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PRIVACY POLICY

In Loco Media is a Brazilian technology startup stemmed from researches developed at the Federal University of Pernambuco - UFPE and a world reference in the media market focused on mobile advertisements. Being the owner of a modern location technology, our applications allow the transmission of information regarding services and products available according to proximity or places visited. *In Loco Media* is hired by many advertisers in order to improve their services in a way that allows the communication to take place in the right moment and in the right time. Today *In Loco Media* has over 500 partners, which you can check on our [website](#).

In order to be possible to work together with the advertisers, enabling the sending of advertising in the smartest way, we of *In Loco Media* collect some data of your mobile device when you make use of partners' applications. Each partner application informs you in its corresponding privacy policies what kind of data *In Loco Media* can collect from your device. To find out if the application you are using is an application from a partner of *In Loco Media*, please read its privacy policy. *In Loco Media* always requests that all its partners' applications inform its users about the data that it is being collected through that application.

Next, we will explain in detail the privacy policy adopted by *In Loco Media*, including the description of how you can opt-out of our database. It is noteworthy that this privacy policy deals exclusively with privacy issues of *In Loco Media* related to the device data collected and processed from partners' applications.

1. Mobile device data

When you make use of a partner application that uses our software, *In Loco Media* can collect data about the device, including the Advertising Identifier of Android, iOS, or other similar operating systems, as well as location data received from the sensors of the device. In addition to these data, *In Loco Media* also collects data about advertising on the device, including clicks made from it, impressions and time spent on advertising. It is important to highlight that not all partners' applications collect all these data.

To fulfill the requirements of transparency, we detail below the data from your device that *In Loco Media* may collect if you use one of the applications from our partners:



- A. Information about your device: the electronic advertising identifier (“advertising ID”) of the operating system (Android Advertising ID - AAID, Apple ID for Advertising - IDFA, or other), model, manufacturer, operating system, mobile carrier, mobile browser, type and speed of the Internet connection being used, IP address of the Internet connection, GMT time zone, WebView User Agent and applications installed on the device, including the identification of the applications that have the software of *In Loco Media*;
- B. Data of the sensors of WiFi, GPS, Bluetooth, accelerometer, magnetometer, gyroscope and proximity when these accesses are available in the partner’s application;
- C. Information about the received, viewed and clicked advertisements on the device, including the type of advertising, as well as the information regarding the user’s interaction with the advertisements: how/where did it click on, how much time did it spent on viewing it, how much time did it pass inside the content after performing the click and accessed the pages viewed within the WebView in which the user may have been directed after clicking on the advertisement;
- D. Data about the age and gender of the user.

In this matter, it is also important to indicate that *In Loco Media* may receive data from your device that have been collected by our partners, such as information about the activity of your device in their services.

These data, collected and received, are stored by *In Loco Media* having as the unifying basis the advertising ID from your operating system (AAID, IDFA or other), which does enable us to recognize your mobile device over time.

It is important to highlight that not all partners’ applications collect all these data. This is the maximum of data that we can collect from a particular advertising ID in the current technical conditions. The minimum of data that the partners’ applications enable us to collect are related to the items A and C described above.

In addition to these data from your device, *In Loco Media* can also process the data gathered in order to make inferences about the location profile and interests associated with the device. Next, we detail these inference data about the advertising ID of the device:

- A. Country, City, State and neighborhood;
- B. Estimated latitude-longitude coordinates from the workplace and housing, as well as neighbors’ devices associated with these coordinates;
- C. Geographic data, such as climate and vegetation;
- D. Occupation, Education and Social Class;
- E. Segments of stores physically visited;



- F. Cultural profile;
- G. Age and gender;
- H. Means of transport;
- I. Internet Provider;

Remembering that, in the case of partners' applications that only have the minimum permissions for data collection, *In Loco Media* makes only partial data inferences about the items D and F above mentioned.

These data from your mobile device collected and processed by In Loco Media, do not include personal data such as your name, civil identifying numbers (such as Social Security) or e-mail, which is an asset of *In Loco Media*. Our company works with the concept of "privacy by design" dealing with the issue of privacy as a fundamental one, following all legal requirements not only in Brazil but also in other countries where it operates.

Specifically in relation to your e-mail, if you have consented specifically and unambiguously with its collection and processing for correlation and aggregation purposes with the database of some of our partners, we will only store it in the form of a hash (which cannot be understood in natural language) in order to make this data anonymous in our database.

In order to ensure even more your privacy, *In Loco Media* does not collect nor do any processing of data considered sensitive, such as, for example, religious and political choices, credit card data and bank data in general.

In addition to these measures, *In Loco Media* similarly does not collect information regarding fixed hardware identifiers (like MAC - Media Access Control, or IMEI - International Mobile Equipment Identity) from your mobile device.

Therefore, the data collected do not enable us to know your identity in real life, but only to understand preferences and context as a consumer, enabling us to recognize your device over time.

Finally, it is important to clarify that *In Loco Media* does not collect any of the device data listed above when the partner's application is aimed at children. Thus, in the case of partners' applications aimed at kids, *In Loco Media* does not collect or make any type of processing with the device data, except for the collection of contextual information of the application, such as the type of content or application, in order to send a thematic advertisement. In addition, *In Loco Media* follows the privacy standards of the Brazilian legislation and of the American Children's Online Privacy Protection Act (COPPA). For this



reason, *In Loco Media* does not intentionally process any data, as indicated above, related to applications aimed at children under 13 years of age.

2. How we at *In Loco Media* use the data collected?

The data from your device that *In Loco Media* collects when you make use of any of our partners' applications are used for the creation of consumer profiles grounded in Advertising IDs, enabling us to send to your device advertising and offers in a smarter and relevant way, preventing randomness.

The competitive advantage of *In Loco Media* is exactly our location technology that enables us to determine with a higher accuracy where the mobile device is or has been, sending ads that are more relevant.

In addition to the specific uses of the collected device data described in this Privacy Policy, *In Loco Media* can also use them to:

- A. Evaluate which ads have been sent and displayed on certain devices, preventing them from recurring in an uncomfortable frequency;
- B. Monitor and analyze consumer trends;
- C. Produce and send reports to partners that use the service of *In Loco Media* to reach consumers interested in their products and/or services. The partners may receive aggregated information such as: which advertisements a certain group of consumers clicked, at what time a particular group of consumers is more likely to check an ad, what product or service lead a particular group of consumers to the advertiser's store, etc.
- D. Enhance the security of the collected data and improve the services provided by *In Loco Media*;
- E. Identify frauds in ads views in order to protect the interests of our advertising partners.

It is also important to highlight that *In Loco Media* may recognize in our database a particular mobile device when an advertiser shares with us the device advertising IDs (AAID or IDFA). This sharing procedure has a goal of maximizing the effectivity of our partners' advertisement web, guaranteeing a smarter and more relevant advertising.

Especially regarding the advertising that you might receive on your mobile device through the partners' applications of *In Loco Media*, we would like to clarify that the third parties' advertisements and contents exhibited in the partners' applications are not under the control or responsibility of *In Loco Media*, instead they are the advertisers' sole responsibility.

3. How we protect and store the collected data



The safety of the data collected by *In Loco Media* is something of a major importance. This is the reason why we use security measures, such as cryptography, both on the transportation and on the storage of the data, in addition to always being updating our protection system.

The Data collection made by *In Loco Media* takes place through a secure transport protocol and uses encryption to protect data in their transport to our servers.

The collected data are then stored in a secure database, encrypted and with restricted access, only being used for the purposes expressly set forth in this Privacy Policy.

4. Sharing of collected data with third parties

In Loco Media also performs contracts for the sharing of collected device data with some of our commercial partners in order to enable the enhancement of the experience of these partners' users. The shared device data have as a key identifying the device advertising IDs (AAID or IDFA), or your e-mail with the protections described above.

In these contracts, *In Loco Media* establishes clauses according to which the partners have to maintain the same standards of data security and privacy as set forth in this privacy policy.

Over and above the relationships with partners regarding the sharing of data, *In Loco Media* will only provide collected data related to a particular device advertising ID or e-mail (with the protections described above, and when collected) in the case of a specific court order and in line with the applicable legislation.

5. International data transfer

In Loco Media may store and process the collected device data on servers from contracted companies located in other countries, including member countries of the European Union or the United States. With regard to the hiring of these services, *In Loco Media* will always seek companies with a high level of information security, and will establish contracts that do not violate the privacy settings provided in this policy. It is worth noting that all data stored by *In Loco Media* are encrypted, which guarantees a level of data security.

In Loco Media can also share the data collected from your device with partners located in countries other than your own. We emphasize that in cases of international data transfer, *In Loco Media* introduces obligations on this transfer agreements in order that the partners are obliged to maintain the same standard of data security and privacy as prescribed in this privacy policy.



Furthermore, *In Loco Media* may share the collected data with other companies from *In Loco Media*'s group to perform the activities described in this Privacy Policy.

6. How to opt-out

In Loco Media always cares about the consumer experience and therefore, makes available to you the option to "opt-out". To start the process of opt-out click [here](#).

The opt-out is a right of the consumer that do not want to share its device data with companies that enable the sending of smart advertising. We need to clarify that when you make the opt-out, you will not be deleting the partner's application that enables the work of *In Loco Media* on your device, or have any other type of loss in the use of this application.

By opting out you will be disabling the collection and processing of data from your device for ad selection purposes by the technology of *In Loco Media*. Nevertheless, if you regret this decision, you can always reactivate our services by sending us an e-mail: publishers@inlocomedia.com.

However, we emphasize that the opt-out procedure of *In Loco Media* does not disable the receipt of advertising on your device. You will still receive ads, but not ads selected based on *In Loco Media* technology.

Finally, we clarify that the opt-out only disables the action of *In Loco Media*, which means that companies other than *In Loco Media* will still collect the data of your device. If you want to disable thoroughly the collection of device data associated with your advertising ID, you can change the settings of your device. If it has the operating system Android or iOS, proceed as follows:

iOS 6:

- Select "settings" > "general" > "about" > "advertising"
- Select "limit ad tracking"

iOS 7 or higher:

- Select "settings" > "privacy" > "advertising"
- Select "limit ad tracking"

Android:

- Select "Google settings" > "ads"
- Select "opt out of Ads Personalization"



There is also the possibility for you to reset your advertising ID generating a new one, and therefore, avoiding the recognition of you mobile device based on the data history associated to your old advertising ID. To do this, if you have the operating system Android or iOS, you can follow the steps below:

iOS 6:

- Select “settings” > “general” > “about” > “advertising”
- Select “reset advertising identifier”

iOS 7 or higher:

- Select “settings” > “privacy” > “advertising”
- Select “reset advertising identifier”

Android:

- Select “Google setting” > “ads”
- Select “reset advertising ID”

If you have any queries about *opt-out*, please contact *In Loco Media* by our service channel: contato@inlocomedia.com

7. Privacy Policy Amendments

In Loco Media is always working to improve its services and to bring innovation for the consumers. This means that we may update and change the terms of this Privacy Policy from time to time. On our website, you will always find the latest version of the terms by simply accessing this [link](#).

If you prefer, we can also notify you by e-mail every time the Privacy Policy changes. To this end, you only have to send an e-mail to us: publishers@inlocomedia.com.

Finally, we would like to remember that if in any future modification of this Policy, you no longer agrees with it, you will always have the option to use the opt-out, as explained in item 6 above, in order to disable the processing of your device data by *In Loco Media*.

8. Contact us

Despite all information in this Privacy Policy, if you still have doubts, please contact us through our service channel. *In Loco Media* encourages the submission of comments, questions and suggestions. To contact us, you can send an e-mail to the address contato@inlocomedia.com or call us at +55 (11) 3090-6766.

