service-related communications, companies that provide consulting or analytics services, and other service providers.

“Customer” is a company, typically a consumer brand, that uses our Solutions.

“Personally Identifiable Information” (“PII”) is information that identifies you individually, such as your email address.

We will treat any information that is combined with PII as PII under this Privacy Policy. Other terms that you should know as you review this Privacy Policy are defined throughout this Privacy Policy in the sections in which they first appear.

## **Our Solutions**

Code3, a subsidiary of Graham Holdings, Inc., is a technology and analytics company that helps our customers, the world’s leading consumer brands, to develop, deliver, and measure the effectiveness of digital advertising strategies. When providing our Solutions to Customers, we may obtain information about you and other consumers, including PII, to aid our Customers in deciding how to reach certain consumer groups through digital ads.

## **Information Received through Our Solutions**

- **Information Provided by Customers and Partners:** We receive information, including PII, about you from our Customers, partners, vendors and other third parties, and we may combine the information that we receive from different sources. For example, our Customers may give Code3 the names, email addresses, phone numbers, physical addresses, and/or device identifiers of individuals who have signed up for their email lists or information about online purchases made through our Customers’ sites. Our Customers and third-party partners may also provide us with information about consumers, such as PII, geographic location, gender, age range, education, and income levels, and activities and interests. Our use of this information is governed by our Customer and partner contracts and this Privacy

Policy. However, our Customers' and partners' use of the information that you provide to them is governed by their privacy policies and terms of use, and not by the Code3 Privacy Policy.

- Information Collected Through Cookies, Web Beacons, and Other Technologies: In providing our Solutions to Customers, we may use technologies called “cookies” and “web beacons” to collect information automatically, on behalf of our customers, from visitors to our Customers' sites and services. This information may include, for example, the browser and operating system you use to access the Internet; your Internet Protocol (IP) address and Internet service provider; other sites you have visited before or after visiting the sites of our Customers or partners. If you interact with our Customers' content, ads, sites, or services (including apps) via a mobile device, we may also collect or receive information such as the type of device you use and device- and app-specific identifiers. The information that we collect or receive through these technologies may be combined with the other information, including PII, that we receive from or on behalf of the same Customer.
  - A cookie is a small, unique piece of information placed and saved in your browser when you access our Customers' websites, services, content, or ads. Cookies help us collect information about your use of our Customers' sites, services, content, or ads over time, such as how many times you visited, which pages you viewed, whether and what you purchased, and how long you spent on the site or service. Cookies allow us to analyze usage of our Customers' sites and services so that we may deliver related reports on user groups and activities to our Customers.
  - A web beacon (also known as a “clear GIF”) is an image that may be used with a cookie to see what content is being accessed by visitors to a particular website. We use web beacons to help us measure site or service traffic and related

browsing behavior, and to improve your experience when you interact with our Customers' websites, services, content, or ads.

- **Reporting and Analysis:** When we help our Customers deliver ads through social media platforms, the platforms may provide us with information about the aggregate performance of those ads. We may provide this reporting information to the Customer on whose behalf the ads were delivered and/or use this information for our own business purposes such as to inform our Solutions for our Customers.

## **How We Use Information Collected through Our Solutions**

**Code3 combines and uses the information that we collect through our Solutions in a variety of ways for our business, such as:**

- **To Provide Our Solutions.** We use the information we collect from our customers, social media partners and other partners, vendors, and other third parties to provide our Solutions such as to help our Customers provide you with more relevant ads and to understand how and which types of consumers interact with their online content, sites, services, and ads. We may also use this information for other operational purposes, such as fraud prevention.
- **To Improve Our Solutions.** In an ongoing effort to better understand consumers, serve our customers and improve our Solutions, Code3 conducts research on consumer demographics, interests, and behavior based on the information we collect and the information that is provided to us by our customers, partners, vendors, and other third parties.
- **Aggregated Data.** We may compile and analyze the information that we collect on an aggregate basis, and we may use and/or share this data for research or business purposes in accordance with applicable law.

For more information on how we may disclose information collected or obtained through our Solutions, please see “Sharing Information Collected through Our Solutions and on Our Website” below.

### **Information Collected On Our Website**

In addition to the information collected in connection with providing our Solutions, we collect certain information on our website, [www.code3.com](http://www.code3.com), which is available to site users who are affiliated with current or prospective Customers, or others who are interested in learning more about our Solutions. In addition to this Privacy Policy, information collected on our website from Customer Users and our use of that information is governed by our contract with the applicable Customer.

- **Information You Provide.** We may ask you to provide information for various reasons. For example, when you contact our sales team for more information on our Solutions, we may ask you to enter information into a contact form such as your name, email address, phone number and geographic region. We may also ask you for similar information at other times – such as when you sign up for our newsletter, download a white paper or view a webinar. We may combine this information with other information about you that we collect from you directly or from other sources, such as information about your employer and job title. If you decline to provide the information that we request, we may be unable to provide you with our Solutions or respond to your requests.
- **Automatically Collected Information.** We may automatically collect other information about you through cookies and similar technologies when you visit this website to facilitate your use of our website and analyze how you interact with our website. For instance, we may automatically collect certain information, such as which pages of our website you visit, the domain name of your Internet service provider, your IP address, your browser software, and referring

website information. In addition, we may place a cookie in your browser to remember who you are.

- **Analytics Services.** On our website, we may use analytics services provided by third parties, including [Google Analytics](#). These service providers may use cookies or other technologies to collect information about your online activities across this and other sites over time for analytics purposes. To learn more about how Google Analytics collects and processes data and the choices Google may offer to control these activities, you may visit <http://www.google.com/intl/en/policies/privacy/partners/>.

## **How We Use Information Collected from Visitors to Our Website**

We use the information we collect, including PII:

- **To Operate and Improve Our Business.** We use the information for a variety of purposes to provide the Services that you request and to operate and improve our Solutions, our website, and our business generally, as well as for other operational purposes, such as fraud prevention.
- **To Communicate with You about Our Solutions and Our Website.** We use the information to communicate with you. For example, we may respond to your questions, comments, or requests for information from us, and to inform you of material changes or additions to this Privacy Policy, our terms, and conditions, or contact you with legal notices.
- **To Send Offers.** We may send you offers and information from Code3, our parent company (Graham Holdings Company), our Affiliates, or other companies whose products and services we believe may be of interest to you.
- **To Conduct Research.** We may conduct research on our site visitors' demographics, interests, and behavior, to analyze traffic patterns, as part of our general business analytics, or to otherwise modify or improve our website.

- **Aggregated Data.** We may compile this information in an aggregated manner, and we may use it for any research or business purposes in accordance with applicable law.

## **Updating Your Information**

If you would like to review, update or modify any contact information you have provided to us through the use of our website, you can do so by emailing us at [legal@code3.com](mailto:legal@code3.com). If you have any questions or concerns about the uses of such information as described above, please contact us at [info@code3.com](mailto:info@code3.com).

## **External Links**

This Privacy Policy applies only to our Solutions and our website. If any part of this website links you to other websites, please note that this Privacy Policy does not apply to other websites. Links from this website do not imply that Code3 endorses or has reviewed linked third-party websites. We suggest that you examine the privacy statements posted on other websites to understand their procedures for collecting, using, disclosing, and protecting personal information.

## **General Policies and Practices for Our Solutions and Our Website**

### **Sharing Information Collected through Our Solutions and on Our Website**

We may share information that we collect, including PII, with the following parties and under the following circumstances:

- With current and prospective customers and partners (including third-party data vendors), to offer and improve our Solutions and as otherwise described in this Privacy Policy.
- With social media platforms when we conduct ad campaigns on such platforms on behalf of our Customers. Specifically, we may transfer information to social media platforms in order for our Customers to provide you with more relevant advertising on those platforms. Social



media platforms may use and share such data in accordance with their own privacy policies.

- With our parent corporation, Graham Holdings Company, and/or our other Affiliates.
- With vendors or Agents.
- When we have a good faith belief that it is reasonably necessary to satisfy applicable law, regulation, legal process or the lawful governmental request of any country, or to protect the rights, property or safety of Code3, its users or the public, or to enforce Code3's Terms and Conditions.
- If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, your information may be transferred to a successor or affiliate as part of that transaction, either alone or along with other assets.
- With respect to information you provide to us through the website, we may share with co-sponsors of certain promotions and events for Code3's business that may appear on our site or in connection with Code3.
- With respect to information you provide to us through the website, we may share it with selected third parties for their direct marketing purposes. Please see below for your choices regarding this sharing.
- We may share aggregated and/or de-identified data with third parties at our discretion.

## **How We Protect Your Information**

We use reasonable administrative, technical, and physical measures to protect your PII. Unfortunately, the Internet cannot be guaranteed to be fully secure. Accordingly, we cannot guarantee the security of our databases, nor can we guarantee that the accuracy of the information that is supplied to us or that it will not be intercepted or corrupted while being transmitted to us over the Internet. We do not accept liability for unintentional disclosures.

## **Data Retention and Disposal**

We retain data as long as we have a legitimate business purpose for it or as otherwise specified by law. When we no longer need to retain PII, we will securely destroy it.

## **Your Choices**

To learn more about the choices and requests you can make as a consumer about PII that we receive from our customers and partners, please refer to their privacy policies.

If you do not wish us to share PII that you provide to us through the use of our website with our customers, partners, or other third parties for their direct marketing purposes, please email your request to opt-out of such sharing to [legal@code3.com](mailto:legal@code3.com).

## **Customers, Partners, and Other Third Parties**

This Privacy Policy applies only to our Solutions and related services and this website. In connection with our Solutions and services, we may receive information related to you, including PII, from our partners, Customers, or other third parties. We do not own, control or operate the businesses of such third parties, and we are not responsible for their privacy policies or practices. However, once we receive your PII, it will be handled in accordance with this Privacy Policy.

## **Persons Under Age 13**

Code3 does not knowingly collect PII from individuals under the age of 13. Should we learn that a person under 13 has provided us with PII, we will delete that information from our database. If you are a parent or legal guardian and believe that your child who is under 13 may have given us PII, contact us at [legal@code3.com](mailto:legal@code3.com).

## **International Users**

Privacy laws and expectations vary from country to country. If you are visiting the Code3 site from locations outside the United States, please note that by providing your information to us, you are agreeing to the transfer of your information to, and the collection and processing of such information in, the United States. U.S. laws regarding the collection, use, disclosure, and processing of information may vary from those in other countries and may be less stringent than the applicable laws in your jurisdiction. By providing your information, you consent to any transfer and processing in accordance with this Privacy Policy.

### **Material Changes to this Privacy Policy**

Sometimes we may change this Privacy Policy and will post any revised policy on our website. If we make a material change, we may notify you by placing a notice on the Code3 website, or by email if you have provided it to us through use of our website. We suggest you come back to this website periodically to check for changes.

### **Contacting Us**

If you have questions or concerns about this Privacy Policy or the use or disclosure of your information as described in this Privacy Policy, please contact us at [legal@code3.com](mailto:legal@code3.com).

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