



ERMES USA Services Privacy Policy

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Ermes USA provides a range of data marketing and consumer analytics products (the "Services") designed to help both for-profit and not-profit organizations, including marketing companies and platforms and their clients, to market their goods and services in a relevant and efficient way to consumers or individuals in the United States. Our Services and solutions, many of which are described in this document, are used to help marketing or advertising that occurs through direct mail, email, online, connected-TV and other channels. You can find out more about our Services here: <https://www.ermes.ai>. Ermes USA is part of the Redpill Group, a company specializing in media and marketing consulting along with its global subsidiaries.

We take seriously the privacy interests of the individuals whose information we receive and share. We provide this Privacy Policy ("Privacy Policy") to describe how we use and manage that information, and what rights consumers have to control how their information is used in marketing. If this Privacy Policy does not address your question about the information used in our Services, you can directly contact our Data Protection Officer at the following email address: dpo@ermes.ai.

1. Information That We Collect and Use in Our Services and the Sources of the Information

When we provide our Services, we process data, including personal information (or similar term as defined by relevant US Laws and/or Regulations), from a variety of sources, including websites and mobile apps, public sources, and other data aggregators. Throughout this Privacy Policy, we refer to the information that we collect, receive and/or process as "Information" or "the Information."

The Information often includes various identifying and demographic information about individuals. It often includes personal attributes such as name, address and other contact information. It may also include information on the individual, household, or geographic level, such as:

- Professional information, including occupation and job title
 - Particular interests, such as (for instance) home improvement, sports enthusiast, online shopping, health and beauty, or travel, or political leanings
 - Organizations to which you belong or have belonged, such as a cycling club, or to which you have contributed
 - Publicly available information, such as that available from government information and files
- Demographic information, such as age, gender, level of education or likely income

This type of information may be inferred – for instance, if a household is in a particularly wealthy area, we might infer a particular income range; if a person's name is "Catherine" we might infer gender as likely female.



The categories of Information we collect and their sources are summarized in the table below.

Category	Categories of Service
Identifiers E.g., name; alias; postal address; mobile ad identifiers; IP address; telephone number; email address; social network handles	<ul style="list-style-type: none">• Data aggregators and consumer data resellers, informational and retail websites, as well as non-profit organizations ("Commercial Sources")• Public records and other publicly available sources• Government entities• Social networks
Characteristics of protected classifications under US laws (inferred or actual, including self-reported) E.g., race; color; religion; sex/gender; pregnancy, marital status; military or veteran status; national origin; ancestry; age (over 40) (may be inferred, actual or self-reported)	<ul style="list-style-type: none">• Commercial Sources• Public records and other publicly available sources• Government entities• Social networks
Commercial or transactions information E.g., products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none">• Commercial Sources• Public records and other publicly available sources
Internet or other electronic network activity information E.g., browsing history; online interests.	<ul style="list-style-type: none">• Commercial Sources
Geolocation data	<ul style="list-style-type: none">• Commercial Sources
Professional or employment-related information E.g., current or past job history or job title.	<ul style="list-style-type: none">• Commercial Sources• Public records and other publicly available sources
Inference Data E.g., consumer information or preferences.	<ul style="list-style-type: none">• Commercial Sources



2. How We Use the Information

Ermes USA uses the Information for various purposes, including the following.

As part of our Services:

Data Marketing Services: Our Services include providing marketing information to our customers, generally regarding which consumers or customers or prospective customers are most likely to be interested (or disinterested) in certain offers, or how to best contact or identify those customers. Similarly, we help our customers identify and understand their customers better, by providing insights about them. Our customers include (but are not limited to) companies, brands, agencies and various marketing data platforms that help them to market and advertise to their own customers (and prospective customers); our customers also include other data aggregators, who work with their own customers.

Online Targeting: We sometimes create defined audience segments ("Audience Segments") based on common demographics and/or shared (actual or inferred) interests or preferences (e.g., households with health care professionals, or with an interest in international travel). When we do this, we may either directly or working with data partners, matches our Information with online cookies and other personal identifiers, in order to target and measure ad campaigns online across various display, mobile and other media channels. You may learn more about how to opt out of this and other online ad targeting below.

Identity Products: We sometimes use the Information we collect to create (or to help our customers create) "identity" graphs, to help locate users across various channels, such as based on common personal, device-based, or network-based identifiers (e.g., IP address, email address).

Additional Marketing Services: Other Services we may sometimes provide to our customers (or that they may provide to their own customers), which may overlap with or supplement the above, may involve (a) help with targeting and optimizing direct mail, email campaigns, display, social and mobile marketing; (b) measuring how effective marketing campaigns have been, by determining which messages are most likely to be seen or opened by which types of consumers, or which types of ads are most likely to lead to purchases; (c) analyzing and optimizing our customers' (or their service providers') proprietary databases, or helping customers to detect and prevent crime and fraud; or (d) providing "validation" or data hygiene services, which is how companies update and/or correct their databases by verifying or removing or correcting old, incorrect or outdated information.

To operate our Services

We also use the Information for our own internal purposes – such as to improve, test, update and verify our own database; to develop new products; and to operate, analyze, improve and secure our Services and our databases and servers.

3. How We Share Information with Customers, Third Parties, including Service Providers

Ermes USA may share the Information with customers, marketing services and platforms, as well as service providers that help us to provide the Services we've described above (or other services we may add in the future). This includes sharing in the following ways:

With our Customers: As described above, we license the Information in various ways to our customers (and sometimes to partners and resellers), who license the Information to their customers. We may sometimes share the Information with those Customers' service providers (for instance, a provider that prints or sends mailings for a Customer), or ad agencies that they work with.

With our Partners: We also may share the Information, including personally identifiable information and Audience Segments, with business and data partners to help provide more tailored targeted marketing, advertising and communications. Likewise, we may do so for analytical purposes, including to help these other parties measure campaign performance, inform future campaigns, or to handle, analyze, or segregate

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this Information on our or our customers' behalf.

With our Service Providers (or Processors, as applicable): We share the Information with a variety of service providers in order to operate, protect and advertise our Services. For instance, we may share the Information with tech and customer support providers, marketing and advertising providers, other data providers (such as to enhance or verify our Information), security vendors, payment vendors (as to our business to business information), and other companies help us deliver or develop Services.

Corporate transfers: We may also share personal information in the event of a major corporate transaction, including for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets, or for purposes of due diligence connected with any such transaction.

Affiliates, parent companies and subsidiaries: Ermes USA may share some or all of the Information in our possession with any affiliated or subsidiary companies (if we ever have any).

As required by law or to protect any person or entity: Ermes USA may disclose Information if we believe that such disclosure is necessary to: (a) comply in good faith with legal process or a regulatory investigation (e.g. a subpoena or court order); (b) enforce our Terms of Service, this Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; and/or (d) protect the rights, property or personal safety of us, our platform, our customers, our agents and affiliates, its users and/or the public. We likewise may provide information to other companies and organizations (including law enforcement) for fraud protection, and spam/malware prevention, and similar purposes.

Sharing of Aggregate Information: We may aggregate and/or de-identify any information collected so that such information can no longer be linked to you or your device ("Aggregate/De-Identified Information"). We may use Aggregate/De-Identified Information for any purpose, including without limitation for research and marketing purposes, and may also share such data with any third parties, including advertisers, promotional partners, and sponsors, at our discretion.

The chart below shows how and with whom we share or disclose personal information.

Category	Categories of Third Parties we Share With	"Sold" this category past 12 months
Identifiers E.g., name; alias; postal address; mobile ad identifiers; IP address; telephone number; email address; social network handles	<ul style="list-style-type: none">Data aggregators and consumer data resellers, consumer goods retailers, informational and retail websites, content publishers, non-profit organizations, business-to-business services and organizations, consumer surveys and survey companies, affiliate networks ("Commercial Recipients") Advertising networks and media platforms, political campaigns, internet service providers, data analytics providers, Social networks	Yes

<p>Characteristics of protected classifications under US law (inferred or actual, including self-reported) E.g., race; color; religion; sex/gender; pregnancy, marital status; military or veteran status; national origin; ancestry; age (over 40) (may be inferred, actual or self-</p>	<ul style="list-style-type: none"> Commercial Recipients, Advertising networks and media platforms, political campaigns, internet service providers, data analytics providers, Social networks 	<p>Yes</p>
<p>Commercial transactions information E.g., products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> Commercial Recipients, Advertising networks and media platforms, political campaigns, internet service providers, data analytics providers, Social networks 	<p>Yes</p>
<p>Internet or other electronic network activity information, E.G., Browsing history; online interests</p>	<ul style="list-style-type: none"> Commercial Recipients, Advertising networks and media platforms, political campaigns, internet service providers, data analytics providers Social networks 	<p>Yes</p>



Professional or employment-related information E.g., current or past job history or job title.	<ul style="list-style-type: none">Commercial Recipients, Advertising networks and media platforms, political campaigns, internet service providers, data analytics providers Social networks	Yes
Inference Data E.g., consumer information or preferences.	<ul style="list-style-type: none">Commercial Recipients, Advertising networks and media platforms, political campaigns, internet service providers, data analytics providers Social networks	Yes

4. Your Rights and Opt-Out Choices

You have the right to request that we disclose what personal information we collect from you, to delete that information, and to opt-out of the sale of your personal information, subject to certain restrictions and without being discriminated against for exercising these rights. You also have the right to designate an agent to exercise these rights on your behalf. This section describes how to exercise those rights and our process for handling those requests. (To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request).

A. Right to request access to your personal information (Right to Know)

You have the right to request that we disclose what categories of your personal information that we collect, use, or sell. You may also request the specific pieces of personal information that we have collected from you. However, we may withhold some personal information where the risk to you or our business is too great to disclose the information.

When you exercise your access rights, we may verify your identity – in part by requesting certain information from you. For instance, you may need to confirm your possession of an identifier, identifying information, or to provide a piece of identification that confirms you are the person you claim to be.

Once we have verified your identity, we will respond to your request as appropriate:

- Where you have requested the categories of personal information that we have collected about you, we will provide a list of those categories.
- Where you have requested specific pieces of personal information, we will provide the information you have requested, to the extent required under law and provided we do not believe there is an overriding privacy or security concern to doing so.
- Upon completion of the above process, we will send you a notice that explains the categories of personal information we were able to locate about you, whether we (1) deleted, (2) de-identified, or (3) retained the information we collected from you. Certain information may be exempt from such requests under applicable law.

If we are unable to complete your requests fully for any of the reasons above, we will provide you additional information about the reasons that we could not comply with your request.

B. Right to request deletion of your personal information

You may also request that we “delete” any personal information that we collected directly from you, such as if you are a customer of ours, or interacted with us at a trade show. You may exercise your deletion rights by clicking here: [Deletion Request Link](#).

“Deletion” is different from “opting out” of sale (or exercising your “do not sell” rights), as it only pertains to information we collected “from” you – not the data in our commercial database. Thus, if you want to avoid being placed in our database in the future, and avoid having your data “sold” to marketers, then you should exercise your “opt out” rights, described below: we will then maintain your information on a suppression list, to “suppress” your data if we later acquire it.

Also note that when we “delete” your information (e.g., if you are a former customer of ours), we may (and are permitted to) retain personal information for certain important purposes, such as (a) to ensure your deleted information is not reintroduced to our systems, (b) to protect our business, systems, and users from fraudulent activity, (c) to address technical issues that impair existing functionality (such as debugging purposes), (e) to comply with law enforcement requests pursuant to lawful process, if applicable (f) for scientific or historical research, (g) for our own internal purposes reasonably related to your relationship with us, or to comply with legal obligations.

C. Right to “opt out” of the sale of your personal information

There are multiple ways that you can opt-out of having the Information used to market to you:

First, if you would like to opt out, you may follow the “Opt Out” or “Do Not Sell My Personal Information” links at the bottom of our website or click here: “Do Not Sell My Personal Information.” You may also call our toll-free number at 800.809.5685 , but we highly recommend using the website link for the most straightforward and efficient processing. The “opt-out” action effectively removes all information from our files, and places your information on a “suppression” list. We will only retain enough to ensure your information is not reintroduced.

For opt out, you’ll be asked to provide your name, current address, and your email address. We may in certain cases require that you verify any of the information that you submit, such as through a verified email response or another verified response.

If you would like to opt-out of direct mail advertising in general, you can contact our Data Protection Officer or privacy team by email here: dpo@ermes.ai.

If you wish to opt out of online targeted ads (sometimes referred to as “interest-based” or “personalized” advertising), you can contact our Data Protection Officer or privacy team at the same email address : dpo@ermes.ai.

If we market to you by email, in our corporate capacity – for instance, if you are a customer or prospective customer of ours and we send information about our Services — you may “unsubscribe” from our marketing emails through a link placed in your emails.

Sometimes, we act only as a “service provider” to our clients (for instance, if they provide information to us for analytics, processing or other data management services), in which case any consumer requests for opt-out, deletion or access to data must be made through that client: we therefore may forward any such requests to a named client, as feasible.

5.Cookies and Similar Technologies

Cookies and How We Use Them

Ermes USA and/or its business partners use certain industry-standard technologies, including cookies and similarly functioning technologies, which we describe below. (We and/or our service providers use these technologies on our website, for instance, and our partners may use these technologies in their own marketing services.)

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We may work with third parties or service providers to provide or enhance our services (e.g. for purposes of tailoring ads, or placing browser cookies), or to offer marketers ways to access or use our Information. These partners may set and access their own cookies, pixel tags and similar technologies on your device, which may have cookies with varying expiration periods. Those partners may, likewise, collect various types of information about your browser, device, or browsing activities through use of these cookies.

Cookies, in turn, are small data files that contain a string of characters, such as a unique browser identifier. Cookies are stored on your computer or other device and act as tags that identify your device. Our (or other companies') servers send your device a cookie when you visit a website. A (pixel) tag (also commonly known as a web beacon or clear GIF) is an invisible 1 x 1 pixel that is placed on certain web pages. When you access web pages (such as the website of a marketer), such tags may generate a generic notice of the visit and permit our partners (or sometimes, us) to read the cookies that a respective company or server has deployed. These tags are used in combination with cookies to track the activity on a site by a particular device. When you turn off cookies, pixel tags simply detect a given website visit.

We or our service providers, and other online marketing platforms that we or they work with, may use cookies to, among other things, "remember" you, determine visitor patterns and trends, collect information about your activities on our clients' sites, or interact with the advertising you see. Cookies are used in this way to provide relevant content to you and replace non-relevant communications with ads that better match your interests.

Disabling Cookies

Most web browsers are set up to accept cookies (particularly "first party" cookies). You may be able to set your browser to warn you before accepting certain cookies or to refuse certain cookies. However, if you disable the use of cookies in your web browser, some features of our website and other services may be difficult to use or become inoperable.

6.Security and Data Integrity

Ermes USA takes steps to help ensure that the data we possess is housed and transmitted securely. This may include various types of physical and electronic security, including firewall protections, encryption, hashing or truncation of data, and access controls to personal information. While neither we nor any platform can guarantee 100 percent safety from hacks or illegal intrusion, we employ efforts we believe are designed to ensure that this does not occur.

7. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. Any changes to it will become effective when it is posted to our website. Please check back to learn of any changes to this Privacy Policy if you are interested in our privacy practices.

8.Storage of Information in the United States

If you are accessing our website or Privacy Policy from outside of the United States, your connection may be through and to servers located in the United States and in such case, the Information you provide will likely be processed and securely maintained in our web servers and internal systems located within the United States. In such case, the information we collect or receive from you may be subject to laws with lesser or different privacy standards than those in your own country (such as if you are in a country located in the European Union).

9. Contact Us

For any questions about our privacy practices, you may contact our Data Protection Officer or privacy team by email here: dpo@ermes.ai.

Our postal address is:
Ermes USA LLC
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