

Providing Notice under GDPR for Exponential

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1. Providing Notification to Users under GDPR

As the owner of a website where Exponential are able to collect personal data from users, to comply with the GDPR, you need to provide notification to your users regarding personal data collection – and to continue working with Exponential, that means including Exponential’s information too.

In essence, you will need to include a mini-version of Exponential’s (and any other vendors you may be working with, of course) privacy policy. Please therefore include one of the following pieces of text in *your* privacy policy (or equivalent page) such that it is obvious to users.

1.1 Legitimate Interest

If you are using legitimate interest as the legal basis for our processing, use this text (including links):

Exponential Interactive, Inc, as our partner, have a legitimate interest to collect and profile personal data in the form of IP address and cookie ID from users on our website in order to provide targeted online advertising and ad measurement. For more details including opt-out requests, access requests or complaints, please review their [privacy policy](#) or contact their data protection officer via privacy@exponential.com.

1.2 Consent

If you are using consent as the legal basis for our processing, use this text (including links):

Subject to your consent, Exponential Interactive, Inc collect and profile personal data in the form of IP address and cookie ID from users on our website in order to provide targeted online advertising and ad measurement. You may change your consent decision at any time via <insert details of your consent mechanism or Consent Management Platform here>. For more details including access requests and complaints, review their [privacy policy](#) or contact their data protection officer via privacy@exponential.com.

1.3 Cookie Details

You will also need to provide information regarding the cookie we use, details of which are:

| Cookie Name | Sort by (Domain) | Function | Party | Class | Type | Expiry |
|-------------|------------------|---|-------|----------|------------|----------|
| ANON_ID | tribalfusion.com | The anonymous hashed id in the cookie links the web user's browser to a profile which contains the behaviors the user has displayed | Third | Tracking | Persistent | 3 months |

This same information can be found on our [privacy policy](#).

2. Information available via our Privacy Policy

Users who want more information will be able to access our [privacy policy](#), which will include details of:

- Data retention
- More detail on legitimate interest
- Who'll have access to the data
- Transfer outside EU – Privacy Shield
- How to escalate complaints – ICO
- How to get a copy of their data
- Rectification/removal of their data
- That, while we use personal data to show users more relevant ads on behalf of the brands we work with, and to help our publisher partners maintain free-to-use websites, we will never use the data to show one user one product price, and another user a different one.
- In the event of a data breach, we will notify our primary Data Protection Authority, the UK's ICO, as any personal data we collect does not include a means of contacting any affected users.
- More detail on how we use the information (i.e. profiling, models)

Our privacy policy is hosted at <http://exponential.com/privacy/> and will soon be updated to incorporate the items above.

Should you have any further information, contact privacy@exponential.com.

3. Disclaimer

While we have taken legal advice in the preparation of this document from our counsel, Osborne Clarke, the guidance above should not be taken as legally authoritative and if you have any concerns, you should obtain independent legal advice.