



THE AICP BID MANAGEMENT PLATFORM

## PRIVACY POLICY

Your privacy is important to AICP Services, Inc. (“ASI”, “we”, “us”). This Privacy Policy (the “Policy”) describes how we gather, use and share the information of individuals and companies interacting with ASI’s bidding platform located at [www.aicp.bid](http://www.aicp.bid) and any ASI mobile application associated therewith (collectively, the “Site”) and our current privacy practices with respect to the use and sharing of such information. By using the Site, you accept the privacy practices described in this Policy. **If you are a California resident, please see *Consumer Privacy for California Residents* below for more information about your specific privacy rights.**

Bidder’s bids and related information will only be shared with Subscribers who are electing to solicit bids for projects submitted through the system. No bidder will be able to access any other bidder’s submissions and data. However, at the sole election of the Subscriber, bidders’ identities can be made visible to all bidders on a project.

Subscribers may choose to provide access to bidder data to their agency or other consultants on a project by project basis, [however, unless the subscriber expressly elects otherwise, your data and/or creative approach will be protected from sharing with an agency if the agency’s in-house or affiliated entities participate in the bidding pool] .

After the Subscriber has chosen a winning bid for a portion of the project, access to any bidding information for that portion of the project other than that relating to the winning bid will no longer be available to any party other than the bidder by whom it was submitted. The Subscriber will be given access to the full bid data for each winning and awarded bid (provided only in raw text/CSV format and not, e.g., as a detailed Excel spreadsheet), but only for the purposes of providing the Subscriber access to information on its past expenditures.

Bidder submissions and data will not be aggregated, except for the sole purpose of the Subscriber’s review of bid submissions and awarded bids. Any data that you enter into the Platform will not be retained or stored on ASI’s systems beyond the immediate need to facilitate exchanges during the bidding process outside of your segregated database. ASI will not, without your consent, retain, collect or aggregate any bidding data for storage or access outside of your segregated database, beyond the awarded bids for the sole use by the awarding client

Any nonpublic information or bid specifications that Subscribers upload to the Platform will only be shared with or made available to those entities that have been invited by the subscriber to participate in the bidding process. Furthermore, each invited bidder will only be able to access the specifications to which the subscriber grants them access

ASI will not access, compile, aggregate or use any specification data or information or any bidding information or data that the subscriber submits to the Platform, except as needed to provide the subscriber for its own analysis purposes. Any data that is entered into the Platform by the subscriber will



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not be retained or stored on ASI's systems beyond (i) the immediate need to facilitate exchanges during the bidding process and (ii) the subscriber's own needs for historical review.

### **I. WHAT TYPES OF INFORMATION DO WE COLLECT?**

**Personal Information, Project Descriptions and Specifications, Bid Data and Creative Treatments and Other Information are gathered through web browsers during use of the site:**

We collect information that you provide through the Site and share this information for the purpose of presenting and evaluating project opportunities and project submissions and historic subscriber ad spending. The information we collect from you varies depending on the way you use our Site or interact with us. This information is collected solely for the purposes of your use of the site, review of presentations and bids in the pre-award phase and review of historically awarded presentations and bids by subscriber (including authorized subscriber partners with specific permissions on a project by project basis) and providing a platform for interaction between bidders and subscribers (including authorized subscriber partners with specific permissions on a project by project basis)

The information we collect about individuals may include **"Personal Information"**, meaning information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. We may collect and store any Personal Information you input into the Site. Personal Information does not include information that is anonymized or deidentified, aggregate consumer information, or publicly available information (i.e., information that is lawfully made available from government records).

The information we collect is used strictly for purposes of utilizing the site and will never be made available for sale to any third party beyond its necessary usage by the authorized subscribers and bidders who are engaged in using the site. The types of information we may collect/receive for this specific usage may include without limitation:

- Your contact information, account information, and other identifiers such as your name, username, address, email address, phone number, and date of birth;
- Your company and business name, address, phone number, email address;
- Project Specification details (such as proposed budgets, project contacts, trafficking specifics, and dates), project proposal information, project details, project schedules, project bids, project awards, creative treatments, references, and company preferences;
- Individual or company resume information and project history;
- Internet activity information as it pertains to our ability to monitor and optimize usage of the site, including but not limited to your browsing history, search history, and information regarding your interaction with the Site,
- Technical information, such as IP address and browser information;
- Location and geolocation data;



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- Your browser type and language, operating system, domain server, type of computer or device, and other information about the device you use to access the Site; and
- Inferences drawn from any of the foregoing information in order to create a user profile.

### **Declaration of Consent:**

By submitting Personal Information and other information to the Site, you consent to the collection, use, storage, alteration, destruction, disclosure or transfer of such information in accordance with the terms of this Policy. You may withdraw this consent at any time by notifying us at [privacy@aicp.bid](mailto:privacy@aicp.bid).

## **II. HOW DO WE COLLECT OR RECEIVE INFORMATION?**

### **Methods of Collection:**

Personal Information may be obtained in a number of ways, including:

- Directly from you, whenever you (i) submit information on or to our Site (e.g., by registering with the Site, creating an account on the Site, posting on the Site, bidding on a project through the Site, filling out a form on the Site, or completing a survey on the Site), (ii) request information or a demo or otherwise contact us, (iii) subscribe to our email list or newsletter, and/or (iv) interact with our emails or advertisements;
- From technology when you visit the Site, such as cookies and similar technologies; and
- From third party sources, which may include partners that offer cobranded or integrated services, and/or publicly-available sources including data in the public domain.

### **About Cookies:**

Our Site uses cookies, web beacons, and/or similar technologies for various purposes, including to keep track of your account, facilitate the sign-in process, authenticate users, personalize your experience when visiting the Site, and analyze which portions of the Site are most visited or used. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of this Site.

### **“Do Not Track” Disclosure:**

“Do Not Track” is a privacy preference that Internet users can set in their web browsers. When a user turns on the “Do Not Track” option, the browser sends a message to websites requesting them not to track the user. Some websites respond to “Do Not Track” signals, while others do not. At this time, our Site does not respond to Do Not Track signals.

## **III. HOW DO WE USE PERSONAL INFORMATION?**



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We do not sell or rent or provide your Personal Information to third parties, except as necessary for use of the site which is described herein.

ASI is provided as a subscription service to advertisers. Subscribers are provided personal information about bidders (i.e.: business contact information) for their use in soliciting bidder company involvement in bidding. **ASI allows subscribers to use bidder email addresses to promote their project opportunities to bidders.**

We may also use the information collected:

- To contact you about our Site or services;
- To notify you of project opportunities which may be of interest to you;
- To tailor your experience to our Site, such as by showing you content that we think you might be interested in and displaying content according to your preferences;
- To send you promotional material;
- To serve our own internal business purposes, such as maintaining or servicing accounts, providing customer service, verifying user information, processing payments, and performing analytics to optimize site usage;
- To monitor or improve use of the Site;
- To conduct internal research and evaluate products or services we could offer you;
- To verify or maintain the quality or safety of a service or product and to improve, upgrade or enhance the service or product;
- For services of third parties subject to your prior authorization.;
- In the case of IP Addresses, to help diagnose problems with our server, administer our Site, help identify you and your account, and gather broad demographic information.

Personal Information may be stored for as long as the information is required to fulfill our legitimate business needs or the purposes for which the Personal Information was collected, or for such period as is required by law.

#### **IV. WHO DO WE SHARE PERSONAL INFORMATION WITH?**

ASI is provided as a subscription service to advertisers. Subscribers are provided personal information about bidders (i.e.: business contact information) for their use in soliciting bidder company involvement in bidding. **ASI allows subscribers to use bidder email addresses to promote their project opportunities to bidders.**

We may also share your Personal Information with:

- Other ASI divisions, and subsidiaries;
- Third party service providers or other entities that (i) are involved in the operation of the Site, (ii) help us provide you with our products and services, and/or (iii) otherwise support our relationship with you (such as billing and account management);



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- Third-party analytics services, in order to determine that the site is functioning properly such as Google Analytics, to (i) evaluate use of the Site, (ii) compile reports on system activity, (iii) (iv) analyze performance metrics, and/or (v) collect and evaluate other information related to the proper functioning of the Site;
- Law enforcement, government agencies or other regulators, to (i) comply with law or legal requirements, (ii) enforce our agreements, and/or (iii) protect our rights and the property or safety of ASI, our users or third parties;
- Transactional parties if we, or some or all of our assets, are acquired by another entity, including through a sale or in connection with a bankruptcy;
- Any other third party where you have provided your consent;

Please note that third-party service providers have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions. For these providers, we recommend that you read their privacy policies so you can understand the manner in which your Personal Information will be handled by these providers. In addition, to the extent that this Site contains links to other parties' websites, ASI is not responsible for the privacy practices or the content of such other websites.

### **V. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?**

We take commercially reasonable steps to protect your Personal Information when you transmit it from your computer to the Site and to protect such information from loss, misuse, unauthorized access, disclosure, alteration, or destruction. You should keep in mind that no Internet transmission is ever 100% secure or error-free. In particular, email sent to or from the Site may not be secure, and you should therefore take special care in deciding what information you send to us via email. It is your responsibility to safeguard your password, user ID or other special access features on the Site from unauthorized access. Be sure to sign off when using a shared computer.

### **VI. HOW CAN YOU MANAGE YOUR PERSONAL INFORMATION?**

#### **Opting Out of Communications From ASI:**

Users may opt-out of receiving future electronic communications by following the unsubscribe directions in those communications. Please note that opting out of electronic communications from ASI will prevent you from receiving email invitations to bid new projects.

#### **Consumer Privacy For California Residents:**

If you are a California resident, the processing of certain personal data about you may be subject to the California Consumer Privacy Act ("CCPA"). Beginning January 1, 2020, the CCPA gives you certain rights with respect to the processing of your Personal Information. You may exercise these rights by sending us an email at [privacy@aicp.bid](mailto:privacy@aicp.bid) writing to us at 3 west 18<sup>th</sup> street, 5<sup>th</sup> floor, NY NY 10011 or calling (800) 780-



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0470 You may make a verifiable consumer request related to your personal information twice per 12-month period. We will not discriminate against you for exercising any of your rights under the CCPA, which include the following:

- **Right to Know and Access Request:** Under the CCPA, you have a right to request information about our collection, use, and disclosure of your Personal Information over the prior 12 months, and ask that we provide you with the following information: (i) categories of and specific pieces of your Personal Information we have collected about you; (ii) categories of sources from which we collect your Personal Information; (iii) purposes for collecting, using, or selling your Personal Information; (iv) categories of third parties with which we share your Personal Information; (v) categories of your Personal Information disclosed about you for a business purpose; and (vi) if applicable, categories of your Personal Information that was sold and the categories of third parties to which such information was sold, identified by category or categories of your Personal Information for each such third party.
- **Right to Delete Request:** Under the CCPA, you also have a right to request that we delete your Personal Information, subject to certain exceptions. Once your request is verified and we have determined that we are required to delete that information in accordance with applicable law, we will delete your Personal Information accordingly. Your request to delete your Personal Information may be denied if it is necessary for us to retain your information under one or more of the exceptions listed in the CCPA. Please note that a record of your deletion request may be kept pursuant to our legal obligations.
- **Right to Opt Out of Sale:** Under the CCPA, you have the right to opt out of the sale of your Personal Information to third parties by contacting us at [privacy@aicp.bid](mailto:privacy@aicp.bid).
- **Right to Correct Request:** Under the CCPA, you have the right to request that we correct your Personal Information.
- **Requests Through Agents:** You may designate, in writing or through a power of attorney document, an authorized agent to make requests on your behalf to exercise your rights. Before accepting such a request from an agent, we will require that the agent provide proof you have authorized them to act on your behalf, and we may need you to verify your identity directly with us.
- **Household Requests:** We do not knowingly collect household data. If all the members of a household makes a Right to Know or Right to Delete request, we will respond as if the requests are individual requests.
- **Disclosure About Personal Information Disclosed for a Business Purpose:** In the last 12 months, ASI may have disclosed certain Personal Information (e.g., username; display name; email address;



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billing information and history; business information, if applicable) to third party recipients for one or more business purposes.

Under Section 1798.83 of the California Civil Code (a separate law from the CCPA), residents of California also have the right to ask us for a notice describing the categories of Personal Information we have shared with third parties or among our affiliated companies, for their direct marketing purposes, during the preceding calendar year. If you are a California resident and would like a copy of this notice, please send an email message to [privacy@aicp.bid](mailto:privacy@aicp.bid) with "Request for California Privacy Information" in the subject line and body of your message.

Please allow 30 days for a response.

#### **VII. CHILDREN'S PRIVACY**

Our Site is not intended for children under 13 years of age. No one under age 13 may provide any information to us through the Site. We do not knowingly collect Personal Information from children under 13. If you are under 13, do not access, use or provide any information on the Site or on or through any of its features. If we learn we have collected or received Personal Information from a child under 13 without parental consent, we will delete that information. If you believe that a child under the age of 13 has provided us with Personal Information online, we ask that a parent or guardian contact us at [privacy@aicp.bid](mailto:privacy@aicp.bid).

#### **VIII. CHANGES TO OUR PRIVACY POLICY**

ASI will update this Policy from time to time, and we will post the revised Policy on this page. We will also notify users of such changes by posting an alert on all user dashboards. Once changed, users will not be able to engage with the site until they have accepted the new Privacy Policy. Such changes will be effective immediately upon your acceptance

#### **IX. HOW TO CONTACT US**

If you have any questions or concerns about this Policy, you may contact us at [privacy@aicp.bid](mailto:privacy@aicp.bid), 3 west 18<sup>th</sup> street, 5<sup>th</sup> floor, NY NY 10011 or (800) 780-0470

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