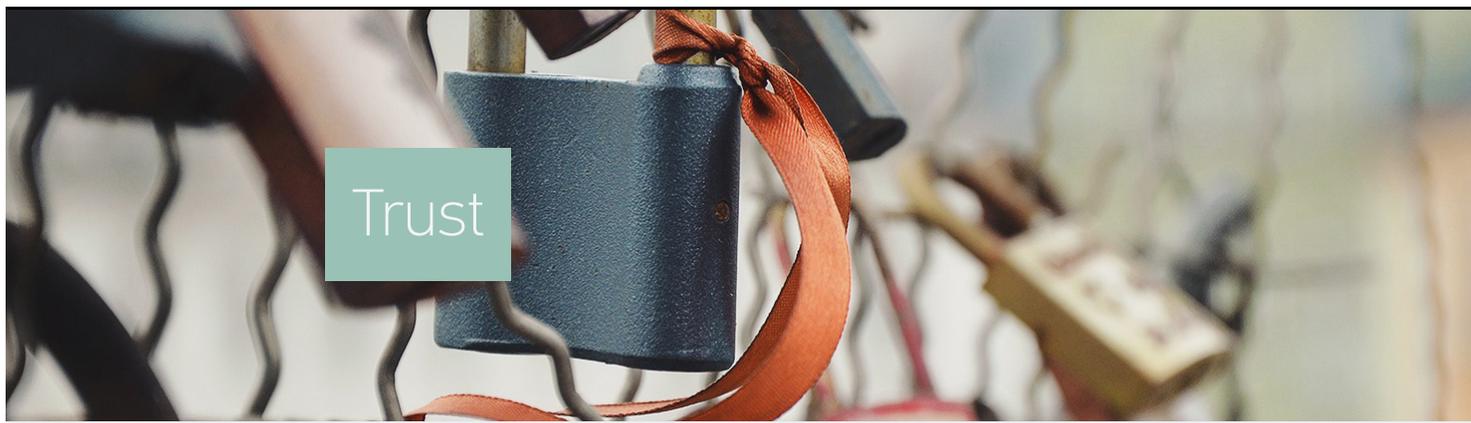


# Exhibit A



## Privacy Guidelines ▸

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# Privacy Guidelines

## Privacy Policy

Turn Inc. (“Turn”) provides advertisers, their agencies, website and apps publishers, and data vendors (our “Business Partners”) access to technologies and processes designed to display relevant, tailored, and privacy-respecting advertisements to consumers viewing a publisher’s properties (e.g., websites, apps, content, etc.) (the “Turn Ads”).

This privacy policy describes Turn’s privacy practices as they pertain to (i) visitors to our website located at [www.turn.com](http://www.turn.com) (our “Site”), and (ii) our tailored advertising technology service. If you’d like to understand our privacy practices as they pertain to information collected from and about our Business Partners, please click [here](#).

Turn participates in a number of self-regulatory organizations and adheres to those organizations’ self-regulatory codes in the jurisdictions in which we operate. A list of our partnerships and associations is at the bottom of this page.

### Site Privacy Policy

The Site is intended primarily to offer information about Turn and the services we provide.

### Information Collected via the Site

We collect Personally Identifiable Information (“PII” or “Personal Information”) from the Site ONLY when you choose to provide it to us. PII is any information that can be used to identify or locate a particular person or entity. This includes, but is not limited to: name, postal address, telephone number, or email address. For example, you may choose to send us PII about yourself in an email or by completing an online form on this Site. We use this information only to contact you to respond to your inquiry. Once collected, we will store your PII for a reasonable time for record keeping purposes. The information that we store is usually deleted as space requires or in the normal course of business.

We also collect Non-Personally Identifiable Information (“Non-PII”) via the Site. Non-PII cannot be used to contact a particular person or entity. Non-PII may include your IP address, pages viewed on this Site, browser type, Internet Service Provider, the time/date of your visit to this Site, and your computer’s operating system (e.g., Windows

### Contact Information

For questions or concerns related to privacy, please send us an email at [privacy@turn.com](mailto:privacy@turn.com).

### You may also contact us at:

Turn Inc.  
835 Main St.  
Redwood City, CA 94063-1901  
Attention: Privacy Officer

XP). Turn uses this information for internal purposes such as to administer the Site, improve and customize the Site, help Turn understand and analyze how the Site is being used, and to track aggregate Site usage.

### Cookies and Web Beacons

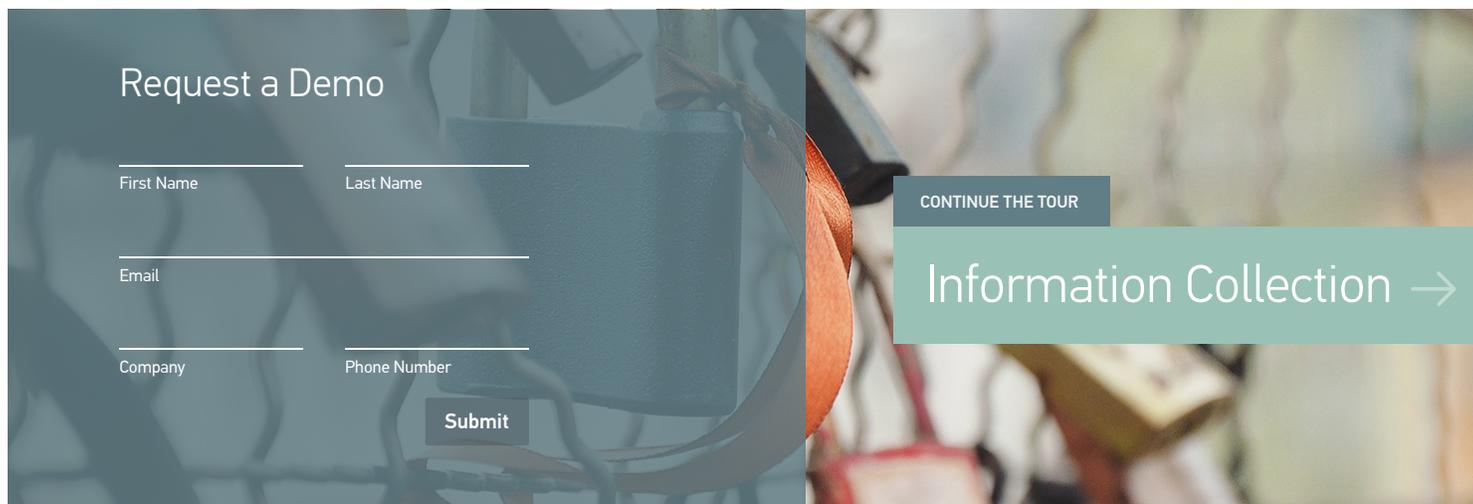
Turn uses cookies (small text files maintained by your browser, which may be session-specific or persistent) on this Site in order to help administer the Site. For more information about cookies, please visit <http://www.allaboutcookies.org/cookies>. Turn also uses web beacons in combination with cookies to analyze usage patterns on the Site. For more information about web beacons, please visit <http://www.allaboutcookies.org/faqs/beacons.html>.

### Third Party Websites

Turn Ads may contain links to other websites, including those of our Business Partners. Such websites may use cookies and/or other data collection tools. Turn is not responsible for the privacy practices, policies or the content of such websites. Turn encourages everyone to read the posted privacy policies whenever interacting with any website to learn more about the privacy practices of that website. Turn has no control over the use of any information by third party websites, and you should exercise caution when deciding to disclose any PII. Similarly, while Turn contractually requires that our Business Partners adhere to law and industry self-regulatory codes such as those offered by the NAI, DAA, and eDAA, Turn does not have access to, or control of, the cookies and/or other data collection tools that may be placed on any advertisement by a third-party. This Privacy Policy does not cover the use of cookies and/or other data collection tools by any third party.

### Access / Updating / Deleting your PII

If you'd like us to update, correct, delete, or deactivate any PII that you have provided to us on this Site, please send your request to us at [privacy@turn.com](mailto:privacy@turn.com) and we will process your request within a reasonable period of time after receipt.



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### Information Collection and Use

#### Overview of Turn's technology

Our technology collects information about the website(s) that a browser visits and the advertisements that a browser displays while online. You may encounter our technology when Turn or a Business Partner purchases online advertisements on a website that you visit, an app that you use, etc.; and/or when one of our Business Partners places one of our web beacons on a property that you visit or use.

We use the information collected by our technology in order to help make the Turn Ads you see more relevant to you, and for ad delivery and reporting purposes. By delivering a more relevant ad, Turn is an important participant in the keeping the internet free, dynamic, and vibrant! That is because advertisers will pay more to deliver a tailored ad, and the website or app you love gets more money when you receive a tailored ad. That helps the website or app keep doing what you love – providing you great content at a great price – usually FREE!

Our technology also offers data management services to Business Partners (our “Data Management Platform” or “DMP”). The Turn DMP enables Business Partners to collect, store, and analyze information about a browser or a user which may include PII. We provide Business Partners with a self-serve website tagging technology (“Flextag”) that enables them to place data into the DMP. We require Business Partners using the DMP to adhere to the NAI Code and DAA Code or other applicable industry standards. We also contractually require that Business Partners don’t bring PII or sensitive Non-PII audience segments into the DMP. However, Business Partners’ use of the DMP is subject to their own privacy policies, not this one.

#### What information is collected?

Turn does not collect PII via our technology. If we discover that PII has been inadvertently collected by our technology (e.g., where a Business Partner has used Flextag to bring PII into the DMP), we will take reasonable steps to attempt to remove the PII and to address the situation with the party responsible for such inadvertent collection.

#### Contact Information

For questions or concerns related to privacy, please send us an email at [privacy@turn.com](mailto:privacy@turn.com).

#### You may also contact us at:

Turn Inc.  
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Redwood City, CA 94063-1901  
Attention: Privacy Officer

## Turn — Information Collection and Use

Our technology does collect and use Non-PII, including: the IP address used to access the Internet, the type of browser used, which, and how many Business Partner web pages have been viewed by a browser, search terms entered on Business Partner websites, referring and exit pages, and the date and time a Turn Ad was viewed. Turn also obtains Non-PII from third party data vendors that receive such Non-PII pursuant to their own privacy policies. Turn takes reasonable steps to attempt to ensure that our data vendors meet our privacy standards, but we cannot be held responsible for their privacy practices.

### **How is the information used?**

Turn uses this information to analyze trends, identify the audience most likely to respond to an advertisement, and to tailor ads using only Non-PII. By delivering tailored ads, Turn helps advertisers, publishers, and you! You get better ads and the content you love has a better chance to thrive.

We also may aggregate this information and share it with Turn's affiliates, advertisers, employees, customers and Business Partners.

Turn does not create nor use any sensitive data segments to tailor ads on behalf of our advertiser clients. However, we recognize that consumers may have differing opinions regarding which data segments are sensitive. In order to provide transparency around potentially sensitive data segments collected and used by Turn, we will provide examples of them here. For example, we may collect health-related segments of consumers that we believe may have an interest in healthy living because they have visited websites that are focused on health-related topics such as yoga and healthy living. Similarly, we may collect finance-related segments of consumers that we believe may have an interest in investing because they've visited websites that are focused on investment strategies or searched for "investment tips".

While we don't consider any of the above data segments to be sensitive, we think it's important to provide this transparency to help you have a better idea of which segments might be collected by us, so you can make informed decisions.

### **Cookies and web beacons**

Turn uses cookies in connection with our technology. Cookies help Turn better understand the effectiveness of a Turn Ad (for example, by tracking the way in which you may respond to, select and interact with a Turn Ad or any content provided therein, or the site placement and context in which you view a Turn Ad). Turn's cookies also help control the number of times you view a Turn Ad. Most Internet browsers automatically accept cookies. You can instruct your browser, by editing its options, to stop accepting cookies or prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to enjoy the full functionality of many of the websites you visit.

Turn also uses web beacons, in combination with cookies, to analyze usage patterns. The use of a web beacon allows Turn to record that a particular browser has visited a particular webpage, along with additional Non-PII that the website may choose to include with the beacon.

### **Opt out from Tailored but Anonymous Advertising (Turn's choice mechanism)**

If you'd like to opt out of tailored advertising from Turn, please click [here](#) to be taken to our opt out page.

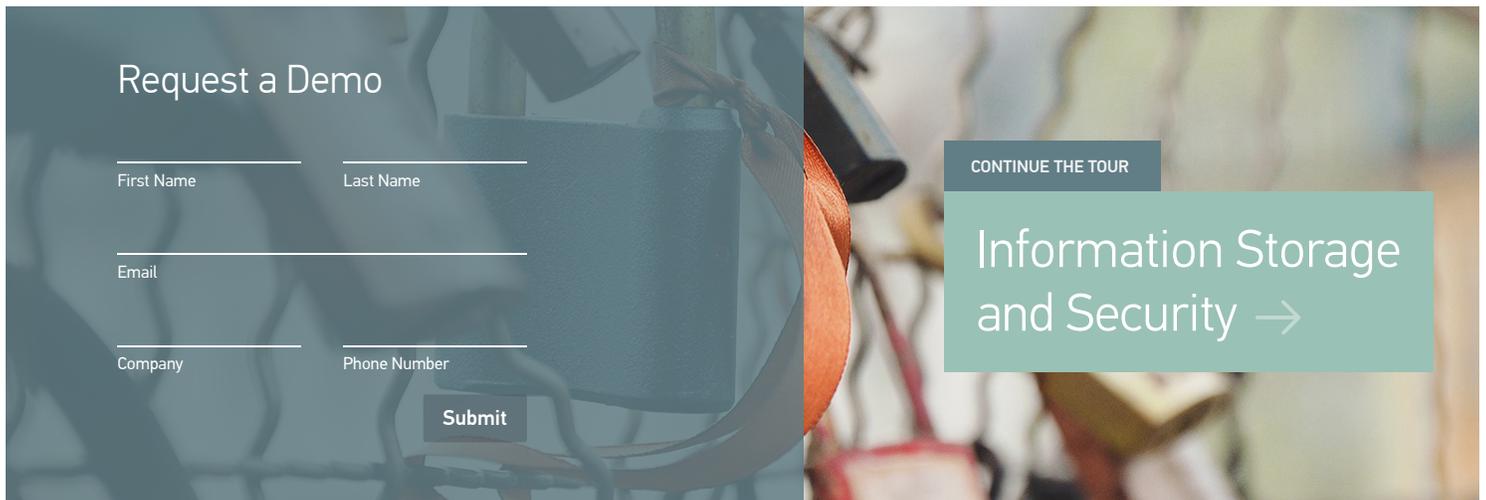
### **Third party links and websites**

## Turn — Information Collection and Use

Turn Ads may contain links to other websites, including those of our Business Partners. Such websites may use cookies and/or other data collection tools. Turn is not responsible for the privacy practices, policies or the content of such websites. Turn encourages everyone to read the posted privacy policies whenever interacting with any website to learn more about the privacy practices of that website. Turn has no control over the use of any information by third party websites, and you should exercise caution when deciding to disclose any PII. Similarly, while Turn contractually requires that our Business Partners adhere to law and industry self-regulatory codes such as those offered by the NAI, DAA, and eDAA, Turn does not have access to, or control of, the cookies and/or other data collection tools that may be placed on any advertisement by a third-party. This Privacy Policy does not cover the use of cookies and/or other data collection tools by any third party.

### Information Relating to Children

Our products and services are designed for those 13 years of age and older. We do not knowingly collect PII from anyone under the age of 13 on the Site or via our technology. If we are made aware that we have received PII from someone under 13, we will use reasonable efforts to remove that information from our records.

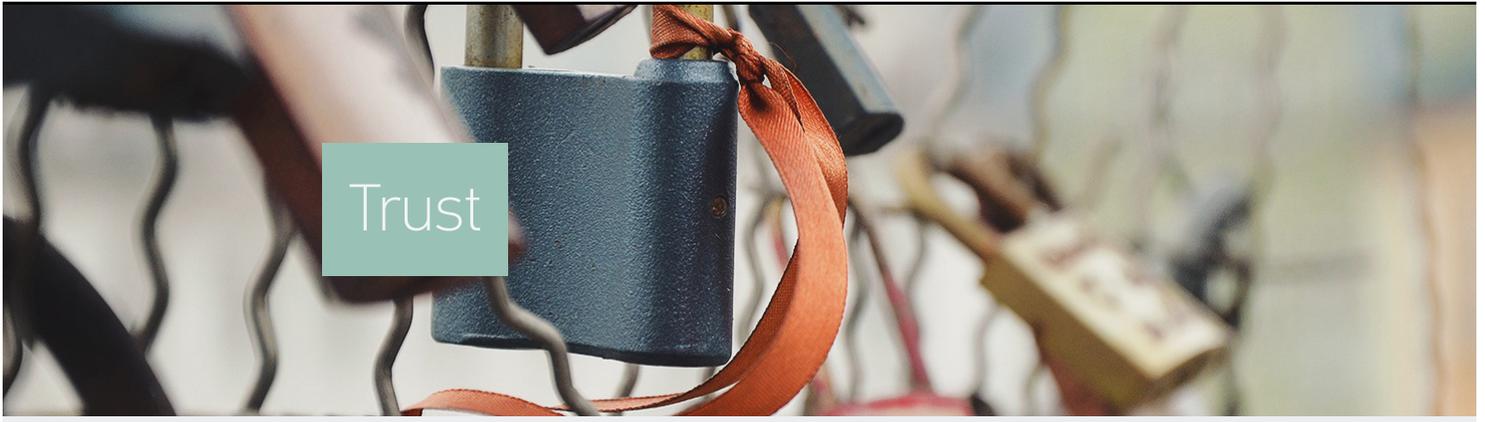


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## Information Storage and Security

### Data retention of Non-PII

We retain the Non-PII collected via our technology for as long as necessary for our reasonable and legitimate business purposes including fraud prevention. Data obtained to deliver tailored advertising is not typically used after 90 days.

### Information Security

The security of your information is important to us. We have implemented reasonable security measures to protect the information in our care, both during transmission and once we receive it. This includes, but is not limited to the use of encryption. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially reasonable means to protect your information, we cannot guarantee its absolute security.

If you have any questions about our security practices, please send an email to us at [privacy@turn.com](mailto:privacy@turn.com).

### Data integrity

Turn processes information in a way that is compatible with, and relevant to, the purpose for which it was collected. To the extent necessary for those purposes, we take reasonable steps to ensure that any information in our care is accurate, complete, current and reliable for its intended use.

### Contact Information

For questions or concerns related to privacy, please send us an email at [privacy@turn.com](mailto:privacy@turn.com).

### You may also contact us at:

Turn Inc.  
835 Main St.  
Redwood City, CA 94063-1901  
Attention: Privacy Officer

## Request a Demo

First Name

Last Name

CONTINUE THE TOUR

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### Information Sharing and Disclosure

Turn will allow an individual access to the PII they have provided to us via the Site to the extent it is available and allow the individual to correct, amend or delete inaccurate information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated. If you'd like us to update, correct, delete, or deactivate any PII that you have provided to us, please send your request to us at [privacy@turn.com](mailto:privacy@turn.com) and we will process your request within a reasonable period of time after receipt.

#### Disclosure of information to Third Parties

We may share information with Business Partners and other trusted third parties who provide services for us. These third party contractors are prohibited from using the information we provide for purposes other than performing services for us.

We may share Non-PII collected via our technology with Business Partners. Similarly, we may enhance the Non-PII collected via our technology with Non-PII collected from Business Partners. This information cannot be used to contact or identify any person individually.

We may disclose your information to third parties when we reasonably believe we are obligated to do so by law, and in order to investigate, prevent, or take action regarding suspected or actual prohibited activities, including but not limited to, fraud and situations involving potential threats to the physical safety of any person.

Finally, we may transfer information, including any PII collected via the Site, to a successor entity in connection with a corporate merger, consolidation, sale of assets, bankruptcy, or other corporate change.

#### Contact Information

For questions or concerns related to privacy, please send us an email at [privacy@turn.com](mailto:privacy@turn.com).

#### You may also contact us at:

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Redwood City, CA 94063-1901  
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Request a Demo

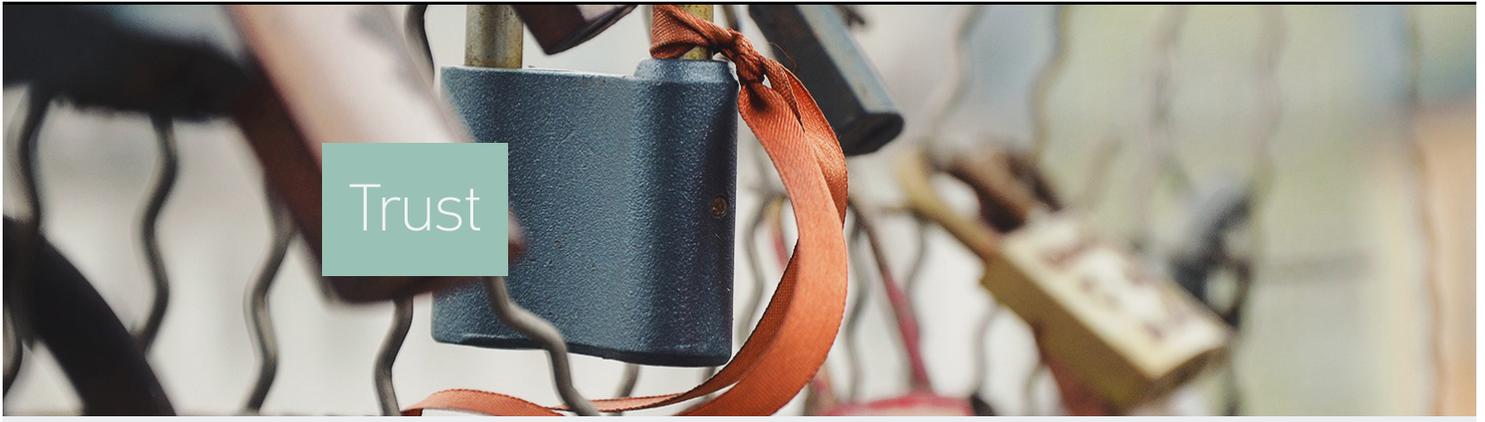


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### Enforcement, Questions and Complaints

Turn uses reasonable processes to ensure compliance with this privacy policy and periodically verifies that the policy is accurate. We encourage you to raise any concerns using the contact information provided, and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of information.

Turn complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information from European Union member countries and Switzerland. Turn has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view our certification page, please visit <http://www.export.gov/safeharbor/>.

In compliance with the U.S.-EU and U.S.-Swiss Safe Harbor Privacy Principles, Turn commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss citizens with inquiries or complaints regarding this privacy policy should first contact [privacy@turn.com](mailto:privacy@turn.com). Turn has further committed to refer unresolved privacy complaints under the US-EU and US-Swiss Safe Harbor Privacy Principles to an independent dispute resolution mechanism, the BBB EU SAFE HARBOR, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by Turn, please visit the BBB EU SAFE HARBOR web site at [www.bbb.org/us/safe-harbor-complaints](http://www.bbb.org/us/safe-harbor-complaints) for more information and to file a complaint.

#### Contact Information

For questions or concerns related to privacy, please send us an email at [privacy@turn.com](mailto:privacy@turn.com).

**You may also contact us at:**

Turn Inc.  
835 Main St.  
Redwood City, CA 94063-1901  
Attention: Privacy Officer

## Request a Demo

First Name

Last Name

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### Partnerships and Associations

#### Networking Advertising Initiative

**The Network Advertising Initiative (NAI)** is a coalition of online advertising companies committed to complying with tough self-regulatory standards that establish and reward responsible business and data management practices. Turn is a participating member of NAI and compliant with NAI self-regulation principles.

#### The Digital Advertising Alliance

**The Digital Advertising Alliance (DAA)** is a coalition of digital advertising companies that have created a self-regulatory code for online behavioral advertising alliance. Turn is in compliance with the DAA Self-Regulatory Code.

#### The European Interactive Digital Advertising Alliance

The European Interactive Digital Advertising Alliance has been founded by a European industry coalition representing advertisers, the advertising agency sector, the direct marketing sector, the advertising network sector and the media sector. eDAA's principal purpose is to license the 'OBA Icon' to companies involved in Online Behavioural Advertising across Europe. The OBA Icon is a consumer-facing, interactive symbol that links consumers to an online portal, [www.youronlinechoices.eu](http://www.youronlinechoices.eu), where they can find easy-to-understand information on the practice of OBA as well as a mechanism for exercising informed choice – if they so wish, consumers may opt out of OBA by some or all companies.

#### U.S.-EU Safe Harbor

EU Safe Harbor Turn complies with the U.S.-EU Safe Harbor Framework and the **U.S.-Swiss Safe Harbor Framework** as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information from European Union member countries and Switzerland. Turn has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view our certification page, please visit <http://www.export.gov/safeharbor/> and [Turn](#)

#### Contact Information

For questions or concerns related to privacy, please send us an email at [privacy@turn.com](mailto:privacy@turn.com).

#### You may also contact us at:

Turn Inc.  
835 Main St.  
Redwood City, CA 94063-1901  
Attention: Privacy Officer

[Certification Page.](#)

**The Interactive Advertising Bureau**

The Interactive Advertising Bureau is comprised of more than 500 leading media and technology companies that are responsible for selling 86% of online advertising in the United States. On behalf of its members, the IAB is dedicated to the growth of the interactive advertising marketplace, of interactive's share of total marketing spend, and of its members' share of total marketing spend.

**Better Advertising**

Turn also partners with Better Advertising, whose mission is to enable advertisers, their partners and industry associations to be more transparent in how consumer data is collected and used for online advertising. Working with Better Advertising's industry leading partners, Turn help develop tools and practices for marketers to ensure consumer privacy protection by providing consumers access to clear information and choices.

**Request a Demo**

First Name \_\_\_\_\_ Last Name \_\_\_\_\_

Email \_\_\_\_\_

Company \_\_\_\_\_ Phone Number \_\_\_\_\_

**Submit**

**CONTINUE THE TOUR**

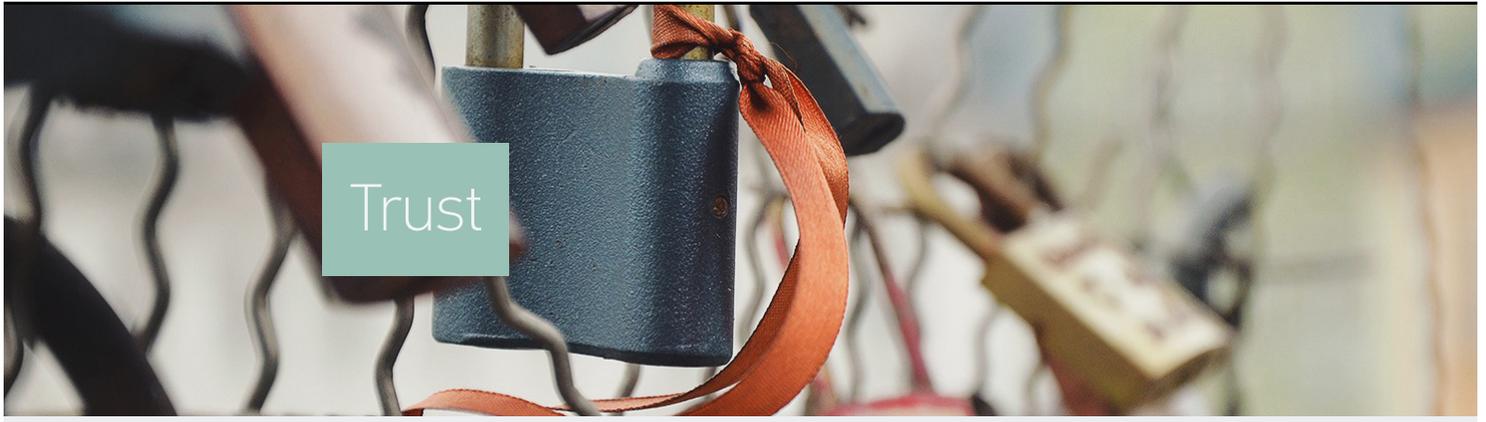
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## Consumer Opt-Out

### Opt Out of Tailored, Anonymous Advertising & a Freer, More Dynamic Internet – our Choice Mechanism

We support empowering you to make informed decisions about advertisements that are delivered to you. If you'd like to opt out from tailored but anonymous ads based on your interests delivered by Turn and for Turn to stop collecting your non-personally identifiable information in order to do so, click the links below.

If you opt out, you will still see just as many ads! They will just be far more likely to be irrelevant to you.

#### Opting out may hurt the sites and apps you love!

Also, if you opt out, you may be making it harder for your favorite websites or apps to survive. This is because advertisers pay more to deliver a tailored ad, and your favorite website/app makes more money when they show a tailored ad on their properties. Studies have shown that a significant portion of a publisher's revenue can come from tailored advertising, and this is particularly true for smaller websites. See 2014 DAA Study and 2010 NAI Study.

SO - if you still want to get ads, but prefer irrelevant ads over tailored ads based on anonymous information and you don't value the free content you enjoy, Turn will place an opt-out cookie on your browser. The opt-out cookie tells our servers not to deliver tailored, anonymous ads to you that deliver high value to the sites and apps you love. If you delete, block, or otherwise restrict cookies, or if you use a different computer or Internet browser, you may need to renew your opt-out choice.

[Opt-out of Turn](#)

[Opt-out of Turn Corporate Marketing](#)

Alternatively, you may control your privacy settings using the NAI or DAA Opt-out Tool which allows consumers to opt out of the behavioral advertising delivered by NAI or DAA member companies, respectively.

[DAA Opt-out Page](#)

[NIA Opt-out Tool](#)

[EDAA Opt-out Tool](#)

## Turn — Consumer Opt-Out

Deleting your PII | We do not collect PII via our technology. If you'd like us to update, correct, delete, or deactivate any PII that you may have provided to us on the Site, please send your request to us at [privacy@turn.com](mailto:privacy@turn.com) and we will process your request within a reasonable period of time after receipt. See Privacy Policy.



**Request a Demo**

First Name  Last Name

Email

Company  Phone Number

**Submit**

**CONTINUE THE TOUR**

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