VIANT AD PLATFORM PRIVACY POLICY

Last updated: [DATE]

This Platform Privacy Policy describes how Viant Technology Inc. and our subsidiary and affiliate companies (collectively, "Viant," "we," or "us"), collect, use, and disclose information about you in connection with our demand side advertising platform ("Viant Platform") and related services we provide to advertising agencies, advertisers, and other companies (our "Clients") that allow them to plan and execute digital media advertising campaigns and measure and analyze the performance of those campaigns (collectively, our "Ad Services").

To opt out of Viant using and disclosing your information for certain advertising purposes, please see "Your Choices" below or visit our Privacy Center.
Please note that this Platform Privacy Policy covers the information we process as a "data controller" and does not apply to information we handle on behalf of our Clients (i.e., when Viant acts as a service provider/processor). To review our website and corporate privacy policy, please click here.

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1. INFORMATION WE COLLECT

Like other digital advertising companies, our Ad Services rely on identifiers and other data about your online and offline activity to help our Clients run more effective advertising campaigns.

Categories of information we collect

To power our Ad Services, we collect data about consumers of digital media ("you" or "Users"), devices, and ads and where they're published. The categories of information we collect include:

- Pseudonymous identifiers (meaning identifiers that do not directly identify Users), such as IP addresses, cookie identifiers, mobile advertising identifiers, and other device identifiers, such as those associated with your connected television ("CTV").

- Other identifiers, such as email addresses and phone numbers (from which we may generate pseudonymized versions) and postal addresses.

- Browser and device information, such as device type and model, manufacturer, operating system type and version (e.g., iOS or Android), web browser type and version (e.g., Chrome or Safari), carrier name, time zone, and network connection type (e.g., Wifi or cellular).

- Location information, including when inferred from an IP address and sometimes including precise geolocation information (GPS data) if provided via our Ad Services by others.

- Data about advertisements shown and User engagement with the ad, such as the type of ad, where it was shown, whether the User clicked on it, how many times the User has seen a given ad, and whether the User subsequently visited the Client's site or app, made a purchase, or took other actions based on the ad.

- Other information about Users' activity online and in mobile apps, such as sites visited, duration of visit, and activities on these properties.

In addition to the information we collect, we also allow third parties to make available interest and demographic information they have collected or inferred about individuals.

Sources of information

Our Ad Services receive information from a host of sources, including:

- Information collected automatically about Users through cookies and similar tracking technologies, including pixels, web beacons, and, in mobile apps, SDKs, used by Viant, our Clients, and our data partners. These technologies automatically collect information about the sites and apps you visit and help our Ad Services identify devices and browsers over time and across services.

- Our Clients upload information to the Ad Services, such as information about audiences or identifiers they aim to reach with their advertising campaigns.

- We work with data partners that make information available to us to improve our Ad Services, including to verify and supplement our identity graph, and data partners that make information available on our Ad Services for our Clients to use to improve their advertising campaigns and measure the effectiveness of those campaigns.

- Other stakeholders in the digital advertising ecosystem, particularly companies that provide information about ad space available on sites, apps, CTVs, and other devices or services that publish ads (also known as the "supply" side of the advertising ecosystem). These supply stakeholders share bid requests with us that describe available ad space and typically include identifiers, information about the device, and other information that the supply stakeholder chooses to include. Viant can often match the bid request data with other identifiers we have in our Ad Services, which helps our Clients more effectively target their advertising campaigns.

- Our Ad Services may receive information from MySpace LLC, which is a Viant affiliate, subject to the MySpace Privacy Policy.

2. HOW WE USE INFORMATION

***Providing Ad Services*:** We use the information we collect to provide our Ad Services, including to:

- Help our Clients develop and execute digital advertising campaigns that reach their intended audiences;
- Enable technical delivery of our Clients' ads;
- Measure, evaluate, and report on the effectiveness of ads, such as by determining whether a User clicked on the ad or took another action after seeing the ad; and
- Limit the number of times a User sees the same ad (known as "frequency capping").

***Building our Identity Graph and Interest Segments*:** We also use the information we collect to build and improve our identity graph, which involves combining information collected across multiple sites, devices, and mobile apps to create profiles and interest segments that help us more effectively target future advertisements. We do so by establishing connections between a User's devices, including by cookie matching and linking devices to common data or activities, sometimes based on assumptions, as well as by cross-referencing this information against identifiers such as email addresses provided to us by data partners. Cross-device connections allow Viant to infer that a single User or household is accessing advertisements served or measured by Viant from multiple devices and to better target advertising and measure the performance of advertisements across those devices.

In building our identity graph and providing our Ad Services, we may combine information we receive about you from third parties (including our affiliates) with other information that we hold about you. We and our Clients use this combined information to create interest-based segments that we and our Clients can use to display more relevant advertisements and other content to Users.

Other Purposes: We also use the information we collect to improve, protect, and operate our business, including to:

- Detect and protect against fraud or malicious activity in connection with our Ad Services;
- Analyze and improve our Ad Services;
- Develop new products and services;
- Protect the rights and property of our Clients, Viant, or others; and
- Comply with our legal and financial obligations.

3. HOW WE DISCLOSE INFORMATION

We may disclose the information we collect in the following scenarios:

- ***Clients and their designees***. In some instances, as a service provider to our clients, we disclose certain information to our clients and their designees for billing and reporting purposes (such as information about where and when their ads were shown).
- ***Affiliates***. We may disclose your information within our family of companies for the purposes described in this Platform Privacy Policy.
- ***Vendors, consultants, and service providers***. We may disclose your information with service providers, vendors, contractors, or agents who perform functions on our behalf, such as providing data storage, technical support for our Ad Services, or fraud prevention services.
- ***Business transfers***. We may disclose information in connection with a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, or assets.
- ***Legal purposes***. We may disclose your information if we believe it is necessary or appropriate: (a) under applicable law; (b) to comply with subpoenas, warrants, or other legal process; (c) to respond to requests from public and government authorities; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to establish or exercise our legal rights or defend against legal claims.

4. YOUR CHOICES

This Section 4 describes opt-out choices available to all Users. If you live in a state governed by a consumer privacy law that gives you the right to opt out of "sharing," or use of your information for "targeted advertising," please review your rights and choices below.

Opt Out of Cookie-Based Ad Targeting by Viant. To opt out of sharing or use of your personal information for targeted advertising on the Viant Platform through our cookie (including when it's placed on third-party sites and services), navigate here and click "opt out of Viant cookie." Please note that this opt out stops the use of our advertising cookie (which is set from the Adelphic domain) and is linked to your current browser only, so you will need to repeat this choice on other browsers or devices or if you clear your cookies.

Non-Cookie Based Opt Out. Please complete this form to request to opt out of sharing or use of your email address and other non-cookie identifiers for targeted advertising purposes on the Viant platform. Depending on where you reside, an agent may also submit this form on your behalf.

Other Opt-Outs. Other companies and industry organizations offer tools enabling you to opt out of targeted advertising by others. For information about these tools, please visit the NAI's consumer resource page at https://thenai.org/how-to-opt-out/.

Mobile Opt-Out Choices. Your mobile device may include a feature that allows you to opt in to or out of having certain information collected through apps used for targeted advertising purposes. You can adjust the advertising preferences on your mobile device as follows:
→ In iOS, visit Settings > Privacy & Security > Tracking> Allow Apps to Request to Track
→ In Android, visit Settings > Google > Ads > Opt out of Ads Personalization

CTV Opt Out. For information about opting out from interest-based advertising on a CTV device (i.e., smart televisions, and/or digital media streaming devices), visit the NAI's consumer opt-out resources at https://thenai.org/how-to-opt-out/.

5. CHILDREN'S INFORMATION

We contractually restrict Clients and data partners from making information available about or from Users they know are children on our Ad Services. We do not knowingly handle information of children or engage in targeted advertising to individuals under 18 years of age (or the permitted legal age, where older).

6. DATA RETENTION

We store the information we collect for as long as necessary to carry out the purposes for which we collected it and for other legal or business purposes explained in this Platform Privacy Policy. We store the information that we use to create tailored advertising audience segments for approximately 18 months, unless the associated User has opted out.

7. INFORMATION FOR U.S. RESIDENTS OF CERTAIN STATES WITH STATE PRIVACY LAWS

Numerous states, including California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, or Virginia, have enacted consumer privacy laws that grant their residents certain rights and require additional disclosures ("State Privacy Laws"). If you are a resident of one of these states, this section applies to you.

This Platform Privacy Policy explains how we collect, use, and disclose information in connection with our Ad Services. Below, we use two tables to explain this same information in accordance with State Privacy Laws, covering our data practices now and over the past twelve months.

Collection, Use, and Disclosure of Personal Information for Business Purposes

Categories of Personal Information	Categories of Recipients	Uses of Personal Information

· Identifiers (such as cookie IDs, device and advertising IDs, email addresses, and phone numbers) · Demographic information (such as inferred age or gender) · Commercial information (such as apps you download, purchases you make, and other conversion activities) · Internet or other electronic network activity information (such as information about your visits to sites and apps and ads you click on) · Location information (such as inferred location based on IP address or other types of information that may include precise geolocation information, which may be "sensitive" personal information under certain State Privacy Laws) · Inferences (such as interests associated with a cookie ID based on digital properties you visit)	· Our Clients and their designees (for their business purposes, such as ad reporting and billing) · Vendors, consultants, and service providers · Recipients in connection with business transfers · Government entities, authorities, and others as needed for legal purposes	· Providing certain Ad Services, including: ad measurement, frequency capping, and delivering contextual ads; · Detect and prevent fraud or malicious activity; · Analyze and improve our Ad Services; · Develop new products and services; · Protect the rights and property of our Clients, Viant, and others; and Comply with our legal and financial obligations.

We collect personal data automatically through cookies and similar tracking technologies, from our Clients, data partners, others in the ad tech ecosystem, and from our affiliate company, MySpace. See details in the "Sources of Information" section above. See "Data Retention" section above for information about how long we store the data we process.

Personal Information that May Be "Shared," or Processed for "Targeted Advertising" on the Viant Platform & Your Opt-Out Rights under State Privacy Laws

As described above, we process personal information to personalize and deliver ads, and for other ads-related purposes, including to build our identity graph and interest segments. Some of these activities may involve Viant engaging in use of your information for purposes of "targeted advertising" or "cross context behavioral advertising" as these terms are defined under certain State Privacy Laws.

In addition, the Viant platform allows our Clients, publishers, and data partners to engage in activities that may constitute "shares" of personal information under the State Privacy Laws. The types of information that may have been processed or disclosed through the Viant Platform for purposes that may constitute sharing or targeted advertising under the State Privacy Laws and the categories of recipients are set out in the table below. For individuals we know to be under 18 years of age, we do not knowingly share or use their personal information for targeted advertising. The categories of information processed for these purposes include:

- Identifiers (such as cookie IDs and device and advertising IDs, pseudonymous version of email addresses or phone numbers, postal addresses)
- Demographic information (such as age and gender)
- Commercial information (such as apps you download, purchases you make, and other conversion activities)
- Internet or other electronic network activity information (such as digital properties that you visit and ads you click on)
- Location information, (such as inferred location based on IP address)
- Inferences (such as interests associated with a cookie ID based on digital properties you visit)

Your Opt-Out Rights

Some of our activities may involve use of personal information deemed "sensitive" under certain State Privacy Laws, such as precise geolocation information. The opt-out procedures described below will also limit how Viant uses and discloses such "sensitive" personal information.

- *Opt Out of Cookie-Based Ad Targeting:* To opt out of "sharing" or use of personal information for targeted advertising using our cookie (including when it's placed on third-party sites and services), navigate here, and click "opt out of Viant cookie." Please note that this opt out stops the use of our advertising cookie (which is set from the Adelphic domain) and is linked to your current browser only, so you will need to repeat this choice on other browsers or devices or if you clear your cookies. If you visit the opt-out page (or other pages where this cookie is set) with a legally recognized opt-out preference signal enabled, such as the Global Privacy Control or GPC, we will treat that signal as a request to opt out of the sharing or use of your personal information for targeted advertising, as applicable under State Privacy Laws.
- *Non-Cookie Based Opt Out:* Please complete this form to request to opt out of "sharing" or use of your email address and other non-cookie identifiers for targeted advertising purposes. Depending on where you reside, an agent may also submit this form on your behalf.

Access, Deletion, and Correction Rights. If you are covered by a State Privacy Law, you have the following rights:

- *Right to Know/Access*: You may request to access personal information we hold about you (including, where feasible, in a portable format).
- *Right to Delete*: You may request we delete the personal information we hold about you.
- *Right to Correct*: You may request we correct the inaccurate personal information that we have about you.

To submit a right to know/access, deletion, or correction request, please use our Consumer Rights Request Portal. You may also make a request by calling us at 1-888-655-1873. When you make such a request, we will take steps to verify your identity, such as by asking you to confirm access to the email address associated with the request or asking you to confirm other information to help ensure we are interacting with the individual making the request.

Appeals. If we deny your request and you are a resident of a state whose privacy law provides an appeal right, you have the right to appeal our decision by contacting us at privacy@viantinc.com. If you are not satisfied with the outcome of an appeal, you may contact the attorney general in the state where you reside. To find your state's attorney general, visit https://www.naag.org/find-my-ag/.

Authorized Agents. If you are a resident of a state whose privacy law provides the following right, you may also permit an authorized agent to make a right to know/access, deletion, or correction request on your behalf, subject to appropriate verification of the agent's authority to submit requests on your behalf. For example, we may ask authorized agents for proof of their authority to operate on your behalf, such as power of attorney, or we may ask you to provide confirmation that you gave the agent permission to make such a request. If you are an authorized agent seeking to make a request, please use our Consumer Rights Request Portal.

Non-retaliation. We will not retaliate against you for exercising your privacy rights.

Metrics Reporting. California law requires that we provide certain metrics about consumer rights requests received in the previous calendar year. The metrics provided below include requests Viant has received globally for the 2025 calendar year.

- Requests to Opt Out: 579 received, all of which were completed.
- Requests to Know: 83 received, of which 61 were completed and 22 were not verified.
- Requests to Delete: 396 received, of which 327 were completed and 69 were not verified.
- Requests to Correct: 12 received, of which 7 were completed and 5 were not verified.

Viant took an average of 8 days to fulfill each request.

8. INFORMATION FOR INDIVIDUALS IN EUROPE

If you are located in Europe, this section applies to you.Viant participates in the IAB Europe Transparency & Consent Framework (TCF) and complies with its specifications and policies. Viant's identification number within the TCF is 1542. To learn more about TCF, visit https://iabeurope.eu/transparency-consent-framework/.

When we process your personal data as described in this Platform Privacy Policy, we do so in reliance on the following lawful bases:

- When you have provided consent (e.g., when you consent to certain cookies being set on a publisher or advertiser site).
- When we have a legitimate interest in processing your personal information that is not overridden by your rights and freedoms. We rely on legitimate interest for the following purposes: (i) delivering and measuring contextual advertising and applying frequency capping; (ii) detecting and preventing fraud and malicious activity in connection with our Ad Services; (iii) analyzing and improving our Ad Services; (iv) developing new products and services; and (v) protecting the rights and property of Viant and our Clients. Where we rely on legitimate interest, we have assessed that our interests are not overridden by the rights and freedoms of the individuals whose data we process.
- To comply with our legal obligations (e.g., to maintain a record of consents we receive and honor consent withdrawals).

- When consent is the legal basis for our processing of your personal information, you may withdraw such consent at any time.

Data Subject Requests. You have the right to (1) access your personal data, including in a portable format, (2) request erasure of your personal data, and (3) request correction of inaccurate personal data. In addition, you may have the right to object to certain processing or request we restrict certain processing. To exercise any of these rights, please visit the Viant Privacy Center.

If you have a concern about our processing of personal data, we encourage you to contact us in the first instance. However, if we are not able to resolve it, you have the right to lodge a complaint with the Data Protection Authority where you reside. Contact details for your Data Protection Authority can be found using the links below:

- For individuals in the European Union: https://edpb.europa.eu/about-edpb/board/members_en
- For individuals in the UK: https://ico.org.uk/global/contact-us/
- For individuals in Switzerland: https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html

9. INTERNATIONAL TRANSFERS

Viant Technology LLC and its U.S. subsidiaries, including Viant US LLC, Adelphic LLC, and IRIS.TV LLC (collectively, "Viant"), are in the process of recertifying that they adhere to the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF), as set forth by the U.S. Department of Commerce.

Viant collects and uses personal information only for the purposes for which it was collected and in accordance with the DPF Principles. Viant also takes steps to protect the security of personal information, including using appropriate technical and organizational security measures. Viant commits to adhere to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles, the Principles shall govern. Viant commits to adhere to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and, once our recertification is finalized, to view our certification, please visit https://www.dataprivacyframework.gov/.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Viant commits to refer unresolved complaints concerning its handling of personal data received in reliance on the DPF to BBB National Programs, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have

not addressed your complaint to your satisfaction, please visit https://bbbprograms.org/programs/all-programs/dpf-consumers for more information or to file a complaint. The services of BBB National Programs are provided at no cost to you.

Viant remains responsible for any of your personal information that is shared under the onward transfer principle for external processing on our behalf, as described in the "How We Disclose Information" section above. Viant remains liable under the DPF Principles if a third party to which it onward transfers your personal information processes it in a manner inconsistent with the DPF Principles, unless Viant proves that it is not responsible for the event giving rise to the damage. Viant may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

The Federal Trade Commission has jurisdiction over Viant's compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF. An individual has the possibility, under certain conditions, to invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms. More information on the arbitration process can be found on the DPF website here.

Viant provides individuals with the opportunity to choose (opt out) whether their personal information is (a) to be disclosed to a third party or (b) to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized. Individuals may exercise this choice by following the instructions as set forth in the "Your Choices" section of this policy, or by contacting Viant as set forth in the "Contact Information" section of this policy.

10. UPDATES TO THIS PLATFORM PRIVACY POLICY

Viant may update this Platform Privacy Policy periodically. If we make changes, we will notify you by changing the date at the top of this policy, and through other means if we make material changes. Please review this policy regularly to stay informed about our practices.

11. CONTACT INFORMATION

If you have any questions about this Platform Privacy Policy, please email us at privacy@viantinc.com.