

Privacy Policy for Euclid

Last Updated: 3/19/18

We at Euclid Analytics, Inc. and Euclid Europe Limited (“we”, “us”, “our” or “Euclid”) are a team of software engineers, data scientists, product managers, and entrepreneurs. We’re also regular people who understand consumer preferences. This privacy policy (“**Privacy Policy**”) describes the data practices for our services (“**Services**”). If you have any questions, please don’t hesitate to contact us as set forth in the “Contacting Us” section at the bottom of this policy.

To view the privacy policy for our corporate website please visit <https://euclidstaging.wpengine.com/about/privacy-statement/>.

Overview of Euclid’s Services.

Euclid provides services to its partners (“**Partners**”) that operate in conjunction with the Wi-Fi networks located in and around public locations, such as stores, restaurants, supermarkets, malls, and performance venues, etc. (collectively, “**Partner Locations**”). Our Euclid Services help these Partners better understand and interact with the people who visit their locations (like shoppers). We do this by using software that integrates with the WiFi networks of the Partner Locations to collect certain information broadcast from WiFi enabled mobile devices (like your smartphone) or that you choose to provide to us and/or to our Partners (described below).

What Information We Collect and How We Do It.

Euclid collects information two ways:

Passive Collection. When you are within the proximity of a Partner Location’s WiFi network with a WiFi enabled mobile device, the WiFi access points may detect the presence of that mobile device and its Media Access Control Address (“**MAC Address**”). This is a number that the mobile device automatically broadcasts if the WiFi feature is turned on to help it connect to WiFi Access points. We refer to this information as “**General Visit Information**”. General Visit Information is collected as the mobile device moves across different Partner Locations that use our technology. For example, if you visit your favorite clothing store today that is a Partner Location – and then a popular local restaurant a few days later that is also a Partner Location – we may know a mobile device was in both locations based on seeing the same MAC Address. For clarity, this information is collected if the device’s WiFi is enabled – **even if you do not actually “connect” to the Partner Location’s WiFi network.** You can learn more about “WiFi access points” and “MAC Addresses” by searching online.

Active Collection. Euclid collects certain “**Registration Information**” when you “**Register**” for the Euclid Services, such as your name, email address, gender, age or home zip code. Registration for the Euclid Services can occur in a number of ways, for example:

- When you are in the proximity of a Partner Location and connect to its WiFi network, you may be asked to provide Registration Information as part of logging-in to the WiFi network in order to be able to use the WiFi network to surf the web, access smartphone apps, etc. (“**Log-In**”).
- The applicable Partner may provide you with other opportunities to provide Registration Information, such as when you Register for a Partner loyalty program administered by the Partner or by Euclid.

For clarity, Registration Information may be collected directly by Euclid or directly by its Partners (or Euclid or any Partner’s services providers) and then passed on to Euclid.

Registration Information may also include information from third parties. If you Log-In to the WiFi network via a third-party service, such as Facebook Login or Google OpenID, we and/or our Partner Locations may access the information described in the third-party service’s request for authorization, such as your name, email address, gender, age, and home zip code. Please review your privacy settings with these third-party services to ensure you are sharing the information you wish to share.

After you Register with the Euclid Service, we may also collect information from your mobile device about the websites visited and applications used and other information such as IP Address, location related data, device and/or browser type and the mobile devices operating system (“**Activity Information**”).

Note Regarding Collection Across Partners, Locations and Time:

Once you first Register for the Euclid Services with a Partner, we deem you Registered with the Euclid Service in general (meaning – across all our Partners and Partner Locations). You will remain Registered with the Euclid Service – and we and/or our Partners will continue to collect information as described herein – until you opt out of the Service as explained in the “How You Can Opt, Access and Correct Your Information” section below. As the Service is used across many different Partner Locations for many different Partners, we may collect information across different Partner Location WiFi networks when you change locations. For example, if you visit a department store today that is a Partner Location and Log-In to their WiFi network – we may collect information from you when you are Logged-In to the WiFi network at a Partner Location concert venue you visit a week later. As noted above, even though you are not asked to Log-In or submit new Registration Information at a new Partner Location – you will still be Registered with the Euclid Service for such location.

How we share and use the General Visit Information, Registration Information and Activity Information is set forth below.

How We Use Your Information.

General Visit Information:

The General Visit Information is used to help Euclid and its Partners better understand how large groups of people behave. We do this by providing Partners with reports and other analytics products generated from such data. We combine your General Visit Information with the General Visit Information of many people. Partners use the reports and other analytics products for a variety of purposes, such as to:

- Improve customer service;
- Improve operation of their facilities;
- Determine timing for promotions and sales;
- Measure the effects of advertising;
- Plan and execute marketing and advertising campaigns;
- Set staffing levels;
- Set store hours; and
- Other business and operational purposes

Also, please note, once you are Registered with the Euclid Services your General Visit Information is combined with your Registration Information and Activity Information – and it may be disclosed to our Partners – as set forth in the “Registration Information and Activity Information” section below. It may also be used for advertising as set forth in the “Third Party Uses” section below.

At the time that you Register with the Euclid Services, we combine Registration Information and Activity Information with General Visit Information from your mobile device that may date back to July 19, 2016, the launch date of the “Euclid Connect” service.

Registration Information and Activity Information:

As noted above, once you Register with the Euclid Services, we may combine your Registration Information and Activity Information with your General Visit Information. All such information may be used by our Partners and by us so that we and/or they may provide you with customized advertising, offers, experiences and features, such as:

- Providing advertising we or they believe is more relevant to your interests;
- Contacting you with special offers and incentives;
- Analytics and market research purposes;
- Fulfilling your requests;
- Assisting our partners with customer service; and
- Other business and operational purposes.

Third Party Uses:

We may combine your General Visit Information, Activity Information, and Registration Information from across our Partners, and with data (e.g., demographic, location related data, and preference data) from other third parties for research and analytics.

In addition, we may use such combined information to create advertising models and serve advertisements based on such models. When used in this manner, your information is combined with the information of many other people. As such, it not used for the purposes of serving you targeted advertisements.

Other Uses:

We also use your information to:

- Help us internally operate and maintain the Euclid Services (such as, for the purposes of fixing malfunctions, testing our security systems, etc.).
- Enhance, improve and further develop the Euclid Services (such as, creating new features or functions, refining the user experience, increasing the technical performance of our services, etc.).
- Provide you with notices relate to your use of the Euclid Services (such as account notifications and legal notices).

Who We Share Your Information With.

Partners: We share information with our Partners (and their service providers acting on their behalf) for the purposes described in the “How We Use Your Information” section above.

Other Third Parties: We may share information as described in the “Third Party Uses” section above.

Agents: We may employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. For example, we may use third parties to provide marketing communications, infrastructure and IT services, provide customer service, and process and administer consumer surveys. In the course of providing such services, these third party providers may have access to your information. But, they are only authorized to use or disclose your information in connection with providing us with their services.

Business Transfers: In the event that Euclid is acquired by or merged with a third-party entity or is potentially going to be acquired by or merged with a third party entity, if its substantial assets are acquired by a third party, in any partial or total sale of assets including in the event of bankruptcy, or in any other corporate change, Euclid may transfer or assign the information as part of that actual or potential merger, acquisition, sale, or other change of control. The promises in this Privacy Policy will apply to your data as transferred to the new entity.

Protection of Euclid and Others: We reserve the right to access, read, preserve, and disclose any information that we believe is necessary to comply with law or court order or governmental request; enforce or apply our terms of use; detect and handle payment fraud, or otherwise to protect the rights, property, or safety of Euclid, our employees, our users, or others.

How You Can Opt Out, Access and Correct Your Information.

Digital Advertising Alliance (“DAA”) Opt Out: Euclid adheres to the Digital Advertising Alliance (“DAA”) Self-Regulatory Principles. As provided by these principles, you may elect to opt out of the collection of Activity Information from your device’s browser for interest-based advertising (“IBA”) purposes by Euclid and other companies that participate in the DAA choice tool by visiting [here](#). IBA involves the use of Activity Information to make inferences about your interests to help our clients deliver ads that are more relevant to those interests to this browser and other browsers and devices associated with it. If you choose to opt out of IBA on this browser, data will not be collected from this browser for IBA in apps on this device or associated devices, and data will not be collected on those devices and used on this browser for IBA.

To opt out of the collection of Activity Information from applications on your mobile device for IBA purposes from Euclid and other companies that participate in the DAA’s AppChoices tool, visit [here](#) to learn how to download AppChoices. If you choose to opt out of IBA on this device, data will not

be collected from apps on this device for IBA on this device or associated devices, and data will not be collected on those devices and used in apps on this device for IBA.

If you elect to opt out, you may still receive ads, but those ads may be less relevant to your interests. In addition, we may still collect Activity Information for other purposes, including analytics. Note that if you delete your cookies, or use a different browser or device, you may need to renew your opt out choices. To control the collection of precise location data from your mobile device, you can use the location data controls that may be available in your device's settings.

Mobile Location Analytics Opt Out: Euclid complies with the [Mobile Location Analytics Code of Conduct](#). As provided for in the code, you may elect to opt out of associating information about your presence at a location with a device's MAC Address at: <https://smart-places.org/>. If you opt out, we will use your device's MAC Address only to maintain the device's opt-out status.

Euclid Services Opt Out: If you want to opt out of (i) Euclid's use, and Euclid's provision to third parties for their use, of your information for direct marketing purposes and (ii) Euclid's further collection of Registration Information and Activity Information please click <http://go.euclidanalytics.com/euclid-services-opt-out>. For clarity, we may still collect and use (except for direct marketing purposes) your General Visit Information (for your choices in this regard – please see the "[Mobile Location Analytics Code of Conduct](#)" section above). The foregoing includes your opt out rights pursuant to California Civil Code 1798.83.

Rights of Access and Correction: You have the right to (i) be informed of the categories of information we collect, the specific information we have collected from you, what such information we have shared with our affiliates and third parties and (ii) have corrections made if such information is not accurate. To request such information, please submit a written request to privacy@euclidanalytics.com or Euclid, Inc. (ATTN: Privacy), 400 Alabama Street, San Francisco, CA 94110. Please write the following in the subject heading: "Privacy Policy Notice of Request". To obtain access to your information we may require that you provide additional information to confirm your identity. This information will be used only for that purpose. To correct any such information, please send any correction request per the same request instructions above. The foregoing includes your access and correction rights pursuant to California Civil Code 1798.83.

Data Storage and Retention.

If you are not Registered with the Euclid Services, we will retain General Visit Information for 24 months only after "hashing". Hashing is essentially a way of scrambling the information into a randomized string of numbers and letters. Once General Visit Information is hashed, Euclid will not attempt to re-identify the original General Visit Information from that hashed data. If you are Registered, General Visit Information, Registration Information and Activity Information is retained for as long as we deem reasonably necessary to continue to provide our services.

EU-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield Frameworks.

Euclid Analytics, Inc. and Euclid Europe Limited (hereinafter "Euclid") comply with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework (collectively, "Privacy Shield") as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from the European Economic Area ("EEA") and Switzerland.

Euclid has certified that it adheres to the Privacy Shield principles of notice, choice, accountability for onward transfer, security, data integrity and purpose limitations, access, and recourse, enforcement and liability. Euclid complies with the Privacy Shield principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions. To learn more about the Privacy Shield program, and to view our certification page, please visit www.privacyshield.gov.

Euclid's participation in the Privacy Shield applies to all personal data collected from the EEA and Switzerland, respectively through this website or through the Euclid Services (described at <http://euclidtagging.wpenline.com/solutions/>).

Euclid will endeavor to resolve complaints about your and our collection or use of your personal information. EEA or Swiss citizens with inquiries or complaints regarding our privacy practices should first contact Euclid at privacy@euclidanalytics.com. Euclid has further committed to refer unresolved privacy complaints to an independent dispute resolution mechanism – the Judicial Arbitration and Mediation Service ("JAMS"). If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by Euclid, you may contact JAMS (<https://www.jamsadr.com>) to file a complaint.

As a last resort and under limited circumstances, EU and Swiss individuals with residual privacy complaints not resolved pursuant to the foregoing mechanisms may invoke a binding arbitration option before the Privacy Shield Panel. For more information regarding the submission of complaints, please see <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>.

Euclid is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

Changes to this Privacy Policy.

We may update this Privacy Policy from time to time. The date it was last changed is set forth at the top of this policy. We will post these changes in this policy at <http://www.euclidanalytics.com/about/privacy-statement/> and suggest that you revisit this policy periodically to stay informed of any updates.

Contacting Us.

If you have any questions regarding our privacy policies, please send us a detailed message to privacy@euclidanalytics.com or Euclid, Inc. (ATTN: Privacy), 400 Alabama Street, San Francisco, CA 94110. Please write the following in the subject heading: "Privacy Policy Inquiry".

Thank you!

Visitors

