

# Privacy Policy

## Introduction

Big Mobile partners with a wide range of publishers, serving ads to their sites on behalf of advertisers. Ads are served to advertiser's target audiences across a publisher ad network. Audiences are identified for presenting advertising using a variety of data sources and data techniques. Big Mobile is committed to protecting consumer privacy and to clearly informing users about the collection and use of information when using our services, as outlined in this privacy policy.

## Information we collect

Big Mobile collects and brings together sets of information and data for marketing purposes, enabling relevant advertising to reach the right audience. The following may be collected:

- information about your device and browser
- Information about your geographic location
- information about your browsing & app activity
- information collected by our partners and shared with Big Mobile
- data from third party partners

We don't collect and use information to personally identify and market to individual users based on information such as such as name, home address, email address & phone number. All marketing efforts are based on aggregating data and then utilising a range of statistical and other data techniques to target relevant audiences.

## Information about your device & browser

Information about your device may include: device type (e.g. smartphone, tablet), operating system, network provider, IP address, a carrier user ID, and a unique identifier of your mobile device.

## Information about your geographic location

Information about your location includes the postcode where you are viewing the advertisement or the GPS location of your device if you have consented to sharing that location. We may also use other location information that is generated through your interaction with the site, application or advertisement.

## Information about your browser & app activity

Information about your browser activity may include: IP address, browser type, click data and types of ads viewed, cookies (small text files stored on your Internet-

enabled device), web beacons, pixel tags, and sites visited. Information about your app activity may include the apps you use.

## **Information collected on behalf of our partners**

We may accept personal information on behalf of our partnering mobile publishers, app developers or advertisers. An example of this would be when a user fills out a competition entry form. This information is collected on behalf of advertisers as part their campaign requirements, and will only be used for the purposes of that advertiser and their campaign. It is not used as a data source by Big Mobile for other advertising purposes.

This information is segregated and transmitted securely to the partner with whom the user intended to share it. Our partners collect such information in accordance with their own privacy policies and are subject to their own applicable legal requirements.

## **Sensitive data management**

There is certain data that although not personally identifiable we consider sensitive, such as viewing of adult sites or indicating a users' specific medical condition. We do not use these types of sensitive data for creative of audiences and targeting across our network.

Collection and re-use of sensitive data extends to a users physical location. Locations that would be associated with sensitive information, such as hospitals, other medical and health practices, drug rehabilitation centres, political/ethnic/religious institutions, adult themed venues (eg. Sex shops, brothels, strip clubs etc)

## **How we use the information**

We use the information we collect to create relevant audiences across our network for advertisers to target, as well as implement dynamic optimisation and re-targeting to relevant audiences.

The information we collect on our system is aggregated and only used in de-identified form. So while we may select an ad for a user based on knowledge or statistical methods that a user is a member of a certain audience we do not personally identify individual users.

This also applies to our re-targeting methods. We employ an anonymised and aggregated data collection approach to re-targeting, where data collected is from mobile browsing and application use behaviour.

In some circumstances we may be provided with explicit demographic, behavioural or preference data obtained from partners. This data will be provided in a de-

identified and aggregated form. For example a publisher can tell Big Mobile the age range of an individual user, but will not provide a unique identifier for that user.

To further the privacy protection, in the situation where Big Mobile receives this type of explicit personal data, the following approach will be taken:

- Use of broad categories, such as age range, rather than specific data of birth
- Avoid including information that is likely to contribute to identity theft or fraud, again date of birth or address
- Limiting time series or historical data sets that either include personal identifiers or could be linked to personal identifiers

## **Information sharing and disclosure**

We may share aggregate or de-identified information with our partners, subject to contractual restrictions.

In the event Big Mobile is acquired by another entity or otherwise experiences a change of control, the successor entity will have the same rights to use the data that is subject to this policy as does Big Mobile.

## **Children's Privacy**

We do not knowingly collect any personal information about children under the age of 13.

## **Data offshore**

Big Mobile's has implemented strategies to minimise risk to individuals when data is handled off shore. In particular no identifiers linked to consumers are included in data sets stored or managed off shore. If required an anonymous ID will be used.

Big Mobile will take the approach of treating all information collected, managed and re-used from offshore data centres as personal information and will manage the privacy protection requirements based on this premise.

## **Data Security**

Big Mobile takes steps to protect the security of information that we collect. To that end, we have designed and deployed hardware, software, and networking solutions in an effort to reasonably secure and protect access to our systems and data.

## **Questions and concerns**

If you have any questions or concerns about our privacy practices, you may contact us: [privacy@bigmobile.com](mailto:privacy@bigmobile.com)

