

## Privacy Policy

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### 1. INTRODUCTION

InMobi is committed to respecting and protecting individuals' privacy rights. This Privacy Policy explains how InMobi ~~Pte Ltd Kabushiki Kaisha Japan~~ ~~its subsidiaries and affiliated companies~~ (collectively, "InMobi" or "we", "us", "our") collect, use, secure, and/or disclose end users' ("you" or "your") device-related information when (i) you view ads served by InMobi on third party websites or mobile apps (see the section below called "InMobi Ad Network") and (ii) you visit the InMobi website at [www.inmobi.com](http://www.inmobi.com) (see section below called "InMobi Website").

The information which InMobi collects may include the Personal Information. The "Personal Information" means the information regarding a specific living person which can identify such specific person by itself or by cross-checking the easily accessible information. To the extent, InMobi collects any user data which falls within the ambit of Personal Information as stated above, InMobi will comply with the Act on the Protection of Personal Information of Japan (the "Act") with respect to handling such Personal Information.

Any ~~mobile consumer application or software feature owned or operated by InMobi which may be either preloaded or downloaded on a device for your use~~ ~~content aggregation services or feature (such as displaying of stories, articles, pictures, blogs etc.) (whether through an app or other software integration) provided by InMobi on a device~~ will not be covered under this Privacy Policy, except to the extent the app or software promotes any interest based advertising by InMobi. We urge you to refer the privacy policy of such services separately, as and when made available.

### 2. INMOBI ADVERTISING

#### 2.1 WHAT IS THE INMOBI AD NETWORK?

InMobi is a global ad network with a suite of ad tech products. We partner with third-party mobile website publishers and mobile app developers to serve ads on their sites and in their apps, and InMobi may also serve ads on the site and mobile applications that InMobi owns. These ads may be customised to their users' interests and geographic locations, which we may derive or infer from information that we collect about how those users interact with such sites and apps (this type of advertising is often called "interest-based advertising" or "targeted advertising"). This enables our partnering publishers and developers to provide content-rich services that are more relevant to their users, often using the advertising revenues they generate to offer their services for free or at a subsidised cost. Further, we may also obtain user data from our data partners, advertisers and/or advertisers' partners for optimising digital advertising and/or analytical purposes including to provide relevant advertising and reporting. Please note that collection, use or storage of such data is governed by the privacy policy of such third-party partners and/or advertisers providing the same.

InMobi may engage in cross-device data collection, which refers to the process of collecting data from devices that have been determined through statistical analysis to be linked or related.

We, or third parties whom we engage to provide this service, may use cross-device data to provide interest-based advertising services and to deliver tailored ads to users across multiple devices.

## 2.2 WHAT INFORMATION DO WE COLLECT?

When you view an InMobi ad on a site or app, we may collect information about your device that you have viewed. This information enables us to improve our services including to recognise your device when you use other sites and apps that have partnered with us.

### (a) Information about your device

InMobi may collect some or all of the following information about your device: device type (e.g. smartphone, tablet, etc.), operating system (e.g. iOS, Android, Windows, Blackberry), network provider, mobile browser used (e.g. Safari, Internet Explorer etc.), platform, SDK version, timestamp, API key (identifier for application), application version, iOS Identifier for Advertising, iOS Identifier for Vendors, model, manufacture of device, OS version of device, session start/stop time, locale (specific location where a given language is spoken), time zone, network status such as WiFi, the geo-location of your device (using GPS or other geo-location data) and the Identifier for Advertising (IDFA) or the Google Advertising ID (AAID) etc. In some countries, we also collect information such as international mobile equipment identity (IMEI), Internet (IP) addresses or geo-location data, ~~which may be considered to be personal information and in which case, we ensure compliance with applicable laws in our collection or use of the same, to the extent applicable in such jurisdictions.~~

InMobi may collect the geo-location of your device only when an app or site, which leverages InMobi's offerings through integration of InMobi's technology/software (whether SDK, API or other integration) is active on the device. One way InMobi derives a device's location is by collecting the device's latitude and longitude coordinates through GPS. InMobi may infer the geo location of a device based on data collected through a WiFi identifier that the device is connected to, subject to country specific laws and/or industry guidelines related to such collection or inference practices. e.g: In the U.S. and UK, InMobi may infer geo-location through WiFi identifiers pursuant to obtaining user consent through applicable apps or sites.

### (b) Information about ads presented on your device

InMobi also collects some or all of the following information about an ad presented on your device: (i) the content type of the ad (what the ad is about, e.g. games, finance, entertainment, news); (ii) the ad type (e.g. whether the ad is a text, image, or video based ad); (iii) where the ad is being served (e.g. the address of the site on which the ad appears); and (iv) certain information about post-click activity in relation to the ad including user interaction with such ad.

On occasion, our partnering mobile publishers or app developers may also disclose to us certain information including email addresses of users in a hashed format (not in raw format) they have separately collected about you so that we can improve the relevance of the ads we serve on their behalf. They do this in accordance with their own specific privacy policies and subject to their own applicable legal requirements. We do not use the information they provide to us for any purpose other than serving you with interest-based ads or for reporting or analytical purpose(s).

### 2.3 HOW DO WE USE INFORMATION THAT WE COLLECT?

InMobi uses the information that we collect from your device to display advertising on your device, which may include interest-based advertising customised to individuals' inferred interests, preferences and locations and to perform analysis aimed at improving our services. The information we collect from your device also helps us to provide filtering options for publishers and developers to manage ads appearing on their sites and in their apps, and to provide targeting options for advertisers. This helps our publishers and developer clients, for example, to avoid presenting you ads that you have already seen and helps our advertiser clients serve advertisements that are more likely to be of interest to you.

### 2.4 WHO DO WE SHARE INFORMATION WITH?

#### (a) Publishers, Developers, Advertisers, Data Partners and Measurement Companies

InMobi may share the information we collect or receive regarding you as described in this Policy with our publishers, developers, data partners, measurement companies and advertisers. These partners may use this information to show you relevant ads, measure your ad/site interaction, identify your interest areas, better understand the site and app traffic usage or user behaviour in order to refine and improve their services. Such partners' use of the information we share with them will be governed by their privacy policies.

#### (b) With InMobi Affiliates

We may also share your information with InMobi affiliates so that we can better provide advertising that is relevant to you.

#### (c) Sharing Info with third parties such as advisors and law enforcement authorities

From time to time, we may also need to disclose your information to other third parties, such as law enforcement authorities or our legal advisers, where it is necessary to: comply with the law or regulations; enforce or apply our user terms and conditions; protect our rights, or; preserve the safety of our users. This may include exchanging information with other companies and organizations for fraud protection.

InMobi may also share your information in connection with any merger, a sale of InMobi assets, or a financing or acquisition of all or a portion of our business to another company.

### 2.5 HOW DO WE KEEP INFORMATION SECURE?

InMobi uses reasonable technical and organisational measures to protect the information it collects about you and your device. We may anonymise the information we collect using one-way hashing technology before sharing it with any third parties. We also seek appropriate contractual protection from our partners regarding their treatment of user data.

### 2.6 HOW LONG DO WE KEEP INFORMATION FOR?

InMobi may retain the information relating to your device collected from partnering mobile publishers or app developers for a period of up to thirteen (13) months, unless otherwise required by law or applicable contract. After the 13-month period, InMobi may retain and use such data in an aggregated format, as necessary for internal analytical purposes, to comply with its legal obligations, resolve disputes and enforce agreements.

### 2.7 OPTING OUT OF INTEREST-BASED ADVERTISING

If you prefer not to receive interest-based advertising from InMobi, you can opt out of

interest-based advertising at any time by going to the InMobi Opt Out page and submitting your device ID.

Please note that if you opt-out of interest-based advertising you will still receive "generic" ads from InMobi.

To effectively opt-out of our cross-device data collection activities, you must opt-out on every device browser and device using the appropriate opt-out methods.

### 3. INTERNATIONAL TRANSFERS

InMobi may share your information with clients, affiliates and other third parties described above who are based in countries outside of your country of residence (for example, if you are an EU resident, we may share your information with our non-EU clients or affiliates), subject to any contractual or legal requirements.

While some countries may not have data protection laws that are equivalent to those of the country in which you reside, we will take reasonable measures to protect your information in accordance with this Privacy Policy.

### 4. INFORMATION COLLECTED ON BEHALF OF THIRD PARTIES

InMobi may offer advertising solutions to clients that include the collection of voluntary information from you as part of an advertisement, e.g. serving an ad that contains an advertiser questionnaire. Such information may consist of personally identifiable information, non-personally identifiable information, or both. All of the information that you voluntarily provide in response to this form of advertisement is forwarded directly to the relevant client and will be governed by that client's privacy policies in place at the time of transfer. This information may be temporarily stored by InMobi solely for the aforesaid purpose, subject to applicable legal requirements. For more information see [www.inmobi.com/leadgen](http://www.inmobi.com/leadgen).

### 5. COOKIES

We use cookies and beacons to help us collect some of the information we have described above. This may be done when you interact with our advertiser or publisher partners who enable InMobi to collect data related to your interaction with their apps or sites for the purpose of serving relevant Ads to you and/or improve our services.

We may also use cookies to provide website functionality and advertising to you, and to save you having to provide the information you have already given us on subsequent visits to our site.

For more detailed information about the technologies we use and your ability to control those cookies, please visit our cookie policy. We recommend that you review the privacy policies the third-party apps, services or sites that you directly interact with to learn how those third parties use cookies.

### ~~6. WHAT ABOUT CHILDREN?~~

~~InMobi complies with the Children's Online Privacy Protection Act (COPPA) in the U.S. and does not knowingly collect Personal Information about users of sites directed to children under the age of thirteen (13). For more detailed information please visit our COPPA policy.~~

### 6. WHAT ABOUT OTHER WEBSITES?

Our website and the ads we service may contain links to other websites. You should be aware that we are not responsible for the privacy practices of such other websites as those may have

different privacy policies and terms of use and are not associated with us. You agree that we cannot control these links and we shall not be responsible for any use of such websites.

## 7.CHANGES TO THIS PRIVACY POLICY

We may amend this Privacy Policy at any time. The amended Privacy Policy will be displayed on our site. If we make any material changes we will notify you by means of a notice on this site prior to the change becoming effective. Please check our Privacy Policy regularly to ensure you have read the latest version.

## 8.YOUR RIGHTS

Much of the information we hold is purely technical in nature and relates to the devices that interact with our website or our ads. Information on how to refuse use of this information for interest-based advertising purposes is provided above in the section "Opting Out of Interest-based Advertising" above.

Where we do hold limited Personal Information about you (such as Personal Information about an InMobi account you have with us), you can ask us for access to this Personal Information, to correct or update any inaccurate Personal Information we hold, to stop sending you direct marketing or to stop using your Personal Information altogether.

If you would like to exercise any of these rights, you may be able to make the update within your account settings or by contacting us using the details provided in "Contact" below.

## 9.YOUR INTERACTION WITH INMOBI WEBSITE

### 9.1 WHAT INFORMATION DO WE COLLECT?

If you choose to create an account on the InMobi website we collect your username, password, email address, country, and preferred account type when you register.

You can also provide us with other optional information, such as your name, picture, postal address, phone number, social network profiles, questionnaire responses, general business information, and other personal, biographical, or demographic info. This optional information is not necessary for you to use the InMobi site or to maintain an account with us, but by sharing this information we can better serve you and improve your overall website experience. If you provide the name and email address of a friend or colleague, we will use that information to send the individual a one-time invitation to visit or register with our site.

### 9.2 THE USAGE INFORMATION WE COLLECT

In addition to the personal information described above, we also collect certain information about your usage of the site. Specifically, our servers collect the following information automatically about your usage of the site:

1. the type of web browser you use (e.g. Internet Explorer, Mozilla Firefox, Google Chrome or another)
2. where you travel within the site (e.g. the pages that you visit within the InMobi site)
3. your browsing preferences, such as your screen size, resolution and other viewing preferences
4. the links and adverts that you click on
5. information about how you arrived at our site (e.g. whether you were directed to our site by a search engine or another third-party website)
6. Information about how you leave our site (e.g. which website you visit immediately after visiting our site).

We may use cookies to help us collect and store this information, as described in more detail

in our cookie policy.

### 9.3 HOW DO WE USE THE INFO WE COLLECT?

We use the account information and other Personal Information you provide to manage your account, communicate with you, conduct business with you (e.g. reporting and payment), personalise the InMobi website, comply with your requests, and inform you about products and services in accordance with your marketing preferences.

We use your usage information to analyse our web traffic, to figure out how often customers use parts of the site, to improve the site and generally to make it appealing to as many users as possible.

As and when, we share your Personal Information with third-parties for Joint-Use, we will update the following:

- (i) Items of Personal Information to be jointly used: [Not Applicable]
- (ii) Party to jointly use Personal Information: [Not Applicable].
- (iii) Purpose of joint use: [Not Applicable]
- (iv) Name of [company/division] responsible for user's Personal Information: [Not Applicable]

### 9.4 WHO DO WE SHARE INFORMATION WITH?

We will share your Personal Information only in the ways that are described in this privacy statement. We do not sell your Personal Information to any third parties.

From time to time, we may need to disclose your Personal Information to third parties such as to law enforcement authorities or our legal advisers, where (i) it is necessary to comply with the law or regulation; ~~enforce or apply our user terms and conditions;~~ (ii) it is necessary in order to protect our rights, or to preserve the safety of our users **your life, body or assets and it is difficult to obtain your consent;** (iii) it is specially necessary for improving public health or promoting the sound growth of children and it is difficult to obtain your consent; or (iv) it is necessary for cooperating with a state organ, a local government, or their contractors in executing the affairs prescribed by laws and regulations and obtaining the consent of the person are likely to impede such execution. ~~This may include exchanging information with other companies and organizations for fraud protection~~

We may also share your Personal Information with companies that provide services to help us with our business activities (e.g. processing payments or submitting emails to you on our behalf), in connection with any merger, a sale of InMobi assets, or a financing or acquisition of all or a portion of our business to another company. Whenever we share your Personal Information for this reason, we will ensure that the recipient is bound by all appropriate confidentiality obligations and that it commits to using your Personal Information only for the purposes for which you originally provided it.

You should also be aware that the information submitted to public areas, such as our blogs, may be read, collected, and used by others who access them.

If you interact with social media features on our site, such as the Facebook Like button, or use your social network credentials to comment on our blog, these features may collect information about your use of this site as well as post information about your activities on this site to your profile page. Your interactions with these features are governed by the privacy policy of the company providing it.

#### 9.5 INTERNATIONAL TRANSFERS

We may share your information with our affiliates and other third parties described above who are based in countries outside of your country of residence (for example, if you are an EU resident, we may share your information with our non-EU clients or affiliates). While some countries may not have data protection laws that are equivalent to those of the country in which you reside, we **will ensure that such affiliate or contractually obligate the third party will take all appropriate and** reasonable measures to protect your Personal Information in accordance with this Privacy Policy and all applicable legal requirements.

#### 9.6 HOW DO WE KEEP INFORMATION SECURE?

We use appropriate technical and organisational security measures to protect the information we collect. We use multiple electronic, procedural, and physical security measures to protect against unauthorised or unlawful use or alteration of information, and against any accidental loss, destruction, or damage to information. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure.

#### 9.7 HOW LONG DO YOU KEEP INFORMATION?

We retain information for only as long as is necessary to fulfil the purposes outlined in this Privacy Policy, unless otherwise required by law.

#### 10. CONTACTING US

If you have any questions about this Privacy Policy, please contact us at [privacy@inmobi.com](mailto:privacy@inmobi.com).

The amendments made by InMobi to the Privacy Policy can be viewed here: [PDF](#)