

## IAS Sanctions Laws Compliance Policy

**Approved By:** IAS Audit Committee

**Policy Owner:** IAS General Counsel

**Policy Contact:** IAS Global Compliance Officer

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## 1.0 Applicability and Scope

### 1.1. Applicability

The IAS Technology Solutions and Reporting Platform Privacy Policy (hereafter referred to as this “Technology Solutions Privacy Policy”) applies to the various operations within Integral Ad Science Holding Corp. (“IAS”), its sales platforms, all employees, and, as applicable, subsidiaries, affiliates, and other business partners that support IAS’s business activities.

### 1.2. Scope

This Technology Solutions Privacy Policy applies to any Personal Data (defined below) that IAS collects through the IAS verification, optimization, and activation technology solutions (“Technology Solutions”) that IAS provides to their Users (defined below) through various channels, as well as the unified reporting platform called IAS Signal, available at <https://reporting.integralplatform.com/> (“Reporting Platform”), which allow IAS’s Users to access reporting regarding their selected Technology Solutions. For additional information regarding IAS’s general privacy practices, please see IAS’s privacy policy [here](#).

## 2.0 Overview and Purpose

IAS is a global measurement and analytics company that builds verification, optimization, and analytics solutions to empower the advertising industry to invest with confidence and activate consumers everywhere, on every device. As part of its role in promoting trust and transparency in digital advertising, IAS takes its responsibilities with respect to privacy seriously. This Technology Solutions Privacy Policy explains how Personal Data related to Users’ engagement with Technology Solutions and the Reporting Platform is collected, used, shared, and retained by IAS.

## 3.0 Policy Content

### 3.1 Definitions

The following terms are used in this Technology Solutions Privacy Policy.

Term	Definition
Controller	The business, organization, operator, or other natural or legal person that, alone or jointly with others, determines the purposes and means of Personal Data processing.
Data Subjects	An identified or identifiable natural person to whom Personal Data relates.
Personal Data	Any information that relates to a living person that can be used, directly or indirectly, to identify that person. Personal information, for example, may include business contact information collected from visitors and clients who wish to obtain information or support or to purchase IAS Technology Solutions. Business contact information includes first name, last name, business email address, job title, name of the organization, country, business phone number and organization type.
Processor	The service provider, data processor, vendor, or other natural or legal person engaged to process Personal Data on behalf of the Controller.
User	IAS customers and Media Partner Users, i.e., a designated media partner on a digital advertising campaign of an IAS customer, that access the Technology Solutions or use the Reporting Platform.

## 3.2 IAS as Controller and Processor

As described below, IAS may act as a Controller or a Processor with respect to Technology Services and the Reporting Platform. For more information about IAS's data collection practices with respect to Users, see [IAS Data Protection Portal](#).

### 3.2.1 IAS Acts as a Processor for the Following Services

#### *3.2.1.1 Non-precise Geo-verification*

IAS's Users can verify the non-precise location of viewers of a particular webpage or mobile application to ensure they do not serve ads irrelevant to or inappropriate for a particular jurisdiction. To do this, IAS obtains information from a device or browser to allow it to determine the approximate (but not precise) location of that IP address. IAS only uses this information to provide geo-verification to the specific User that has requested it and not for any other purpose, so again IAS only acts on the specific User's instructions. When acting as a Processor, IAS does not disclose or combine any Personal Data collected from one User with that of other Users.

### 3.2.2 IAS Acts as a Controller for the Following Services

#### *3.2.2.1 Ad Fraud Services*

In addition to identifying invalid traffic which includes specific attempts at ad fraud for individual customers, IAS leverages IP Addresses that are collected from pixels embedded in all of its customers' ads, as well as SDKs integrated into ad servers, video players, and mobile applications, and analyzes them to identify anomalies that indicate non-human traffic. This information is collected across all IAS channels, customers, and platforms and is aggregated together to create scalable detection models, which allow IAS to distinguish real human behavior from bot behavior.

#### *3.2.2.2 IAS Reporting Platform.*

IAS is a Controller of Personal Data provided by Users when creating an account login for the Reporting Platform.

### 3.2.3 Personal Data that IAS Collects as a Controller

#### 3.2.3.1 Personal Data Collected when Using the Reporting Platform

When a person creates an account with IAS, they may provide IAS with their business contact details, such as their name, phone number, physical address, and email address to enable IAS to provide the Reporting Platform to them. Users may also be asked to provide a username and password to use as identity verification credentials to access their Reporting Platform. Through the Reporting Platform, Users may access reporting services in connection with the use of Technology Solutions.

IAS may automatically collect certain Personal Data about a User when they access or use the Reporting Platform, including:

- *Log Information.* Log information is data about the User's use of the Reporting Platform, such as IP address, browser type, referring/exit pages, operating system, date/time stamps, and related data, stored in log files.
- *Information Collected by Cookies.* First-party technical, functional, and performance cookies may be used to collect information about interactions with the Reporting Platform. The cookies utilized in the Reporting Platform do not create profiles regarding individuals and are only for purposes of ensuring the technical functionality of the Reporting Platform.

#### 3.2.3.2 Personal Data Collected by IAS Technology Solutions

The Technology Solutions serve both advertisers and media sellers by providing independent, third-party verification and measurement services. To provide Technology Solutions to its Users, IAS uses pixels and other similar technologies that place small pieces of HTML code on a webpage or embed information in a mobile app to collect information about advertising impression opportunities and displayed ads or website/mobile app traffic. IAS collects IP addresses used to navigate the Internet, including non-precise location information, through its Technology Solutions to provide ad fraud and non-precise geo-verification services.

### 3.2.4 How IAS Uses the Personal Data that IAS Collects

IAS uses Personal Data it collects to deliver its Technology Solutions, including:

- Examining impression data of advertising opportunities, using IAS technology and User parameters, to determine if User's advertisements should or should not be displayed.
- Detailing contextual information about advertisements displayed in order to ensure its compliance with terms of IAS User contracts, insertion orders that detail User campaigns, and/or User parameters set in IAS systems.
- Reporting viewability metrics of advertisements that indicate qualified « Viewed Impressions » according to industry standards and/or User's criteria, time in which advertisements are displayed on consumers' browsers, and properties of creative elements that are displayed on consumers' browsers.
- Analyzing website and mobile app visitation characteristics such as visitor quality, fraud identification, invalid traffic detection, and other quality characteristics necessary to determine agreement compliance.
- Providing Users with the highest quality services in IAS Technology Solutions and Reporting Platform.
- Personalizing and enhancing User's experience within IAS Technology Solutions and Reporting Platform.
- Managing and improving IAS Technology Solutions and Reporting Platform.

IAS Technology Solutions include the detection and elimination of general invalid and sophisticated invalid traffic, including ad impression fraud, which it defines in this Technology Solutions Privacy Policy as the management of ad serving, ad display, or traffic activity such that ad impression measurements are shown inappropriately because the ads cannot be viewed by a consumer, are not served within operationally viewable parameters, or were displayed as a result of fraudulent machine-generated traffic. IAS fraud and invalid traffic services are intended to address fraud for advertising measurement purposes.

Additionally, IAS uses advertising impression information, mobile app information, and website traffic information, including IP address and browser header information, to:

- Identify traffic sources by their non-precise geographic location and determine if the location is correct and located within the advertiser's campaign parameters or traffic settings.
- Determine if traffic acquired is fraudulent or if traffic acquisition practices are out of compliance with an advertiser's guidelines or contractual requirements.
- Determine if middleware is attempting to misrepresent its operating characteristics to prevent the identification of fraud or other invalid traffic.
- Determine if traffic or ad impressions are originating from a server farm unlikely to be responsible for human-generated browsing activity.

IAS leverages AI and machine learning in order to automate the process of detecting invalid traffic and fraudulent activity.

### **3.2.5 How and Why IAS Discloses the Personal Data that IAS Collects**

#### *3.2.5.1 Disclosures to Other Parties*

Like many businesses, IAS hires other companies to perform certain business-related services. IAS may disclose Personal Data to certain of these companies but only to the extent needed to enable them to provide services to IAS, such as direct marketing assistance (including disclosure to IAS distributors for direct marketing of Technology Solutions), billing, User service, data storage, hosting services, disaster recovery services, and credit card processors.

All such companies function as IAS agents, performing services at its instruction and on its behalf pursuant to contracts which require they provide at least the same level of privacy protection as is required by this Technology Solutions Privacy Policy and implemented by IAS.

#### *3.2.5.2 Disclosures to Affiliates*

IAS may disclose Personal Data to its affiliates in order to support marketing, sales, and delivery of its Technology Solutions and the Reporting Platform. Personal Data may be transferred from IAS subsidiaries located within the European Economic Union or United Kingdom to IAS in the United States. IAS has executed intra-group European Commission Standard Contractual Clauses to transfer such Personal Data in compliance with applicable data protection laws.

#### *3.2.5.3 Business Disclosures*

In the event of a merger, dissolution, reorganization, or similar corporate event, or the sale of all or substantially all of IAS's assets, IAS may transfer any Personal Data that it has collected to the surviving entity in a merger or to an acquiring entity. All such transfers shall be subject to IAS commitments with respect to the privacy and confidentiality of Personal Data as set forth in this Technology Solutions Privacy Policy. This Technology Solutions Privacy Policy shall be binding upon IAS and its legal successors in interest.

#### *3.2.5.4 Disclosure to Public Authorities*

IAS may be required to disclose Personal Data in response to valid requests by public authorities, including in response to law enforcement requests. IAS may also disclose Personal Data to other



parties when compelled to do so by government authorities or required by law, regulation, or legal process including in response to court orders and subpoenas.

### 3.2.6 Data Subject Rights and Choices

The law in some jurisdictions provides Users in those jurisdictions with certain rights regarding their Personal Data when they access or use the Reporting Platform. IAS will respond to Data Subject privacy rights requests related to Personal Data IAS maintains as a Controller. For additional information regarding IAS's management of Data Subject rights and choices, please see IAS's state privacy notice [here](#).

To the extent that IAS acts as a Processor, IAS will reasonably cooperate with the Controller to handle privacy rights requests.

### 3.2.7 Personal Data Retention

When IAS is the Controller, IAS will retain Personal Data for as long as needed to fulfill the purposes for which it was collected or as required by law. For additional information regarding IAS's retention of Personal Data as a Controller, please see IAS's privacy policy [here](#).

When IAS is the Processor, IAS will securely delete all User Personal Data processed (and not previously deleted in accordance with IAS standard data deletion schedules) when any User's agreement with IAS ends, unless the User requests in writing that User Personal Data be returned to User.

### 3.2.8 International Transfers

The Reporting Platform and Technology Services are hosted and operated in the United States through IAS and its vendors. Users acknowledge that Personal Data is processed by IAS, which is located in the United States, and the processing may include the cross-border transfer of Personal Data. IAS will execute the European Commission Standard Contractual Clauses for transfers of Personal Data from the European Economic Area, Switzerland, or the United Kingdom with Users. User agreements with IAS may include other jurisdiction-specific terms when required under applicable data protection laws.

### 3.2.9 Legal Bases for Processing

IAS's processing of User Personal Data as a Processor is necessary for IAS to provide a User with the products and services they request, or to respond to their inquiries.

When IAS is a Processor, IAS has a legitimate interest in carrying out the Personal Data processing activity. In particular, IAS has a legitimate interest in relation to operating, analyzing, maintaining, providing, and improving the safety and security of the ad fraud services and Reporting Platform, including by implementing and enhancing security measures and safeguards and protecting against fraud, spam, and abuse.

For additional information regarding IAS's legal bases for processing consumer Personal Data, please see IAS's privacy policy [here](#).

### 3.2.10 U.S. State Privacy Rights

For information regarding User rights provided under state-specific privacy laws when they access or use the Reporting Platform, including disclosures IAS provides to consumers in California and Virginia, please see IAS's Supplemental U.S. State Privacy Notice here, which provides information to supplement the IAS privacy policy.

### 3.2.11 Changes to this Technology Solutions Privacy Policy

IAS may change this Technology Solutions Privacy Policy from time to time. We encourage Users to review this document on a regular basis.

### 3.2.12 How to Contact IAS

If Users have questions about this Technology Solutions Privacy Policy or IAS's privacy practices, please contact IAS in one of the following ways:

Email IAS at: [privacy@integralads.com](mailto:privacy@integralads.com)

Write to IAS at: Integral Ad Science, Inc.  
12 E 49th St  
20th Floor  
New York, NY 10017  
Attn: Legal

## 4.0 Policy Maintenance

### 4.1 Authority and Delegation

The IAS Audit Committee (AC) has approved this Policy. The IAS AC hereby delegates to the General Counsel (“Policy Owner”) responsibility for this Policy and its maintenance, including authority to review and approve procedures established in accordance with this Policy. Any authority granted by the IAS AC and any responsibility they assign to the Policy Owner under this Policy may be delegated at his/her discretion, except as otherwise provided in this Policy.

### 4.2 Policy Review, Renewal and Approval

**Approval:** The IAS AC shall review and approve all material revisions to this Policy. The IAS AC approval shall be documented in the meeting minutes of this governing body.

**Periodic Renewal:** The IAS AC shall renew this Policy periodically, but no less frequently than annually.

**Periodic Review:** The Global Compliance Officer shall review this Policy on an annual basis to evaluate its effectiveness and accuracy. Any resulting revisions shall be submitted for review and approval as outlined in the Approval section above and documented in the Revision History section of the Appendix. If no revisions are needed, the Global Compliance Officer or assigned delegate shall communicate the outcome of the review to the General Counsel.

**Additional Triggers:** Certain events, including but not limited to audit findings or changes in business activities, shall trigger unscheduled additional review and revision to this Policy.

### 4.3 Procedure Review, Renewal and Approval

All related procedures are expected to be in compliance with the spirit and letter of this Policy. The General Counsel has delegated to the Global Compliance Officer to review and approve all material revisions to related procedures. The Global Compliance Officer must review and renew all related procedures no less frequently than annually. In addition, any related procedures created by functions outside of Information Technology requires approval from the function leader most closely aligned with the procedure subject matter. Only those procedures that reflect material deviations from this Policy must be raised to the attention of the Global Compliance Officer or his/her delegate for review.

## 5.0 Cross References

None

## 5.1 Related Policies

Related Policies

## 5.2 Related Standards

None

## 5.3 Related Procedures

None

## 5.4 Related Notices

None

## 6.0 Revision History

Version	Approval Date	Effective Date	Description of Revisions:
1.0	02.10.2022	07/01/2021	Retired privacy policy and created two separate policies for website and technical platform. Reformatted into IAS policy template format
2.0	02.10.2022	02/08/2022	Retired privacy policy and created two separate policies for website and technical platform. Reformatted into IAS policy template format

## 7.0 Appendix

None