



Cheetah Digital Privacy Policy

Updated: February 27, 2017

This Cheetah Digital Privacy Policy ("Policy") applies to Cheetah Digital ("we", "us" and "our") and concerns the privacy practices relating to our Cheetah Digital platforms where we host, manage, and send email, SMS and other electronic messages on behalf of our clients.

Cheetah Digital provides cloud-based message delivery, data management and Cheetah Digital services which enable our clients to communicate effectively with their customers across channels and contexts.

This Policy addresses Cheetah Digital's data collection and digital tracking practices (including cookies) with respect to recipients of our corporate or client email messages, as well as for visitors to our corporate or client-designated web pages. It also describes how Cheetah Digital collects, uses, shares and secures the personal information you provide, as well as your choices regarding use, access and correction of your personal information.

- To learn more about our firm commitment to not providing software or services used for sending unsolicited commercial electronic messages ('spam'), please refer to the [Global Anti-Spam Policy](#).
- For user-recipients of our corporate or client electronic messages, please refer to the [Receiving Messages from Our Clients guide](#).

Information we Collect and use

We are the exclusive owner of information collected through our websites. We collect information such as name, company, email address, and phone number from both business users (our clients) and user-recipients (our clients' customers) through our submission forms. We also collect information through our blog, [Dedicated to Marketers](#), when you post a comment and when you interact with us through social media. You should be aware that any information you provide in these public areas may be read, collected, and used by others who access them. To request removal of your personal information from our blog or community forum, contact us at contactus@cheetahdigital.com. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

We collect this information and use it for internal business purposes and web operations and to engage with our clients, prospective clients and visitors to our websites. As a permission-based marketing services provider, we detest 'spam'.

- If you visit our website and volunteer your email address, we will send you appropriate information at your request, such as a white paper or newsletter. Additionally,
- If you are our corporate client or are interested in becoming one, we may use the email address you volunteer in order to send you important information regarding our products and services as well as promotions that we deem relevant.
- If information requested is directed to a Cheetah Digital-related interest, we may share the information with an appropriate Cheetah Digital party in order to fulfill the directed request.

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, contact us at



contactus@cheetahdigital.com. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Access

You may access, correct or request deletion of your personal information. For our corporate clients, if your personal information changes, or if you would like to modify your business contact details, please contact your Client Services representative or call us at any of the telephone numbers listed on our [contact page](#) or as described below. All inquiries or requests for access to personal information will be responded to within 30 days.

Cheetah Digital respects and acknowledges that individuals frequently desire to access their personal information. However, Cheetah Digital has no direct relationship with the individuals whose personal data it processes on behalf of its customers. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct his or her query to the respective Cheetah Digital client. If requested to remove data, we will respond within 30 days.

Information sharing and legal notice

We may share your information with third parties who provide services on our behalf to help with our business activities. These companies are authorized to use your personal information only as necessary to provide these services to us. These services may include fulfilling orders or purchases, payment processing, validating contact information, sending marketing communications, and providing cloud infrastructure.

From time to time we may also share your information with third party business partners, for instance, for the purpose of enhancing our products and services, or so that they may market their events, venues, products or services to you. If you do not want us to share your personal information with these companies, contact us at contactus@cheetahdigital.com.

In certain situations, Cheetah Digital may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also disclose your personal information as required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or properly respond to a government request.

If Cheetah Digital is involved in a merger, acquisition, dissolution or sale of all or a portion of its assets, we reserve the right to transfer your personal information. You will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

Website activity

We track visitors to our corporate website, as well as provide our platform clients with services enabling additional website activity reporting. In addition to cookie and pixel tag uses we describe below, website visitor tracking also involves the automatic collection of web server log file data, including Internet Protocol (IP) addresses, web pages visited, operating system, date/time stamp, clickstream data, unique visitations, type of browser used, and other session-based activity. Web server log file information, by itself, is not linked to any personally identifiable information and is used to analyze trends in the



aggregate and administer the site.

Cheetah Digital is not responsible for website activity monitoring on client websites, by clients or any other third parties.

Client and business inquiry communications

We reserve the right to moderate the content of respondent postings and publish the name and website of our Marketing Forward blog respondents in association with their comments. We take no responsibility for the accuracy or other content with our respondent postings. If you believe a respondent comment is inappropriate or deserves further analysis by a corporate representative, please [contact us](#).

In addition, we may occasionally send clients or previous business inquiries, including blog respondents, email messages with product updates, educational events, or other important business related information. Each email includes an opportunity to unsubscribe from future messaging, or recipients can contact us directly through any of our [points of contact](#) or email contactus@cheetahdigital.com.

Cookies and web technologies

We, our service providers, and/or non-affiliated third parties, may use "cookies" or similar technologies such as "pixel tags" on our digital properties. As described below, we and our partners use cookies or similar technologies in order to analyze trends, administer the websites, track users' movements around the websites, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.

- Cookies are small text files that a web browser uses to store data to make a website experience easier and faster. This technology only stores certain data, such as your website behavior, browser information and your perceived interests. Cookies are the primary technology that enables our advertising partners to display relevant ads to you.
- Pixel tags, also known as "web beacons" or "clear GIFs", are small electronic images, often a single pixel (1x1), that are ordinarily not visible to website visitors and may be associated with cookies on the visitors' hard drives. Pixel tags allow us to count users who have visited certain pages of the Site, to deliver branded services, to provide online advertising, and to help determine the effectiveness of promotional or advertising campaigns.

We currently use cookie-based technologies with our website visitors in a de-identified fashion to track overall website performance. We may also use third party analytics services such as those by Google, Oracle and Adobe to help us track and optimize our website performance and corporate marketing.

These third parties use both cookies and pixel tags in order to help us better manage content on our site by informing us what content is effective. In contrast to cookies, which are stored on a user's computer hard drive, web beacons are embedded invisibly on web pages and are about the size of the period at the end of this sentence. We do not tie the information gathered by pixel tags to our client customers' personally identifiable information. These third parties are prohibited from using collected data for any purpose other than as a service provider to us.

Please note that these terms do not refer to cookies enabled through client-access portals to our [Marketing Suite](#) and [CheetahMail](#) platforms, nor client-specific applications through other domain names we may host on their behalf. For inquiries regarding client software access or client-specific uses of cookies, please contact your account services representative.



Social media features and widgets

We use Social Media Features, including the Facebook Like button and Widgets, such as the Share button or similar interactive mini-programs that run on our site. These features may collect your IP address and other non-personal information including 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 it. Refer to the below section covering online targeting to learn how you can limit such collection.

If you provide us your personal information, we may use it to interact with you on third party social networks such as Twitter. Our interactions with you on a social network would be subject to that network's privacy policies, terms of use, and your consent as appropriate.

Additionally, Facebook allows our [Marketing Suite](#) platform to:

- Update and expand user-recipient profiles using data the user-recipient makes public on Facebook, and to
- Collect additional data in the platform when an individual has given clients an express consent to collect and use such data outside of Facebook.

We may store such social profile data as directed by our clients to deliver more personalized Cheetah Digital communications.

Online and targeted advertising

We reserve the right to use cookies or similar technologies to serve online advertising on our websites and to identify unique customers or prior blog respondents. We may work with advertising partners to deliver targeted advertising related to Cheetah Digital's own products and services. To facilitate targeted advertising, we and our third-party partners may utilize "cookies" or equivalent identifiers (explained above) and other audience matching technologies. We use data elements from our corporate marketing databases to assist us in presenting appropriate offers to our prospective clients.

We may also work with advertising networks, advertising exchanges, and/or other types of advertising technology providers to enable the delivery of relevant online targeted advertising to our corporate clients' customers while respecting consumer privacy and offering choices about participating in such activities.

In addition, third parties may collect data about browsing activities on our websites and other unrelated websites over time, for online targeted advertising purposes.

Our advertising partners may place a pixel tag or cookie on certain websites, such as a website registration page. This enables our partner companies to later display a relevant advertisement to you based on your website browsing behavior. This type of online, targeted advertising — known as "retargeting" — is used to re-engage consumers who previously visited a website. To measure the effectiveness of the online targeted advertising you see, we partner with companies to evaluate your interactions with the ads. Certain information may be collected and shared with these partners, including what ad you received, when you viewed it and whether you clicked on the ad.

We and our partners adhere to the Digital Advertising Alliance (DAA) Self-Regulatory Principles. You can opt-out of online targeted advertising from companies participating in the DAA program through the [DAA Consumer Choice page](#), which is available in versions for desktop and mobile browsers. The



DAA also offers a separate choice tool for the collection of cross-app data on mobile devices for online targeted advertising and other applicable uses. To exercise choice applicable to companies participating in this choice tool, you can install the DAA's AppChoices app.

Please ensure you review the opt-out choices available to you within the applicable policies on other Cheetah Digital owned, affiliated, or operated websites.

Performance and personalization technology we provide clients

Email-Related Cookies

As an Email Service Provider we may set cookies associated with pixel tags for (i) web pages we develop and host on behalf of clients, or (ii) where authorized by a client within their email messages and on their own websites.

Cookies may be downloaded from our web servers and stored locally on a user-recipient's computer. Information on the cookie is then referenced by the web browser in conjunction with specific web-enabled email or visited web pages. This cookie responds to a web server with information about how the email recipient engaged with the email or web pages (i.e., open, click-through, image download, etc). An example of this occurs when clients track email users' visits to a website and any subsequent online sales that could be correlated with the email recipient.

In addition to engagement tracking, our cookies enable our clients to provide website and email personalization services for their email subscribers, customers, or registered website visitors. This requires us to connect email and website visitor activity with previously provided information in order to offer personalization, web form pre-population and closer relevance of our clients' email marketing efforts.

The cookies we attempt to set do not contain any personally identifiable information such as name or email address in the cookie itself.

The cookies that Cheetah Digital sets are configured to expire, generally after 7 days, but the expiration period can be longer. Cheetah Digital cookies are re-authenticated for incremental 7-day, or greater, periods when a client's customer opens an email or clicks through an email to a URL embedded into the email. Otherwise, they expire.

How you can control email-related cookies:

- All Internet browsers can be set to notify you before you receive a cookie and give you control over whether or not you choose to accept any particular cookies. You have the option of setting your browser to turn off cookies or restrict cookie delivery to particular websites.
- Emails sent by Cheetah Digital as well as our hosted web pages can be viewed irrespective of our use of cookies. If you do not enable images or click on any links within our client emails, then you can avoid any related cookies.
- Please visit <http://www.aboutcookies.org/> for more information about how to delete and control cookies.
- At this time, we do not respond to 'do not track' browser signals.

Please note that our platforms do not read, store or otherwise interact with cookies placed by other firms on sites where Cheetah Digital may place a cookie. As such, we are not responsible for tracking technologies placed on client websites by clients or their other service providers.



Email-related pixel tags (aka web beacons)

A pixel tag is an invisible image with a line of code, also called a clear gif, which is placed within an email message in the same way as on a web page. The reasons for use of a pixel tag in an HTML email message include:

- To sense whether a recipient can receive html email or only receive text email.
- To detect whether the email recipient has opened the message, and whether that email message was opened successive times.
- To help activate a cookie and integrate web activity with email activity.

Please note that pixel tags do not create, modify or delete files on a user's machine. They are not executable and cannot be used to deliver dangerous content, such as a virus. Rather, pixel tags help our clients identify particular email recipients, who can then be sent more relevant email in the future.

Message 'click-through' monitoring

Nearly every email sent through Cheetah Digital systems includes a hyperlink to another website. Our clients have the ability to track whether that hyperlink has been clicked on and whether that link was clicked on successive times. Clients can then determine the success of their email campaigns and tailor future messaging to recipients based on the relevancy of that 'click-through' activity. When links are clicked on, additional pixel tags attempt to activate cookies to help measure the effectiveness of the email campaign.

User-initiated message forwarding

We may also collect anonymous tracking information with email messages 'forwarded' from a recipient within their own email software or webmail service to another user. Examples of information collected may include the number of times the message was forwarded, the number of times the forwarded message was opened, and the click-through activity within those forwarded messages. No personally identifiable information is collected with email messages forwarded by a recipient through this process.

About the web pages we host for our clients

Cheetah Digital provides web page hosting for our clients and enables services such as email subscription, preference management, refer-a-friend, sweepstakes, and coupons or offer fulfillment information. Our privacy and security practices with respect to these web pages are:

- **Personal information collection and use:** As a data processor, personal information that we collect on behalf of our clients is the exclusive property of the client that is branded on the web page. Web pages we host on the client's behalf will include links to its website which will include information on its privacy and data security policies.
- **A special note about Refer-a-Friend (RAF) services:** We offer clients the ability for recipients to use a web form we host on their behalf to forward an email message to another recipient. Referrals of this nature are sent similarly to any other message a client would send through our system with all of the applicable tracking technology referenced above.

In accordance with international privacy laws and our policies, we collect referral email addresses only to process the message transaction. Neither we nor our clients use the referral email address for any purpose other than to execute the requested email transmission on behalf of the forwarder. Since email forwarding may be restricted by law or otherwise impractical in some jurisdictions, clients are responsible for ensuring compliance wherever this service is offered.

In special circumstances, we may host this transmission request for a specified period of time in order to monitor delivery or deliver subsequently requested email referrals.



If you believe that an email sent through a RAF web page we host was sent to you incorrectly, please email contactus@cheetahdigital.com with the message-in-question and its full transmission header.

- **Non-personal information collection and use:** Web pages we host may include use of all of the non-personal information technologies described above.
- **Hosted web page security:** Data we collect on behalf of our clients is held in a secure environment, with restricted user access, and managed by a team of experienced system administrators. While many of the pages we host on our clients behalf are encrypted with SSL and certified by a third party security provider, a number of the pages we host may not be encrypted or third party certified. As a result, we may not be liable for unforeseen security incidents beyond our control while managing these web pages on our clients' behalf. Once we collect information through a hosted web page on our clients' behalf, the client will have immediate access to this information for their own purposes. While we maintain data security processes for information we host through our services, we are not responsible for the privacy

or security practices of information hosted by our clients. If you have questions or concerns about our clients' privacy or security practices, please communicate directly with the client.

Website security

Safeguarding the information you give us or we receive about you is important to us. Your information is maintained in a secure environment, and our team of security professionals continually monitors our web interface touch-points to detect and thwart any attempts at unwanted intrusion. Cheetah Digital takes appropriate security measures to protect against loss, misuse and unauthorized access, alteration, disclosure, or destruction of your information.

We take commercially reasonable steps to ensure the ongoing confidentiality, integrity, availability and resilience of our systems and services processing your personal information. In the event of a physical or technical incident, we will restore the availability and access to information in a timely manner. If you have questions about the security of your personal information, please contact us as described below.

International data transfers

We maintain servers and offices around the world, including in the United States. If you are our international client, your customer information such as names and email addresses may be transferred to, stored, or processed in the United States.

As a global data processor working on behalf of our international clients, we take many steps to protect the personal information in our care, including offering contractual assurances to this effect. By using our websites and services, you understand and consent to the collection, storage, processing, and transfer of your and your customers' personal information to the United States, as mutually agreed.

Please also note that Cheetah Digital adheres to the Principles of notice, choice, onward transfer, security, data integrity, access and enforcement that comprise the U.S. Department of Commerce's Safe Harbor privacy framework with the European Union. This framework historically enabled our European clients to work interoperably with our databases and other technology resources located in the United States. To learn more about the Safe Harbor program, and to view our past certification, please visit <http://safeharbor.export.gov/list.aspx>.

Links



Our web content and corporate communications may contain links to other sites. Cheetah Digital is not responsible for the content or privacy practices of these sites. We recommend users read the privacy statements of each linked website.

Notification of changes to this policy

If we decide to change our website and tracking privacy practices, we will post those changes to this privacy statement, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this Policy at any time. If we make material changes to these statements, we will notify you on this page prior to the changes taking effect.

Contact us

Please direct any questions or comments regarding our privacy policy or practices to us at:

Cheetah Digital Head Office
Attention: Privacy
29 Broadway, Level 6
New York, NY 10006
Phone: 212-863-4600
Email: contactus@cheetahdigital.com

Or use this online form: <http://www.cheetahdigital.com/contact>

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

More info:

- [Global anti-spam policy](#)
- [Receiving messages from our clients](#)