

Site Privacy Policy

Effective Date: March 20, 2023

Site Privacy Policy

Alphonso Inc. interacts with consumers and businesses in several different ways. Alphonso owns and operates the website www.alphonso.tv (the “Site”). Alphonso develops and distributes certain software applications for automatic content recognition (“ACR”), which may include applications relating to smart televisions. Alphonso also develops and distributes a software development kit, including application programming interfaces, software, documentation and related materials (the “SDK”), which certain device manufacturers and other users (“Independent Developers”) may elect to utilize in connection with developing and operating their own ACR applications (“Independent Applications”). Additionally, some of Alphonso’s media partners may include an Alphonso web beacon (sometimes also known as a “pixel”) on their advertisements or web sites. These beacons allow Alphonso to assist partners in understanding the effectiveness of ads and to measure visitation to the websites. The Site, SDK and beacons, together with the data collection, storage, analysis and reporting tools, functions and services that are provided at or by the Site, SDK, or beacons, are collectively referred to as the “Service”.

The following policy explains how Alphonso collects, uses and shares information when consumers interact with the Service, which may occur directly or as the result of interacting with an Independent Application or a web site. Capitalized terms used herein without definition will have the same meanings as defined in the Terms of Service applicable to the Service, which are available at www.alphonso.tv/privacy/terms. If you are a developer, publisher, advertiser, or device manufacturer that wants to use the Service, please visit our website at www.alphonso.tv to learn more or email us at info@alphonso.tv.

Information Collected

Site

While you are on our Site, you may provide us with information about yourself when you submit a form, ask questions, or request services from us. You can also authorize a third party to provide us with information

about you when you register or sign in with our Site using a third-party login service (such as LinkedIn). You may correct or otherwise change your registration data by contacting Alphonso, as provided below.

When you visit our Site, we automatically collect information about your visit, like time, date and the URL or address of the website from which you entered the Site, and the IP address or other identifiers linked to the device you are using to access the Site (collectively, the “Traffic Data”). We combine this information with information from third party data providers that help us understand the demographics and interests of our Site visitors, as well as the frequency and duration of use of areas within our Site. Collection of Traffic Data may involve the use of software programs, web beacons, pixel tags, cookies (as defined below), or other similar technologies.

Service

Whenever you interact with the Service, which may occur directly or as a result of interacting with an Independent Application or web site, a variety of technologies may be employed to collect data that may include:

- browser or device type;
- make and model of device;
- operating system type;
- the time of your interaction with the Service;
- your use of the Site or other sites where an Alphonso partner has placed a beacon, and what websites you previously viewed;
- device identifiers, such as IDFA, IP address, MAC address, or other such identifiers;
- information about the websites you visit over time and across various devices and browsers; and
- information about your location.

We also receive information, such as demographic, interests, and other information described in this policy, about you from certain third-party data providers. We combine any of the information we collect and use and share it in the manner described in this privacy policy.

The Service collects data to enhance your media viewing experience, and to increase the relevancy of the advertising that you may see across the various devices you use. However, the Service only collects data from your device if you have agreed to participate. If you agree to receive the Service, the Independent Application receives brief audio samples (about 10 milliseconds, or 1/100 of a second) directly from the audio content of your viewing device (e.g., TVs, video and audio streaming devices, set-top boxes, etc.). These audio samples are collected internally (i.e., the sample is taken from the internal source, not from the use of any external listening device) and are encoded (sometimes referred to as “hashed”) into digital “audio signatures” on your device. The audio signatures are then sent to Alphonso’s servers where they are compared to audio signatures of pre-existing commercial content. Matched audio signatures are used by Alphonso and shared with third parties for a variety of media recommendations (such as alerting viewers of breaking news or the release of a favorite show), and for ad targeting and measurement services across associated devices. Unmatched audio signatures are discarded. The audio signatures are associated with IP address and/or device ID, but not name, postal

address, or email. Importantly, Alphonso's ACR service can't detect and is not designed to recognize human conversation, ambient sounds, and other non-commercial audio or sounds.

Use & Sharing of Information

Alphonso uses the various types of information it collects for a variety of purposes with your consent where required, including to:

- maintain, operate, improve and provide the Service;
- analyze user trends and behaviors, and to generate reports;
- deliver marketing and advertising materials on our behalf, and for other third parties, that we believe are relevant to you;
- offer recommendations to you about programming content on your TV and other devices we believe you may enjoy; and
- as otherwise disclosed at the time of collection.

Alphonso also uses the various types of information it collects in its legitimate interest:

- to maintain, operate, improve our business;
- to support our business development efforts;
- to provide customer service, communicate with and market to our customers;
- to monitor the Service for legal compliance, and compliance with your terms of use; and
- as otherwise disclosed at the time of collection.

Alphonso may share any data it collects with a variety of parties, including:

- service providers, such as email and marketing fulfillment providers;
- with select third parties that will use the information for their own business purposes including ad targeting and measurement for participants in the Service and other users;
- with third parties for their direct marketing purposes;
- with third parties for reporting and analytics purposes;
- with our affiliated companies for their business and marketing purposes;
- as part of a corporate sale, merger, acquisitions, or other transfer of all or part of our assets;
- pursuant to a subpoena, court order, or other legal process or as otherwise required by law, or to protect our rights, or the rights of third parties; or
- with your consent or as otherwise disclosed at the time of collection.

To learn about how you can control our use and sharing of information we collect, or to withdraw consent that you previously provided, please see the "Your Choices" section of this policy. Please note that if you do not provide consent, or if you choose to withdraw your consent, the advertising you see may be less relevant to you and you will not receive personalized content recommendations on your TV. You have the right to withdraw

your consent at any time. Alphonso shares data that does not identify you or your device specifically, such as aggregate or de-identified data, without restriction.

“Cookies” are pieces of information that a website transfers to your computer for record-keeping purposes. Cookies are used, among other purposes, to identify a user’s web browser. If applicable, you may be able to set your web browser to refuse cookies, which in turn may affect your ability to access and use the Site and Service. Note that if you block cookies we may still collect information from your browser or device using different technologies. Our Business Partners and third parties who provide advertising using the Service may also use cookies for the purpose of collecting and storing information across this website and other websites over time. Alphonso does not have access to or control over third party advertisers’ use of cookies. For more information regarding Alphonso’s use of cookies and your choices related to them, please see our Cookie Policy, located at <https://alphonso.tv/privacy/cookie-policy/>.

Your Choices

Choice on Televisions and Other Devices: If you own a television or other device that includes the Service, you can consent to our collection and use of data about the video content you watch on that television to provide you with television content recommendations. If you would like to withdraw that consent at any time, you can do so in the settings menu of your television where the Service is integrated.

Interest-Based Advertising

After you opt in, the Service can suggest Smart TV viewing content that you might like. Also, by understanding the types of shows you watch, our Service may enable the delivery of interest-based advertisements to you on your browser and across various browsers and devices associated with it.

Website Beacons

As described above, certain partners who are looking to better understand the visitors that come to the partners’ websites may include an Alphonso web beacon on those websites. These beacons use JavaScript to run. Consequently, if you disable JavaScript on your browser, none of the Alphonso beacons will be active, so no data will be collected. One thing to note, if you want to disable JavaScript, you will need to do it for each type of browser you use (e.g., Chrome, Firefox, Edge, etc.). Instructions for disabling JavaScript are widely available either through the Help function of your browser or through an Internet search.

As part of our Service, we or our business partners engage other companies to serve advertisements on our behalf and to provide analytics services to us. These companies may use cookies, web beacons, device IDs, and other technologies to collect information about your use of the Services, including: your IP address, web browser, pages viewed, time spent, and links clicked. This information may be used by Alphonso and others in various ways, including to analyze and track data, determine the popularity of certain features, deliver interest-based advertising and other content targeted to your interests on our Services and other websites, and to better understand your online activity. This type of advertising is called interest-based advertising. Alphonso adheres to the Digital Advertising Alliance’s (“DAA”) Self-Regulatory Principles regarding interest-based advertising.

If you would like to exercise choice regarding interest-based advertising in this browser, you can visit www.aboutads.info/choices. When you make choices regarding interest-based advertising using this tool, we will stop using data from that browser for interest-based advertising on that browser and on associated devices and browsers. We will also stop using data collected from browsers for interest-based advertising on the browser where the choice was exercised. If you delete cookies, reset your device identifier, or use another browser, you may need to repeat your choices made through the AdChoices tool. If you opt out, you will still receive ads, but these ads may be less relevant to you. Also, if you elect to opt out, we may still collect data for other purposes including analytics, reporting, content personalization, and other business purposes.

Marketing E-mails

If you receive marketing emails from Alphonso regarding our products and services, you can unsubscribe from these emails through opt-out included in that e-mail.

Children

Alphonso will not collect personally identifiable or other information from any person who is actually known to us to be under the age of 13 (or an age set by local law in a jurisdiction where we offer our Services). If we become aware that a person under 13 has provided personally identifiable or other information, Alphonso will take steps to remove such information and terminate that individual's access and use of the Service.

Security

Alphonso takes reasonable physical, technical, and administrative steps to help maintain information we collect, store, and use in a secure manner.

Data Retention

Alphonso retains data we collect to support our Site and Service only as long as it is needed to provide our services to our customers or for our use for our legitimate interest such as accounting and legal compliance, and after this time, that data is deleted or de-identified.

US Residents

The processing of certain personal data may be subject to various statutes and regulations across the United States. These privacy laws give you certain rights with respect to the processing of your personal information. Alphonso provides all residents across the United States with the ability to access the rights listed below.

Under no circumstances does Alphonso collect any sensitive personal information, including data relating to social security, driver's license, state identification card, or passport numbers; log-in, financial account, debit card, or credit card numbers in combination with any required security or access codes, passwords, or credentials; or data revealing racial or ethnic origin, religious beliefs, mental or physical health diagnosis, sexual orientation, union membership, citizenship or immigration status, or precise geolocation data.

Right to Know

One consumer right is the “Right to Know”, sometimes referred to as a “Right to Access” or a “Right to Confirm”. This right allows you to know whether we have collected any information about you and what that information contains. You can 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:

- Categories of and specific pieces of personal information we have collected about you.
- Categories of sources from which we collect personal information.
- Purposes for collecting, using, or selling personal information.
- Categories of third parties with which we share personal information.
- Categories of personal information disclosed about you for a business purpose.
- If applicable, categories of personal information sold about you and the categories of third parties to which the personal information was sold, by category or categories of personal information for each third party to which the personal information was sold.

Right to Delete

You also have a right to request – with some exceptions – that we delete personal information we have collected about you.

Right to Data Portability

You have the right to obtain a copy of your personal data that you previously provided to Alphonso.

Right to Correct

You have the right to correct any inaccuracies you find in your personal data, based on the nature of the personal data and the purposes of processing it.

Right to Opt-Out of the Sale or Profiling of Personal Information

Generally, a “sale” means providing to a third party personal information for valuable consideration. You have the right to direct us not to sell any personal information we have collected from you (commonly known as the “right to opt-out”). Importantly, this right to opt-out should not be confused with your ability to opt-out of the collection of data through your Smart TV. If you want to opt-out of data collection through your Smart TV, please see the “Your Choices” section above.

You also have the right to direct us not to use any data we may have for profiling purposes. This right allows you to request that any information we may have about you not be used to create profiles which could be used to analyze or predict your interests and not be used to provide you with advertisements specifically relating to your behavior.

Right to Appeal

You have the right to appeal Alphonso’s failure to act within the time set forth in the applicable consumer data privacy law.

Making a Request

You can make a request to opt-out of the sale by us of any personal information we have related to you, you can click on the “Do Not Sell My Personal Information” on the Alphonso website (available at <https://choice.alphonso.tv/donotsell>) or by sending us an email to the address set out in the “Contact” section below.

For all other consumer privacy requests, please go to <https://choice.alphonso.tv/otherccparequests>. Alternatively, you can send us an email to the address set out in the “Contact” section below.

If you provide personal information in obtaining products or services from Alphonso, you are entitled to request and obtain from us, once a calendar year, information about the customer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year. For any such requests, please send us an email to the address set out in the “Contact” section below.

Because Alphonso collects such a limited amount of personal data, we have to verify all incoming requests to make sure that we are only providing data relevant to the person making the request. To verify your request and to associate your request to the data that we have, it is necessary for us to obtain your IP Address (as stated above, IP Address is the only personal information we collect from you). To verify the IP Address, we have created a tool that will send the correct IP Address to us. This tool will also ask for an email address, so that we can respond to you with the information you have requested. This email address will be used for no purpose other than to provide you with the information you have requested.

Household Data

As described above, all data collected by Alphonso is associated with a household, as opposed to an individual, and all data is associated with the IP Address of that household. If any member of the household makes a request pursuant to the guidelines set out above (and properly verified through the verification tool), we will respond to the individual request as if the individual is representing the entire household, and will provide all household data.

Requests Made Through Agents

You may have the option to designate, through the use of a proper legal instrument, 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 will need you to verify your identity directly with us, as described above.

Discrimination Based on the Exercise of Rights

While Alphonso would never discriminate against anyone who chooses to exercise their statutory rights, it is important to note that our provision of services to you may be completely related with our ability to collect data. Therefore, if you have asked us to stop collecting data about you, then we may be unable to provide you

with services. For example, on some TVs, Alphonso offers the ability to provide you with recommendations of TV shows you may not know about but may have an interest in based on the shows you have watched in the past, and if Alphonso is unable to collect information about the shows you have watched in the past, then we can't make those kinds of recommendations.

EU, UK and Switzerland Residents

European data protection laws give you certain rights regarding your personal information. If you are located in Europe, you may ask us to take the following actions in relation to your Personal Information that we hold:

- **Right of access:** You can ask us to provide you with information about our processing of your personal information and give you access to your personal information.
- **Right to rectification:** If the personal information we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified.
- **Right to erasure:** You can ask us to delete or remove your personal information where there is no lawful reason for us continuing to store or process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law.
- **Right to restrict processing:** You can ask us to suspend the processing of your personal information if: (i) you want us to establish the data's accuracy; (ii) where our use of the personal information is unlawful but you do not want us to erase it; (iii) where you need us to hold the personal information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your personal information but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to object:** Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Right to data portability:** You have the right, in certain circumstances, to ask us to provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Right to withdraw consent at any time:** Where we are relying on consent to process your personal information you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the personal information or where certain exemptions apply. If we decline your request, we will tell you why, subject to legal restrictions.

To exercise any of these rights, please contact us at EUprivacy@alphonso.tv. We may request specific information from you to help us confirm your identity and process your request.

Although we urge you to contact us first to find a solution for every concern you may have, you always have the right to lodge a complaint with your competent data protection authority. You can find your data protection regulator [here](#).

Cross-border data transfers

Alphonso may transfer your data to recipients outside of the EEA and/or the UK. Some of these recipients are located in countries in respect of which either the European Commission and/or UK Government (as and where applicable) has issued adequacy decisions, in which case, the recipient's country is recognized as providing an adequate level of data protection under UK and/or European data protection laws (as applicable) and the transfer is therefore permitted under Article 45 of the GDPR.

Some recipients of your data may be located in countries outside the EEA and/or the UK for which the European Commission or UK Government (as and where applicable) has not issued adequacy decisions in respect of the level of data protection in such countries ("Restricted Country"). For example, the United States is a Restricted Country. When we transfer your data to a recipient in a Restricted Country, we will either:

- enter into appropriate data transfer agreements based on the EEA or UK Standard Contractual Clauses (as applicable) as approved from time-to-time by the European Commission under Article 46 of the GDPR, the UK Information Commissioner's Office or UK Government (as and where applicable); or
- rely on other appropriate means permitted by the EEA/UK GDPR, which establish that such recipients will provide an adequate level of data protection and that appropriate technical and organizational security measures are in place to protect Personal Information against accidental or unlawful destruction, loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing.

Alphonso reserves the right, at its sole discretion, to update, modify or replace this Privacy Policy, in whole or in part, at any time. Alphonso will use reasonable efforts to notify you of any material change approximately 30 days in advance of the effective date of any change. Change notices may be communicated by postings at or through the Site, SDK or otherwise. In any case, you should periodically check the Privacy Policy for changes. Continued access or use of the Service following any change to the Privacy Policy constitutes your acceptance of those changes. Information collected by the Service is subject to the Privacy Policy in effect at the time of use.

Contact

If you have any questions regarding this Privacy Policy or your dealings with the Service, please contact us in our role as a data controller, at:

Alphonso Inc.

Attn: Privacy

211 Hope Street

Suite 390905

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LG Ad Solutions

LG Ad Solutions, incorporated as Alphonso Inc., is a global leader in advanced advertising for Connected TV and cross-screen devices, driven by our mission to create meaningful connections between brands and their audiences. With a vast network of award-winning LG Smart TVs worldwide, we offer advertisers and content creators broad reach and targeted engagement on the largest screen in the home.

- Careers
- News
- Contact
- Company

- Solutions
- Technology
- Resources
- Press Releases
- Newsletter

