

PRIVACY AND COOKIE POLICY

Introduction

This privacy and cookie policy (“**Privacy Policy**”) applies to information collected through the Outbrain Inc. (“**Outbrain**”) family of web sites, web pages, interactive features, applications, widgets, blogs and their respective contents at the following URL: **Outbrain.com** (the “**Site**”) and our platforms: Amplify, Engage, Visual Revenue and Sphere whether accessed via computer, mobile device or other technology (collectively, the “**Service**”). The Service is offered by Outbrain Inc. and its subsidiaries and affiliated companies (collectively, “**Outbrain,**” or “**we**,” “**us**,” “**our**”).

Outbrain is committed to protecting your information. This Privacy Policy explains what information we may collect through the Service and the Site, how such information may be used and/or shared with others, how we safeguard it and how you may access and control its use in connection with our marketing communications and activities.

When you use the Service or access the Site, we employ “cookies” and other similar tracking devices to help us collect and store information about you and other users. Please read this Privacy Policy carefully, because by using the Service, and/or accessing the Site, and/or interacting with Outbrain’s widget via the Service, you are acknowledging that you understand and agree to the terms of this Privacy Policy.

TRUSTe

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact TRUSTe, our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Data Transfers Outside the EU/EEA

To the extent any data is provided to Outbrain UK Limited and transferred to Outbrain Inc or to any other recipient outside the EU/EEA, Outbrain ensures the transfer is in full compliance with EU Data Protection Laws by ensuring that an adequate level of protection is given to that data and that adequate safeguards are put in place to protect the data. As an example, Outbrain Inc. has entered into the EU Model Clauses with Outbrain UK Limited and does also adhere to other methods for meeting the ‘adequate protection’ requirements of Article 25 of the EU Data Protection Directive (95/46/EC), such as standard contract clauses or Binding Corporate Rules.

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1. Information We Collect Automatically

Whenever you visit or interact with the Service, Outbrain, as well as any third-party vendors and/or service providers, may use a variety of technologies that automatically or passively collect information about how the Service is accessed and used ("**Usage Information**"). Usage Information may include, in part, browser type, operating system, device type, an estimate of your geographic location associated with your IP address, the page served, the time, referring URLs and other information normally transmitted in HTTP requests. This statistical data provides us with information about the use of the Service, such as how many visitors visit a specific page on which the Service is installed, how long they stay on that page, the type of content on that page, which hyperlinks, if any, they "click" on and how they generally engage with that page. This information helps us keep the Service fresh and interesting to our users and tailor content to each visitor's interests. Usage Information is generally non-identifying, but to the extent Usage Information may be associated with you as a specific and identifiable person (for example, because you have registered for the Service) and thereby provided Outbrain with personal information such as name, e-mail address, telephone number or home address) Outbrain treats such information as "**Personal Information**" (i.e., information that could be used to contact you or to identify you personally) and will only use it for the purposes described in this Privacy Policy.

We also automatically collect the internet protocol ("**IP**") address or other unique identifier ("**Device Identifier**") for each computer, mobile device, technology or other device (collectively, "**Device**") you use to access the Service. A Device Identifier is a number that is automatically assigned to your Device when you access a web site or its servers, and our computers identify each Device by its Device Identifier.

Our Service uses several different technologies to collect Usage Information, including Device Identifiers. These may include, without limitation:

Cookies.

Cookies are small text files placed on a Device when the Device is used to visit the Service or the Site. We may place cookies or similar files on your Device for security purposes, to facilitate site navigation and to personalize your experience while using the Service, including by better tailoring internal recommendations and promoted content to your preferences over time. For example, we may use your web browsing information to try to show you specific recommendations and sponsored recommendations that we think will be of particular interest to you. You can read more about the cookies we use for the Service by clicking [here](#).

We also use cookies in order to keep you logged in to the Service if you register with us. Cookies allow us to collect technical and navigational information, such as browser type, time spent on the Service and pages visited. Cookies may include a Device Identifier along with information about the particular type of content in which you have shown interest. Cookies also allow us to select which content is most likely to appeal to you and display that content while you are using the Service.

When interacting with the Service, if you click on a link to one of our promoted content recommendations, the customer sponsoring the promoted link may place a cookie on your Device as well, in which case you will be subject to their privacy policy. Please note that you are subject to the privacy policies of each site you visit – if Outbrain is installed on that site, you are subject both to this Privacy Policy and the policy of the web site owner. As further explained in the section of this Privacy Policy entitled [OTHER SITES](#), if you click on an Outbrain link to visit a site where the Service is not installed, you are subject only to that site’s privacy policy while visiting that site, and not to this Privacy Policy.

You can find more information about the individual cookies most relevant to your use of the Service, and the purposes for which we use them, in our Cookie Glossary [here](#). If you would prefer not to accept cookies, you can do this by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies, please be aware that some functions and features of the Service may not work properly because we may not be able to recognize and associate you with your Outbrain account. In addition, we may not be able to tailor our recommendations as well as we would be able to if you had not blocked the cookies.

Log Files.

As is true of most web sites, we and our third party tracking-utility partner gather certain information automatically and store it in log files. This information includes IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and clickstream data.

We use this information, which does not identify individual users, to analyze trends, to administer the site, to track users’ movements around the site and to gather demographic information about our user base as a whole.

Pixel tags.

A pixel tag is a transparent graphic image, sometimes called a web beacon or tracking beacon, placed on a web page or in an e-mail, which indicates that a page or e-mail has been viewed. We do link Personal Information provided to us through the Service to Personal Information. In addition, a pixel tag may tell your browser to get content from another server.

Information You Provide To Us

In addition to the information we collect automatically, we may ask you to provide Personal Information when you sign up for the Service or otherwise communicate or interact with us. We may also ask you to provide other information about yourself, such as name, e-mail address and phone number. If you apply to become a customer of Outbrain, we may request additional information from you via customer application forms, insertion orders and other forms. If you are a customer, we may provide you with the ability to access your account via an Open ID provider, in which case we will ask for your Open ID authentication information. If you do not want your Personal Information collected, please do not submit it. In order to ensure the safekeeping of your information, network advertising companies and publishers are not permitted to directly collect Personal Information through the Service.

Our Site includes social media features, such as the Facebook “Like” button or other similar features such as the “share this” button or interactive mini-programs that run on our Site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these features are governed by the privacy policy of the company providing such features.

2. How We Use The Information We Collect

Outbrain uses the information we collect about and from you for a variety of business purposes, including for example: to respond to your questions and requests; to provide you with access to certain functions and features of the Service; to provide and maintain your platform account(s); to verify your identity; to communicate with you about your account and activities using the Service and, in our discretion, to communicate changes to any Outbrain policy; to tailor content recommendations we serve you; to improve the Service for internal business purposes; to process applications and transactions; and for purposes we disclose at the time you provide your Personal Information or to which you otherwise consent.

Anytime you post on our blog please be aware that you are posting using a third party application and we have no access or control over this information. To request removal of your personal information from our blog, you can either log into the third party application and remove your comment or you can contact the appropriate third party application. Your interaction with these features is governed by the privacy policy of the company providing it.

3. Sharing Of Information

Except as provided in this Privacy Policy, we will not provide any of your Personal Information to any third parties without your specific consent. We may share non-Personal Information, such as aggregate user statistics, demographic information and Usage Information with third parties. We may combine your Usage Information with those of other users of the Service in order to share trend information with third parties, always in aggregated and anonymized form. For example, we may use your Usage Information as part of an aggregated number to tell a prospective sponsor how many people in the Outbrain network visit sports web sites each month.

We may also share your information as disclosed at the time you provide your information, as set forth in this Privacy Policy and in the following circumstances:

Services On Our Behalf.

Though we normally perform all of the Services “in-house”, in order to carry out your requests, to make various features, services and materials available to you through the Service, and to respond to your inquiries, in certain instances we may share your Usage Information or Personal Information with third parties that perform functions on our behalf (or on behalf of our partners), such as companies or individuals like an e-mail service provider to send e-mails on our behalf or a career provider to process employment applications on our behalf and other companies or individuals that host or operate the Service and analyze data or provide customer service including via live chat software. We enter into agreements with all third parties who process Personal Information on our behalf to ensure that they do so in accordance with our instructions and applicable data protection laws.

Business Transfers.

Your Personal Information may also be used by us or shared with our subsidiaries, affiliates and other entities in the family of companies controlled by Outbrain for internal reasons, primarily for business and operational purposes. As we continue to develop our business, we may sell or purchase a business or assets. If we purchase another entity or if another entity acquires us or all or substantially all of our assets, or assets related to the Service, Personal Information, Usage Information, and any other information that we have collected about the users of the Service may be disclosed to such entity as part of the due diligence process and, if we or our assets are acquired, will be transferred to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

Legal Disclosure.

Outbrain may transfer and disclose information, including your Personal Information, Usage Information and Device Identifier, to third parties to comply with certain legal obligations when we believe in good faith that the law requires it; at the request of governmental authorities conducting an investigation; to verify, enforce or applicable terms or other

applicable policies; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of Outbrain, our customers or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

4. Advertising/Behavioral Targeting; How To Opt-Out.

Outbrain complies with the Digital Advertising Alliance’s self-regulatory principles and encourages you to exercise your right to control and choice regarding Outbrain’s use of interest-based targeting in the Service and/or advertising on the Site. Please review this section carefully to consider whether you would like to opt out of: personalization of the Outbrain Service, cookies from this Site or both.

The Service

We may use third party analytics vendors to evaluate and provide us with information about the use of the Service. We do not share Personal Information with these third parties, but they may set and access their own cookies, pixel tags and similar technologies on your Device and they may otherwise collect or have access to information about you, including Usage Information.

We may also use third party redirects, which will redirect you through a third party server before redirecting to the final landing page. On this redirect, the third party may place its own cookies, pixel tags and similar technologies on your device (e.g., for purposes of retargeting) and collect or have access to information about you, including Usage Information.

Websites

If the privacy of your clicks on recommendations or the pages you visit is a concern for you, we urge you to do the following:

- Do NOT click on any recommendation you do not want to be associated with.
- Opt out of Outbrain’s personalization tracking by clicking the below “Opt-Out” button
- If you use multiple devices and/or multiple browsers, opt out on each device/browser, and/or if you clear your cookies, to opt out again.



Opt Out

You have Opted In to Outbrain tracking. Outbrain will serve you personalized recommendations

Applications.

To opt-out of the collection and use of data on your mobile application(s), you can adjust your Device's settings. Here are two examples for iOS and Android Devices:

iOS Devices: Settings > Privacy > Advertising > Limit Ad Tracking

Android Devices: Google Settings App > Ads > Opt Out of Interest-based Advertising

Your opt-out process may differ from the examples above, depending on which version of operating system is installed on your Device.

Please note, even though you have opted out:

- **You will still see Outbrain recommendations.** Opting out of Outbrain personalization tracking does not mean you will no longer receive internal recommendations and promoted content recommendations from Outbrain. It does mean that the internal recommendations and promoted content recommendations we serve you will not be personalized based on pages you read in the Outbrain network. You will likely receive less benefit from the Service because our recommendations will not be as well tailored to your interests, but we will still use information about the document you are viewing to provide you recommendations on that page.
- **Outbrain honors requests to opt out of personalization tracking by placing a special Outbrain cookie on your Device that informs our servers not to record information about the pages you are visiting.** We place cookies on your Device to prevent personalization tracking. Opting out of personalization tracking is not the same as blocking cookies. As mentioned above, if you browse the web from several Devices, you will need to opt out from each Device to ensure that we prevent personalization tracking on all of them. For the same reason, if you buy a new Device, change browsers or delete this cookie (or clear all cookies), you will need to perform this opt-out task again.

The Site

We use cookies to help us understand how you interact with the Site, including to track conversions (i.e., when an end user registers for the Service) and to collect various usage statistics. Additionally, third parties also place cookies on your Device to engage in interest-based advertising and display advertisements tailored to end users' preferences. These third party technologies are not covered by our Privacy Policy; please consult the privacy policy of each third party for details. If you do not wish to have cookies placed on your Device, you have two options: (i) you can block cookies from your web browser or (ii) opt out of interest-based advertising performed by companies that participate in the Digital Advertising Alliance program [here](#).

5. Your Privacy Rights, Choice And Access

To the extent you have previously registered with us, you may always direct us not to share your Personal Information with third parties, not to use your Personal Information to provide you with information or offers, or not to send you newsletters, e-mails or other communications, by following the removal instructions in the communication that you receive. Please note that we do not send any communications to you unless you have previously indicated to us that you would like to receive such communication. In any event, in each commercial communication we send, we provide an opportunity to opt-out of such communication via an unsubscribe link. Please note that (i) it may take time to process email opt-out requests consistent with applicable law (but no longer than 10 days after receipt of a request) and (ii) you cannot opt-out of transactional or relationship messages sent to registered users of the Service or those who have engaged in transactions with us (e.g., account notifications).

If you wish to verify, correct, update or request the deactivation of your information collected through the Site or Service, you may edit your profile preferences or contact us at the above address or e-mail. In accordance with our routine record keeping, we may delete certain records that contain Personal Information you have submitted through the Service. We will respond to requests for access within 30 days. We are under no obligation to store such Personal Information indefinitely and disclaim any liability arising out of, or related to, the destruction of such Personal Information. In addition, you should be aware that it is not always possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons.

Outbrain will retain your Personal Information for as long as needed to provide services to our customers. Outbrain will retain and use this Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

6. Children

The Service is not directed to children under 13. We do not knowingly collect Personal Information from anyone under 13 years of age. If we determine upon collection that a user is under 13, we will not use or maintain his/her Personal Information without the parent/guardian's consent. If we become aware that we have unknowingly collected Personal Information from a child under the age of 13, we will make reasonable efforts to delete such information from our records. If you're a kid, please go play in the yard, don't register for Outbrain!

7. Security Of Your Information

We maintain tight controls over all the data we collect, retaining it in firewalled and secured databases with strictly limited and controlled access rights, to ensure it is secure. When you enter sensitive information (such as login credentials) we encrypt that data via SSL encryption. Where we have given you (or where you have chosen) a password that enables you to access

certain features of the Service, you are responsible for keeping this password confidential. Please remember that unfortunately, the transmission of information via the internet is not completely secure, so although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted via the Service; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

8. Other Sites

The Service may contain links to other sites that we do not own or operate. This includes links from customers, sponsors and partners that may use our logo(s) as part of a co-branding agreement. We do not control, recommend or endorse and are not responsible for these sites or their content, products, services or privacy policies or practices. These other web sites may send their own cookies to your Device, they may independently collect data or solicit Personal Information and may or may not have their own published privacy policies. You should also independently assess the authenticity of any site that appears or claims that it is a part of the Service (including those linked to through an e-mail or social networking page).

9. Consent To Processing And Transfer Of Information

The Service is operated in the United States. Given that we are an international business, our use of your information necessarily involves the transmission of data on an international basis. If you are located in the European Union, Canada or elsewhere outside of the United States, please be aware that information we collect may be transferred to and processed in the United States. By using the Service, or providing us with any information, you consent to the collection, processing, maintenance and transfer of such information in and to the United States and other applicable territories in which the privacy laws may not be as comprehensive as or equivalent to those in the country where you reside and/or are a citizen.

10. Changes

Please note, we may modify information presented via the Service and/or this Privacy Policy from time to time. If we make any material changes, we will place a prominent notice on the Site prior to the change becoming effective. You should check back here periodically to see if the Privacy Policy has been updated. We will always show the date of the latest modification of the Privacy Policy at the bottom of the page so you can tell when it was last revised.

11. Contact Us

We regularly review our compliance with this Privacy Policy. Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to legal@outbrain.com or by mail to Outbrain Inc., 39 West 13th Street, 3rd floor, New York, NY 10011, Attn: Legal Department.