

Symphony Advanced Media, LLC Media Insiders Privacy Policy

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1. About Media Insiders

Media Insiders is a division of Symphony Advanced Media, LLC (“Media Insiders” or “MI” or “we” or “SymphonyAM”) that collects information from participants in its research programs about how they view, use, and share digital, mobile, TV, and social media (collectively, “Media Consumption Information”). It provides access to this Media Consumption Information to its customers - advertisers and others - so that they gain insights on consumers’ interests, in order to make informed decisions about how to communicate and deliver content, entertainment or information to the public (“Media Insiders Service” or “MI Service”).

This Privacy Policy applies to the registration information (collectively, “Registration Information”), which will include personal information (“PII”), and Media Consumption Information (collectively and including any related information collected by or on behalf of Media Insiders, “Information”) that we collect from individuals who sign-up to participate in our panels (“panelists” or “you”). We are firmly committed to protecting the privacy of our panelists while collecting and processing any of this Information. Your privacy is as important to us as it is to you.

2. Scope

This Privacy Policy explains in general terms how we collect, store, use, share, and disclose the Information that we obtain from our panelists. It applies only to the Media Insiders Service and does not apply to any information collected through any other services of ours. It also briefly explains what information we collect from individuals who visit the www.mediainsiders.com website without becoming panelists and what is done with that information.

This Privacy Policy does not apply to the practices of the third parties who may have access to Information about our panelists as described in this Privacy Policy. In addition, Media Insiders may license the use of its tools and

technologies to third parties. The use of these tools and technologies by these third parties for their own purposes is subject to the privacy policies of these third parties.

3. How to Become a Panelist

To become a panelist, you must (a) be a lawful resident of the United States, (b) register on the Media Insiders website at <https://www.mediainsiders.com/index.php/registration-survey>, and (c) provide the PII requested. Some questions are mandatory as indicated with a red asterisk (*) in the survey; others are optional. If you do not complete all mandatory questions, you cannot become a panelist.

4. Consent

By completing, in whole or in part, the registration survey described above, you are consenting to the processing of your Information in conformance with this Privacy Policy. In particular, you are consenting to the transfer of data from your country to a country that may have less stringent data protection laws for the purposes described in this Privacy Policy.

5. Children and Minors

Children

Children are not eligible to become panelists. We do not intentionally collect or maintain any Information from people whom we know to be under 13 years of age. No part of the Media Insiders Service is designed to attract children under 13 years of age. If we later learn that a panelist is under 13 years of age, we will take steps to remove that panelist's Information from our databases and will prevent the panelist from participating in any of our future panels.

Minors over 13

Minors who are over 13 years of age are eligible to become panelists. Their continued participation is subject to their parent's approval. If we receive a written request from a parent to block his or her child from further participating in our panels, and/or to delete Information collected about the child, we will cooperate promptly with the parental request in accordance with our internal policies on this matter.

6. How do we Collect Information?

We use a variety of tools to collect Information from our panelists.

Initial Registration survey

An individual who wishes to become a panelist is requested to complete a registration survey. We collect all Information that the individual provides when completing the survey.

Media Insiders Metering Application (MI App)

In order to be able to participate in our panels, a panelist must have downloaded the Media Insiders Metering Application ("MI App"). The MI App is a piece of software that collects data when installed on the panelist's device (i.e., smartphone, tablet, laptop or desktop computer, or similar device). To download the MI App, you must follow the instructions located at: <https://mediainsiders.com/data/3.2 App Installation Instructions.pdf>.

Media Insiders collects Information through the Media Insiders Metering Application. If you do not wish your Media Consumption Information to be collected through the MI App, you should un-install the MI App. For un-install instructions, see https://mediainsiders.com/data/APP_removal_instructions.pdf

Audio Content Collected through Media Insiders Metering Application

During the activation of the MI App, the panelist is prompted to accept the GraceNote Audio Content

Recognition Agreement https://mediainsiders.com/data/Gracenote_Agreement.pdf. Media Insiders uses the GraceNote service for audio content recognition. The GraceNote technology is required for the operation of the MI App because it helps identify the TV show that a panelist is viewing.

The MI App collects Media Consumption Information by taking short (5-30 second) sound samples at intervals throughout the day. A sound sample can include any sound that can be picked up by the MI App (e.g., TV shows, TV commercials, radio broadcasting, music, personal computer sounds, and conversations). These sound samples are immediately translated into a numeric code called a hash, using the GraceNote App, and are transmitted directly to GraceNote. GraceNote then compares each sound sample to its database and identifies which TV show or TV ad the panelist was watching.

Media Insiders does not have access to the content of the recording. The hash codes representing the sound samples are deleted from the panelist's device within a few hours after having been created. A hash cannot be reconverted into the original sound sample.

Access to Social Media Accounts

We ask the panelists' permission to collect Information from their social media accounts (e.g., Facebook or Twitter). We will collect only Information that a panelist makes available to his/her friends or followers. You are responsible for setting your social media privacy levels so that we have access only to the level of Information that you wish to make viewable to Media Insiders.

Please be aware that any Information that you make available to us on Facebook (or other social media service) may also be made available to anyone or any entity on Facebook or any other social media sites in accordance with your privacy settings on that social media service.

Please be thoughtful when choosing your social media privacy settings. The use and disclosure restrictions contained in this Privacy Policy will not apply to any third party social media service. We do not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable.

Surveys

Panelists may also be invited to participate in surveys. If Media Insiders is conducting the survey on behalf of any of its customers, the responses from all panelists will be combined to create a report. If a panelist agrees to participate in a survey directly conducted by a third party, including any Media Insiders Affiliate as defined and described below, that third party will collect and use the panelist's responses, subject to and in accordance with the terms of this Privacy Policy.

Sweepstakes

We may organize sweepstakes in cooperation with a business partner. See, for example, <https://www.mediainsiders.com/data/MediaInsidersPanel-Sweepstakes-rules.pdf>. To participate in a sweepstake, an individual is requested to complete a survey and provide certain additional information.

Browser Cookies

While participating in a panel, a panelist's browser will receive Media Insiders cookies. Permanent cookies allow us to (i) monitor which Internet ads are loaded into a panelist's browser and (ii) gather information regarding the websites that the panelist visits, the apps or social networks that he/she uses, his/her interaction with them, the date and time of the panelist's visits and the solutions and information which the panelist searches and views on the Internet.

We also deploy a separate session cookie (which is deleted when you close your browser or turn off your device) when you log into the "members only" area of our site to allow you to redeem rewards. These session cookies allow us to uniquely identify you when you log in to process your online transactions and requests.

Other Technologies

We may also use pixel tags (also known as clear gifs or beacons), which are tiny graphics with a unique identifier that are placed in the code of a webpage. We use pixel tags to understand and monitor website users' traffic patterns and to improve site performance.

We use pixel tags in emails in order to determine which emails were opened by recipients.

Website Visitors

If you visit the Media Insiders website at www.mediainsiders.com website without registering to become a panelist, we will collect information provided by your browser (e.g. IP address, operating system, referring site), which we use and analyze in aggregated format to understand the traffic on our website and to improve our user interface and our visitors' experience.

7. What Information do we Collect at Registration?

When you register to become a panelist, we request that you complete a registration survey. In the registration survey, we request, for example:

- Age information;
- Contact information (e.g., name, address, phone number and e-mail address);
- Gender information;
- Social media information (e.g., which social media channels you use);
- Demographic information (e.g., marital status, race, education, employment, information about your household, income levels); and/or
- Device information (e.g., type of equipment, operating system).

When completing the registration survey, you will choose a username and password, which you will be required to use to access protected areas of the Media Insiders website.

8. What Information do we Collect when you Participate in a Panel?

We collect a significant amount of Information as you participate in a panel. This Information is obtained through the MI App. In addition to your Registration Information, the kinds of Media Consumption Information that we collect from you will depend on the components of the panel in which you participate and the tools used to collect this Information. The collected Information may pertain to any of the following five areas: (a) online activities; (b) use of mobile phone; (c) TV watching; (d) use of social media; and (e) responses to surveys.

Online Activities

We may collect Media Consumption Information on a panelist's online activities conducted from his or her device. This Information may include, for example:

- URL of the site the panelist is visiting;
- Complete URL of the specific page visited;
- Search terms used;
- Results of such searches;
- Browser history;
- Content of the pages visited or apps used;
- Products or services purchased online;
- Content downloaded or uploaded;
- Advertisements seen; and/or
- With whom the panelist interacts.

We do NOT collect or record:

- The telephone number or email address of the persons with whom the panelist is communicating;

- The content of the panelist's calls, text, SMS, MMS or other messages; and/or
- The content of the panelist's address book.

Location Information Required We collect Information that indicates the geographic location of a panelist's mobile device. When you download our MI App, you will be asked whether you allow us to collect the location information disclosed by your device. If you do not consent, you will not be eligible to join the Media Insiders panel and you should uninstall the MI App as indicated in the "How to Un-install the MI App" https://mediainsiders.com/data/APP_removal_instructions.pdf section below.

Device Use Information

In addition to Information about a panelist's activities, we may collect several types of Information about the panelist's device, for example:

- Device type;
- Individual device ID, IP address, MAC address;
- General hardware and software information;
- Which applications are installed on the panelist's device;
- Which applications are used regularly;
- Which browser(s) are used;
- When and how long the device is charged;
- Whether the device is powered on or off or is in airplane mode;
- Which mobile network is used;
- Which Wi-Fi network is used and at what time;
- The volume of content downloaded to the device;
- When such downloads are made;
- The method of connection that is used when downloading content;
- The time and duration of calls made or received using the device; and/or
- When emails or texts messages are sent or received.

TV Watching

We collect Information about a panelist's TV watching patterns using the MI App. When the panelist's smartphone is powered on, the MI App collects sound bytes associated with the activities in the room where the smartphone is used. After the sound bytes have been interpreted by the GraceNote technology (as described above), these sound bytes and other Information collected from the devices on which the MI App is installed allow us to determine, for example:

- What TV show the panelist is watching;
- Whether the panelist is conducting any other activity while watching TV, as indicated by any device (smartphone, tablet, computer) on which the panelist has installed the MI App;
- For how long the panelist is watching a particular show; and/or
- What ads are displayed to the panelist while the TV show is being aired.

Social Media

If a panelist allows us to access his/her social media account, we will have access to the same information as the panelist's friends. For example:

- The panelist's social media profile information;
- Any posts, notifications, messages that the panelist makes, sends or receives on these services;
- How many people the panelist follows;
- By how many people the panelist is followed;
- What the panelist tweets or retweets;
- What content is displayed on the panelist's page or wall;
- What content the panelist views; and/or
- How much time the panelist spends on his/her social media account.

To restrict what information is made available to us, you should **edit your privacy settings of your Facebook, Twitter, or other social media account.**

Surveys

If a panelist participates in a survey, we will collect his/her response to the survey as well as Information about the device used to complete the survey, at what time the survey is completed, and how long it took to complete the survey.

If a panelist is invited to take the National Consumer Survey (“NCS”) conducted by Simmons Research LLC (“Simmons”), an Affiliate of SymphonyAM, and elects to do so, that panelist will be directed to Simmons’ NCS website and Simmons will collect his/her responses to the NCS. Further to Section 11 of this Privacy Policy below, Media Insiders will also provide Simmons with the Media Consumption Information generated for Media Insiders by each NCS-participating panelist.

Sweepstakes

Sweepstakes are conducted in cooperation with a business partner. The Information collected through the sweepstake is that which the panelist provides when completing the sweepstake form. This Information will be shared with the business partner. The Privacy Policy of that business partner will apply together with this Privacy Policy.

Rewards

We collect Information about the [rewards](#) that you earn as a panelist. For example:

- Which type of reward you have chosen;
- When or how frequently you collect your rewards; and/or
- The amount and nature of the reward collected.

9. How do we Use the Collected Information?

Information that can be Linked to a Panelist

We use the Personal Information collected from our panelists to:

- Administer the panel and related services;
- Administer our [rewards program](#);
- Provide services to a panelist, and respond to his/her requests;
- Verify the accuracy of the Information that the panelist provided;
- Improve the quality of the panel; and/or
- Communicate with a panelist regarding the panelist’s involvement in the Media Insiders panel, incentive redemption Information (when applicable), survey participation, and software upgrades.

Information that Cannot Be Linked to a Panelist

We combine the Media Consumption Information collected from all or a subset of our panelists to create reports or summaries that describe or analyze how our panelists, as a whole, interact with media (e.g., listing the types of people visiting a certain website, watching a certain TV program, or viewing certain advertising campaigns). These reports or summaries may group our panelists into segments (i.e., “females, 25-30 years old, who like sports and eat health food.”) However, they will not identify or allow the identification of a particular panelist.

Neither Media Insiders nor any of its Affiliates or any of its third party service providers will contact or target any panelist for marketing, advertising or sales purposes.

10. Who are our Customers and Business Partners with Whom We Share Information?

The Media Consumption Information that Media Insiders collects about how consumers view, use and share digital, mobile, TV and social media is made available to its customers and business partners so that they gain insights into consumers' interests. The nature and type of Information provided depends on the type of contract that Media Insiders has with these customers or business partners:

Subscribers to the SymphonyAM Analytics Services

We provide subscribers to the SymphonyAM Analytics services – e.g., advertisers, advertising agencies, market research firms and media companies – the raw Information that we have collected from the panelists as described above.

We do not provide them with any PII or other Information that would allow them to identify a specific panelist. However, we provide Information about the market segment to which each panelist belongs (e.g., “35-45 years old, female, urban area”).

SymphonyAM's Analytics tools allow our subscribers to create reports – or engage SymphonyAM to create reports -- that analyze this Information, evaluating trends and focusing on aggregated data.

Panel Partners

We may enter into cooperative agreement with business partners that also offer market research services. Under these agreements, we may combine our respective databases of Information about our respective panelists.

These panel partners have access to all Information collected about or from our panel members, including the identity of the panelists.

Each panel partner is required to use the Information collected from the Media Insiders panelists in accordance with this Privacy Policy.

Affiliates

Further to Section 11 below, Media Insiders may share Media Consumption Information with Simmons and other Affiliates, subject to and in accordance with the terms herein. Media Insiders may also provide Affiliates with the Information and/or reports generated therefrom that are made available to subscribers to SymphonyAM Analytics. With respect to Simmons specifically, Media Insiders and Simmons, directly or indirectly, may combine their respective databases of Information about their respective panelists; initially, database matching, if undertaken, would only apply to Media Insiders panelists who, when invited, elect to participate in the NCS.

11. With Whom Else do we Share Information?

In addition to SymphonyAM's sharing of Information with our customers and panel partners as set forth in Section 10 above, we may share Information with other third parties as part of the day-to-day operation of our business, including the Media Insiders panel. We may disclose the Information collected from our panelists as follows:

Third Party Service Providers

We will share some Information with third party service providers who help us identify potential panelists, collect Information (including through cookies), process or store the collected Information and manage our surveys or our incentive and rewards programs. We require each service provider to covenant in writing that it will process such Information only for internal use and for the benefit of SymphonyAM, based on our instructions and in a manner consistent with this Privacy Policy.

Business Transfers

We may disclose Information to a parent company and/or any subsidiaries, joint ventures or other companies under common control ("Affiliate"), in which case we will require each Affiliate to honor this Privacy Policy.

In the event of a merger, acquisition, sale, bankruptcy or other transaction pursuant to which our databases are acquired by a third party, panelist Information may be disclosed to the third party both before and after the transaction for the sole purpose of due diligence or facilitating or effecting that transaction. If a transaction is consummated, each panelist will be notified of the transaction via email and/or through a notice on our website, and custody of each panelist's Information will be transferred to the successor entity subject to all the terms and restrictions in this Privacy Policy. If the transaction is not consummated, we will require the third party not to use or disclose the panelists' Information in any manner whatsoever and to completely erase the same.

Legal Requirements

As is the case with any information provided to any business operating in the United States, we may share your Information in response to judicial, administrative or government subpoenas, warrants or court orders or other legal process in accordance with applicable laws.

To Enforce Rights

We may also share a panelist's Information if we believe in good faith that such disclosure is necessary to (a) resolve disputes, investigate problems or prevent or take action regarding illegal or suspected illegal activity; (b) protect and defend our rights, property or safety or the rights, property or safety of our customers, panelists or third parties; or (c) in connection with our [Terms and Conditions](#) or other agreements.

Aggregated Information

As set forth above, we may share aggregated Media Consumption Information with unaffiliated third parties such as customers or business partners. Data aggregation is a process that combines the Information of a group of panelists on an anonymized basis. As a result, the combined Information does not contain any PII or other information that can be linked to a specific individual. In this case, the aggregated Information is used, among other things, for advertising research (i.e., to compare the reaction of two different groups to an advertisement) or for media use analysis (i.e., to compare how different groups interact with a particular website or app or to assess how many individuals are watching a particular program or channel).

12. Suspension; Cancellation and Termination

Suspension

If you wish your activities not to be recorded or monitored temporarily by Media Insiders, you can:

- Not take your device (phone, computer, or tablet, as applicable) with you; and/or
- Not power on your device.

Cancellation and Termination

If at any point you decide that you no longer wish to be a panelist and/or that you wish to prevent us from collecting Information about your activities, you can terminate our relationship and your participation on the Media Insiders panel as follows:

- Send an email to support@mediainsiders.com and you will receive instructions on how to unsubscribe

Additionally, you should delete the MI App and any associated configuration file from the device(s) (phone, computer, tablet, etc.) on which you have installed the MI App pursuant to the instructions referenced above.

If you retain the MI App on your device(s), the MI App will keep collecting and sending Media Consumption Information to us.

Instructions on how to uninstall the MI App can be found in the section "How to Uninstall the MI App" below and at https://mediainsiders.com/data/APP_removal_instructions.pdf.

Upon termination, your record will be identified as “no longer in use.” We will continue to use Information collected before you terminated your participation on the Media Insiders panel subject to and in accordance with this Privacy Policy, unless otherwise required by law.

If we have disclosed some of your Information to third parties before termination, we cannot force the deletion or modification of any such Information.

13. How to Uninstall the Media Insiders Metering Application

To uninstall the MI App, you should follow the instructions available at:

https://mediainsiders.com/data/APP_removal_instructions.pdf.

If you have more questions or need assistance in uninstalling a MI App from any device (computer, tablet or mobile phone) please contact us as indicated in the “How to Contact Us” section below or as follows:

email: support@mediainsiders.com

Telephone: (855) 209-2230 (toll free), Monday – Friday: 8:00 am-5:00 pm, Eastern Time.

14. California Disclosures

Do Not Track

Some web browsers offer a "Do Not Track" ("DNT") signal, which is an HTTP header field indicating the user's preference regarding tracking or cross-site user tracking. Because there is not yet a common understanding of how to interpret DNT signals, we do not currently respond to DNT signals, if any, that we might receive from browsers. We take privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology.

Third Party Cookies

Further to Section 11 above, we allow third party service providers under contract with SymphonyAM to use cookies or other technologies to collect Information about visitors to and users of our website in accordance with the terms herein.

California Privacy Rights

We do not share information with third parties for their direct marketing purposes other than as described in this Privacy Notice. If our practices change, we will provide you with the relevant information as required by applicable law.

15. Third Party Access to Information

While navigating our website, you may be directed to content or functionality that is hosted by a third party supplier and not on a Media Insiders-owned domain. When you are on third party websites, the site owner's privacy policy will govern how your information is used. We have no control over, do not review and are not responsible for the privacy policies of or content displayed on such third party websites. We recommend that you carefully read the privacy policy of each website that you visit for information on their privacy, security, data collection and distribution policies.

Notwithstanding the foregoing, if Media Insiders panelists elect to participate in the NCS conducted by Simmons, this Privacy Policy will govern and control with respect to Simmons' use of any Information generated by any participating Media Insiders panelist.

16. Security

We use reasonable technical, administrative and physical safeguards measures to protect against unauthorized access to, disclosure, destruction, loss, misuse and alteration of the Information under our control. Panelist

Information is maintained on a secured database accessible only by Media Insiders staff or third parties that are authorized to access such Information as set forth in this Privacy Policy.

We have also established industry-standard technical procedures to filter or avoid the use or transmission of certain types of Information that might be collected inadvertently, e.g., user ID, password, account number, credit card number, social security number, email address or similar PII or sensitive Information. We do not knowingly use or share any such inadvertently-collected Information in our databases.

Your Media Insiders account will be activated once you activate the MI App or link with us on Facebook, Twitter or other social network, as applicable. We will not activate a prospective panelist's account without such confirmation. Additionally, all panelists are required to use their respective passwords and usernames when registering, updating their Registration Information or accessing the "Members only" sections of our website. Panelists may access their own Information to verify and update it, but they cannot view other panelists' Information.

We need your assistance in maintaining data security. Please do not share your Media Insiders username or password with any third party. Please choose a strong password, keep it safe and change it frequently.

Despite such efforts, however, no company, including SymphonyAM, can fully eliminate risks or guarantee the security of information stored online. Unauthorized entry or use, hardware or software failure, loss of a device and other factors may compromise the security of information at any time. We bear no liability for uses or disclosures of PII or non-personal Information caused by events over which we have no control.

If there is a breach of security, we will use all reasonable steps to stop the breach and will inform you of the breach in accordance with applicable law.

If you have any questions about security, please contact us as indicated in the "How to Contact Us" section below.

17. Crossborder Data Transfers

Information may be processed by us or on our behalf in the country where it was collected as well as other countries (including the United States) where laws regarding the processing of information may be less stringent than the laws in the country where a panelist resides.

18. Changes to this Privacy Policy

We may modify our privacy practices and/or update and/or make changes to this Privacy Policy at any time. If we change our Privacy Policy, we will notify you regarding the change by posting a notice on our website at www.mediainsiders.com and/or as required by applicable law. For this reason, we encourage you to refer to this Privacy Policy on an ongoing basis.

This Privacy Policy is current as of the "last revised" date that appears at the start of this Policy. By continuing as a visitor or a Member of the panel or by participating on the Media Insiders Panel following any Privacy Policy change, you freely and specifically give your consent to collect, use, transfer and disclose your Information in the manner specified in the then-current Privacy Policy.

19. How to Contact Us

You can contact us by mail, email or telephone as indicated below.

Media Insiders Panel Support
Symphony Advanced Media, LLC
2475 Hanover Street
Palo Alto, CA 94304 USA
email: support@mediainsiders.com

Telephone: (855) 209-2230 (toll free), Monday – Friday: 8:00 am-5:00 pm, Eastern Time