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17  
 18 **IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 19 **SAN JOSE DIVISION**

20 BENJAMIN HEWITT and KIMBERLEY  
 WOODRUFF, on behalf of themselves and  
 21 all others similarly situated,

Plaintiffs,

v.

24 GOOGLE LLC,

Defendant.

No. \_\_\_\_\_

**CLASS ACTION COMPLAINT**

**DEMAND FOR JURY TRIAL**

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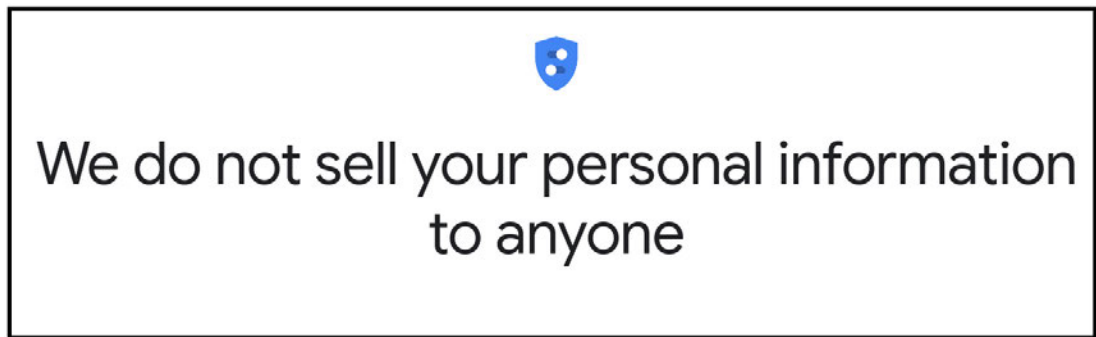
<b>EX.</b>	<b>DOCUMENT DESCRIPTION</b>
1	Documents Constituting the Relevant Contract from June 28, 2016 to Present
2	Google Terms of Service dated April 14, 2014
3	Google Terms of Service dated Oct. 25, 2017
4	Google Terms of Service dated March 31, 2020
5	<i>How our business works</i> , Google, <a href="https://about.google/intl/en_US/how-our-business-works/">https://about.google/intl/en_US/how-our-business-works/</a> (last visited Mar. 26, 2021)
6	Google Privacy Policy dated June 28, 2016
7	Google Privacy Policy dated Aug. 29, 2016
8	Google Privacy Policy dated March 1, 2017
9	Google Privacy Policy dated April 17, 2017
10	Google Privacy Policy dated Oct. 2, 2017
11	Google Privacy Policy dated Dec. 18, 2017
12	Google Privacy Policy dated May 25, 2018
13	Google Privacy Policy dated Jan. 22, 2019
14	Google Privacy Policy dated Oct. 15, 2019
15	Google Privacy Policy dated Dec. 19, 2019
16	Google Privacy Policy dated Mar. 31, 2020
17	Google Privacy Policy dated July 1, 2020
18	Google Privacy Policy dated Aug. 28, 2020
19	Google Privacy Policy dated Sept. 30, 2020
20	Google Privacy Policy dated Feb. 4, 2021
21	<i>Who are Google's Partners?</i> , Google, <a href="https://policies.google.com/privacy/google-partners?hl=en-US">https://policies.google.com/privacy/google-partners?hl=en-US</a> (last visited Mar. 25, 2021)
22	<i>Personalized Advertising</i> , Google, <a href="https://support.google.com/adspolicy/answer/143465">https://support.google.com/adspolicy/answer/143465</a> (last visited Mar. 25, 2021)



EX.	DOCUMENT DESCRIPTION
23	<i>We do not sell your personal information to anyone</i> , Google, <a href="https://safety.google/intl/en_ca/privacy/ads-and-data/">https://safety.google/intl/en_ca/privacy/ads-and-data/</a> (last visited Mar. 25, 2021)
24	<i>Your privacy is protected by responsible data practices</i> , Google, <a href="https://safety.google/intl/en_us/privacy/data/">https://safety.google/intl/en_us/privacy/data/</a> (last visited Mar. 25, 2021)
25	Pichai, Sundar (May 7, 2019), <i>Google's Sundar Pichai: Privacy Should Not Be a Luxury Good</i> , The New York Times (emphasis added), available at: <a href="https://www.nytimes.com/2019/05/07/opinion/google-sundar-pichai-privacy.html">https://www.nytimes.com/2019/05/07/opinion/google-sundar-pichai-privacy.html</a>
26	Google AdWords API: VERTICALS <a href="https://developers.google.com/adwords/api/docs/appendix/verticals">https://developers.google.com/adwords/api/docs/appendix/verticals</a> (last visited Mar. 24, 2021)
27	Google Example OpenRTB Protobuf for Web video Real-Time Bidding: Pregnancy and Maternity Vertical, <a href="https://developers.google.com/authorized-buyers/rtb/request-guide#openrtb-protobuf_6">https://developers.google.com/authorized-buyers/rtb/request-guide#openrtb-protobuf_6</a> (last visited January 22, 2021)
28	Google Example OpenRTB Protobuf for "App native" Real-Time Bidding: OBGYN Vertical, <a href="https://developers.google.com/authorized-buyers/rtb/request-guide#openrtb-protobuf_6">https://developers.google.com/authorized-buyers/rtb/request-guide#openrtb-protobuf_6</a> (last visited January 22, 2021)

1 **I. INTRODUCTION**

2 1. Through its various consumer-facing products and services – and its business  
3 advertising and surveillance tools – Google amasses data about billions of people for the purpose  
4 of creating detailed dossiers about them in furtherance of targeted advertising. Recognizing that  
5 American consumers have significant privacy concerns, however, Google makes two  
6 “unequivocal” promises to users who sign up for Google’s services: (1) “Google will never sell any  
7 personal information to third parties;” and (2) “you get to decide how your information is used.”<sup>1</sup>  
8 Google also promises that it will not use certain sensitive information for advertising purposes.



14 2. Google breaks these promises billions of times every day.

15 3. This Complaint identifies how Google actively sells and shares consumers’ personal  
16 information with thousands of entities, ranging from advertisers to publishers to hedge funds to  
17 political campaigns and even to the government, through its Google Real-Time Bidding system.  
18 The personal information that Google sells, shares and uses includes the very sensitive information  
19 Google promised it would not use for advertising purposes. These practices are not disclosed to  
20 consumers.

21 4. This case is brought on behalf of all Google account holders whose personal  
22 information is sold and disseminated by Google to thousands of companies through Google’s  
23 proprietary advertising auction process effectuated through real-time bidding (“RTB”) auctions.

24 5. Regulators have described RTB as follows:

25 RTB is the process by which the digital ads we see every day are  
26 curated. For each ad, an auction takes place milliseconds before it is

27 <sup>1</sup> Pichai, Sundar (May 7, 2019), *Google’s Sundar Pichai: Privacy Should Not Be a Luxury Good*,  
28 The New York Times, available at <https://www.nytimes.com/2019/05/07/pinion/google-sundar-pichai-privacy.html> (attached as Exhibit 25).

1 shown in an app or browser. The hundreds of participants in these  
2 auctions receive sensitive information about the potential recipient  
3 of the ad—device identifiers and cookies, location data, IP  
4 addresses, and unique demographic and biometric information such  
5 as age and gender. Hundreds of potential bidders receive this  
6 information, even though only one—the auction winner—will use it  
7 to deliver an advertisement.

8 Few Americans realize that companies are siphoning off and storing  
9 that “bidstream” data to compile exhaustive dossiers about them.  
10 These dossiers include their web browsing, location, and other data,  
11 which are then sold by data brokers to hedge funds, political  
12 campaigns, and even to the government without court orders.<sup>2</sup>

13 6. Google runs the world’s largest RTB auction (the “Google RTB”). In the Google  
14 RTB, Google solicits participants to bid on sending an ad to a specific individual (the “Target”).  
15 Google provides highly specific information about the Target in the Bid Request provided to  
16 auction participants, including data that identifies the individual person being targeted through  
17 unique identifiers, device identifiers and IP addresses, among other information. The collected data  
18 provided about the Target to auction participants is called “Bidstream Data.”

19 7. Auction participants receive the information and compete for ad space to send a  
20 message to the Target at a specific price. The winning bidder pays Google for the ad placement  
21 with currency. But all auction participants, even those who do not win and those who do not submit  
22 a bid, are able to collect Bidstream Data on the Target. Such “non-winning” auction participants  
23 include not just auction participants who engage in the RTB process with the intent of competing  
24 to fill the ad space, but also pure “Surveillance Participants” – participants that have no interest in  
25 filling the ad space but who participate in Google’s RTB for the sole purpose of gaining access to  
26 the Target’s Bidstream Data. Even though they do not bid, the Surveillance Participants’ presence  
27 drives interest and encourages competitive bids, which increases the reach and profitability of  
28 Google RTB.

8. The Google RTB process takes place in fewer than 100 milliseconds, faster than the  
blink of an eye.

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<sup>2</sup> Senator Ron Wyden (Oregon), et al. (July 31, 2020), Letter to Hon. Joseph J. Simmons, Chairman of the Federal Trade Commission (FTC) urging FTC investigation of RTB (“Wyden FTC Letter”), available at <https://www.wyden.senate.gov/imo/media/doc/073120%20Wyden%20Cassidy%20Led%20FTC%20Investigation%20letter.pdf>

1           9.       Google’s ability to provide a rich and highly personalized set of Bidstream Data for  
2 each Target is unprecedented and is the primary source of Google’s massive revenues. Google is a  
3 consumer data powerhouse unmatched in human history. Google operates the world’s largest  
4 search engine (Google.com), web-browser (Chrome), email service (Gmail), Internet video service  
5 (YouTube), mobile phone operating system (Android), and mapping service (Google Maps).  
6 Google also operates large consumer services in app sales (Google Play), document processing  
7 (Google Docs), scheduling (Google Calendars), storage (Google Drive), instant messaging (Google  
8 Chat), travel planning (Google Flights), fitness (Google Fit), videoconferencing (Google Meet),  
9 payment services (Google Pay), smartphone hardware (Google Pixel), laptop hardware  
10 (Chromebooks), and broadcast television (YouTube TV).

11           10.       Through these services, Google surreptitiously observes, collects, and analyzes real-  
12 time information about everyone engaging on those platforms. This includes collecting and selling  
13 information about activity users could not expect to be sold. Google’s purpose is to build massive  
14 repositories of the most current information available about the people using its services to sell it  
15 to Google’s partners. But because transparency about those practices would lead to less user  
16 engagement on those platforms, which in turn would impede its ability to maximize targeted ad  
17 revenues, Google fails to make accurate, transparent disclosures about those practices to its account  
18 holders.

19           11.       Instead, Google promises its account holders privacy and control. Any consumer  
20 can sign up for a Google Account by clicking a button assenting to the terms of service that Google  
21 has unilaterally drafted. In that contract, Google makes the following promises:

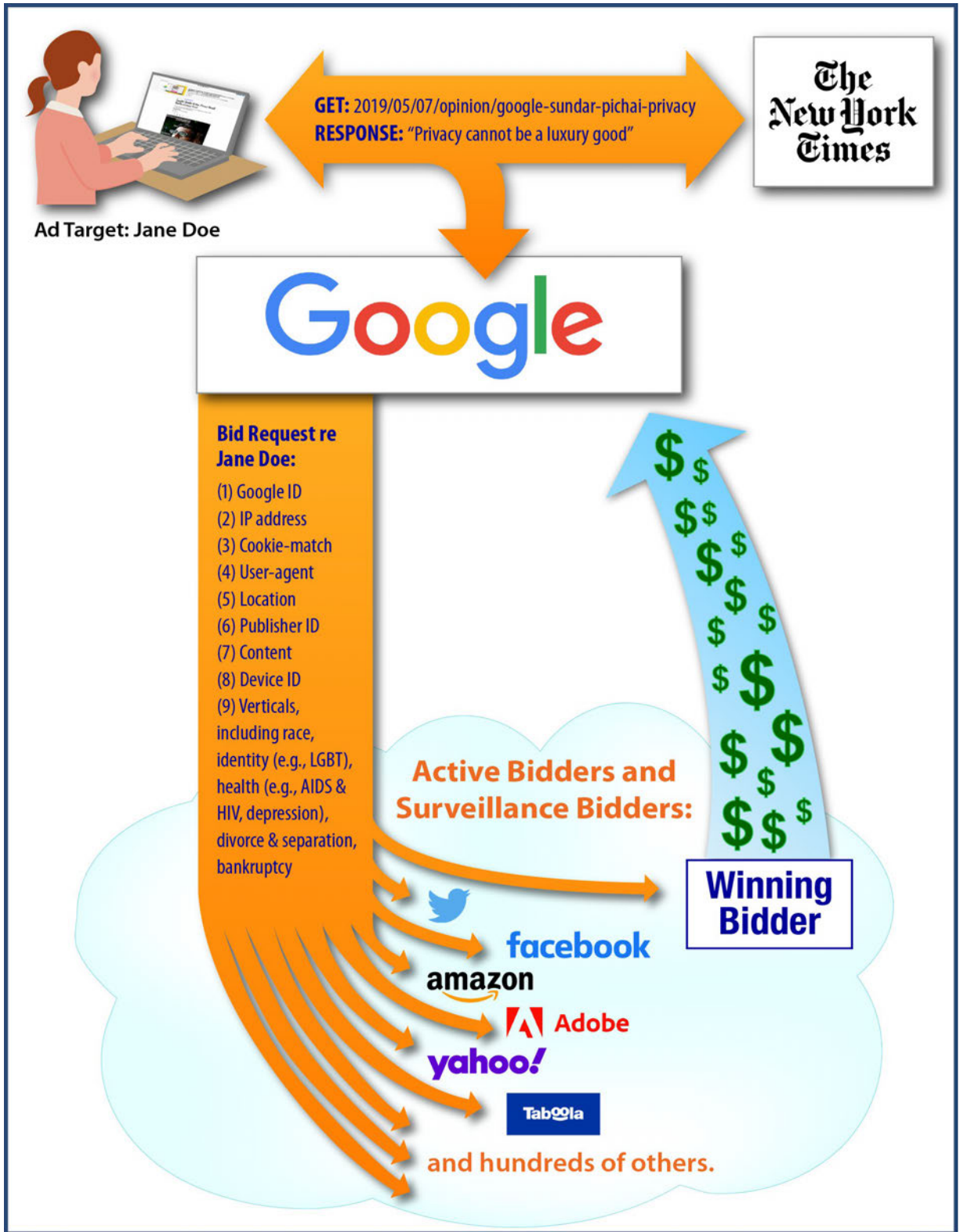
- 22           a.       “You get to decide how your information is used.” Ex. 25 at 1.
- 23           b.       “We don’t sell your personal information to anyone.” Ex. 5 at 1.
- 24           c.       “Advertisers do not pay us for personal information.” Ex. 5 at 1.
- 25           d.       “We don’t share information that personally identifies you with advertisers.”  
26               *E.g.* Ex. 20 at 6.
- 27           e.       “We also never use ... sensitive information like race, religion, or sexual  
28               orientation, to personalize ads to you.” Ex. 5 at 1.

f. “We don’t show you personalized ads based on sensitive categories, such as race, religion, sexual orientation, or health.” *E.g.* Ex. 20 at 6.

12. Google does not honor these terms. Without telling its account holders, Google automatically and invisibly sells Bidstream Data about them to thousands of different participants on the Google RTB billions of times every day. The Bidstream Data that Google sells and discloses to thousands of Google RTB participants identifies individual account holders, their devices, and their locations; the specific content of their Internet communications; and even highly personal information about their race, religion, sexual orientation, and health.

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13. The Google RTB system may be illustrated as follows:



14. Contrary to Google’s promises, Bidstream Data is not anonymized. It includes:

- a. A Google ID for each account holder;

- b. The account holder's IP address;
- c. A cookie-matching service that helps the recipient match the account holder's personal information up with other personal information that the recipient has on the account holder;
- d. The account holder's User-Agent information;
- e. The Publisher ID of the website in question;
- f. The content of the URL for the webpage where the ad will be placed;
- g. The account holder's unique device identifier; and
- h. "Vertical" interests associated with the bid that include interests relating to race, religion, health, and sexual orientation.

15. The "verticals" included in Bidstream Data sold and disclosed on Google RTB categorize Google's account holders into targetable interests. Google runs algorithms across the massive repositories of data it acquires about account holders and sorts them into more than 5,000 consumer categories (segments) and subcategories (verticals). According to Google's own description of the segments and verticals, these categories include:

- a. In the Health segment, verticals include AIDS & HIV, Depression, STDs, and Drug & Alcohol Treatment. *Ex. 24 at 14.*
- b. In the Religion segment, verticals include Buddhism, Christianity, Hinduism, Islam, and Judaism. *Id. at 21.*
- c. In the Identity segment, verticals include African-Americans, Jewish Culture, and LGBT. *Id.*
- d. In the Finance segment, verticals include Debt Collection and Short-Term Loans and Cash. *Id. at 11-12.*
- e. Other verticals include Troubled Relationships, Divorce & Separation, and Bankruptcy. *Id. at 21.*

16. These "verticals" exemplify Google's use of the information it collects about account holders' activities and its ability to take that information and infer personal and sensitive characteristics. Google then packages account holders into narrowly drawn, targetable categories. That is, the Bidstream Data that Google provides to Google RTB participants is drawn from the extensive profile Google has built on the Target. This data set includes information based on Google's distillation of both public and highly private data points and inferences. Google's



1 Bidstream Data on Targets is so compelling that publishers are incentivized to choose Google RTB  
2 over other services to place their messages, and bidders in Google RTB will offer to pay premium  
3 dollars for the information. And all participants, including Surveillance Participants, can keep the  
4 Bidstream Data for each Target, which encourages Surveillance Participants to participate even if  
5 they do not wish to buy the ad space. But the consumers themselves do not even know that these  
6 categories exist, let alone that Google has placed them into one of these categories.

7 17. Data included in Bidstream Data constitutes “personal information” under  
8 California law. Google adopts California law in its contract with account holders. California law  
9 defines “personal information” to include any “information that identifies, relates to, describes, is  
10 reasonably capable of being associated with, or could reasonably be linked, directly or indirectly,  
11 with a particular consumer or household.” California law also provides a non-exhaustive list of  
12 “personal information,” which includes unique personal identifiers, online identifiers, IP addresses,  
13 email addresses, account names, characteristics of protected classifications under California or  
14 federal law, purchase history or consideration, Internet or other electronic network activity  
15 (including browsing history, search history, and information regarding a consumer’s interaction  
16 with an internet website, application, or advertisement), geolocation data, employment-related  
17 information, education information, and “inferences drawn ... to create a profile about a consumer  
18 reflect the consumer’s preferences, characteristics, psychological trends, predispositions, behavior,  
19 attitudes, intelligence, abilities, and aptitudes.” Cal. Civ. Code § 1798.140(o)(1). Thus, the  
20 information Google sells and discloses as part of a Target’s Bidstream Data includes personal  
21 information under California law.

22 18. The exchange of Bidstream Data for auction participation constitutes a “sale” of  
23 “personal information.” California law defines a sale of personal information as “selling, renting,  
24 releasing, disclosing, disseminating, making available, transferring, or otherwise  
25 communicating ... by electronic or other means, a consumer’s personal information by the business  
26 to another business or a third party for monetary or other valuable consideration.” Cal. Civ. Code  
27 § 1798.140(t)(1).  
28

1           19.     Google’s dissemination and sale of the type of Bidstream Data available in Google  
2 RTB violates Google’s express contractual promises to its account holders.

3           20.     It also violates laws prohibiting Google from selling account holders’ personal  
4 and/or sensitive information, including (and especially) when it sells and discloses such information  
5 for the purpose of targeting them.

6           21.     Google does not disclose to its account holders its creation and use of massive data  
7 sets to profile them specifically (and identifiably) in these auctions, and it cannot plausibly or  
8 credibly claim it has account holders’ consent for this use of their data and information. None of  
9 the categories of information in Bidstream Data are identified in any of the many policies and terms  
10 of service Google presents to account holders. Indeed, the success of Google’s RTB process is a  
11 function, in part, of the fact that account holders – the Targets for ad placements – are unaware that  
12 information drawn from their activities wholly unrelated to any bid are incorporated into what is  
13 presented to them in targeted ads milliseconds later.

14           22.     “We also never use your emails, documents, photos, or sensitive information like  
15 race, religion, or sexual orientation, to personalize ads to you,” Google tells account holders. Ex. 5  
16 at 2. But that is precisely what Google does. Google RTB bidders specifically seek to stimulate  
17 response in the Target based on the way Google slots the Target into verticals and segments  
18 concerning, among other things, the Target’s race, religion, and sexual orientation.

19           23.     The breadth of Google’s privacy violations is staggering. Plaintiffs engaged an  
20 expert, Professor Christo Wilson, to help identify the scope of Google’s dissemination of Bidstream  
21 Data on individual Targets. Professor Wilson identified 1.3 million separate publishers  
22 participating in Google’s ad systems. Each of those publishers is a potential recipient of Google  
23 RTB Bidstream Data, including the personal information Google tells account holders it will not  
24 share.

25           24.     Once a Target’s Bidstream Data is disseminated by Google, the data is not  
26 recoverable.

27           25.     Because Google account holders are not informed about this dissemination of their  
28 personal information – indeed, they are told the opposite – they cannot exercise reasonable

1 judgment to defend themselves against the insidious, pervasive, and highly personal ways Google  
2 has used and continues to use data Google has about them to make money for itself. Nor can  
3 account holders exercise reasonable judgment to defend themselves against winning bidders that  
4 are targeting them individually, or Surveillance Participants that use Google RTB to build their  
5 own data profiles on account holders.

6 26. In July 2020, Senator Ron Wyden and nine other members of Congress wrote a letter  
7 to the Federal Trade Commission explaining the privacy dangers of RTB systems. The letter  
8 explained:

9 Unregulated data brokers have access to bidstream data and are  
10 using it in outrageous ways that violate Americans' privacy. For  
11 example, media reports recently revealed that Mobilewalla, a data  
12 broker and a buyer of bidstream data, used location and inferred race  
13 data to profile participants in recent Black Lives Matter protests.  
14 Moreover, Mobilewalla's CEO revealed, in a podcast recorded in  
15 2017, that his company tracked Americans who visited places of  
16 worship and then built religious profiles based on that information.

17 The identity of the companies that are selling bidstream data to  
18 Mobilewalla and countless other data brokers remains unknown.  
19 However, according to major publishers, companies are  
20 participating in RTB auctions solely to siphon off bidstream data,  
21 without ever intending to win the auction and deliver an ad. ...

22 Americans never agreed to be tracked and have their sensitive  
23 information sold to anyone with a checkbook. ... This outrageous  
24 privacy violation must be stopped and the companies that are  
25 trafficking in Americans' illicitly obtained private data should be  
26 shut down.<sup>3</sup>

27 27. Plaintiffs bring this class action on behalf of themselves and all Google account  
28 holders in United States whose personal information was sold or otherwise disclosed by Google  
without their authorization, and assert claims for breach of contract, violations of statutory and  
common law, and equitable claims against Google for compensatory damages, including statutory  
damages where available, unjust enrichment, punitive damages, injunctive relief, and all other  
remedies permitted by law.

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<sup>3</sup> Wyden FTC Letter.

1 **II. JURISDICTION, VENUE, AND ASSIGNMENT**

2 28. This Court has personal jurisdiction over Defendant Google LLC (“Defendant” or  
3 “Google”) because it is headquartered in this District. Google also concedes personal jurisdiction  
4 in its current and prior Google Terms of Service. *See* Exhibits 2 through 4.

5 29. Venue is proper in this District because Google is headquartered in this District and  
6 because its current and prior Terms of Service purport to bind Plaintiffs to bring disputes in this  
7 District. *See id.*

8 30. Assignment of this case to the San Jose Division is proper pursuant to Civil Local  
9 Rule 3-2(c)(e) because a substantial part of the events or omissions giving rise to Plaintiffs’ claims  
10 occurred in Santa Clara County, California.

11 31. This Court has subject matter jurisdiction over the federal claims in this action. *Infra*  
12 Counts Nine, Ten, Eleven, and Twelve.

13 32. This Court has subject matter jurisdiction over this entire action pursuant to the  
14 Class Action Fairness Act, 28 U.S.C. § 1332(d), because this is a class action in which the amount  
15 in controversy exceeds \$5,000,000, and at least one member of the class is a citizen of a state other  
16 than the state in which Google maintains its headquarters (California) and in which it is  
17 incorporated (Delaware).

18 33. This Court has supplemental jurisdiction over the state law claims in this action  
19 pursuant to 28 U.S.C. § 1367 because the state law claims form part of the same case or controversy  
20 as those that give rise to the federal claims.

21 **III. PARTIES**

22 34. Plaintiff Benjamin Hewitt is an adult domiciled in California. Plaintiff Hewitt is a  
23 Google account holder who has used the Internet, including websites from which Google sold and  
24 shared account holder information without authorization, as alleged herein. Plaintiff Hewitt has  
25 used the Chrome web browser. In order to become a Google account holder, Plaintiff Hewitt was  
26 required to indicate he agreed to uniform conditions drafted and set forth exclusively by Google  
27 that govern the relationship between him and Google.

28

1           35. Plaintiff Kimberley Woodruff is an adult domiciled in Missouri. Plaintiff Woodruff  
2 is a Google account holder who has used the Internet, including websites from which Google sold  
3 and shared account holder information without authorization, as alleged herein. Plaintiff Woodruff  
4 has used the Chrome web browser. In order to become a Google account holder, Plaintiff Woodruff  
5 was required to indicate she agreed to uniform conditions drafted and set forth exclusively by  
6 Google that govern the relationship between her and Google.

7           36. Because of the ubiquity of Google’s advertising services to businesses and its  
8 surveillance technologies, it is practically impossible for any American to use the Internet without  
9 their personal information being subject to Google RTB. As alleged below, nearly 1.3 million  
10 different publishers or brokers for publishers are identified by Google as being involved on the  
11 supply side in the Google RTB system.

12           37. On information and belief, like millions of other Americans, Google has sold and  
13 shared Plaintiffs’ personal information through Google RTB. Plaintiff Hewitt frequently uses  
14 Chrome to request, obtain and watch audio-visual materials, including materials from publishers  
15 for which he is a subscriber. On information and belief, like millions of Americans, Google has  
16 sold and shared information about the video materials Plaintiff Hewitt receives and obtains on  
17 Chrome through Google’s RTB auctions without his express written consent.

18           38. Defendant Google is a Delaware Limited Liability Company headquartered at  
19 1600 Amphitheatre Parkway, Mountain View, California, whose membership interests are entirely  
20 held by its parent holding company, Alphabet, Inc. (“Alphabet”), headquartered at the same  
21 address. Alphabet trades under the stock trading symbols GOOG and GOOGL. Alphabet generates  
22 revenues primarily by delivering targeted online advertising through the Google subsidiary. All  
23 operations relevant to this complaint are run by Google.

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1 **IV. FACTUAL ALLEGATIONS**

2 **A. The Operative Terms of Service Between Google and Google Account Holders**  
3 **Repeatedly and Uniformly Promise that Google Will Not Sell Account Holders’**  
4 **Personal Information to Google RTB Participants**

5 39. A Google Account gives a user access to Google products.<sup>4</sup> The user, in turn  
6 becomes a Google account holder (the “Account Holder”).

7 40. Google requires an Account Holder to indicate they agree to the Google Terms of  
8 Service (the “Terms of Service”).

9 41. The Terms of Service are drafted exclusively by Google.

10 42. Though the Terms of Service at issue are materially identical throughout the Class  
11 Period, the manner by which they were presented to persons creating a Google Account shifted  
12 slightly over the relevant time period. All versions of the Terms of Service contain the following  
13 assertions material to the claims asserted herein:

14 **1. The Terms of Service Provide That California Law Governs**

15 43. At all times relevant to Plaintiffs’ allegations, the Terms of Service designated  
16 California law as governing law.

17 44. Google is bound by the California’s definition of “personal information.”

18 45. California law defines personal information as “information that identifies, relates  
19 to, describes, *is reasonably capable of being associated with*, or could reasonably be linked,  
20 directly or indirectly, with a particular consumer or household.” Cal. Civ. Code § 1798.140(o)(1)  
21 (emphasis added).

22 46. California law also provides a non-exhaustive list of information deemed to be  
23 personal information: “Personal information includes, but is not limited to, the following if it  
24 identifies, relates to, describes, is reasonably capable of being associated with, or could be  
25 reasonably linked, directly or indirectly, with a particular consumer or household:

26  
27 <sup>4</sup> Google Account Help, Create A Google Account, [https://support.google.com/accounts/answer/27441?hl=en&ref\\_topic=3382296](https://support.google.com/accounts/answer/27441?hl=en&ref_topic=3382296).  
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- a. Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.
- b. Any categories of personal information described in subdivision (e) of Section 1798.80.
- c. Characteristics of protected classifications under California or federal law.
- d. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- e. Biometric information.
- f. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an internet website, application, or advertisement.
- g. Geolocation data.
- h. Audio, electronic, visual, thermal, olfactory, or similar information.
- i. Professional or employment-related information.
- j. Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. § 1232(g); 34 C.F.R. Part 99).
- k. Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.”

*Id.* (emphasis added).

**2. The Terms of Service State Google Will Not Sell or Share Personal Information**

47. Since March 31, 2020, the Terms of Service have stated, “You have no obligation to provide any content to our services and you’re free to choose the content that you want to provide.” Ex. 4 at 5.



1 48. The second paragraph of the Terms of Service provides:

2 These Terms of Service reflect [the way Google's business works](#), the laws that apply to our company, and [certain](#)  
3 [things we've always believed to be true](#). As a result, these Terms of Service help define Google's relationship with you as  
4 you interact with our services. For example, these terms include the following topic headings:

- 5 • [What you can expect from us](#), which describes how we provide and develop our services
- 6 • [What we expect from you](#), which establishes certain rules for using our services
- 7 • [Content in Google services](#), which describes the intellectual property rights to the content you find in our services –  
8 whether that content belongs to you, Google, or others
- 9 • [In case of problems or disagreements](#), which describes other legal rights you have, and what to expect in case  
10 someone violates these terms

11 Understanding these terms is important because, by using our services, you're agreeing to these terms.

12 49. The reference and hyperlink to “the way Google’s business works” takes the  
13 Account Holder to Google’s “How our business works” page, thereby incorporating that linked  
14 document into the Terms of Service. On the very first page of that linked document, in large type,  
15 Google declares: “We don’t sell your personal information to anyone.” Google also states, “[W]e  
16 never sell your personal information to anyone[.]”<sup>5</sup>

17 **We don't sell your personal information to anyone**

18 We use your personal information to make our products more helpful to you. It's how we can  
19 autocomplete your searches, get you home faster with Maps, or show you more useful ads  
20 based on your interests. But we never sell your personal information to anyone and you can  
21 use many of our products without signing in or saving any personal information at all.

22 50. The “the way Google’s business works” page further promises:<sup>6</sup>

- 23 a. “Advertisers do not pay us for personal information[.]”
- 24 b. “[W]e never share that information with advertisers, unless you ask us to.”

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26  
27 <sup>5</sup> Ex. 5 at 1-2.

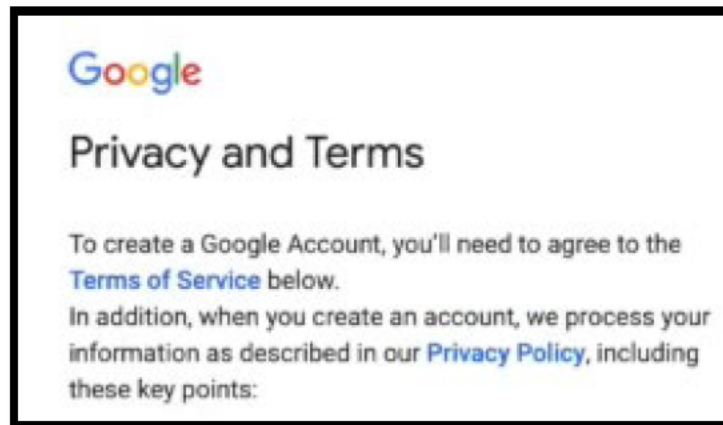
28 <sup>6</sup> *Id.* at 1-2.

- c. “We also never use your emails, documents, photos, or sensitive information like race, religion, or sexual orientation, to personalize ads to you.”
- d. “We share reports with our advertisers to help them understand the performance of their ads, but we do so without revealing any of your personal information.”
- e. “At every point in the process of showing you ads, we keep your personal information protected with industry-leading security technologies.”

**3. The Google Privacy Policy Promises Not to Sell or Share Personal Information**

51. Prior to around May 2018, Account Holders who created a Google Account were required to agree to both the Terms of Service and the Google Privacy Policy (the “Privacy Policy”).

52. From around May 2018 to present, Account Holders who created a Google Account were required to agree only to the Terms of Service. While Account Holders were not required to agree to the Privacy Policy during this period, the Google Account creation process included a link (see below) to the Privacy Policy as a guide to how Google would “process your information.”<sup>7</sup> As described further below, the Privacy Policy during this time contained repeated assurances and representations from Google regarding how Google would process Account Holders’ information.



53. From March 31, 2020 to present, the Terms of Service refer to the Privacy Policy, but state that the Privacy Policy is “not part of these terms.” Ex. 4 at 1. During this time period, the Terms of Service expressly state that the “Terms of Service reflect the way Google’s business

<sup>7</sup> See, e.g., Tom Leeman, *How to create a Google Account*, YouTube (Feb. 2, 2020) [https://www.youtube.com/watch?v=ArZpwBl\\_z10](https://www.youtube.com/watch?v=ArZpwBl_z10) (at 4:40-4:45).

1 works [hyperlink].” *Id.* The hyperlink takes an Account Holder to the “How our business works”  
2 webpage, thereby incorporating the terms set forth on that webpage into the Terms of Service.  
3 Accordingly, as of March 31, 2020, the contract between the Parties consisted of the Terms of  
4 Service and the Google “How our business works” webpage (discussed above).

5 54. Like the Terms of Service, the Privacy Policy made promises to Account Holders  
6 throughout the Class Period regarding the protection of their personal information.

7 55. The Privacy Policy tracks the California statutory definition of “personal  
8 information,” defining it as “information that you provide to us which personally identifies you,  
9 such as your name, email address, or billing information, *or other data that can be reasonably*  
10 *linked to such information by Google, such as information we associate with your Google*  
11 *Account.”* See Ex. 15 at 28 (emphasis added).

12 56. The Privacy Policy describes the information it associates with Google Accounts,  
13 i.e. “personal information,” to include the following:

14 The information we collect includes unique identifiers, browser type and settings,  
15 device type and settings, operating system, mobile network information including  
16 carrier name and phone number, and application version number. We also collect  
17 information about the interaction of your apps, browsers, and devices with our  
18 services, including IP address, crash reports, system activity, and the date, time, and  
referrer URL of your request.

19 *See, e.g., id.* at 2.

20 57. The document at the “unique identifiers” hyperlink defines a unique identifier as “a  
21 string of characters that can be used to uniquely identify a browser, app, or device,” which includes  
22 cookies, advertising ids and other unique device identifiers. *See, e.g., id.* at 29.

23 58. Google associates these unique identifiers – cookies, IP addresses, User-Agent  
24 information, advertising ids, other unique device identifiers, and browsing history information –  
25 with individual accounts that include names, email addresses, geolocation, and all other information  
26 Google maintains on individual account holders.



1           59. But Google expressly assures Account Holders that personal information will not  
2 be shared with third parties without Account Holders' consent. Specifically, the Privacy Policy  
3 makes the following promises:

- 4           a. "We do not share your personal information with companies, organizations,  
5 or individuals outside of Google except...[1] "With your consent;" [3])  
6 "With domain administrators;" [3]) "For external processing"; and [4]) "For  
7 legal reasons." *E.g.*, Ex. 6 at 6; Ex. 15 at 11-12. Google has made this  
8 promise in the Google Privacy Policy since at least March 1, 2012.
- 9           b. "We don't share information that personally identifies you with  
10 advertisers[.]" *E.g.*, Ex. 12 at 5; Ex. 15 at 5. Google has made this promise  
11 in the Google Privacy Policy since at least May 25, 2018.
- 12           c. "We don't show you personalized ads based on sensitive categories, such as  
13 race, religion, sexual orientation, or health." *E.g.*, Ex. 12 at 5; Ex. 15 at 5.  
14 Google has made this promise in the Google Privacy Policy since at least  
15 May 25, 2018.
- 16           d. The Google Privacy Policy includes a definition of "sensitive categories"  
17 that promises: "We don't use topics or show personalized ads based on  
18 sensitive categories like race, religion, sexual orientation, or health. And we  
19 require the same from advertisers [hyperlink] that use our services."<sup>8</sup> *E.g.*,  
20 Ex. 12 at 21; Ex. 15 at 22. Google has made this promise in the Google  
21 Privacy Policy since at least May 25, 2018.

22           60. Also, since at least May 25, 2018, Google has acknowledged its responsibility to  
23 keep users' personal information secure, stating: "When you use our services, you're trusting us  
24 with your information. We understand this is a big responsibility and work hard to protect your  
25 information[.]" *E.g.*, Ex. 12 at 1; Ex. 15 at 1; Ex. 20 at 1.

26           61. Where the Privacy Policy mentions sharing information with "partners," it  
27 emphasizes and promises that the information shared is *not* personally identifiable:

28           We may share non-personally identifiable information publicly and with our partners –  
like publishers, advertisers, developers, or rights holders. For example, we share  
information publicly to show trends about the general use of our services. We also  
allow specific partners to collect information from your browser or device for  
advertising and measurement purposes using their own cookies or similar  
technologies.

<sup>8</sup> The words "require the same from advertisers" provide a hyperlink to a separate policy titled "Personalized Advertising" detailed below.

1 *E.g., id.* at 12.

2 62. But that provision of the Privacy Policy is not protective of personal information.  
3 The provision defines “non-personally identifiable information” as “information that is recorded  
4 about users so that it no longer reflects or references an individually-identifiable user.” *E.g., id.* at  
5 27. That definition conflicts with California law (as set forth above), as well as the definition  
6 Google provides elsewhere in the privacy policy, both of which provide that the data Google  
7 associates with individual Account Holders is “personal information,” regardless of whether it “no  
8 longer reflects or references an individual user,” and thus does not qualify as “non-personally  
9 identifiable information.” *See, e.g., id.* at 28.

10 63. Further, Google’s statement that it “allow[s] specific partners to collect information  
11 from your browser or device for advertising and measurement purposes using their own cookies or  
12 similar technologies” is limited to the “specific partners” listed in the hyperlink. Those “specific  
13 partners” are Nielsen, comScore, Integral Ad Science, DoubleVerify, Oracle Data Cloud, Kantar,  
14 and RN SSI Group, and Google promises that their use is limited to “non-personally identifiable  
15 information.” Ex. 21 at 1. In the section identifying these partners, Google repeats the promise,  
16 “We don’t share information that personally identifies you with our advertising partners[.]” *Id.* at  
17 2.

#### 18 **4. Google Makes Additional Statements Promising Not to Sell or Share** 19 **Account Holders’ Information**

20 64. In addition to the contractual promises Google makes to Account Holders, Google  
21 makes similar promises elsewhere on its website and in the public sphere. These include but are  
22 not be limited to: (1) the “Who are Google’s Partners” webpage, (2) the Google “Personalized  
23 Advertising” webpage, (3) the “We do not sell your personal information to anyone” webpage, (4)  
24 the Google “Your privacy is protected by responsible data practices” webpage, (5) Google CEO  
25 Sundar Pichai’s statement and testimony before Congress when Google was facing inquiry into its  
26 privacy practices, and (6) an op-ed from Google CEO Sundar Pichai that was published in the New  
27 York Times.

28

a) The Google “Who are Google’s Partners” Webpage Promises

1  
2 65. As alleged above, the Privacy Policy states that it “allow[s] specific partners  
3 [hyperlink] to collect information from your browser or device for advertising and measurement  
4 purposes using their own cookies or similar technologies.”

5 66. The hyperlink for “specific partners” takes an Account Holder to the “Who are  
6 Google’s Partners” webpage where Google reiterates, “*We don’t share information that*  
7 *personally identifies you with our advertising partners*, such as your name or email, unless you  
8 ask us to share it.” Ex. 21 at 2.

9 67. The same webpage identifies seven “partners” (Nielsen, comScore, Integral Ad  
10 Science, DoubleVerify, Oracle Data Cloud, Kantar, and RN SSI Group) that Google permits to  
11 “collect or receive *non-personally identifiable* information about your browser or device when you  
12 use Google sites or apps.” *Id.* at 1. Thus, Google promises its account holders that it does not share  
13 personal information with those partners.

14 68. The webpage fails to disclose, however, that Google sends Account Holder personal  
15 information to hundreds of other companies *not* identified on this page, and that Google works with  
16 nearly 1.3 million different publishers that Google sometimes refers to as partners and with which  
17 Google routinely shares Account Holder personal information.

b) The Google “Personalized Advertising” Webpage Promises

18  
19 69. Under the definition of “sensitive categories”, the Privacy Policy provides a  
20 hyperlink to an Advertising Policies Help webpage titled “Personalized Advertising.” *See, e.g.*, Ex.  
21 15 at 22.

22 70. According to Google, the webpage makes promises applicable to “all Google  
23 features using personalized advertising functionality.” Ex. 22 at 1.

24 71. On this webpage, Google repeats its promises about sensitive categories, stating:

25 a. “Advertisers can’t use sensitive interest categories to target ads to users or  
26 to promote advertisers’ products or services.” *Id.* at 2.

27 b. “Personal hardships: Because we don’t want ads to exploit the difficulties or  
28 struggles of users, we don’t allow categories related to personal hardships.”  
*Id.*

- 1 c. “Identity and belief: Because we want ads to reflect a user’s interests rather  
2 than more personal interpretations of their fundamental identity, we don’t  
3 allow categories related to identity and belief, some of which could also be  
4 used to stigmatize an individual.” *Id.*
- 5 d. “Sexual interests: Because we understand that sexual experiences and  
6 interests are inherently private, we don’t allow categories related to sexual  
7 interests.” *Id.*

8 72. On the same webpage, under the header “Prohibited Categories,” Google promises  
9 that “[t]he following sensitive interest categories can’t be used by advertisers to target ads to users  
10 or to promote advertisers’ products or services” (*id.*):

- 11 a. Restricted drug terms – “Prescription medications and information about  
12 prescription medications, unless the medication and any listed ingredients  
13 are only intended for animal use and are not prone to human abuse or other  
14 misuse.” *Id.* at 3.
- 15 b. “Personal hardships – We understand that users don’t want to see ads that  
16 exploit their personal struggles, difficulties, and hardships, so we don’t allow  
17 personalized advertising based on these hardships. Such personal hardships  
18 include health conditions, treatments, procedures, personal failings,  
19 struggles, or traumatic personal experiences. You also can’t impose  
20 negativity on the user.” *Id.*
- 21 c. “Health in personalized advertising [including] Physical or mental health  
22 conditions, including diseases, sexual health, and chronic health conditions,  
23 which are health conditions that require long-term care or management[;]  
24 products, services, or procedures to treat or manage chronic health  
25 conditions, which includes over-the-counter medications and medical  
26 devices[;] any health issues associated with intimate body parts or functions,  
27 which includes genital, bowel, or urinary health[;] invasive medical  
28 procedures, which includes cosmetic surgery[;] Disabilities, even when  
content is oriented toward the user’s primary caretaker. Examples [include]  
Treatments for chronic health conditions like diabetes or arthritis, treatments  
for sexually transmitted diseases, counseling services for mental health  
issues like depression or anxiety, medical devices for sleep apnea like CPAP  
machines, over-the-counter medications for yeast infections, [and]  
information about how to support your autistic child.” *Id.*
- d. “Relationships in personalized advertising [including] Personal hardships  
with family, friends, or other interpersonal relationships. Examples [include]  
divorce services, books about coping with divorce, bereavement products or  
services, family counseling services[.]” *Id.* at 4.
- e. “Sexual orientation in personalized advertising [including] lesbian, gay,  
bisexual, questioning, or heterosexual orientation[.] Examples [include]  
information about revealing your homosexuality, gay dating, gay travel,  
information about bisexuality.” *Id.* at 4-5.
- f. “Personal race or ethnicity.” *Id.* at 5.
- g. “Personal religious beliefs.” *Id.*



c) The Google “We do not sell your personal information to anyone.”  
Webpage Promises

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2  
3 73. On a Google webpage titled “We do not sell your personal information to anyone,”  
4 Google promises:

- 5 a. “We do not sell your personal information to anyone.” Ex. 23 at 1.  
6 b. “Without identifying you personally to advertisers or other third parties, we  
7 might use data that includes your searches and location, websites and apps  
8 that you’ve used, videos and ads that you’ve seen, and basic information that  
9 you’ve given us, such as your age range and gender.” *Id.*  
10 c. “We give advertisers data about their ads’ performance, but we do so without  
11 revealing any of your personal information. At every point in the process of  
12 showing you ads, we keep your personal information protected and private.”  
13 *Id.*  
14 d. “[R]emember, we never share any of this personal information with  
15 advertisers.” *Id.* at 2.

d) The Google “Your Privacy is Protected by Responsible Data  
Practices” Webpage Promises

16 74. On its webpage “Your privacy is protected by responsible data practices,” Google  
17 promises:<sup>9</sup>

- 18 a. “Data plays an important role in making the products and services you use  
19 every day more helpful. We are committed to treating that data responsibly  
20 and protecting your privacy with strict protocols and innovative privacy  
21 technologies.” Ex. 24 at 1.  
22 b. “We never sell your personal information, and give you controls over who  
23 has access[.]” *Id.* at 2.  
24 c. That it uses “advanced privacy technologies [to] help keep your personal  
25 information private.” *Id.* at 3.  
26 d. “We are continuously innovating new technologies that protect your private  
27 information without impacting your experiences on our products.” *Id.*  
28 e. “We use leading anonymization techniques to protect your data while  
making our services work better for you.” *Id.* at 3-4.  
f. “Privacy is core to how we build our products, with rigorous privacy  
standards guiding every stage of product development. Each product and  
feature adheres to these privacy standards, which are implemented through  
comprehensive privacy reviews.” *Id.* at 4.

<sup>9</sup> [https://safety.google/intl/en\\_us/privacy/data/](https://safety.google/intl/en_us/privacy/data/).

1 75. Screenshot examples from this webpage are provided below:

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# Your privacy is protected by responsible data practices.

Data plays an important role in making the products and services you use every day more helpful. We are committed to treating that data responsibly and protecting your privacy with strict protocols and innovative privacy technologies.

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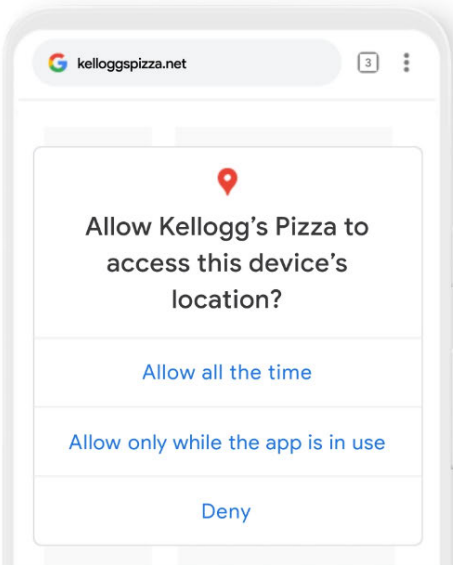
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#### BLOCKING ACCESS

## We never sell your personal information, and give you controls over who has access

We are committed to protecting your data from third parties. That's why it's our strict policy to never sell your personal information to anyone. We don't share information that personally identifies you with advertisers, such as your name or email, unless you ask us to. For example, if you see an ad for a nearby flower shop and select the "tap to call" button, we'll connect your call and may share your phone number with the flower shop. If you're using an Android device, we require third-party apps to ask for your permission to access certain types of data – like your photos, contacts, or location.

[Learn more in our Privacy Policy](#) 

e) Google CEO Sundar Pichai's Promises

1  
2 76. On December 11, 2018, Google CEO Sundar Pichai testified on behalf of Google  
3 before Congress and repeated the unequivocal promise, "We do not and would never sell consumer  
4 data."<sup>10</sup>

5 77. On May 7, 2019, Google CEO Sundar Pichai published an opinion piece in the New  
6 York Times in which he said the following:<sup>11</sup>

7 Many words have been written about privacy over the past year,  
8 including in these pages. I believe it's one of the most important  
9 topics of our time.

10 People today are rightly concerned about how their information is  
11 used and shared, yet they all define privacy in their own ways. I've  
12 seen this firsthand as I talk to people in different parts of the world.  
13 To the families using the internet through a shared device, privacy  
14 might mean privacy from one another. To the small-business owner  
15 who wants to start accepting credit card payments, privacy means  
16 keeping customer data secure. To the teenager sharing selfies,  
17 privacy could mean the ability to delete that data in the future.

18 Privacy is personal, which makes it even more vital for companies  
19 to give people clear, individual choices around how their data is  
20 used. Over the past 20 years, billions of people have trusted Google  
21 with questions they wouldn't have asked their closest friends: How  
22 do you know if you're in love? Why isn't my baby sleeping? What  
23 is this weird rash on my arm? We've worked hard to continually  
24 earn that trust by providing accurate answers and keeping your  
25 questions private. We've stayed focused on the products and  
26 features that make privacy a reality — for everyone.

27 Our mission compels us to take the same approach to privacy. For  
28 us, that means privacy cannot be a luxury good offered only to  
people who can afford to buy premium products and services.  
Privacy must be equally available to everyone in the world.

\* \* \*

***To make privacy real, we give you clear, meaningful choices around your data. All while staying true to two unequivocal policies: that Google will never sell any personal information to third parties; and that you get to decide how your information is used.***

26 <sup>10</sup> See Google CEO Sundar Pichai Testifies Before the House Judiciary Committee. December 11,  
27 2018. Available at [https://www.c-span.org/video/?455607-1/google-ceo-sundar-pichai-testifies-  
data-privacy-bias-concerns#](https://www.c-span.org/video/?455607-1/google-ceo-sundar-pichai-testifies-data-privacy-bias-concerns#) (at 1:33:51).

28 <sup>11</sup> Ex. 25 at 1.

## 5. A Summary of Google’s Promises

78. In sum, Google repeatedly makes the following promises to individuals who sign up for a Google Account:

- a. “We don’t sell your personal information to anyone.” Ex. 5 at 1.
- b. “[W]e never sell your personal information to anyone[.]” *Id.*
- c. “Advertisers do not pay us for personal information[.]” *Id.*
- d. “[W]e never share that information with advertisers, unless you ask us to.” *Id.* at 2.
- e. “We share reports with our advertisers ..., but we do so without revealing any of your personal information.” *Id.*
- f. “At every point in the process of showing you ads, we keep your personal information protected with industry-leading security technologies.” *Id.*
- g. “We also never use your ... sensitive information like race, religion, or sexual orientation, to personalize ads to you.” *Id.* at 1.
- h. “We do not and would never sell consumer data.” Pichai, *supra* note 10.
- i. “We do not share your personal information with companies, organizations, or individuals outside of Google” except in limited circumstances. *See e.g.* Ex. 15 at 11-12.

### B. Google Violates its Promises to Account Holders by Selling Their Personal Information on Google RTB

79. Google operates the world’s largest ad exchange, the Google Ad Exchange, a digital marketplace that facilitates the buying and selling of advertising inventory. Through the RTB auction process on the Google Ad Exchange, Google shares and sells users’ personal information with Google RTB participants to solicit bids for the right to display what is essentially a real-time, near-instantaneous advertisement to a specific user.

80. Thus, the Google RTB is an automated auction system where Google Account Holders’ personal information is continually siphoned out and sold to hundreds of participants for advertising purposes.

81. Google RTB bidders bid on the “cost per mille” – the cost per one thousand impressions – which is used to measure how many impressions have been made by an ad.

1           82.     The Google RTB process – from the offer of a targeted ad placement based on a  
2 specific user’s personal information, to the solicitation of bids, to the sale to the highest bidder, to  
3 the placement of the winning bidder’s ad on the specific user’s personal device – takes less than a  
4 hundred milliseconds. For perspective, it takes 300 milliseconds to blink an eye. Hence the name  
5 “real time bidding.”

6           83.     Google RTB is invisible and undisclosed to Account Holders.

7           84.     To understand the many ways in which Google is selling Account Holders’  
8 information, and how many companies Google is selling it to, it helps to first understand the ad  
9 ecosystem in which these auctions occur.

10          85.     Account Holders’ information passes through multiple layers of what is referred to  
11 as an “Ad Stack” as the data is re-directed by Google to various third parties.

12          86.     The Ad Stack consists of between three to five layers depending on the ad:

- 13           a.     The publisher is the website (or entity controlling the website) that has ad  
14 space to sell on its website;
- 15           b.     The supply side platform (“SSP”) is an entity that collects Account Holder  
16 data to sell and ad space inventory to populate ads targeted to those account  
17 holders;
- 18           c.     The ad exchange organizes auctions between each side of the ad stack;
- 19           d.     The demand-side platform (“DSP”) bids on behalf of advertisers to show ads  
20 to specific account holders; and
- 21           e.     The advertiser purchases ads targeted to specific account holders.

22          87.     In practice, for any single ad placement to a specific user, the Ad Stack may be  
23 compressed. For example, a DSP could place an ad for itself, rather than for another advertiser on  
24 whose behalf the DSP has been contracted to submit a bid. If a DSP wins an auction on behalf of  
25 itself, the DSP is also the advertiser for that particular ad.

26          88.     Likewise, a publisher in one ad auction may be an advertiser in another. For  
27 example, *The New York Times* sells ads targeted to specific users on its own websites through this  
28 system – and may also pay for ads targeted to users on other websites.

1 89. Google compresses the Ad Stack in Google RTB because Google controls  
2 significant players at the SSP, ad exchange, and DSP layers of the Ad Stack.

3 90. On the supply side, Google's AdMob is the most popular SSP for apps on iOS and  
4 Android, the two dominant mobile operating systems. AdMob creates software development kits  
5 ("SDKs") for publishers to incorporate into their apps. AdMob's SDKs serve as the mechanism  
6 for exchanging information between ad exchanges (the auction) and the developers. Within an app,  
7 AdMob code collects information and shares it with Google through the bidding process. Google  
8 purchased AdMob in 2009. Account Holders' phones share information with Google and ad  
9 exchanges.

10 91. According to the company MightySignal, an analytics firm that "provides detailed  
11 and accurate mobile data," Google AdMob is currently installed on:

- 12 a. 129,273 apps as of February 1, 2021 – or 82 percent of the Monetization  
13 SDK market on Apple devices, including 136 of the top 200 apps in Apple  
14 iOS products;<sup>12</sup>
- 15 b. 1,013,605 apps as of February 1, 2021 – or 97 percent of the Monetization  
16 SDK market on Android devices, included 146 of the top 200 apps on  
17 Android.<sup>13</sup>

18 92. Google's Ad Manager is among the most prominent and used SSP for websites and  
19 functions just as AdMob does for smartphone and handheld device apps. Publishers install Google's  
20 code on their websites, which make requests to Google tied to identifying cookies.

21 93. After data leaves an Account Holder's device to be exchanged with the website with  
22 which the Account Holder is communicating, Google contemporaneously redirects the Account  
23 Holder's personal information and the content of the communication being exchanged with the  
24 website to the Google RTB, which, in turn, contemporaneously redirects the personal information  
25 and contents to hundreds of different participants on the Google RTB. Google RTB participants  
26 then consider the personal information of the Account Holder on whose device the ad will be

27 <sup>12</sup> <https://mightysignal.com/sdk/ios/1162/google-admob>

28 <sup>13</sup> <https://mightysignal.com/sdk/android/55931/google-admob>

1 displayed, and calculate how much they are willing to bid for that specific Account Holder (i.e. the  
2 Target). As explained above, the entire process takes less time than it does to blink an eye.

3 94. The Google RTB sells approximately 53 percent of all ad exchange transactions.

4 95. On the demand side, Google also has the world's largest DSP. For example, millions  
5 of advertisers contract through Google DoubleClick or Google Ads to target specific users with  
6 specific attributes.

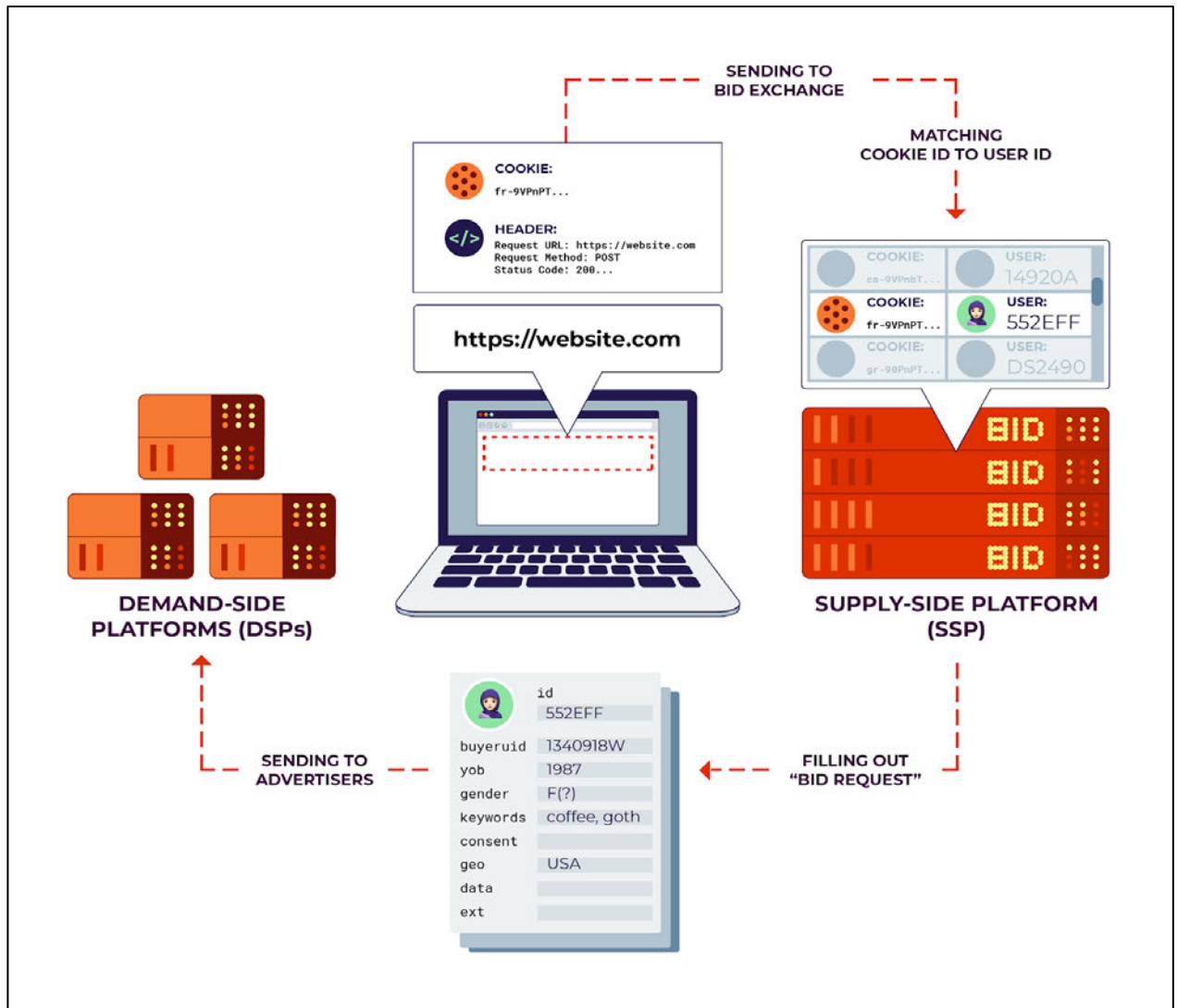
7 96. In the Google RTB process, Google sends bid requests to DSPs from publishers to  
8 solicit bids from the DSPs based on the personal information of Account Holders. Thus, Google  
9 holds the auction and awards the winning bid.

10 97. All participants in Google RTB are part of the Bidstream, receiving Google's Bid  
11 Request, which is the vehicle through which Google sells and shares Account Holder personal  
12 information.

13 98. As illustrated below, the Bid Request moves from the publisher's website  
14 (<https://website.com> in the illustration), to the SSP, to the ad exchange (Google RTB), which fills  
15 out a "Bid Request," which is sent to DSPs, who bid on behalf of advertisers based on the personal  
16 information that is provided in the Bid Request.

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Data flows in a typical real-time bidding system<sup>14</sup>

99. A concrete example helps illustrate the process. Consider a situation where *The New York Times* reserves advertising space on its property to sell through Google RTB. An Account Holder views a specific page, in this example an article on post-partum depression, by entering the web address in the navigation bar of his or her web browser and hits ENTER. This triggers the web browser to send a GET request (or electronic communication) to *The New York Times*, which, in turn, responds by displaying *The New York Times* article on the Account Holder’s device. Common

<sup>14</sup> Bennett Cyphers, *Google Says It Doesn’t ‘Sell’ Your Data. Here’s How the Company Shares, Monetizes, and Exploits It.*, Electronic Frontier Foundation (Mar. 19, 2020), <https://www.eff.org/deeplinks/2020/03/google-says-it-doesnt-sell-your-data-heres-how-company-shares-monetizes-and>.

1 experience shows that the requested webpage will display in a matter of seconds. But what the  
2 Account Holder does not know is that the request to view *The New York Times* article on postpartum  
3 depression is also accompanied by a “cookie,” which is sent from the Account Holder’s web  
4 browser to the SSP (recall that an SSP is an entity that collects Account Holder information to sell  
5 ad space for targeted advertising). If the SSP is AdMob, which is owned by Google, AdMob  
6 matches the cookie to the Account Holder’s personal information stored by Google. As one of the  
7 preeminent data companies in the world, Google’s storage of individuals’ personal information is  
8 vast and, consequently, its capability to connect cookies to personal information is unprecedented.  
9 From Google’s vast data store, Google RTB creates a Bid Request – containing the Account  
10 Holder’s personal information and the content of the specific article that is the subject of the  
11 Account Holder’s communication. This Bid Request is then sent to DSP participants of the Google  
12 RTB (recall that DSPs bid on behalf of advertisers to display targeted ads on available ad space).  
13 All Google RTB participants, in turn, can view, collect, and use the information in the Bid Request  
14 to determine whether and in what amount they will pay to deliver an ad to the specific Account  
15 Holder in question. Bids are submitted and the highest bidder wins the right to place its ad (or its  
16 client’s ad) on *The New York Times* postpartum depression article that the Account Holder is  
17 viewing. This is all done by algorithm and, as set forth above, the entire process takes milliseconds:  
18 between the time the Account Holder clicks to access the article and the seconds it takes for the  
19 article display, Google RTB has collected, disseminated, and sold the Account Holder’s personal  
20 information to hundreds of Google RTB participants for the purpose of targeted advertising.

### 21 **1. The Google RTB Shares Account Holders’ Personal Information**

22 100. Google publishes several documents in which it explains how Google RTB Bid  
23 Requests are structured. Among them are documents titled:

- 24 a. OpenRTB Integration;<sup>15</sup>

25  
26  
27  
28 <sup>15</sup> <https://developers.google.com/authorized-buyers/rtb/openrtb-guide>

- 1                   b. Real-Time Bidding Protocol Buffer v.199;<sup>16</sup>
- 2                   c. Authorized Buyers Real-time Bidding Proto;<sup>17</sup> and
- 3                   d. Infrastructure Options for RTB Bidders (part 4).<sup>18</sup>
- 4                   a) OpenRTB Integration

5                   101. OpenRTB Integration provides a chart with “Bid request variables and definitions”  
6 involved in Google OpenRTB.

7                   102. The following chart provides a subset of the Bid Request variables that OpenRTB  
8 Integration shares with developers:

CATEGORIES	
site	Details about the publisher’s website.
app	Details about the publisher’s app.
device	Details about the user’s device to which the impression will be delivered.
user	Details about the human user of the device; the advertising audience.
name	Site or app name.
domain	Domain of the site or app. For example, “foo.com”.
COMMUNICATIONS CONTENT	
cat	Array of IAB content categories of the site or app.
sectioncat	Array of IAB content categories that describe current section of site or app.
pagecat	Array of IAB content categories that describe current site or app page or view.
page	URL of the page where the impression will be shown.
ref	Referrer URL that caused navigation to the current page.
publisher	Details about the Publisher object of the site or app.
content	Details about the Content within the site or app.
keywords	Comma-separated list of keywords about this site or app.
content id	ID uniquely identifying the content.
episode	Content episode number (typically applies to video content).
title	Content title. Video examples: “Search Committee” (television); “A New Hope (movie); or “Endgame” (made for web). Non-video example: “Why an Antarctic Glacier is Melting So Quickly” (Time magazine article).
series	Content series. Video examples: “The Office” (television); “Star Wars” (movie); or “Arby ‘N’ The Chief (made for web). Non-video example: (“Ecocentric”) (Time magazine blog).
DEVICE	
dnt	Standard ‘Do Not Track’ flag as set in the header by the browser.
ua	Browser user-agent string.
ip	IPv4 address closest to device.
geo	Location of the device assumed to be the user’s current location defined by a Geo object.
didsha1	Hardware device ID.

16 <https://developers.google.com/authorized-buyers/rtb/downloads/realtime-bidding-protocol-buffer-v199>

17 <https://developers.google.com/authorized-buyers/rtb/realtime-bidding-guide>

18 <https://cloud.google.com/solutions/infrastructure-options-for-rtb-bidders>



1 105. As shown in Real-Time Bidding Protocol Buffer v.199, data is shared in the  
2 following order:

SPECIFIC REQUEST IDENTIFIER		
1	BidRequest	Unique request id generated by Google. This is 16 bytes long.
"INFORMATION THAT WE KNOW ABOUT THE USER"		
2	IP address	The first 3 bytes of IPv4 or first 6 bytes for IPv6.
3	Special Treatment	Reasons for special treatment of user data. For example, if the "current request should be treated as child-directed for purposes of the Children's Online Privacy Protection Act."
4	Google ID	"The Google ID for the user. ... This field may be the same as the Google ID returned by the cookie matching service."
5	Google ID Version	"The version number of the google_user_id. We may sometimes change the mapping from cookie to google user id."
6	Google ID Age	"The time in seconds since the google user id was created."
7	Match Data	"Match data stored for this google_user_id through the cookie matching service. If a match exists, then this field holds the decoded data that was passed in the google_hm parameter."
8	User-Agent	"A string that identifies the browser and type of device that sent the request."
9	FLoC	"The value of a cohort ID – a string identifier that is common to a large cohort of users with similar browsing habits. ... Experimental feature: may be subject to change."
10	User Agent Information	"This will be populated with information about the user agent, extracted from the User-Agent header."
11	Publisher location	The billing address country of the publisher.
12	End-user location	The user's approximate geographic location.
13	Zip code	Detected postal code of the user.
14	Hyperlocal	A hyperlocal targeting location when available.
15	User verticals	"List of detected user verticals. Currently unused. This field is not populated by default. We recommend that bidders instead store and look up list ids using either google_user_id or hosted-match-data as keys."
16	User-list	The user list id.
"INFORMATION THAT WE KNOW ABOUT THE WEB PAGE OR MOBILE APP"		
17	Publisher ID	The publisher ID.
18	Seller network ID	The seller network ID.
19	Partner ID	ID for the partner that provides this inventory.
20	URL	The URL of the page with parameters removed.
21	Bool	Indicates that the request is using semi-transparent branding which means only a truncated version of the request URL provided.
22	String	An id for the domain of the page that is set when the inventory is anonymous.
23	String language	Detected user languages based on the language of the webpage.
24	Detected Verticals	One or more detected verticals for page as determined by Google.
25	Vertical Weight	Weight for each vertical.
26	Ordered Verticals	Orders list of detected content verticals.
27	Content Labels	List of detected content labels.



AUCTION INFORMATION		
28	Unique ID	A unique ID for the overall query.
29	Auction type	The type of auction that will be run for this query.
"INFORMATION ABOUT THE DEVICE"		
30	Type	Phone, tablet, desktop, connected TV, game console, or set-top box.
31	Platform	Examples: Android, iPhone, Palm.
32	Brand	Examples: Nokia, Samsung.
33	Model	Examples: N70, Galaxy.
34	Operating System	Contains the OS version for the platform.
35	Mobile Carrier	Unique identifier for the mobile carrier.
36	Screen-width	As measured in pixels.
37	Screen-height	As measured in pixels.
38	Screen pixel ration millis	Screen Density
39	Orientation	Portrait or Landscape
INFORMATION FOR "AD QUERIES COMING FROM MOBILE DEVICES"		
40	Mobile	If true, then this request is coming from a smartphone or tablet.
41	Mobile App	The identifier of the mobile app or mobile webpage. "If the app was downloaded from the Apple iTunes app store, then this is the app-store id, e.g. 343200656. For Android devices, this is the fully qualified package name, e.g. com.rovio.angrybirds. For Windows devices, it's the App ID, e.g. f15abcde-f6gh-47i0-j3k8-37193817mn3o. For SDK-less requests (mostly from connected TVs), the app ID provided by the publisher directly in the request."
42	Interstitial	If true, then this is a mobile full screen ad request.
43	App Category	The IDs of categories to which the current mobile app belongs.
44	Mobile Optimized	This indicates whether the page is optimized for mobile browsers on high-end phones.
45	Advertising IDs	This field is used for advertising identifiers for: <ul style="list-style-type: none"> <li>1) iOS devices (This is called Identifier for Advertising or IDFA, as described at <a href="https://support.google.com/authorizedbuyers/answer/3221407">https://support.google.com/authorizedbuyers/answer/3221407</a>);</li> <li>2) Android devices;</li> <li>3) Roku devices;</li> <li>4) Microsoft Xbox devices;</li> <li>5) Amazon devices (i.e. Amazon Fire)</li> </ul>
46	App Name	App names for Android by Google Play and for iOS by App Annie.
47	App User Rating	Average User rating for the app.
48	Bidder SDK	Identification of and information about an SDK installed in the publisher's app that the bidder has access to, often because it's the bidder's SDK.
49	SKAdNetwork	Publisher's SKAdNetwork information to support app installation attribution for iOS 14 and later.
VIDEO INFORMATION		
50	Placement	Where the ad is placed.
51	URL	The URL of the page that the publisher gives Google to describe the video content, with parameters removed.
52	Playback Method	How the video ad will be played.
53	Clickable	Describes whether the video ad is clickable.
54	Start-Delay	The time in milliseconds from the start of the video when the ad will be displayed.
55	Ad Duration	The minimum and maximum ad durations.

56	Skippable	Whether the publisher allows users to skip the ad.
57	Protocols	Supported video protocols.
58	File formats	Supported video file formats.
59	Companion Ads	Information about companion ad slots shown with the video.
60	Size	Height and width for the video ad.
61	Video title	The video title.
62	Video keywords	A list of keywords describing the video, extracted from the content management system of the video publisher.

106. The above chart indicates that “User verticals” are among the types of information that have been sold to and shared with Google RTB participants. Verticals pertain to a marketing technique known as “vertical segmentation,” and is used to facilitate targeted advertising by identifying users as falling within particular categories, segments, and subcategories. Segments include health, religion, ethnicity, nationality, and sexuality. These categories of information therefore reflect the information that Google knows about each Account Holder’s personal characteristics.

107. Google’s acknowledged use, disclosure, and sale of a “list of detected user verticals” therefore constitutes a substantial invasion of Account Holders’ privacy.

108. Some of the categories used by Google are made available on its developer pages.<sup>19</sup> For example:

- a. The People & Society segment includes the following verticals: LGBT, Men’s Interests (mature), and Divorce & Separation.
- b. The Ethnic & Identity Groups segment includes the following verticals: Africans & Diaspora, African-Americans, Arabs & Middle Easterners, Asians & Diaspora, East Asians & Diaspora, Southeast Asians & Diaspora, Eastern Europeans, Indigenous Peoples, Native Americans, Jewish Culture, Latinos and Latin-Americans, and Western Europeans.
- c. The Religion & Belief segment includes the following verticals: Buddhism, Christianity, Hinduism, Islam, Judaism, Scientology, Skeptics & Non-Believers, and Spirituality.

<sup>19</sup> <https://developers.google.com/adwords/api/docs/appendix/verticals>

d. The Health segment includes the following verticals:

HEALTH VERTICALS CATEGORIES			
Acne & Blem. Treatments	Weight Loss	Aging & Geriatrics	Alzheimer's Disease
Cleansing and Detox.	Steroids & PEDs	AIDS & HIV	Allergies
Arthritis	Blood Sugar & Diabetes	Cancer	Ear Nose & Throat
Eating Disorders	Endocrine Conditions	Thyroid Conditions	GERD & Diges. Disorders
Genetic Disorders	Heart & Hypertension	Cholesterol Issues	Infectious Diseases
Parasites & Parasitic Dis.	Vaccines & Immunizations	Injury	Neurological Conditions
Learn. & Dev. Disabilities	ADD & ADHD	Obesity	Pain Management
Headaches & Migraines	Respiratory Conditions	Asthma	Skin Conditions
Sleep Disorders	Doctor's Offices	Hospitals & Treat. Centers	Surgery
Cosmetic Surgery	Physical Therapy	Men's Health	Mental Health
Anxiety & Stress	Counseling Services	Depression	Toxic Sub. & Poisoning
Reproductive Health	Birth Control	Infertility	Male Impotence
OBGYN	Sex Ed. & Counseling	Sexual Enhancement	STDs
Substance Abuse	Drug & Alcohol Testing	Drug & Alc. Treatment	Smoking & Sm. Cessation

109. Each of these verticals comprise personal information under California law and Google's policies.

c) Authorized Buyers Real-time Bidding Proto

110. Until sometime in February or March 2021, Google's developer tools included "sample bid requests and response," which illustrate how Account Holders' information in verticals are shared and sold through Bid Requests, on a developer page called Authorized Buyers Real-time Bidding Proto. The sample Bid Request for an app banner provides that the following data would be included among the bidstream sent from Google to the authorized bidder:

```

user {
  id: "7T0uAq192ru9Ndd90Pnh731sY2L"
  data {
    id: "DetectedVerticals"
    name: "DoubleClick"
    segment {
      id: "236"
      value: "0.2"
    }
    segment {
      id: "457"
      value: "0.2"
    }
  }
}

```

This code tells the bidder that the Account Holder with the id 7T0uAq192ru9Ndd90Pnh731sY2L is in the "weight loss" (236) and "special and restricted diets" (457) segments.<sup>20</sup>

<sup>20</sup> The complete list of verticals, including both the descriptor (e.g., Weight Loss) and corresponding segment ID (e.g., 236), is available at: <https://developers.google.com/adwords/api/docs/appendix/verticals>.



111. Another example provided by Google showed an Account Holder with the ID iE0B3ASr55t81Mf8XnJ34W084h8 is in the “Pregnancy and Maternity” vertical:

```

device {
  ua: "Mozilla/5.0 (Linux; Android 7.1.1; Moto E (4) Build/NCQS26.69-64-16;
  wv) AppleWebKit/537.36 (KHTML, like Gecko) Version/4.0 Chrome/79.0.3945.116
  Mobile Safari/537.36 [FB_IAB/FB4A;FBAV/252.0.0.22.355;]"
  ip: "192.168.1.0"
  geo {
    country: "USA"
    region: "US-NY"
    metro: "9067609"
    city: "New York"
    utcoffset: -480
  }
  carrier: "70091"
  make: "MOTOROLA"
  model: "moto e(4)"
  os: "android"
  osv: "7.1.1"
  devicetype: HIGHEND_PHONE
  w: 720
  h: 1280
  pxratio: 1.0
}
user {
  id: "iE0B3ASr55t81Mf8XnJ34W084h8"
  buveruid: "9WYq1C4JG3hQfIM862Eym660G4UdsG4c"
  customdata: "WqU725BD4feN7831884366n9mA5Rk77Ud7R61GL85e4i9A6"
  data {
    id: "DetectedVerticals"
    name: "DoubleClick"
    segment {
      id: "184"
      value: "1"
    }
    segment {
      id: "401"
      value: "0.2"
    }
  }
}

```

See Exhibit 27.

112. Another exemplar identifies the Account Holder with id 2R2e3G7G096GuMK118NkE67282 is in the vertical “OBGYN”:

```

device {
  ua: "Mozilla/5.0 (Linux; Android 9; Mi A2 Build/PKQ1.180904.001; wv)
  AppleWebKit/537.36 (KHTML, like Gecko) Version/4.0 Chrome/78.0.3904.108
  Mobile Safari/537.36 (Mobile; afma-sdk-a-v19831030.19831030.0)"
  ip: "192.168.1.0"
  geo {
    lat: 0.0
    lon: 0.0
    country: "USA"
    region: "US-NY"
    utcoffset: 420
  }
  make: "xiaomi"
  model: "mi a2"
  os: "android"
  osv: "9"
  devicetype: HIGHEND_PHONE
  ifa: "b\c\|x|bc|x|f|bn|b<|xe9|x|lem|x|f9|x|dc|x|d1|x|04|x|a1|x|df|x|88|*"
  w: 360
  h: 672
  pxratio: 3.0
}
user {
  id: "2R2e3G7G096GuMK118NkE67282"
  data {
    id: "DetectedVerticals"
    name: "DoubleClick"
    segment {
      id: "558"
      value: "0.2"
    }
    segment {
      id: "695"
      value: "0.2"
    }
  }
}

```

See Exhibit 28.

113. Sometime in February or March 2021, Google removed these exemplars that show the line of code specifying “DetectedVerticals” for Account Holders. On March 14 or 15, 2021, Google also replaced what had previously been labeled as Real-Time Bidding Protocol Buffer

1 v.198 with v.199 (the latter referenced above in this Complaint). As set forth above, Real-Time  
2 Bidding Protocol Buffer v.199 now claims that “User verticals” are unused. *See supra* at ¶ 105,  
3 Row 15. This is a distinction without a difference because Real-Time Bidding Protocol Buffer  
4 v.199 specifies that Google *does* include “Detected Verticals” for each page or app where the  
5 Google RTB auction sales system is in place. *See supra* at ¶ 105, Row 24.

6 114. Google’s statement that “user verticals” are “unused” may simply reflect the fact  
7 that the inferred information contained in those verticals has been transferred to the new FLoC  
8 value, which Google describes in the Real-Time Bidding Protocol Buffer v.199 as “[t]he value of  
9 a cohort ID – a string identifier that is common to a large cohort of users with similar browsing  
10 habits.” As the Electronic Frontier Foundation detailed in a recent article, “[i]t is highly likely that  
11 FLoC will group users” by gender, ethnicity, age, income, mental health and “may also directly  
12 reflect visits to websites related to substance abuse, financial hardship, or support for survivors of  
13 trauma.”<sup>21</sup>

14 115. Moreover, the “Detected Verticals” still constitute “personal information” under  
15 California law because they are inferred data about web-browsing history that Google is selling and  
16 from which Google RTB participants can compile and augment their own detailed dossiers about  
17 Account Holders. Google still sells and shares these verticals and segments with approved bidders  
18 in Google RTB together with Account Holders’ Google ID and other identifiers.

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28 <sup>21</sup> Bennett Cyphers, *Google’s FLoC Is a Terrible Idea*, Electronic Frontier Foundation (Mar. 3, 2021), <https://www.eff.org/deeplinks/2021/03/googles-floc-terrible-idea>.

d) Infrastructure Options for RTB Bidders (Part 4)

1  
2 116. In the article “Infrastructure Options for RTB Bidders (Part 4)” (“Infrastructure  
3 Options”), Google notes that a Google RTB bidder may do the following:

## 4 Bidding

5 A bidder performs the following tasks:

- 6 • User matching: Identify the (unique) user.
- 7 • Selecting segments: Retrieve and select the (unique) user’s segments and their price.
- 8 • **Deciding whether to bid:** Some bids are too expensive, and some ad requests might not match any existing  
9 campaigns. A bidder should be able to refuse a bid. This refusal saves processing time and resources.
- 10 • **Selecting relevant ads:**\*\* \*\*If the bidder decides to bid then the bidder must also select an ad. Selecting the right  
11 ad can improve the odds that a user might click and possibly generate a conversion.
- 12 • **Optimizing bids:** A bidder should always try to find the minimum bid price that will still win the auction.
- 13 • **Building a bid response:** Using [OpenRTB](#) or a custom application, build and return a bid response serialized in  
14 protobuf or JSON format. The response should include information such as the ad URL, the bid, and the win URL  
15 endpoint that can be called if the bid wins.

16 117. For “user matching,” the article encourages Google RTB participants to collaborate  
17 on creating “match tables” that would enable them to sync cookies and identify users across  
18 multiple platforms. The article further directs the reader to a hyperlink to learn more about “[h]ow  
19 cookie matching works in real-time bidding.” As explained below, cookie matching is a Google  
20 service that enables Google RTB participants to match cookie identifiers to participants’ existing  
21 individual profiles.

22 118. For “selecting segments,” Google explains that the Google RTB system can “extract  
23 user segments from the (unique) user profile store [hyperlinked], order the segments by price, and  
24 filter for the most appropriate segment.”

25 119. The link to “(unique) user profile store,” explains that “[t]his store contains (unique)  
26 users and their associated information that provide key insights to select a campaign or ad on  
27 request. Information can include the (unique) user’s attributes your own segments, or segments  
28

1 imported from third-parties. In RTB, imported segments often include bid price  
2 recommendations.”<sup>22</sup>

3 120. The “(unique) user profile store” goes on to explain: “The store is updated frequently  
4 based on the (unique) user’s interaction with ads, sites they visit, or actions they take. The more  
5 information, the better the targeting. You might also want to use third-party data management  
6 platforms (DMPs) to enrich your first-party data.”

7 121. Thus, Google’s internal documents indicate that in addition to sharing Account  
8 Holders’ personal information in the Google RTB Bidstream, Google is also grouping Account  
9 Holders into targeted advertising segments, which includes sensitive categories related to race,  
10 religion and sexual orientation, compiling in-depth personal profiles, and then using those profiles  
11 in furtherance of the Google RTB.

12 122. Independent research has confirmed that Google allows targeted advertising based  
13 on sensitive categories. In a 2015 study, researchers created an automated tool called AdFisher to  
14 “explore[] how user behaviors, Google’s ads, and Ad Settings interact.” The researchers started  
15 with a group of 500 fresh simulated browser instances. They then sent part of the group to the top  
16 100 websites for substance abuse as listed on Alexa while the remainder acted as a control group  
17 and did nothing. Next, the researchers sent both browser groups the Times of India, a content-  
18 providing webpage that uses Google for advertising. The ads displayed on the Times of India for  
19 both groups were collected and analyzed, to determine whether there was any difference in the  
20 outputs shown to the agents. For the substance abuse group, the top three ads shown to them were  
21 for an alcohol and drug rehabilitation center called the Watershed Rehab, with these top three ads  
22 making an appearance, respectively, 2,276 times, 362 times, and 771 times. The non-substance-  
23 abuse group was not shown the Watershed Rehab ads a single time.<sup>23</sup>

24 <sup>22</sup> [https://cloud.google.com/solutions/infrastructure-options-for-serving-advertising-workloads#  
25 unique\\_user\\_profile\\_store](https://cloud.google.com/solutions/infrastructure-options-for-serving-advertising-workloads#unique_user_profile_store)

26 <sup>23</sup> Amit Datta, Michael Carl Tschantz, and Anupam Datta, Automated Experiments on Ad Privacy  
27 Settings, Proceedings on Privacy Enhancing Technologies 2015; 2015 (1):92-112, available at  
28 <https://www.andrew.cmu.edu/user/danupam/dtd-pets15.pdf>. Despite this, the browsers visiting  
substance abuse websites showed no impact on the “Ad Settings” page that Google makes available  
to Account Holders for the purported purpose of letting those Account Holders understand inferred

1           123. Account Holders have no idea that they have been associated with these categories,  
2 and no way to prevent being targeted by their association with them. Indeed, the same article  
3 reported that despite the obvious, statistically significant return of drug rehabilitation ads for the  
4 substance abuse group when compared non-substance abuse group, the Ad Settings page for  
5 members of each group were not different. “Thus,” the researchers concluded, “information about  
6 visits to these websites” – the 100 websites for substance abuse – “is indeed being used to serve  
7 ads, but the Ad Settings page does not reflect this use in this case. Rather than providing  
8 transparency, in this instance, the ad settings were *opaque* as to the impact of this factor.”  
9 (emphasis in original).

10           124. The above study is not an outlier. A 2019 study confirms that data collection and  
11 behavioral tracking information is aggregated to derive user interest profiles, which in turn are  
12 leveraged by advertising platforms, like Google RTB, to (1) expand their own data profiles on  
13 individual users, and (2) to sell more expensive ads that are more specifically targeted.  
14 Significantly, the 2019 study noted that Google has unprecedented visibility into users’ browsing  
15 behavior because it is able to collect and aggregate user information from a vast array of sources,  
16 either owned by Google or accessible to Google by virtue of Google’s embedded source code.<sup>24</sup>  
17 Google can therefore infer user interests to an alarmingly accurate degree.<sup>25</sup>

18           125. In 2012, researchers at Worcester Polytechnic Institute conducted a focused study  
19 of the Google ad network. The study found, among other things, that non-contextual ads were  
20 shown related to induced sensitive topics regarding sexual orientation, health, and financial matters.  
21 By way of background, contextual ads are those that derive from the content of the webpage that a

22  
23 \_\_\_\_\_  
24 interests that Google has assigned. The study also showed that browser instances identified as  
25 women were 6 times less likely to be shown ads for high-paid executive positions than similarly-  
26 situated male browser instances.

25 <sup>24</sup> Muhammad Ahmad Bashir, et al., Quantity vs Quality: Evaluating User Interest Profiles Using  
26 Ad Preference Managers, Network and Distributed Systems Security (NDSS) Symposium 2019  
(February 24-27, 2019), available at [https://www.ndss-symposium.org/wp-content/uploads/2019/02/ndss2019\\_04B-5\\_Bashir\\_paper.pdf](https://www.ndss-symposium.org/wp-content/uploads/2019/02/ndss2019_04B-5_Bashir_paper.pdf).

27 <sup>25</sup> Only platforms that can observe users on a given site (i.e. by being directly embedded in the site,  
28 or by partnering with another third-party that is embedded[]) can draw such an inference. *Id.*

1 user is viewing, e.g. shoe ads being displayed on a website selling shoes. Conversely, non-  
2 contextual ads have no relation to the webpage content, e.g. ads for mental health treatment on a  
3 website selling shoes. Thus, the fact that the 2012 study found that the Google ad network was able  
4 to facilitate non-contextual ads related to induced sensitive categories supports the conclusion that  
5 sensitive information is being sold by the Google ad network to foster targeted advertising.<sup>26</sup>

6 126. Account Holder information sold and shared by Google with advertising bidders  
7 constitutes personal information as defined by both Google and California law. The information  
8 shared by Google through its RTB process is personal information that is reasonably capable of  
9 being associated, or that could reasonably be linked, directly or indirectly, with a particular  
10 consumer or household. Cal. Civ. Code § 1798.140(o)(1). In fact, it is not only “capable” of being  
11 associated but *is being* associated with a particular consumer. That is, after all, the entire purpose  
12 of Google RTB.

13 127. The above studies and examples demonstrate that Google violates its express  
14 privacy promises not to share Account Holders’ personal information each time it shares and sells  
15 their information, including information contained in verticals and segments, with participants in  
16 Google’s RTB process. Moreover, each time Google shares information in segments concerning  
17 health, religion, ethnicity, race, or sexuality, Google violates its express promises to Account  
18 Holders that it will never share or sell their sensitive personal information.

## 19 **2. The Data Google Discloses is Designed to be Personally Identifiable to** 20 **Google RTB Participants**

21 128. Google is not sharing anonymized, non-personally identifiable data to just a few  
22 “partners,” as Google suggests in one paragraph in its Terms of Service. To the contrary, the data  
23 it sells and shares with participants on the Google RTB is tied to unique identifiers that track  
24 specific Account Holders across web and physical activity, including where they are, what they are  
25 doing, and what they purchase, and draw inferences from that data of the sort derived from and  
26

27 <sup>26</sup> Craig E. Wills and Can Tartar, Understanding What They Do with What They Know (Short  
28 Paper), *WPES’12*, October 15, 2012, available at: <https://web.cs.wpi.edu/~cew/papers/wpes12.pdf>.

1 constituting the kinds of sensitive verticals described above. All of this data is tied to unique  
2 persistent identifiers.

3 129. Critically, the data Google sells allows its RTB participants not only to target  
4 Account Holders specifically, but also to build from scratch or cross-reference and add to the data  
5 that they already have in *their* own detailed profiles for Account Holders.

6 130. For example, Facebook is a frequent bidder in Google RTB and, in addition to the  
7 personal information received from Google, Facebook has its own database of account holder  
8 names, email addresses, phone numbers, device IDs, likes, interests, and friends.<sup>27</sup> A large data  
9 company like Facebook is therefore able to connect the personal information made available by  
10 Google RTB to its own existing databases, matching certain of the information in the Account  
11 Holder's profile, such as the IP address, to information already in Facebook's possession.

12 131. The consequence is two-fold.

13 132. *First*, Google provides Facebook with personal information that Facebook uses to  
14 specifically identify the account holder for the purpose of bidding on an ad in Google's Ad  
15 Exchange. Recent reports in *The Wall Street Journal* and *The New York Times* indicate that, in  
16 exchange for Google helping Facebook to recognize specific mobile and web users, Facebook  
17 agreed to place bids through Google RTB for 90 percent of the users it recognizes and to spend at  
18 least \$500 million per year on the Google Ad Exchange.<sup>28</sup> Put differently, Google helped Facebook  
19 deanonymize its account holders in exchange for at least one half billion dollars.

20 133. Neither Google nor Facebook denied the existence of the deal or its terms in  
21 response to these reports. To the contrary, Google's response hinted that its deal with Facebook  
22 was not unique, stating that it is just "one of over 25 partners participating in Open Bidding" inside  
23

24  
25 <sup>27</sup> See [www.facebook.com/privacy](https://www.facebook.com/privacy).

26 <sup>28</sup> Daisuke Wakabayashi and Tiffany Hsu, *Behind a Secret Deal Between Google and Facebook*,  
27 *The New York Times* (Jan. 17, 2021), available at <https://www.nytimes.com/2021/01/17/technology/google-facebook-ad-deal-antitrust.html>; Ryan Tracy and Jeff Horwitz, *Inside the Google-Facebook Ad Deal at the Heart of a Price-Fixing Lawsuit*, *The Wall Street Journal* (Dec. 29, 2020), available at <https://www.wsj.com/articles/inside-the-google-facebook-ad-deal-at-the-heart-of-a-price-fixing-lawsuit-11609254758>.  
28



1 the Google Ad Exchange.<sup>29</sup> This significant admission supports the conclusion that Google is  
 2 selling Account Holders' personal information – presumably to the highest bidder, or perhaps to  
 3 itself when it sees fit.

4 134. **Second**, whether or not Facebook (or another DSP or advertiser) submits a winning  
 5 bid, participating in the auction facilitates the acquisition and retention of Account Holders'  
 6 personal information that Google RTB participants can and do use to create or continuously update  
 7 and augment their own existing user data troves.

8 135. This is true even for Google RTB participants who are not as large as Facebook and  
 9 who do not have their own consumer account holders. Google actively assists Google RTB  
 10 participants in matching Account Holder information made available in a Bid Request to the  
 11 information those participants already have about specific individuals through a “cookie matching  
 12 service.”

13 136. According to Google, “[c]ookie matching is a feature that enables” Google RTB  
 14 participants “to match [their own cookie] – for example, an ID for a user that browsed your  
 15 website – with a corresponding bidder-specific Google User ID, and construct user lists that can  
 16 help you make more effective bidding choices.”<sup>30</sup> Specifically:

17 In the context of digital advertising, Google identifies users with cookies that belong to the `doubleclick.net`  
 18 domain, and bidders participating in Real-Time Bidding may have their own domain where they identify some  
 19 set of users they would like to show ads. Cookie Matching enables the bidder to match their cookies with  
 20 Google's, such that they can determine whether an impression sent in a bid request is associated with one of  
 21 users being targeted, they will receive either their own cookie data or a bidder-specific Google User ID that is an  
 22 encrypted form of the `doubleclick.net` cookie in the bid request.

23 The cookie matching service described in this guide facilitates the creation and maintenance of the association  
 24 between a bidder's cookie and the Google User ID, and also allows one to populate user lists.

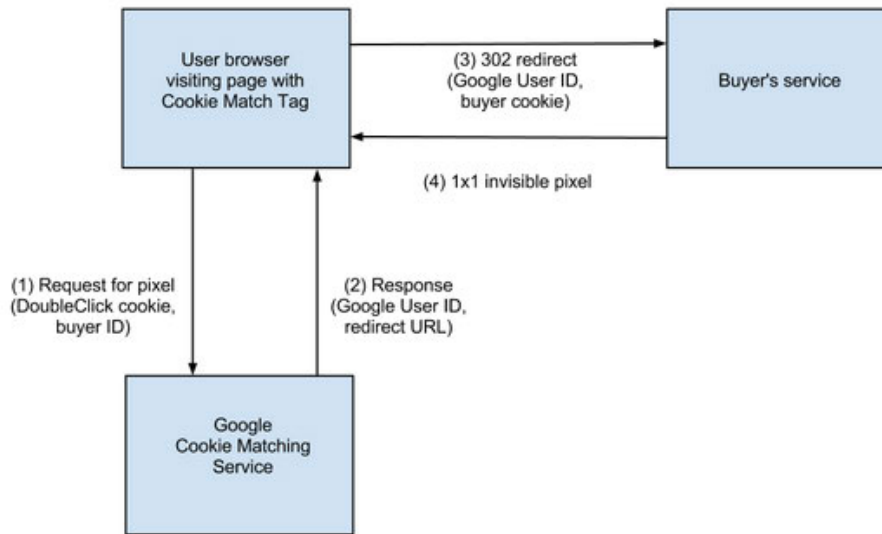
25 137. Google illustrates how cookie matching works:

26 <sup>29</sup> Adam Cohen, *AG Paxton's misleading attack on our ad tech business* (Jan. 17, 2021),  
 27 <https://blog.google/outreach-initiatives/public-policy/ag-paxtons-misleading-attack-on-our-ad-tech-business/>.

28 <sup>30</sup> Cookie Matching, <https://developers.google.com/authorized-buyers/rtb/cookie-guide>.

### Cookie Matching workflow diagram

This workflow is illustrated by the diagram below, where requests and responses are represented by an arrow, and the data items that accompany them are listed in parentheses.



138. Thus, Google RTB participants are able to match the alphanumeric id of the Google ID shared in the Bid Request with the auction participants' (including Surveillance Participants') own unique cookie identifier for the Account Holder. In other words, even though the Google ID is purportedly anonymous, Google provides participants a key, via cookie matching, to determine exactly who certain Account Holders are. If the Account Holder whose profile is up for bid also has an account id with the participant, cookie matching will not only let the participant know that fact, it will enable the participant to tie the personal information from Google RTB together with data it already has to enhance its profile of the Account Holder.

139. In an indication that Google realizes its cookie matching process violates California law, the Cookie Matching page states a "Key Point" that "the Google User ID will not be specified in the bid request" for "users detected to originate from California," but the bidder will "still receive ... hosted match data" to inform bidding.<sup>31</sup>

<sup>31</sup> *Id.*



**Key Point:** For users detected to originate from California, the Google User ID will not be specified in the bid request. You will still receive your hosted match data, which can be used to inform your bidding logic.

140. But this “Key Point” cannot absolve Google. It does not change the fact that Google is disclosing personal information about the Account Holder directly to the “buyer’s service.” By still providing the “buyer’s service” with the “hosted match data,” Google is connecting its own Google User ID to the buyer’s user id, which is also personal information.

141. Cookie matching permits Google to share and sell Account Holders’ personal information with participants *even when Account Holders take steps to avoid Google’s tracking*. By constructing “user lists,” which include Account Holders, Google RTB auction participants can reidentify people even when different identifiers are used, purportedly to prevent that kind of targeting.

142. As Google explains to its developers: “Cookie Matching enables the bidder to match their cookies with Google’s, such that they can determine whether an impression sent in a bid request is associated with one of users being targeted.”<sup>32</sup> And Google explains to developers that the purpose of this is to allow third parties to associate information with Account Holders: “The cookie matching service described in this guide facilitates the creation and maintenance of the association between a bidder’s cookie and the Google User ID, and *also allows one to populate user lists*” (emphasis added).<sup>33</sup>

143. Notably, Google *encourages* Google RTB participants to “store” these user lists, inviting them to retain keys to defeat de-identification processes: “We recommend that bidders instead store and look up list ids using either google\_user\_id or hosted\_match\_data as keys.”<sup>34</sup> That is, *rather than protecting Account Holders’ privacy, Google encourages its partners to invade it*.

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<sup>32</sup> *Id.*

<sup>33</sup> *Id.*

<sup>34</sup> Real-Time Bidding Protocol Buffer v.202, <https://developers.google.com/authorized-buyers/rtb/downloads/realtime-bidding-proto>

1 144. The Google Cookie Matching service is ubiquitous. A 2019 analysis by the web  
2 browser Brave showed that a single hour of web browsing resulted in 318 different Google cookie  
3 matches with at least 10 different companies participating in RTB auctions.<sup>35</sup>

4 145. Through Google Cookie Matching and through Google’s ubiquitous presence on the  
5 Internet, participants in Google RTB are sold and provided with personal information through  
6 which they can and do build rich user dossiers based on the vast majority of every Internet Account  
7 Holder’s browsing history.

8 146. A 2018 study co-authored by Professor Wilson found that 52 different companies  
9 “observe at least 91 percent of an average user’s browsing history under reasonable assumptions  
10 about information sharing within RTB auctions” and 636 companies “observe at least 50 percent  
11 of an average user’s impressions.”<sup>36</sup>

12 147. Further, a recent investigation by *The New York Times* reveals how easy it is to tie  
13 what Google and others characterize as anonymous pieces of data together to identify a specific  
14 person. In an article titled “They Stormed the Capitol. Their Apps Tracked Them,” writers Charlie  
15 Warzel and Stuart Thompson explain how they were able to identify specific individuals who  
16 participated in the attack on the United States Capitol on January 6, 2021 through a database of  
17 purportedly “anonymous” information that was provided to them by an industry insider.<sup>37</sup>

18 148. The article illustrates how an Account Holder’s precise movements could be tracked  
19 across the country using purportedly anonymous data. For example, one person shown to have been  
20 near the Capitol during the attack was Ronnie Vincent from Kentucky. Starting with what the  
21 industry deemed anonymous data, *The New York Times* identified Vincent and tracked his specific  
22 path to and within Washington D.C.:

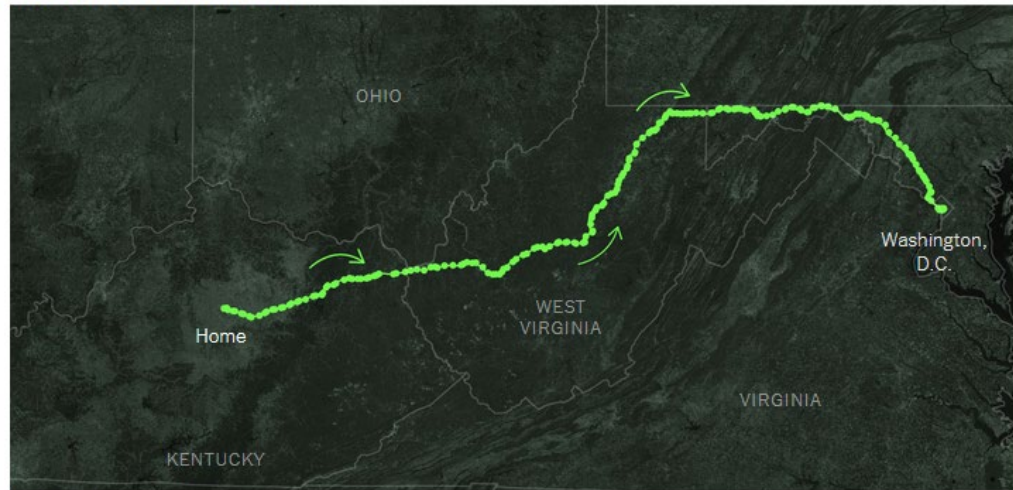
23 <sup>35</sup> Dr. Johnny Ryan, RTB Header Bidder Evidence – Explanatory Document, Brave, Inc. (Sept. 2,  
24 2019), [https://brave.com/wp-content/uploads/explanatory\\_note\\_google\\_RTb\\_and\\_push\\_pages.pdf](https://brave.com/wp-content/uploads/explanatory_note_google_RTb_and_push_pages.pdf)

25 <sup>36</sup> Muhammad Ahmad Bashir and Christo Wilson, “Diffusion of User Tracking Data in the Online  
26 Advertising System,” *Proceedings on Privacy Enhancing Technologies 2018* (4):85-103, at 86,  
<https://www.ccs.neu.edu/home/ahmad/publications/bashir-pets18.pdf>.

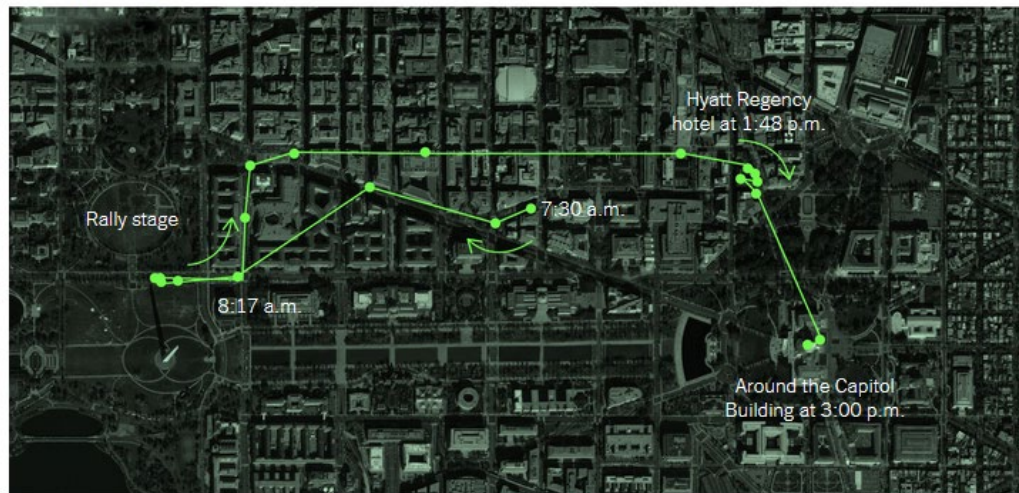
27 <sup>37</sup> Warzel, C. and Thompson, S. (Feb. 5, 2021), *They Stormed the Capitol. Their Apps Tracked*  
28 *Them*. *The New York Times*. <https://www.nytimes.com/2021/02/05/opinion/capitol-attack-cellphone-data.html>

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**The trip to Washington, D.C.**



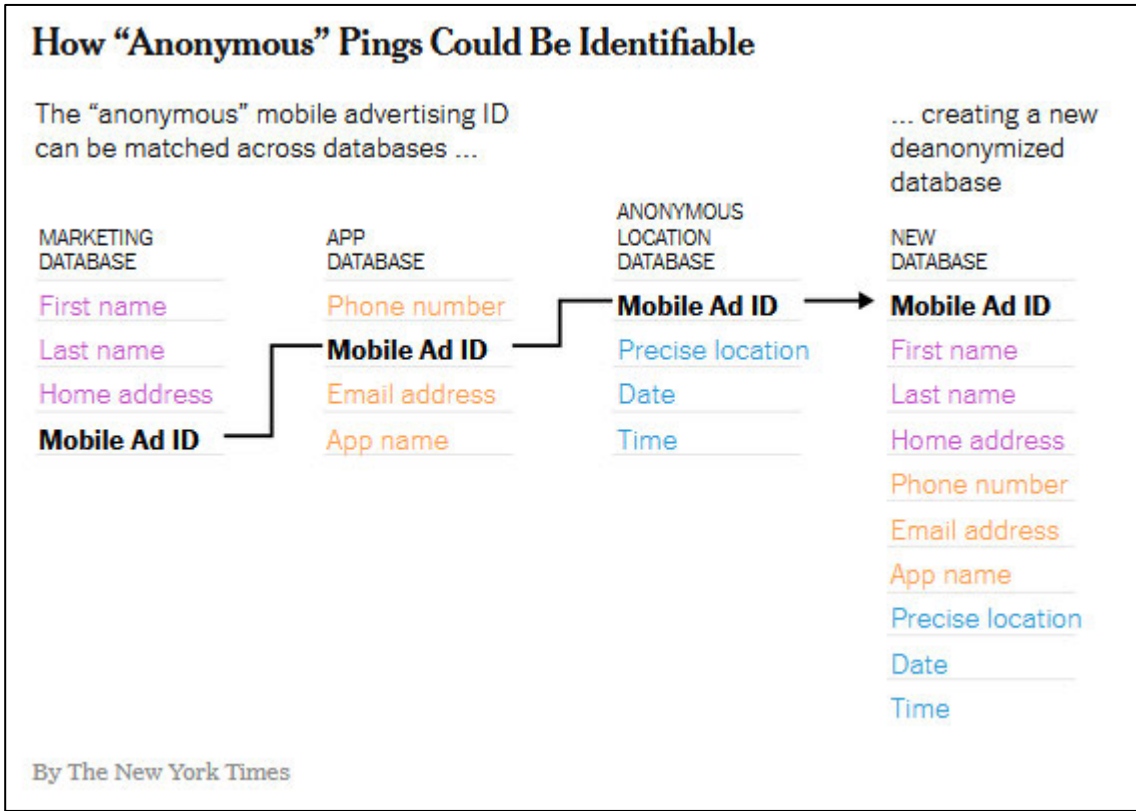
**The day of the protest**



149. *The New York Times* further reported that, by purchasing data from advertisers, it was “quickly able to match more than 2,000 supposedly anonymous devices in the data set [of people in or around the Capitol on the afternoon of January 6, 2021] with email addresses, birthdays, ethnicities, ages and more.”



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**C. Google Sells Account Holders’ Private Information**

150. Google’s release, disclosure, dissemination, transfer, and electronic communication of Account Holders’ personal information to participants in Google RTB is a sale of personal information for purposes of advertising.

151. The communication of Account Holders’ personal information is made by Google in exchange for money and other valuable consideration.

152. The winning bidder pays for Account Holders’ personal information.

153. Participants in Google RTB who do not win a bid to place an ad nevertheless receive Account Holders’ personal information in exchange for other valuable consideration. This includes their continued participation in Google RTB, *i.e.*, the continued ability to receive, review, retain and bid on Account Holders’ personal information.

154. Moreover, even participants that do not submit a bid to advertise directly to an Account Holder still receive access to that Account Holder's personal information via the Google RTB. This is a benefit and encourages them to participate in the auction.

155. All of the data transferred by Google is associated with multiple unique persistent identifiers. After the data leaves an Account Holder's device, it is sent to Google RTB, which entertains bids from SSPs all over the internet as well as bids from Google itself. Those bids are then presented to DSPs (who are acting on behalf of advertisers), also including Google itself. All of these third parties on the Ad Exchange thus have an opportunity to review and analyze the personal information about Account Holders that Google has collected and disseminated through the Bid Request.



156. This directly violates Google's promises to Account Holders that it will not sell their information to advertisers or share the information except in limited circumstances.



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**1. Plaintiffs Have Identified Hundreds of Companies Who Are Winning Bidders in Google's Ad Exchange Auctions**

157. There is no transparency in the process that occurs in Google RTB. Indeed, one of the factors motivating recent antitrust investigations into Google is that Ad Stack markets are opaque, Google has a powerful role in multiple layers of the process, and Google has resisted disclosure of how the auctions operate. Plaintiffs' investigation is ongoing and many of these practices are only now coming to light and being analyzed by experts.

158. Regardless, and relevant here, Google does not tell Account Holders which companies are bidding on, and therefore accessing, their personal information, let alone which companies are winning the auctions.

159. To determine the prevalence of Google RTB in the United States, Plaintiffs retained Professor Wilson of the Khoury College of Computer Sciences at Northeastern University. Plaintiffs asked Professor Wilson to identify the raw number of publishers (those websites who are selling ad space on the Google Ad Exchange) that use the Google RTB in the United States.

160. Professor Wilson determined the precise number of publishers in the Google RTB by downloading the data Google publishes at <https://storage.googleapis.com/adx-rtb-dictionaries/sellers.json>. Professor Wilson determined that 1,298,541 publishers were identified by Google as participating in the Google RTB to sell their ad space. Of the approximately 1.3 million RTB publishers, Professor Wilson determined that only 172,849 (13.31 percent) were publicly disclosed by Google. Google marked the remainder as anonymous.

161. Professor Wilson also researched the scope of the RTB participants who won auctions in an experiment and concluded that there are *at least* 229 different advertisers to whom Google discloses Account Holders' personal information. Among the companies who did not win the auction but to whom Google disclosed Account Holders' personal information were Amazon, Facebook, Twitter, Taboola, Wayfair, Yahoo, and eBay. The list also included hundreds of companies American consumers have likely never heard of. Google sold and shared Account Holder personal information to each of these companies.

1 162. Professor Wilson’s effort to identify these participants through the creation and  
 2 deployment of massive web-crawling scripts is only necessary because Google is not required to  
 3 publish such information to American consumers. However, other data protection regimes do  
 4 require at least some transparency into who is buying Account Holders’ personal information.  
 5 Disclosures and reports from those other jurisdictions indicate that Professor Wilson’s report may  
 6 dramatically underestimate participation in Google RTB and the number of entities to which  
 7 Google sells user personal information.

8 163. For example, European law requires Google to identify all companies with which it  
 9 shares personal data in the European Economic Area. The published list includes 833 companies,  
 10 including well-known companies like Amazon, Facebook, Twitter, Microsoft (LinkedIn), Netflix,  
 11 Adobe, Oracle, Salesforce, and eBay, as well as hundreds of little-known companies such as  
 12 Betgenius, Neustar, and Outbrain.<sup>38</sup>

13 164. A September 2020 study submitted to the Irish Data Protection Commission  
 14 estimated that an estimated 13.5 million websites participated in the Google RTB and 2,182  
 15 companies directly received Google RTB data.<sup>39</sup>

## 16 2. Google’s Promises Versus Google’s Actions

17 165. The following chart compares Google’s promises with its actions:

What Google Promises	What Google Does
“[W]e never share [personal] information with advertisers, unless you ask us to.” <i>How our business works</i> , Ex. 5 at 1.	Google shares Account Holders’ personal information, including information that is tied to Account Holders’ unique identifiers, with Google RTB participants for the purpose of targeted advertising. Google does so without Account Holders’ consent.
“We don’t share information that personally identifies you with advertisers[.]” <i>Google Privacy Policy</i> , e.g., Ex. 15 at 5; Ex. 20 at 6.	
“We do not share your personal information with companies, organizations, or individuals outside of Google except...[1] With your consent ... [3] With domain	

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26 <sup>38</sup> <https://support.google.com/admanager/answer/9012903>

27 <sup>39</sup> Dr. Johnny Ryan, [Submission to the Irish Data Protection Commission](https://www.iccl.ie/wp-content/uploads/2020/09/1.-Submission-to-Data-Protection-Commissioner.pdf), Irish Council for Civil  
 28 Liberties (Sept. 21, 2020) <https://www.iccl.ie/wp-content/uploads/2020/09/1.-Submission-to-Data-Protection-Commissioner.pdf> at 16-17.

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<p>administrators... [3]) For external processing ... and [4]) For legal reasons[.]” <i>Google Privacy Policy, e.g., Ex. 15 at 11-12; Ex. 20 at 11-12.</i></p>	
<p>“[R]emember, we never share any of this personal information with advertisers.” <i>We do not sell your personal information to anyone., Ex. 23 at 2.</i></p>	
<p>“We don’t sell your personal information to anyone.” <i>How our business works, Ex. 5 at 1.</i></p>	
<p>“We don’t share information that personally identifies you with our advertising partners, such as your name or email, unless you ask us to share it.” <i>Who are Google’s Partners?, Ex. 21 at 2.</i></p>	<p>While Google may not directly provide Account Holders’ names or email, Google does share their unique identifiers, provides cookie matching services to assist in identification of Account Holders, and encourages Google RTB participants to store user lists and hashed keys that enables them to reidentify Account Holders whose names and emails are known to participants.</p>
<p>“Without identifying you personally to advertisers or other third parties, we might use data that includes your searches and location, websites and apps that you’ve used, videos and ads you’ve seen, and basic information that you’ve given us, such as your age range and gender.” <i>We do not sell your personal information to anyone., Ex. 23 at 1.</i></p>	
<p>“We give advertisers data about their ads’ performance, but we do so without revealing any of your personal information. At every point in the process of showing you ads, we keep your personal information protected and private.” <i>We do not sell your personal information to anyone., Ex. 23 at 1.</i></p>	<p>Google not only fails to protect personal information, but rather directly provides it to Google RTB participants and enables participants to de-anonymize personal information with cookie matching services.</p>
<p>“Privacy is personal, which makes it even more vital for companies to give people clear, individual choices around how their data is used.” <i>Google’s Sundar Pichai: Privacy Should Not Be a Luxury Good, Ex. 25 at 1.</i></p>	<p>Google does not provide Account Holders with clear individual choices about how their data is used; rather, Google provides misinformation and broken promises about user privacy and fails to disclose that Account Holders’ personal information is being sold on Google RTB.</p>
<p>“[P]rivacy cannot be a luxury good offered only to people who can afford to buy premium products and services. Privacy must be equally available to everyone in the world.” <i>Google’s Sundar Pichai: Privacy Should Not Be a Luxury Good, Ex. 25 at 1.</i></p>	<p>Google does not make “privacy equally available.” Instead, it targets its own Account Holders, making privacy unavailable to them by subversively revealing their personal information thousands of times per second to millions of Google RTB participants. Only Google and Google RTB participants, not Account Holders, profit.</p>

1 2 3 4	<p>“To make privacy real, we give you clear, meaningful choices around your data. All while staying true to two unequivocal policies: that Google will never sell any personal information to third parties; and that you get to decide how your information is used.” <i>Google’s Sundar Pichai: Privacy Should Not Be a Luxury Good</i>, Ex. 25 at 1.</p>	<p>Google does not disclose what it is doing with Account Holders’ data and gives Account Holders no choice about whether their personal information is sold at the Google RTB auctions.</p>
5 6 7	<p>“Advertisers do not pay us for personal information[.]” <i>How our business works</i>, Ex. 5 at 1.</p>	<p>Through Google RTB, advertisers in fact do pay Google for advertising the value of which is directly tied to the disclosure of Account Holders’ personal information.</p>
8 9	<p>“We never sell your personal information, and give you controls over who has access.” <i>Your privacy is protected by responsible data practices</i>, Ex. 24 at 2.</p>	<p>Google sells Account Holders’ personal information on Google RTB, a process that is invisible to Account Holders and in which their consent is not solicited prior to sale.</p>
10 11 12	<p>“At every point in the process of showing you ads, we keep your personal information protected with industry-leading security technologies.” <i>How our business works</i>, Ex. 5 at 2.</p>	<p>Google reveals Account Holders’ personal information in the Google RTB Bid Requests and provides cookie matching tools that enable participants to match Account Holders’ personal information with individual profiles the participants already has.</p>
13 14 15 16 17	<p>“Privacy is core to how we build our products, with rigorous privacy standards guiding every stage of product development. Each product and feature adheres to these privacy standards, which are implemented through comprehensive privacy reviews.” <i>Your privacy is protected by responsible data practices</i>, Ex. 24 at 4.</p>	<p>Google’s core practice is building Account Holder profiles and monetizing those profiles through, among other things, the Google RTB, where Google sells Account Holders’ personal information to facilitate targeted advertising, all the while making false promises of privacy to Account Holders.</p>
18 19 20	<p>“We also never use your emails, documents, photos, or sensitive information like race, religion, or sexual orientation, to personalize ads to you.” <i>How our business works</i>, Ex. 5 at 2.</p>	<p>Google targets Account Holders based on their sensitive information, like race, religion, sexual orientation, and health. Google does this by collecting Account Holders’ browsing information to determine whether Account Holders’ fall within certain consumer categories, known as verticals and segments. These consumer categories include sensitive categories related to race, religion, sexual orientation, and health. This information is then shared with Google RTB participants to facilitate targeted advertising based on those sensitive categories. Google RTB participants are then able to bid on the ability to serve ads to Account Holders, including the ability to serve personalized ads based on specific sensitive information.</p>
21 22 23	<p>“We don’t show you personalized ads based on <u>sensitive categories</u>, such as race, religion, sexual orientation, or health.” <i>Google Privacy Policy</i>, e.g., Ex. 15 at 5; Ex. 20 at 6.</p>	
24 25 26 27	<p>“We don’t use topics or show personalized ads based on sensitive categories like race, religion, sexual orientation, or health. And we <u>require the same from advertisers</u> [hyperlink] that use our services.” <i>Google Privacy Policy</i>, e.g., Ex. 15 at 22; Ex. 20 at 30.</p>	

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<p>1 “Advertisers can’t use sensitive interest 2 categories to target ads to users or to 3 promote advertisers’ products or services.” 4 <i>Personalized Advertising</i>, Ex. 22 at 2.</p>	
<p>5 “Personal hardships: Because we don’t want 6 ads to exploit the difficulties or struggles of 7 users, we don’t allow categories related to 8 personal hardships.” <i>Personalized 9 Advertising</i>, Ex. 22 at 2.</p>	<p>Google groups Account Holders into verticals and segments and facilitates targeted advertising based on these verticals and segments, which include those related to personal hardships, like health issues (e.g., depression, eating disorders, infectious diseases, learning &amp; developmental disabilities), financial hardship (e.g., bankruptcy, debt collection &amp; repossession, short-term loans &amp; cash), and difficult interpersonal circumstances (e.g., troubled relationships, divorce &amp; separation).</p>
<p>10 “Identity and belief: Because we want ads 11 to reflect a user’s interests rather than more 12 personal interpretations of their 13 fundamental identity, we don’t allow 14 categories related to identity and belief, 15 some of which could also be used to 16 stigmatize an individual.” <i>Personalized 17 Advertising</i>, Ex. 22 at 2.</p>	<p>Google allows advertisers to target messages to Account Holders based on verticals and segments related to identity and belief, including religion (e.g., Judaism, Islam) and identity (e.g., lesbian, gay, bisexual &amp; transgender).</p>
<p>18 “Sexual interests: Because we understand 19 that sexual experiences and interests are 20 inherently private, we don’t allow 21 categories related to sexual interests.” 22 <i>Personalized Advertising</i>, Ex. 22 at 2.</p>	<p>Google allows advertisers to target messages to Account Holders based on verticals and segments related to sexual interests (e.g., sexual enhancement).</p>

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1 “The following sensitive interest categories  
2 can’t be used by advertisers to target ads to  
users or promote advertisers’ products or  
services”:

- 3 • “Restricted drug terms ... [including]  
4 Prescription medications and  
5 information about prescription  
6 medications”;
  - 7 • “Personal hardships ... [including]  
8 health conditions, treatments,  
9 procedures, personal failings, struggles,  
10 or traumatic personal experiences”;
  - 11 • “Personal health content, which  
12 includes: []Physical or mental health  
13 conditions, including diseases, sexual  
14 health and chronic health conditions,  
15 which are health conditions that require  
16 long-term care or management[; and]  
17 Products, services, or procedures to treat  
18 or manage chronic health conditions,  
19 which includes over-the-counter  
medications and medical devices”;
  - “Relationships [including] Personal  
hardships with family, friends, or other  
interpersonal relationships”;
  - “Sexual orientation”;
  - “Personal race or ethnicity” and
  - “Personal religious beliefs”
- Personalized Advertising*, Ex. 22 at 2-5.

Google allows advertisers to target messages to  
Account Holders sorted by Google into  
verticals and segments related to verticals and  
segments related to the following categories and  
examples within each:

Prescription medications: Drugs & Medications  
Personal Hardships & Personal Health Content:  
AIDS & HIV; Cancer; Eating Disorders;  
Genetic Disorders; Infectious Diseases;  
Neurological Conditions; Learning &  
Developmental Disabilities; Autism Spectrum  
Disorders; Obesity; Skin Conditions;  
Counseling Services; Depression; Fertility;  
Male Impotence; Sexual Enhancement;  
Sexually Transmitted Diseases; Drug &  
Alcohol Treatment; Steroids & Performance  
Enhancing Drugs; Anxiety & Stress;  
Counseling Services; Drugs & Medications;  
Troubled Relationships; Divorce & Separation;  
Bankruptcy; Debt Collection & Repossession;  
Short-Term Loans & Cash

Sexual Orientation: Lesbian, Gay, Bisexual &  
Transgender

Race/Ethnicity: African-Americans; Arabs &  
Middle Easterners; South Asians & Diaspora;  
Southeast Asians & Pacific Islanders; Eastern  
Europeans; Native Americans; Jewish Culture;  
Latinos & Latin-Americans  
Religious Beliefs: Buddhism; Christianity;  
Hinduism; Islam; Judaism

20 **D. Google’s Improper Sale of Personal Information Is a Serious Invasion of the**  
21 **Privacy and Is Highly Offensive**

22 166. Article I, § 1 of the California Constitution provides: “All people are by nature free  
23 and independent and have inalienable rights. Among these are enjoying and defending life and  
24 liberty, acquiring, possessing, and protecting property, and pursuing and obtaining safety,  
25 happiness, and privacy.” The phrase “and privacy” was added by the “Privacy Initiative” adopted  
26 by California voters in 1972.

27 167. The right to privacy in California’s constitution creates a right of action against  
28 private entities. The principal purpose of this constitutional right was to protect against unnecessary



1 information gathering, use and dissemination by public and private entities, including computer-  
2 stored and -generated dossiers and cradle-to-grave profiles on every American.

3 168. In its public statements, Google pays lip service to the need to protect the privacy of  
4 Internet communications. For example, on June 6, 2016, a coalition of technology companies and  
5 privacy advocates came together to oppose Congressional efforts to expand government  
6 surveillance of online activities through the Senate's Intelligence Authorization Act for Fiscal Year  
7 2017 and Senator Cornyn's proposed amendments to the ECPA.

8 169. The joint letter, signed by the ACLU, Amnesty International and others, was also  
9 signed by Google. These organizations and companies argued (correctly) that obtaining sensitive  
10 information about Americans' online activities without court oversight was an unacceptable  
11 privacy harm because it "would paint an incredibly intimate picture of an individual's life" if it  
12 included "browsing history, email metadata, location information, and the exact date and time a  
13 person signs in or out of a particular online account."<sup>40</sup>

14 170. The letter further posited that the proposed online surveillance could "reveal details  
15 about a person's political affiliation, medical conditions, religion, substance abuse history, sexual  
16 orientation" and even physical movements. The letter concluded that online surveillance raises  
17 "civil liberties and human rights concerns."

18 171. Google has publicly declared that non-consensual electronic surveillance is  
19 "dishonest" behavior. For example, Google's Update to its "Enabling Dishonest Behavior Policy"  
20 (effective August 11, 2020) restricted advertising for spyware and surveillance technology. The  
21 updated policy purports to "prohibit the promotion of products or services that are marketed or  
22 targeted with the express purpose of tracking or monitoring another person or their activities  
23 without their authorization." Through this amendment, Google explicitly takes the position that  
24 nonconsensual surveillance of "browsing history" is "dishonest behavior."<sup>41</sup>

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26 <sup>40</sup> June 6, 2016 Joint Letter. Available at [http://www.ala.org/advocacy/sites/ala.org.advocacy/  
27 files/content/advleg/federallegislation/06-06-16%20Coalition%20Letter%20to%20Senators  
28 %20in%20Opposition%20to%20Expansion%20of%20NSL%20Statute%20on%20ECTRs.pdf](http://www.ala.org/advocacy/sites/ala.org.advocacy/files/content/advleg/federallegislation/06-06-16%20Coalition%20Letter%20to%20Senators%20in%20Opposition%20to%20Expansion%20of%20NSL%20Statute%20on%20ECTRs.pdf)

<sup>41</sup> [https://support.google.com/adspolicy/answer/9726908?hl=en&ref\\_topic=29265](https://support.google.com/adspolicy/answer/9726908?hl=en&ref_topic=29265)

1 172. Google has also publicly declared privacy to be a human right. In 2004, in a letter  
2 from Google’s founders to shareholders at the IPO (included with the Company’s S-1 Registration  
3 Statement filed with the SEC), Google declared its goal to “improve the lives of as many people as  
4 possible.”<sup>42</sup> This letter appears today on Google’s website on a page touting the company’s  
5 commitment to be guided by “internationally recognized human rights standards,” including  
6 specifically the human rights enumerated in three documents: The Universal Declaration of Human  
7 Rights (the “Universal Declaration”); the United Nations Guiding Principles on Business and  
8 Human Rights (the “UN Principles”); and the Global Network Initiative Principles (the “GNI  
9 Principles”).

10 173. These three documents establish that privacy is a human right and a violation of  
11 privacy rights is a violation of human rights. The Universal Declaration declares that no one should  
12 be subject to arbitrary interference with privacy, and even declares the right to the protection of  
13 laws against such interference. Similarly, the UN Guiding Principles for business identify privacy  
14 as a human right. The GNI Principles has an entire section dedicated to privacy that begins:  
15 “Privacy is a human right and guarantor of human dignity. Privacy is important to maintaining  
16 personal security, protecting identity and promoting freedom of expression in the digital age.”<sup>43</sup>

17 174. Finally, although not mentioned on Google’s website, in 1992 the United States  
18 ratified the International Covenant on Civil and Political Rights, a human rights treaty that  
19 guarantees privacy rights in Article 17.

20 **E. Google Faces Numerous Regulatory and Governmental Agency Investigations**  
21 **for RTB Privacy Concerns**

22 175. In May 2019, the Irish Data Protection Commission opened an investigation into  
23 Google RTB after receiving complaints from the Irish Council for Civil Liberties (ICCL) and other  
24 groups about the disclosure of personal information in Google RTB. This investigation remains  
25 ongoing.

26  
27 <sup>42</sup> [https://about.google/intl/ALL\\_my/human-rights/](https://about.google/intl/ALL_my/human-rights/)

28 <sup>43</sup> <https://globalnetworkinitiative.org/gni-principles/>

1 176. The U.K.'s Information Commissioner's Office (ICO) has also opened an  
2 investigation into the privacy risks associated with RTB exchanges, including Google RTB. In a  
3 June 2019 report published by the ICO, the organization noted the following concerns:<sup>44</sup>

4 1. Processing of non-special category data is taking place unlawfully  
5 at the point of collection due to the perception that legitimate  
6 interests can be used for placing and/or reading a cookie or other  
7 technology . . . .

8 6. The profiles created about individuals are extremely detailed and  
9 are repeatedly shared among hundreds of organisations for any one  
10 bid request, all without the individuals' knowledge.

11 7. Thousands of organisations are processing billions of bid requests  
12 in the UK each week with (at best) inconsistent application of  
13 adequate technical and organisational measures to secure the data in  
14 transit and at rest, and with little or no consideration as to the  
15 requirements of data protection law about international transfers of  
16 personal data.

17 8. There are similar inconsistencies about the application of data  
18 minimisation and retention controls.

19 9. Individuals have no guarantees about the security of their personal  
20 data within the ecosystem.

21 177. The ICO recently announced it would be reopening this investigation after  
22 temporarily suspending it to respond to the COVID-19 pandemic.<sup>45</sup> The ICO noted that in response  
23 to its ongoing investigation, Google "will remove content categories, and improve its process for  
24 auditing counterparties."<sup>46</sup> Despite these vague promises, Google has not stopped disclosing users'  
25 personal information.

26 178. The Belgian Data Protection Commission likewise has opened an investigation into  
27 privacy risks on RTB exchanges. In October 2020, the Belgium privacy authority issued an internal  
28 report focusing on the online ad auctions and identifying as a core problem, how online-ad bidding

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24 <sup>44</sup> *Update report into adtech and real time bidding*, Information Commissioner's Office, June 20,  
25 2010, <https://ico.org.uk/media/about-the-ico/documents/2615156/adtech-real-time-bidding-report-201906-dl191220.pdf>.

26 <sup>45</sup> Simon McDougall, *Adtech - the reform of real time bidding has started and will continue*, Jan.  
27 17, 2020, <https://ico.org.uk/about-the-ico/news-and-events/blog-adtech-the-reform-of-real-time-bidding-has-started/>.

28 <sup>46</sup> *Id.*

1 systems “collect personal data when a user hasn’t consented to share it.”<sup>47</sup> The report “also took  
2 issue with the collection of ‘sensitive category’ data about users—such as race, sexuality, health  
3 status or political leaning—without their consent.”<sup>48</sup> This investigation is ongoing.<sup>49</sup>

4 179. In addition, dozens of complaints have been filed by civil liberties groups against  
5 Google and IAB over privacy abuses arising from real-time bidding. The list of countries where  
6 these complaints have been filed with governmental regulators includes: Bulgaria, Croatia, Cyprus,  
7 the Czech Republic, Estonia, France, Germany, Greece, Hungary, Luxembourg, Malta,  
8 Netherlands, Poland, Portugal, Romania, and Spain.<sup>50</sup> Investigations regarding these complaints  
9 are ongoing.

10 180. Further, as detailed above, in a July 2020 letter, Senator Wyden and other members  
11 of Congress urged the FTC to examine the privacy dangers of RTB exchanges. The letter explains  
12 that “hundreds of participants in these auctions receive sensitive information about the potential  
13 recipient of the ad—device identifiers and cookies, location data, IP addresses, and unique  
14 demographic and biometric information such as age and gender. Hundreds of potential bidders  
15 receive this information, even though only one—the auction winner—will use it to deliver an  
16 advertisement.” The Congressional letter further cites to Mobilewalla as an example, explaining  
17 how Mobilewalla used bidstream data, location, and inferred race data to profile participants in  
18 recent Black Lives Matter protests.<sup>51</sup>

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22 <sup>47</sup> Patience Haggin and Sam Schechner, *European Regulator Turns Up Heat on Ad Tactics Used*  
23 *by Google and Rivals*, WSJ (Oct. 16, 2020) [https://www.wsj.com/articles/european-regulator-](https://www.wsj.com/articles/european-regulator-turns-up-heat-on-ad-tactics-used-by-google-and-rivals-11602872300)  
[turns-up-heat-on-ad-tactics-used-by-google-and-rivals-11602872300](https://www.wsj.com/articles/european-regulator-turns-up-heat-on-ad-tactics-used-by-google-and-rivals-11602872300).

24 <sup>48</sup> *Id.*

25 <sup>49</sup> Natasha Lomas, *Google and IAB adtech targeted with more RTB privacy complaints*,  
26 TechCrunch, Dec. 10, 2020, [https://techcrunch.com/2020/12/10/google-and-iab-adtech-targeted-](https://techcrunch.com/2020/12/10/google-and-iab-adtech-targeted-in-latest-batch-of-rtb-privacy-complaints/)  
[in-latest-batch-of-rtb-privacy-complaints/](https://techcrunch.com/2020/12/10/google-and-iab-adtech-targeted-in-latest-batch-of-rtb-privacy-complaints/).

27 <sup>50</sup> [https://privacyinternational.org/examples/4349/cso-coalition-files-complaints-against-google-](https://privacyinternational.org/examples/4349/cso-coalition-files-complaints-against-google-and-iab-member-companies-six-eu-states)  
[and-iab-member-companies-six-eu-states](https://privacyinternational.org/examples/4349/cso-coalition-files-complaints-against-google-and-iab-member-companies-six-eu-states); <https://brave.com/rtb-updates/>.

28 <sup>51</sup> Wyden FTC Letter.

1 181. This growing list of governmental entities that have opened investigations into the  
2 ad exchange process highlights the threat Account Holders face of their personal information being  
3 collected through Google RTB.

4 **F. Google Has Been Unjustly Enriched**

5 182. Google's \$1 trillion business was built entirely on monetizing the value of Internet  
6 users' personal information.

7 183. The value of Plaintiffs' personal information to Google is demonstrated in part by  
8 Google's advertisement revenue during the relevant time period. Google reported \$146.9 billion in  
9 advertising revenue in 2020, \$134.8 billion in 2019, \$116.3 billion in 2018, \$95.4 billion in 2017,  
10 and \$79.4 billion in 2016.<sup>52</sup> This translates to 83% of Google's total revenues in 2019, 85% in  
11 2018, 86% in 2017 and 88% in 2016.<sup>53</sup> While not all of that value is unjustly derived from the  
12 specific information collected by Google here, some portion of it is. Shown graphically below,  
13 Google's annual advertising revenue has increased over five hundred percent since 2008.<sup>54</sup>  
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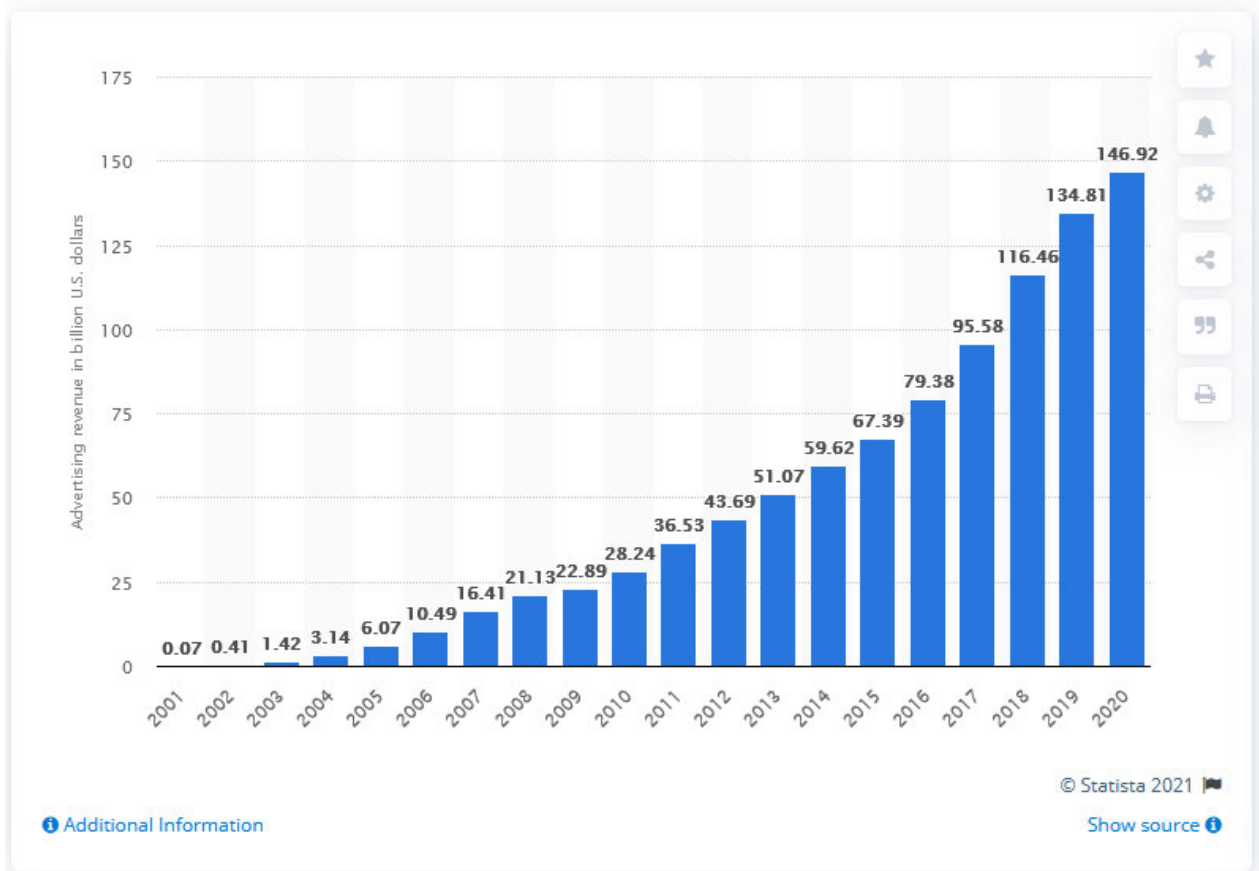
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25 <sup>52</sup> 2018 Annual Report, Alphabet Inc. (Feb. 4, 2019), <https://www.sec.gov/Archives/edgar/data/1652044/000165204419000004/goog10-kq42018.htm> (hereinafter "2018 Annual Report").

26 <sup>53</sup> 2019 Annual Report, Alphabet Inc. (Feb. 3, 2020), <https://www.sec.gov/Archives/edgar/data/1652044/000165204420000008/goog10-k2019.htm> (hereinafter "2019 Annual Report");  
27 2018 Annual Report.

28 <sup>54</sup> J. Clement, *Advertising revenue of Google from 2001 to 2019*, statista (Feb. 5, 2020), <https://www.statista.com/statistics/266249/advertising-revenue-of-google/>.

## Advertising revenue of Google from 2001 to 2020

(in billion U.S. dollars)



184. The collection of Account Holders’ personal information has facilitated the revenues of Google’s Network Members’ properties, which include ads placed through AdMob, AdSense, DoubleClick AdExchange. Google reported the following revenues from Google Network Members’ properties: \$21.5 billion in 2019, \$20 billion in 2018, \$17.6 billion in 2017, and \$15.6 billion in 2016.<sup>55</sup> Google reports “strength in both AdMob and AdManager” primarily led to the \$2.4 billion increase in Google Network Members’ properties revenues from 2017 to 2018.<sup>56</sup>

<sup>55</sup> 2019 Annual Report; 2018 Annual Report.

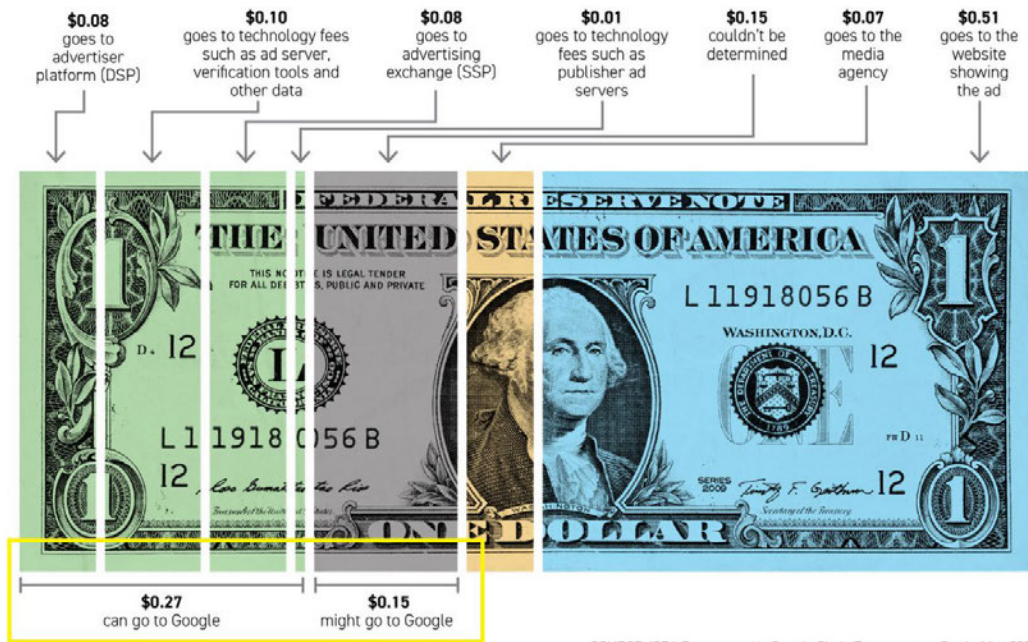
<sup>56</sup> 2019 Annual Report.



185. The fact of the advertising auctions themselves confirms that the personal information Google sells to RTB participants has economic value. A recent article published by Politico discussed one study that found that Google makes as much as 42 cents for each dollar spent on advertising on its platform.<sup>57</sup>

**Where does the money go?**

Google could collect as much as 42 cents of every dollar spent on online display ads through the advertising technology it controls. A first-of-its kind study by the British advertising group ISBA and accounting firm PwC tracked £100 million – roughly \$125 million – spent on display ads by 15 major brands like Disney and Pepsi, breaking down the role of tech providers like Google, Amazon and AT&T in the stages of buying and placing ads. The study focused on the United Kingdom’s estimated \$7 billion market for digital ads sold through exchanges but has implications for the roughly \$60 billion U.S. market.



SOURCE: ISBA Programmatic Supply Chain Transparency Study, May 2020

186. A 2019 study co-authored by Robert J. Shapiro and Siddhartha Aneja, titled *Who Owns America’s Personal Information and What is it Worth?*, calculated the value of Americans’ personal information gathered and used by Google: \$15.3 billion in 2016, \$18.1 billion in 2017, and \$21.5 billion in 2018.<sup>58</sup>

<sup>57</sup> Leah Nysten, *Google dominates online adds – and DOJ may be ready to pounce*, Politico (June 4, 2020), <https://www.politico.com/news/2020/06/04/google-doj-ads-302576>.

<sup>58</sup> Robert Shapiro and Siddhartha Aneja, *Who Owns Americans’ Personal Information and What Is It Worth?*, Future Majority (April 2019), available at [http://www.sonecon.com/docs/studies/Report\\_on\\_the\\_Value\\_of\\_Peoples\\_Personal\\_Data-Shapiro-Aneja-Future\\_Majority-March\\_2019.pdf](http://www.sonecon.com/docs/studies/Report_on_the_Value_of_Peoples_Personal_Data-Shapiro-Aneja-Future_Majority-March_2019.pdf). Shapiro is a Senior Policy Fellow at the Georgetown University McDonough



Table 1. The Value of Americans' Personal Information Gathered and Used by Major Internet Platforms, Data Brokers, Credit Card and Healthcare Data Companies 2016-2018 (\$ billions)

Platform	2016	2017	2018	Increase
<b>Major Internet Platforms</b>				
Google	\$15,303.6	\$18,132.4	\$21,453.5	40.2%
Facebook	\$6,432.4	\$9,344.4	\$11,882.0	84.7%
Amazon	\$582.4	\$920.4	\$2,397.2	311.6%
Microsoft	\$1,736.8	\$1,944.8	\$2,339.4	34.7%
Oath (Verizon)	\$1,830.4	\$1,872.0	\$1,917.8	4.8%
Twitter	\$707.2	\$608.4	\$728.2	2.9%
Other	\$10,951.2	\$14,180.4	\$17,045.7	55.7%
<b>Subtotal</b>	<b>\$37,544.0</b>	<b>\$47,002.8</b>	<b>\$57,763.9</b>	<b>53.9%</b>
<b>Major Data Brokers</b>				
Axiom	\$804.0	\$824.6	\$1,053.0	31.0%
CoreLogic	\$1,755.9	\$1,664.7	\$1,650.5	- 6.0%
Epsilon	\$2,062.4	\$2,174.3	\$2,080.2	0.08%
Equifax	\$1,938.7	\$2,026.9	\$2,066.4	6.6%
Experian	\$2,412.5	\$2,597.5	\$3,070.7	27.3%
FICO	\$572.9	\$596.6	\$681.4	18.9%
Harte-Hanks	\$348.6	\$330.9	\$249.8	28.3%
RELX	\$1,910.3	\$1,973.6	\$2,061.9	7.9%
Transunion	\$1,452.2	\$1,636.2	\$1,934.3	33.2%
<b>Subtotal</b>	<b>\$13,257.6</b>	<b>\$13,825.3</b>	<b>\$14,848.2</b>	<b>12.0%</b>
<b>Credit Card Firms</b>				
MasterCard	\$1,010.1	\$1,185.4	\$1,418.1	40.4%
American Express	\$238.2	\$279.6	\$334.5	40.4%
<b>Subtotal</b>	<b>\$1,248.3</b>	<b>\$1,465.0</b>	<b>\$1,752.6</b>	<b>40.4%</b>
<b>Healthcare Data Firm</b>				
IQVIA	\$443.4	\$1,478.1	\$1,681.5	379.2%
<b>TOTAL</b>	<b>\$52,493.3</b>	<b>\$63,771.2</b>	<b>\$76,046.2</b>	<b>44.9%</b>

School of Business and, among other past positions, served as the U.S. Under-Secretary of Commerce for Economic Affairs under President Clinton.

187. Shapiro and Aneja further predicted that Americans' personal information gathered and used by Google would be worth \$30.1 billion in 2020, and \$42.2 billion in 2022.

**Table 2. Projected Value of Americans' Personal Information Gathered and Used by Major Internet Platforms, Data Brokers, Credit Card and Healthcare Data Companies 2020 and 2022 (\$ billions)**

Platform	2018	2020	2022
<b>Major Internet Platforms</b>			
Google	\$21,453.5	\$30,077.2	\$42,167.3
Facebook	\$11,882.0	\$21,948.6	\$40,543.7
Amazon	\$2,397.2	\$9,867.1	\$40,613.5
Microsoft	\$2,339.4	\$3,151.9	\$4,246.6
Oath (Verizon)	\$1,917.8	\$2,010.4	\$2,107.5
Twitter	\$728.2	\$749.7	\$771.7
Other	\$17,045.7	\$26,531.7	\$41,296.8
<b>Subtotal</b>	<b>\$57,763.9</b>	<b>\$94,336.5</b>	<b>\$171,747.1</b>
<b>Major Data Brokers</b>			
Axiom	\$1,053.0	\$1,379.1	\$1,806.2
CoreLogic	\$1,650.5	\$1,551.4	\$1,458.3
Epsilon	\$2,080.2	\$2,098.2	\$2,116.3
Equifax	\$2,066.4	\$2,202.5	\$2,347.6
Experian	\$3,070.7	\$3,908.5	\$4,974.8
FICO	\$681.4	\$810.5	\$963.9
Harte-Hanks	\$249.8	\$179.0	\$128.3
RELX	\$2,061.9	\$2,225.5	\$2,402.2
Transunion	\$1,934.3	\$2,576.5	\$3,431.8
<b>Subtotal</b>	<b>\$14,848.2</b>	<b>\$16,933.1</b>	<b>\$19,629.3</b>
<b>Credit Card Firms</b>			
MasterCard	\$1,418.1	\$1,991.0	\$2,795.3
American Express	\$334.5	\$469.6	\$659.3
<b>Subtotal</b>	<b>\$1,752.6</b>	<b>\$2,460.6</b>	<b>\$3,454.5</b>
<b>Healthcare Data Firm</b>			
IQVIA	\$1,681.5	\$2,177.6	\$2,820.1
<b>TOTAL</b>	<b>\$76,046.2</b>	<b>\$115,907.8</b>	<b>\$197,651.1</b>

188. The intergovernmental economic organization the Organization for Economic Cooperation and Development ("OECD") has issued numerous publications discussing how to value data such as that which is the subject matter of this Complaint. For example, as early as 2013, the OECD published a paper titled "Exploring the Economics of Personal Data: A Survey of Methodologies for Measuring Monetary Value."<sup>59</sup> More recently, the OECD issued a study

<sup>59</sup> *Exploring the Economics of Personal Data: A Survey of Methodologies for Measuring Monetary Value*, OECD Digital Economy Paper No. 220 at 7 (Apr. 2, 2013), <http://dx.doi.org/10.1787/5k486qtxldmq-en>.

1 recognizing that data is a key competitive input not only in the digital economy but in all markets:  
2 “Big data now represents a core economic asset that can create significant competitive advantage  
3 for firms and drive innovation and growth.”<sup>60</sup>

4 189. The Google RTB relies on the disclosure of sufficiently detailed personal  
5 information so that bidders can be confident their ads are purchased for the right Account Holders,  
6 so that the ads are likelier to be effective. Without personal information, Google RTB would not  
7 provide sufficient information for bidders to make an informed bid, and prices for the bids would  
8 be lower.

9 190. There is also a market incentive for companies to participate in an RTB system  
10 solely for the purpose of compiling consumer data for further sale, even if those companies have  
11 no intention of placing advertisements. This is because mere participation in an RTB enables  
12 participants to receive Account Holders’ personal information even if they never prevail on, or even  
13 submit, a bid. Participants can thus harvest information through an RTB and can resell it to make  
14 money.

15 191. In her book *The Age of Surveillance Capitalism*, Harvard Business School Professor  
16 Shoshana Zuboff notes Google’s early success monetizing account holder data prompted large  
17 corporations like Verizon, AT&T and Comcast to transform their business models from fee for  
18 services provided to customers to monetizing their users’ data—including user data that is not  
19 necessary for product or service use, which she refers to as “behavioral surplus.”<sup>61</sup> In essence,  
20 Professor Zuboff explains that revenue from user data pervades every economic transaction in the  
21 modern economy. These revenues reveal that there is a market for this data. Data generated by  
22 users on Google’s platform has economic value.

23 192. While the economic value of user data was discovered and leveraged by  
24 corporations who pioneered the methods of its extraction, analysis, and use, user data can also have  
25 economic value to user themselves. Market exchanges have sprung up where individual users like

26 \_\_\_\_\_  
27 <sup>60</sup> *Supporting Investment in Knowledge Capital, Growth and Innovation*, OECD, at 319 (Oct. 13,  
2013), [https://www.oecd-ilibrary.org/industry-and-services/supporting-investment-in-knowledge-capital-growth-and-innovation\\_9789264193307-en](https://www.oecd-ilibrary.org/industry-and-services/supporting-investment-in-knowledge-capital-growth-and-innovation_9789264193307-en).

28 <sup>61</sup> Shoshana Zuboff, *The Age of Surveillance Capitalism* 166 (2019).

1 Plaintiffs herein can sell or monetize their own data. For example, Nielsen Computer and Mobile  
 2 Panel pays certain users for their data.<sup>62</sup> Facebook has launched apps that pay users for their data  
 3 directly.<sup>63</sup> Likewise, apps such as Zynn, a TikTok competitor, pay users to sign up and interact with  
 4 the app.<sup>64</sup>

5 193. Indeed, Google once paid users to track their online behaviors:

6 Google is building an opt-in user panel that will track and analyze  
 7 people's online behaviors via an extension to its Chrome browser,  
 8 called Screenwise. Users that install the plug-in will have the  
 9 websites they visit and the ways in which they interact with them  
 recorded, and they will then be paid with Amazon gift cards worth  
 up to \$25 a year in return.<sup>65</sup>

10 194. There are other markets for users' personal information. One study by content  
 11 marketing agency Fractl has found that an individual's online identity, including hacked financial  
 12 accounts, can be sold for \$1,200 on the dark web.<sup>66</sup> These rates are assumed to be discounted  
 13 because they do not operate in competitive markets, but rather, in an illegal marketplace. If a  
 14 criminal can sell other users' content, the implication is that there is a market for users to sell their  
 15 own data.

16 195. As Professors Acquisti, Taylor and Wagman relayed in their 2016 article "The  
 17 Economics of Privacy," published in the *Journal of Economic Literature*:

18 Such vast amounts of collected data have obvious and substantial  
 19 economic value. Individuals' traits and attributes (such as a person's

20 <sup>62</sup> Kevin Mercadante, *Ten Apps for Selling Your Data for Cash*, Best Wallet Hacks (March 16,  
 21 2021), <https://wallethacks.com/apps-for-selling-your-data/>.

22 <sup>63</sup> Saheli Roy Choudhury and Ryan Browne, *Facebook pays teens to install an app that could*  
 23 *collect all kinds of data*, CNBC (Jan. 30, 2019), [https://www.cnbc.com/2019/01/29/Facebook-](https://www.cnbc.com/2019/01/29/Facebook-paying-users-to-install-app-to-collect-data-techcrunch.html)  
 24 [paying-users-to-install-app-to-collect-data-techcrunch.html](https://www.cnbc.com/2019/01/29/Facebook-paying-users-to-install-app-to-collect-data-techcrunch.html)

25 <sup>64</sup> Jacob Kastrenakes, *A New TikTok Clone hit the top of the App Store by Paying users to watch*  
 26 *videos*, The Verge (May 29, 2020), [https://www.theverge.com/2020/5/29/21274994/zynn-tiktok-](https://www.theverge.com/2020/5/29/21274994/zynn-tiktok-clone-pay-watch-videos-kuaishou-bytedance-rival)  
 27 [clone-pay-watch-videos-kuaishou-bytedance-rival](https://www.theverge.com/2020/5/29/21274994/zynn-tiktok-clone-pay-watch-videos-kuaishou-bytedance-rival).

28 <sup>65</sup> Jack Marshall, *Google Pays Users for Browsing Data*, DigiDay (Feb. 10, 2012),  
<https://digiday.com/media/google-pays-users-for-browsing-data/>.

<sup>66</sup> Maria LaMagna, *The sad truth about how much your Facebook data is worth on the dark web*,  
 MarketWatch (June 6, 2018), [https://www.marketwatch.com/story/spooked-by-the-Google-](https://www.marketwatch.com/story/spooked-by-the-Google-privacy-violations-this-is-how-much-your-personal-data-is-worth-on-the-dark-web-2018-03-20)  
[privacy-violations-this-is-how-much-your-personal-data-is-worth-on-the-dark-web-2018-03-20](https://www.marketwatch.com/story/spooked-by-the-Google-privacy-violations-this-is-how-much-your-personal-data-is-worth-on-the-dark-web-2018-03-20).

1 age, address, gender, income, preferences, and reservation prices,  
 2 but also her clickthroughs, comments posted online, photos  
 3 uploaded to social media, and so forth) are increasingly regarded as  
 4 business assets that can be used to target services or offers, provide  
 5 relevant advertising, or be traded with other parties.<sup>67</sup>

6 196. While the exact value of users' personal information in this action will be a matter  
 7 for expert determination, it is clear that Google has been unjustly enriched by the practices  
 8 described herein.

9 **G. Plaintiffs' Personal Information is Property Under California Law**

10 197. Property is the right of any person to possess, use, enjoy, or dispose of a thing,  
 11 including intangible things such as data or communications.

12 198. California courts have recognized the lost "property value" of personal information,  
 13 thus Plaintiffs and Account Holders have a property interest in their own data and personal  
 14 information.

15 199. Accordingly, personal information, including websites visited by Plaintiffs and  
 16 Account Holders, is property under California law.

17 200. Property includes intangible data, including the very specific data at issue here that  
 18 Google is taking despite promising Plaintiffs and Account Holders it would not do so—personal  
 19 information including Internet communications history and personally identifiable information.

20 201. Recent changes in California law have confirmed that individuals have a property  
 21 interest in their information. In 2018, California enacted the California Consumer Privacy Act.  
 22 Among other provisions, the CCPA permits businesses to purchase consumer information from  
 23 consumers themselves (Cal. Civ. Code § 1798.125(b)(1)) and permits businesses to assess and  
 24 appraise – *i.e.*, to place a monetary value on – consumer data (Cal. Civ. Code §1798.125(a)(2)).

25 202. Just last year, Californians passed Proposition 24, the California Privacy Rights Act.  
 26 In the California General Election Voter Guide, proponents of Proposition 24 made their case for  
 27 the law by noting specifically that companies use personal information such as a user's location:

28 <sup>67</sup> Alessandro Acquisti, Curtis Taylor, and Liad Wagman, *The Economics of Privacy*, 54 J. of Econ.  
 Literature 2, at 444 (June 2016), [https://www.heinz.cmu.edu/~acquisti/papers/  
 AcquistiTaylorWagman-JEL-2016.pdf](https://www.heinz.cmu.edu/~acquisti/papers/AcquistiTaylorWagman-JEL-2016.pdf).



1 “Giant corporations make billions buying and selling our personal information – apps, phones, and  
2 cars sell your location constantly.”<sup>68</sup> Among other things, passage of the CPRA foreclosed the  
3 ability of companies like Google to evade the CCPA by contending they were “sharing,” and not  
4 “selling,” users’ personal information. Specifically, the CPRA clarified that the provisions  
5 protecting users’ data apply equally whether defines its activities as “selling” or “sharing” data.  
6 CPRA § 9(a); *see id.* § 4(d)(2) (providing that “service providers” have the same data protection  
7 obligations as contractors and third parties).

8 203. Taking Plaintiffs’ and Account Holders’ personal information without authorization  
9 is larceny under California law regardless of whether and to what extent Google monetized the  
10 data, and Plaintiffs and Account Holders have a right to disgorgement and/or restitution damages  
11 for the value of the stolen data.

12 204. Plaintiffs and Account Holders have also suffered benefit of the bargain damages,  
13 in that Google shared and sold more data than the parties agreed would be permitted. Those benefit  
14 of the bargain damages also include, but are not limited to, (i) loss of the promised benefits of their  
15 Google experience; (ii) out-of-pocket costs; and (iii) loss of control over property which has  
16 marketable value.

17 205. In addition, when Plaintiffs and Account Holders became Account Holders, they  
18 gained access to Google’s various services in exchange for agreeing to Terms of Service that  
19 Google drafted. Those terms assured them that Google would not share or sell their personal  
20 information without authorization. Now that Google has sold the data without authorization,  
21 Plaintiffs and Account Holders are entitled to disgorgement of all such ill-gotten gains.

22 206. Data brokers and online marketers have developed sophisticated schemes for  
23 assessing the value of certain kinds of data, as discussed above. Experts in the field have identified  
24 specific values to assign to certain kinds of activity.

25 207. While Plaintiffs and Account Holders largely knew that Google generates revenue  
26 from business by selling advertising directed at them, it was a material term of the bargain that

27 \_\_\_\_\_  
28 <sup>68</sup> California General Election Voter Guide, Proposition 24.



1 Plaintiffs' and Account Holders' personal information would not be shared by Google with third  
2 parties.

3 208. Google did not honor the terms of this bargain.

4 209. When Google shared and sold Plaintiffs' and Account Holders' personal  
5 information, it received direct benefits of payments from those authorized bidders that paid for  
6 advertisements based on the personal information.

7 210. As Google shared and sold Plaintiffs' and Account Holders' personal information  
8 beyond that to which Plaintiffs and Account Holders had agreed, Plaintiffs and Account Holders  
9 were denied the benefit of a Google experience where they were promised the right to determine  
10 the terms and scope of their content and personal information sharing and sale. Thus, through  
11 Google's sharing of Plaintiffs' and Account Holders' personal information with hundreds of  
12 different third parties, Plaintiffs and Account Holders lost benefits.

13 211. In order to preserve their privacy, Plaintiffs who now understand at least some of  
14 Google's violations—and there remains much to be revealed about Google's actual activities—are  
15 presented with the choice of: (i) reducing or ending their participation with Google; or (ii)  
16 knowingly accepting less privacy than they were promised. Each of these options deprives Plaintiffs  
17 and Account Holders of the remaining benefits of their original bargain. There is no option which  
18 recovers it. None of it recaptures the data taken in violation of Google's promises.

19 212. Further, Plaintiffs and Account Holders were denied the benefit of knowledge that  
20 their personal information was being shared by Google. Therefore, they were unable to mitigate  
21 harms they incurred because of Google's impermissible sharing and sale of their personal  
22 information to hundreds of third parties. That is, Google's lack of transparency prevented and still  
23 prevents Plaintiffs' and Account Holders' ability to mitigate.

24 213. Google knew that it was sharing and selling Plaintiffs' and Account Holders'  
25 personal information in violation of its express promises. Yet, Google failed to warn Plaintiffs and  
26 Account Holders so that they could take steps to attempt to avoid exposing their personal  
27 information.

28

1           214. Google also knew that it was not possible for Plaintiffs and Account Holders to use  
2 Google without Google sharing or selling their personal information.

3           215. Google avoided costs it should have incurred because of its own actions—  
4 particularly the loss of user engagement which would have resulted from transparent disclosure of  
5 Google’s actions—and transferred those costs to Plaintiffs and Account Holders. Warning users  
6 would have chilled Internet engagement as well as discouraged potential new users from joining.

7           216. Google was thus not only able to evade or defer these costs but to continue to accrue  
8 value for the Company and to further benefit from the delay due to the time value of money. Google  
9 has thus transferred all the costs imposed by the unauthorized disclosure of users’ content and  
10 personal information onto Plaintiffs and Account Holders. Google increased the cost to Plaintiffs  
11 and Account Holders of mitigating such unauthorized disclosures by failing to notify them that  
12 their personal information had been disclosed so that they could take steps to minimize their  
13 exposure on the browser.

14           217. In addition, Plaintiffs and Account Holders have also suffered from the diminished  
15 loss of use of their own personal information, property which has both personal and economic value  
16 to them.

17           218. Plaintiffs’ and Account Holders’ personal information has value. First, there is  
18 transactional, or barter, value to user content and personal information. Indeed, Google has sold the  
19 data to other companies – all the while promising users that it would not do so.

20           219. Second, Plaintiffs’ and Account Holders’ property, which has economic value, was  
21 taken from them without their consent and in contradiction of Google’s express promise not to  
22 share or sell it to others. There is a market for this data, and it has at minimum a value greater than  
23 zero.

24           220. Plaintiffs and Account Holders were harmed when Google took their property under  
25 false pretenses and exerted exclusive control over it, sharing it with and selling it to others without  
26 Plaintiffs’ and Account Holders’ knowledge or authorization.

27  
28

## H. Google’s False Privacy Promises are Market-Tested

221. Public polling on Internet tracking has consistently revealed that the overwhelming majority of Americans – 93% – believe it is important or very important to be “in control of who can get information” about them; to not be tracked without their consent; and to be in “control[] of what information is collected about [them].”<sup>69</sup>

222. Google has conducted its own research on the topic and understands that consumers are more likely to trust an Internet company when they believe the company has told them everything about its business practices and when the consumers believe they have control over how the Internet company uses their information.

223. In 2016, Google researcher Martin Ortlieb explained the following in a published research paper titled “Sensitivity of personal data items in different online contexts”:<sup>70</sup>

- a. “[I]nternet users are reluctant to share personal data items if it is not consciously perceived to be necessary to the primary function of the service;”
- b. If the outcome of their Internet activity “can be achieved by sharing only the mandatory data required for that interaction, they do not want to share more.”
- c. For search providers, like Google, “users do not see a reason, or reasons, for sharing personal data items with a search provider as readily as with social networks and online retailers.”
- d. “In general, Internet users prefer to keep their online engagement separate – or at least separable – to their real world identity. In other words, they want to keep their personal identity and their virtual identities as disconnected as possible.”
- e. “Providing re-assurances on the security and secondary use of personal data can help allay these fears.”
- f. “[A]llowing users control over their digital identity will be key to engaging them at a deeper level.”

<sup>69</sup> <https://www.pewresearch.org/internet/2015/05/20/americans-views-about-data-collection-and-security/>

<sup>70</sup> Martin Ortlieb and Ryan Garner, *Sensitivity of personal data items in different online contexts*, De Gruyter Oldenbourg (June 3, 2016) available at <https://www.degruyter.com/document/doi/10.1515/itit-2016-0016/html> (Last Visited Feb. 1, 2021).

- 1 g. “Data collected passively – which we have called internet behavior and  
account linkage in this word – are regarded as highly sensitive in all context  
2 scenarios.”
- 3 h. “[I]f online service providers are collecting data passively they have to be  
aware that users of their service will consider such data sensitive as privacy  
4 concerns become more of a conscious consideration.”
- 5 i. “The biggest factor reducing the level of data sensitivity in each context  
scenario is trust.”
- 6 j. “Trust, when it comes to sharing personal data items, can be generated  
7 through positive outcomes (relevant with clear benefits), transparency (no  
surprises through clear communication), and control (allowing the user to  
8 have a say in how and by whom their data is used).”

9 224. In another paper, Google researchers explained:<sup>71</sup>

10 In order to increase users’ comfort, . . . first-party companies should  
11 adopt more comprehensive communication strategies based on a  
greater transparency (i.e., what and how data is used or shared),  
12 provide more control over the data access to users (e.g., through  
intuitive settings and an opt-in approach) and clarify the extent of  
13 data anonymization before it is being shared.

14 225. In yet another paper, Google researchers explained:<sup>72</sup>

- 15 a. Previous research “has shown that people are more likely to share  
16 information if they feel that they have overview knowledge of personal data  
and are able to act on data controls.”
- 17 b. “If trust is established through such means, users are ready to share more  
18 online and vice versa.”
- 19 c. “The simple display of all personal data and eventual behavioral traces  
available can be an overwhelming and anxiety producing experience for  
20 users.”
- 21 d. “Essentially, no one likes to be out of control, so as soon as this becomes  
apparent or is perceived, users will either execute control or go to places  
22 where they have these options.”

23  
24  
25 <sup>71</sup> Igor Bilogrevic and Martin Ortlieb, “*If You Put All The Pieces Together...* ” – *Attitudes Towards*  
26 *Data Combination and Sharing Across Services and Companies*, CHI Conference on Human  
Factors in Computing Systems (May 2016), available at  
<https://dl.acm.org/doi/pdf/10.1145/2858036.2858432> (Last Visited Feb. 1, 2021).

27 <sup>72</sup> Martin Ortlieb, et al., *Trust, Transparency & Control in Inferred User Interest Models*, CHI  
28 Extended Abstracts on Human Factors in Computing Systems (April 2014).

1 e. “Recent research also shows that technologies that make individuals feel  
2 more in control over the release of personal information may have the  
unintended consequence of eliciting greater disclosure of sensitive  
information.”

3 f. “The concept of trust is an extensively studied concept. . . . [T]rust is a social  
4 mechanism for reducing complexity. Transposing this to the world of  
5 products we could argue that the cumulative experience with a product or  
6 brand leads to confidence. In the realm of online services this could mean  
confidence in a company’s practices such as never selling personal data to  
any third party.”

7 226. Google’s research into the value of trust highlights its knowledge of the importance  
8 of deceiving Account Holders by giving them the illusion of safety and control over their own data.  
9 Google’s privacy disclosures reflect this market research by providing Account Holders  
10 information to put them at ease. But, as alleged herein, the privacy disclosures are contradicted by  
11 the Company’s practices.

#### 12 **I. Fraudulent Concealment and Tolling**

13 227. All applicable statutes of limitation have been tolled by Google’s knowing and  
14 active fraudulent concealment and denial of the facts alleged herein through the time period relevant  
15 to this action.

16 228. Plaintiffs and Account Holders were not informed anywhere in the Terms of Service  
17 that Google’s advertising services would disclose their personal information; that Google has used  
18 their personal information to associate them into verticals and segments that it discloses in the RTB  
19 bidding process and/or makes available to participants in that process; that Google enables  
20 participants to re-identify Plaintiffs and Account Holders by saving and storing keys that  
21 reassociate Plaintiffs’ and Account Holders’ unique identifiers across platforms and devices; or that  
22 Google provides Google RTB participants with cookies that enable them to match information  
23 provided by Google during the RTB bidding process with information the participants already have  
24 on individuals, including their names and email addresses.

25 229. Google chooses not to disclose this information precisely because doing so might  
26 chill user engagement.

27 230. Google continues to conceal this information.  
28

1           231. An average consumer could not reasonably be expected to know or understand how  
2 Google is using their data. The developer pages cited herein, while available on the web, are not  
3 easily understandable to the average person, and even they do not fully reveal the extent of Google’s  
4 actions. Indeed, Plaintiffs’ counsel had to retain experts to begin to understand Google’s practices  
5 at issue in this Complaint.

6           232. Despite reasonable diligence on their part, Plaintiffs remained ignorant of the factual  
7 bases for their claims for relief. Google’s withholding of material facts concealed the claims alleged  
8 herein and tolled all applicable statutes of limitation.

9 **V. CLASS ACTION ALLEGATIONS**

10           233. This is a class action pursuant to Rules 23(a), (b)(2), and (b)(3) (or, alternatively,  
11 23(c)(4)) of the Federal Rules of Civil Procedure on behalf of a Class of all persons residing in the  
12 United States with a Google Account who used the Internet on or after Google began using RTB  
13 in a manner that disclosed Account Holders’ personal information.

14           234. Excluded from the Class are the Court, Defendant and its officers, directors,  
15 employees, affiliates, legal representatives, predecessors, successors and assigns, and any entity in  
16 which any of them have a controlling interest.

17           235. The members of the Class are so numerous that joinder of all members is  
18 impracticable.

19           236. Common questions of law and fact exist as to all members of the Class and  
20 predominate over any questions affecting solely individual members of the Class. The questions of  
21 law and fact common to the Class include:

- 22           a. Whether Google promised not to share personal information with others;
- 23           b. Whether Google promised not to sell personal information to others;
- 24           c. Whether Google shared Account Holder personal information with others;
- 25           d. Whether Google sold Account Holder personal information to others;
- 26           e. Whether Google was authorized to disclose Account Holder personal  
27 information to others;
- 28           f. Whether Google was authorized to sell Account Holder personal information  
to others;



- 1 g. Whether Google breached its contract with Account Holders;
- 2 h. Whether Account Holders' Personal Information was improperly sold by Google;
- 3 i. Whether Google was unjustly enriched by the unauthorized sales of Account Holders' personal information;
- 4 j. Whether Google's actions would be highly offensive to a reasonable person;
- 5 k. Whether Google's actions breached the duty of good faith and fair dealing;
- 6 l. Whether Google's actions violated the California Unfair Competition Law;
- 7 m. Whether Google's actions violated Article I, Section 1 of the California Constitution;
- 8 n. Whether Google's actions violated the California Invasion of Privacy Act;
- 9 o. Whether Google's actions violated the Electronic Communications Privacy Act;
- 10 p. Whether Google's actions violated the Video Privacy Protection Act;
- 11 q. Whether and the extent to which injunctive relief is appropriate.

12  
13  
14 237. Plaintiffs' claims are typical of the claims of other Class Members, as all members  
15 of the Class were similarly affected by Google's wrongful conduct in violation of federal and  
16 California law as complained of herein.

17 238. Plaintiffs will fairly and adequately protect the interests of the members of the Class  
18 and have retained counsel that is competent and experienced in class action litigation. Plaintiffs  
19 have no interest that conflicts with or is otherwise antagonistic to the interests of the other Class  
20 Members.

21 239. A class action is superior to all other available methods for the fair and efficient  
22 adjudication of this controversy since joinder of all members is impracticable. Furthermore, as the  
23 damages individual Class and Subclass members have suffered may be relatively small, the expense  
24 and burden of individual litigation make it impossible for members of the Class and Subclass to  
25 individually redress the wrongs done to them.

26 240. There will be no difficulty in management of this action as a class action.

27  
28

1 VI. COUNTS

2 COUNT ONE: BREACH OF CONTRACT

3 241. Plaintiffs hereby incorporate all other paragraphs as if fully stated herein.

4 242. Google’s relationship with its account holders is governed by the Google Terms of  
5 Service.

6 243. Since March 31, 2020, the Google Terms of Service incorporated by reference the  
7 document titled “How our business works.”

8 244. Through these documents, Google tells account holders:<sup>73</sup>

- 9 a. “We don’t sell your personal information to anyone.”
- 10 b. “[W]e never sell your personal information to anyone[.]”
- 11 c. “Advertisers do not pay us for personal information, such as your name or  
12 email, and we never share that information with advertisers, unless you ask  
us to [hyperlink].” *Id.*
- 13 d. “We also never use your emails, documents, photos, or sensitive information  
14 like race, religion, or sexual orientation, to personalize ads to you.”
- 15 e. “We share reports with our advertisers . . . but we do so without revealing  
16 any of your personal information.”
- 17 f. “At every point in the process of showing you ads, we keep your personal  
18 information protected with industry-leading security technologies  
19 [hyperlink].”
- 20 g. “When you use our products you trust us with your personal information.  
21 That’s why we never sell your personal information.”

22 245. Since at least May 25, 2018, the Google Privacy Policy has also told account  
23 holders:

- 24 a. “We don’t share information that personally identifies you with  
25 advertisers[.]” *E.g.*, Ex. 12 at 5; Ex. 15 at 5.
- 26 b. “We don’t show you personalized ads based on sensitive categories  
27 [hyperlink], such as race, religion, sexual orientation, or health.” *E.g.*, Ex.  
28 12 at 5; Ex. 15 at 5.

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<sup>73</sup> Ex. 5 at 1-2.

1 c. Google's Privacy Policy includes a definition of "sensitive categories" that  
2 promises: "We don't use topics or show personalized ads based on sensitive  
3 categories like race, religion, sexual orientation, or health. And we require  
4 the same from advertisers [hyperlink] that use our services." *E.g.*, Ex. 12 at  
5 21; Ex. 15 at 22.

6 246. Moreover, since at least March 1, 2012, the Privacy Policy has promised, "We do  
7 not share your personal information with companies, organizations, or individuals outside of  
8 Google[.]" *E.g.*, Ex. 15 at 11. The Privacy Policy identifies four exceptions to this promise, none  
9 of which applies to the allegations herein.<sup>74</sup>

10 247. Prior to May 2018, Account Holders who created a Google Account were required  
11 to agree to both the Terms of Service and the Privacy Policy.

12 248. From May 2018 to March 31, 2020, while Account Holders were required to agree  
13 to only the Terms of Service, the Google Account creation process included a link to the Privacy  
14 Policy as a guide to how Google would "process your information."

15 249. The Terms of Service expressly adopt California substantive law, including  
16 California's definition of personal information.

17 250. Plaintiffs and Class Members accepted Google's offer, have fulfilled their  
18 obligations under the contract, and are not in breach of contract.

19 251. Google has breached and continues to breach its contractual promise to maintain the  
20 privacy of Account Holders' personal information by selling and sharing Plaintiffs' and Class  
21 Members' personal information through Google RTB.

22 252. As a result of Google's breach of its contractual obligations, Google was able to  
23 obtain the personal property of Plaintiffs and Class Members, earn unjust profits, and cause privacy  
24 injury and other consequential damages.

25 253. Plaintiffs and Class Members did not receive the benefit of the bargain for which  
26 they contracted and for which they paid valuable consideration in the form of certain personal

27 <sup>74</sup> The four exceptions in Google's Privacy Policy state that Google may share personal information  
28 with companies, organizations, and individuals outside Google: (1) with the Account Holder's  
consent; (2) with domain administrators; (3) for external processing; and (4) for legal reasons. *See*,  
*e.g.*, Ex. 15 at 11-12.

1 information they agreed to share. As alleged above, this personal information has ascertainable  
2 value to be proven at trial.

3 254. As a result of Google’s breach of its contractual promises, Plaintiffs and Class  
4 Members are entitled to recover benefit of the bargain damages, unjust enrichment, and nominal  
5 damages.

6 **COUNT TWO: BREACH OF THE IMPLIED COVENANT OF**  
7 **GOOD FAITH AND FAIR DEALING**

8 255. Plaintiffs hereby incorporate all other paragraphs as if fully stated herein.

9 256. Every contract imposes upon each party a duty of good faith and fair dealing in its  
10 performance and enforcement.

11 257. In dealings between Google, Plaintiffs and Class Members, Google is invested with  
12 discretionary power affecting the rights of its Account Holders.

13 258. The terms of Google’s contract with Account Holders purport to respect and protect  
14 Account Holders’ privacy and expressly promise not to sell or share their personal information.  
15 Google not only violated these contractual promises, it frustrated the purpose of those terms by  
16 specifically and repeatedly selling and sharing Account Holders’ data through its RTB process.

17 259. Moreover, Google made statements concerning the purported privacy of Account  
18 Holder data outside of the specific confines of the contracts it drafted and required Account Holders  
19 to enter. By explicitly violating these extra-contractual terms and thereby acting in bad faith,  
20 Google violated the implied covenant of good faith and fair dealing.

21 260. On the “How our business works” webpage, Google promises, “[W]hen you use our  
22 products you trust us with your personal information. That’s why we never sell your personal  
23 information and why we give you powerful privacy controls.” Ex. 5 at 2.

24 261. On Google’s “Who are Google’s Partners” webpage,

- 25 a. Google states: “We don’t share information that personally identifies you  
26 with our advertising partners, such as your name or email, unless you ask us  
27 to share it.” Ex. 21 at 2.  
28

- 1                   b. Google identifies seven “partners” that it permits to “collect or receive non-  
2 personally identifiable information about your browser or device when you  
3 use Google sites and apps,” without disclosing the hundreds of auction  
4 participants with whom it shares personal information, including highly-  
5 sensitive personal information. *Id.* at 1.

6                   262. On Google’s “Personalized Advertising” webpage, Google states:

- 7                   a. “Advertisers can’t use sensitive interest categories to target ads to users or  
8 to promote advertisers’ products or services.” Ex. 22 at 2.  
9                   b. “Personal hardships: Because we don’t want ads to exploit the difficulties or  
10 struggles of users, we don’t allow categories related to personal hardships.”  
11 *Id.*  
12                   c. “Identity and belief: Because we want ads to reflect a user’s interests rather  
13 than more personal interpretations of their fundamental identity, we don’t  
14 allow categories related to identity and belief, some of which could also be  
15 used to stigmatize an individual.” *Id.*  
16                   d. “Sexual interests: Because we understand that sexual experiences and  
17 interests are inherently private, we don’t allow categories related to sexual  
18 interests.” *Id.*

19                   263. On the same webpage, under the header “Prohibited Categories,” Google states:  
20 “The following sensitive interest categories can’t be used by advertisers to target ads to users or to  
21 promote advertisers’ products or services” (*Id.* at 2):

- 22                   a. Restricted drug terms – “Prescription medications and information about  
23 prescription medications, unless the medication and any listed ingredients  
24 are only intended for animal use and are not prone to human abuse or other  
25 misuse.” *Id.* at 3.  
26                   b. “Personal hardships – We understand that users don’t want to see ads that  
27 exploit their personal struggles, difficulties, and hardships, so we don’t allow  
28 personalized advertising based on these hardships. Such personal hardships  
include health conditions, treatments, procedures, personal failings,  
struggles, or traumatic personal experiences. You also can’t impose  
negativity on the user.” *Id.*

- 1 c. “Health in personalized advertising [including] Physical or mental health  
2 conditions, including diseases, sexual health, and chronic health conditions,  
3 which are health conditions that require long-term care or management[;]  
4 products, services, or procedures to treat or manage chronic health  
5 conditions, which includes over-the-counter medications and medical  
6 devices[;] any health issues associated with intimate body parts or functions,  
7 which includes genital, bowel, or urinary health[;] invasive medical  
8 procedures, which includes cosmetic surgery[;] Disabilities, even when  
9 content is oriented toward the user’s primary caretaker. Examples [include]  
10 Treatments for chronic health conditions like diabetes or arthritis, treatments  
11 for sexually transmitted diseases, counseling services for mental health  
12 issues like depression or anxiety, medical devices for sleep apnea like CPAP  
13 machines, over-the-counter medications for yeast infections, [and]  
14 information about how to support your autistic child.” *Id.*
- 15 d. “Relationships in personalized advertising [including] Personal hardships  
16 with family, friends, or other interpersonal relationships[.] Examples  
17 [include] divorce services, books about coping with divorce, bereavement  
18 products or services, family counseling services[.]” *Id.* at 4.
- 19 e. “Sexual orientation in personalized advertising [including] lesbian, gay,  
20 bisexual, questioning, or heterosexual orientation[.] Examples [include]  
21 information about revealing your homosexuality, gay dating, gay travel,  
22 information about bisexuality.” *Id.* at 4-5.
- 23 f. “Personal race or ethnicity.” *Id.* at 5.
- 24 g. “Personal religious beliefs.” *Id.*

25 264. On Google’s “Your privacy is protected by responsible data practices” webpage,  
26 Google states:

- 27 a. “Data plays an important role in making the products and services you use  
28 every day more helpful. We are committed to treating that data responsibly  
and protecting your privacy with strict protocols and innovative privacy  
technologies.” Ex. 24 at 1.
- b. That it uses “advanced privacy technologies [to] help keep your personal  
information private.” *Id.* at 3.
- c. “We are continuously innovating new technologies that protect your private  
information without impacting your experiences on our products.” *Id.*
- d. “We use leading anonymization techniques to protect your data while  
making our services work better for you.” *Id.* at 3-4.
- e. “Privacy is core to how we build our products, with rigorous privacy  
standards guiding every stage of product development. Each product and  
feature adheres to these privacy standards, which are implemented through  
comprehensive privacy reviews.” *Id.* at 4.



1           265. On Google’s “We do not sell your personal information to anyone” webpage,  
2 Google states:

- 3           a. “We do not sell your personal information to anyone.” Ex. 23 at 1.
- 4           b. “Without identifying you personally to advertisers or other third parties, we  
5 might use data that includes your searches and location, websites and apps  
6 that you’ve used, videos and ads that you’ve seen, and basic information that  
7 you’ve given us, such as your age range and gender.” *Id.*
- 8           c. “We give advertisers data about their ads’ performance, but we do so without  
9 revealing any of your personal information. At every point in the process of  
10 showing you ads, we keep your personal information protected and private.”  
11 *Id.*
- 12           d. “[R]emember, we never share any of this personal information with  
13 advertisers.” *Id.* at 2.

14           266. On Google’s “Your privacy is protected by responsible data practices” webpage,  
15 Google states:

- 16           a. “Your privacy is protected by responsible data practices.” Ex. 24 at 1.
- 17           b. “We never sell your personal information, and give you controls over who  
18 has access.” *Id.* at 2.
- 19           c. “We are committed to protecting your data from third parties. That’s why  
20 it’s our strict policy to never sell your personal information to anyone.” *Id.*
- 21           d. “We don’t share information that personally identifies you with advertisers,  
22 such as your name or email, unless you ask us to.” *Id.* at 1-2.

23           267. Google’s CEO Sundar Pichai publicly stated:

- 24           a. “We do not and would never sell consumer data.” Pichai, *supra* note 10.
- 25           b. “To make privacy real, we give you clear, meaningful choices around your  
26 data. All while staying true to two unequivocal policies: that Google will  
27 never sell any personal information to third parties; and that you get to decide  
28 how your information is used.” Ex. 25 at 1.

29           268. Google’s sharing and selling of Plaintiffs’ and Class Members’ personal information  
30 with other companies:

- 31           a. Was objectively unreasonable given Google’s numerous privacy promises  
32 both within and outside the confines of the terms it forced Account Holders  
33 to agree to in order to become Account Holders;

- b. Evaded the spirit of the bargain made between Google, Plaintiffs and Class Members; and
- c. Abused Google’s power to specify terms in the contract.

269. Google’s sharing, sale, and use of Plaintiffs’ and Class Members’ sensitive personal information for purposes of targeted advertising through Google RTB:

- a. Evaded the spirit of the bargain made between Google, Plaintiffs and Class Members; and
- b. Abused Google’s power to specify terms in the contract.

270. Google’s failure to inform Plaintiffs and Class Members of its conduct in Google RTB and failure to give Plaintiffs and Class Members privacy controls to prevent the sale and sharing of their personal information in Google RTB was objectively unreasonable and evaded the spirit of the bargain made between Google, Plaintiffs and Class Members

271. Google’s use of Plaintiffs’ and Class Members’ personal information to target them and enable other companies to add to their own user profiles was in bad faith, and promising Plaintiffs’ and Class Members’ personal information would not be disclosed induced them to share more information with Google.

272. As a result of Google’s misconduct and breach of its duty of good faith and fair dealing, Google was able to obtain the personal property of Plaintiffs and Class Members, earn unjust profits, and cause privacy injury and other consequential damages.

273. As a result of Google’s bad faith breach of its contractual and extra-contractual promises, Plaintiffs and Class Members are entitled to recover benefit of the bargain damages, unjust enrichment damages in the form of restitution measures by either unearned profits or a reasonable royalty value, and nominal damages.

**COUNT THREE: VIOLATIONS OF THE CALIFORNIA UNFAIR  
COMPETITION LAW (“UCL”)  
Cal. Bus. & Prof. Code § 17200, et seq.**

274. Plaintiffs incorporate all preceding paragraphs as though set forth herein.

275. The UCL prohibits any “unlawful, unfair, or fraudulent business act or practice and unfair, deceptive, untrue or misleading advertising.” Cal. Bus. & Prof. Code § 17200.

1 276. Google is a “person” as defined by Cal. Bus. & Prof. Code § 17201.

2 277. Google violated the UCL by engaging in the following unlawful, unfair, and  
3 deceptive business acts and practices:

- 4 a. Violating its Terms of Service, knowingly and willfully or negligently and  
5 materially, in violation of Cal. Bus. & Prof. Code § 22576;
- 6 b. Violating the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510  
7 and 2701, *et seq.*;
- 8 c. Violating the Video Privacy Protection Act, 18 U.S.C. § 2710, *et seq.*;
- 9 d. Violating the California Invasion of Privacy Act, Cal. Penal Code §§ 630, *et*  
10 *seq.*;
- 11 e. Violating the California Computer Data Access and Fraud Act, Cal. Penal  
12 Code § 502;
- 13 f. Committing Statutory Larceny, Cal. Penal Code §§ 484 and 496;
- 14 g. Violating the common law right of privacy via intrusion upon seclusion and  
15 publication of private facts;
- 16 h. Violating the Art. 1, § 1 of the California Constitution Right to Privacy;
- 17 i. Violating express contract promises to consumers;
- 18 j. Violating the duty of good faith and fair dealing; and
- 19 k. Violating the duty to hold Account Holders’ personal information in  
20 confidence.

21 278. Google’s conduct violated the spirit and letter of these laws, which protect property,  
22 economic and privacy interests, and prohibit unauthorized disclosure and collection of private  
23 communications and personal information.

24 279. Google stated it would not sell or disseminate Plaintiffs’ and Class Members’  
25 personal information without their consent to other companies, except in limited situations not  
26 applicable here.

27 280. Google’s conduct was immoral, unethical, oppressive, unscrupulous, and  
28 substantially injurious to Plaintiffs and Class Members. Further, Google’s conduct narrowly  
benefitted its own business interests at the expense of Plaintiffs’ and Class Members’ fundamental  
privacy interests protected by the California Constitution and the common law.

1           281. Plaintiffs’ and Class Members’ loss of their personal information constitutes an  
2 economic injury.

3           282. Plaintiffs and Class Members have suffered harm in the form of lost property value,  
4 specifically the diminution of the value of their private and personally identifiable data and content.

5           283. Google’s actions caused damage to and loss of Plaintiffs’ and Class Members’  
6 property right to control the dissemination and use of their personal information and  
7 communications.

8           284. Plaintiffs and Class Members seek all monetary and non-monetary relief allowed by  
9 law, including restitution, declaratory relief, reasonable attorneys’ fees and costs under California  
10 Code of Civil Procedure § 1021.5, injunctive relief, and all other equitable relief the Court  
11 determines is warranted.

12           **COUNT FOUR: CALIFORNIA CONSTITUTIONAL INVASION OF PRIVACY**

13           285. Plaintiffs hereby incorporate all other paragraphs as if fully stated herein.

14           286. Article I, § 1 of the California Constitution provides, “All people are by nature free  
15 and independent and have inalienable rights. Among those are enjoying and defending life and  
16 liberty, acquiring, possessing, and protecting property, and pursuing and obtaining safety,  
17 happiness, and privacy.”

18           287. The phrase “and privacy” was added by an initiative adopted by California voters  
19 on November 7, 1972 (the Privacy Initiative).

20           288. The Privacy Initiative created a private right of action against nongovernmental  
21 entities for invasions of privacy.

22           289. The California Supreme Court has explained that, one of the principal “mischiefs”  
23 to which the Privacy Initiative was directed was “the overbroad collection and retention of  
24 unnecessary personal information by government and business interests.” *White v. Davis*, 13 Cal.3d  
25 757, 775 (Cal. 1975). “The moving force behind the new constitutional provision ... relat[ed] to  
26 the accelerating encroachment on personal freedom and security caused by increased surveillance  
27 and data collection activity in contemporary society. The new provision’s primary purpose is to  
28

1 afford individuals some measure of protection against this most modern threat to personal privacy.”

2 *Id.* at 774.

3 290. The ballot language for the Privacy Initiative explained:

4 Computerization of records makes it possible to create ‘cradle-to-  
5 grave’ profiles of every American. ... The right of privacy is the  
6 right to be left alone. It is a fundamental and compelling interest. It  
7 protects our homes, our families, our thoughts, our emotions, our  
8 expressions, our personalities, our freedom of communion and our  
9 freedom to associate with the people we choose. It prevents  
10 government and business interests from collecting and stockpiling  
11 unnecessary information about us and from misusing information  
12 gathered for one purpose in order to serve other purposes or to  
13 embarrass us.

14 *Fundamental to our privacy is the ability to control circulation of  
15 personal information.* This is essential to social relationships and  
16 personal freedom. The proliferation of government and business  
17 records over which we have no control limits our ability to control  
18 our personal lives. Often, we do not know that these records even  
19 exist and we are certainly unable to determine who has access to  
20 them.

21 *White v. Davis*, 13 Cal.3d at 774-75 (emphasis in original) (quoting ballot language).

22 291. Google’s conduct in selling and sharing Plaintiffs’ and Class Members’ personal  
23 information in violation of its express unequivocal promises to the contrary is exactly why  
24 California voters adopted the Privacy Initiative in 1972.

25 292. Google creates “cradle-to-grave profiles” and detailed dossiers of Plaintiffs and  
26 Class Members, and then sells and shares the personal information contained in those profiles and  
27 dossiers with hundreds of different companies to aid those other companies for the purpose of  
28 making money and assisting those other companies in supplementing or building their own separate  
profiles and dossiers about Plaintiffs and Class Members.

29 293. As described herein, Google has intruded upon the following legally protected  
30 privacy interests of Plaintiffs and Class Members:

- 31 a. The right to privacy contained on personal computing devices, including  
32 web-browsing history;
- 33 b. The right to restrain business interests from misusing information gathered  
34 for one purpose in order to serve other purposes;
- 35 c. The right to control circulation of their personal information;

- d. Statutory rights codified in federal and California privacy statutes;
- e. The California Computer Crime Law, Cal Pen. Code § 502, which applies to all plaintiffs in this case by virtue of Google’s choice of California law to govern its relationship with Google users;

294. Through the Terms of Service, other policies and other public statements set forth above, Google promised not to share or sell Plaintiffs’ and Class Members’ personal information without authorization.

295. Plaintiffs and Class Members had a reasonable expectation of privacy in the circumstances in that:

- a. Plaintiffs and Class Members could not reasonably expect Google would commit acts in violation of federal and state laws as set forth below.
- b. Google affirmatively promised users it would not share or sell their personal information without authorization.

296. Google’s actions constituted a serious invasion of privacy in that it:

- a. Violated several federal criminal laws, including the Electronic Communications Privacy Act.
- b. Violated dozens of state criminal laws.
- c. Invaded the privacy rights of hundreds of millions of Account Holders without their consent.
- d. Disclosed sensitive personal information every time it shared information related to the verticals above relating to health, religion, ethnicity, race, or sexuality.
- e. Enabled the targeting of Account Holders by third parties who did not have legal access to their personal information.

297. The surreptitious and unauthorized sharing and sale of the internet communications and associated personal information of millions of Account Holders constitutes an egregious breach of social norms.

298. Google lacked a legitimate business interest in sharing and selling Plaintiffs’ and Class Members’ personal information without their authorization.

299. In violating Plaintiffs’ and Class Members’ privacy in the manner described above, Google acted with oppression, fraud, or malice.





1 person in that Google violated federal and state criminal and civil laws designed to protect  
2 individual privacy and against theft.

3 308. Google's unauthorized sharing and sale of personal information from hundreds of  
4 millions of Americans, including highly sensitive information about individuals' race, ethnicity,  
5 religion, health, and financial status, is highly offensive behavior.

6 309. Google's secret monitoring of web browsing for purposes of selling and sharing it  
7 with hundreds of unknown companies without Account Holders' consent is highly offensive  
8 behavior.

9 310. In intruding on Plaintiffs' and Class Members' seclusion in the manner described  
10 herein, Google acted with oppression, fraud, or malice.

11 311. Plaintiffs and Class Members have been damaged by Google's intrusion upon their  
12 seclusion and are entitled to just compensation in the form of actual damages, general damages,  
13 unjust enrichment, nominal damages, and punitive damages.

14 **COUNT SIX: PUBLICATION OF PRIVATE INFORMATION**

15 312. Plaintiffs hereby incorporate all other paragraphs as if fully stated herein.

16 313. Plaintiffs' and Class Members' personal information, including their Internet  
17 communications and sensitive data, are private facts that Google promised not to share or sell to  
18 advertisers.

19 314. Google gave publicity to Plaintiffs' and Class Members' private facts and the  
20 content of their Internet communications by sharing and selling them to hundreds of different  
21 companies. Many of those companies have business models predicated on building massive  
22 databases of individual consumer profiles from which to sell targeted advertising and make further  
23 disseminations.

24 315. Plaintiffs and Class Members had no knowledge that Google was sharing and selling  
25 their personal information and did not authorize or consent to such publication.

26 316. Google's selling and sharing of patient personal information to hundreds of different  
27 advertising companies would be highly offensive to a reasonable person.  
28



1 326. There was an understanding between Google on the one hand, and Plaintiffs and  
2 Class Members on the other, that Google would not betray their confidence by sharing their  
3 personal information without consent.

4 327. By disclosing and using Account Holders' personal information in violation of this  
5 understanding, Google breached the trust and confidence that Plaintiffs and Class Members placed  
6 in it.

7 328. In breaching Plaintiffs' and Class Members' confidence in the manner described  
8 above, Google acted with oppression, fraud, or malice.

9 329. Plaintiffs and Class Members have been damaged by Google's breach of trust and  
10 confidence and are entitled to just compensation in the form of actual damages, general damages,  
11 unjust enrichment, nominal damages, and punitive damages.

12 **COUNT EIGHT: VIOLATION OF THE CALIFORNIA INVASION OF PRIVACY ACT**

13 330. Google is subject to the California Invasion of Privacy Act ("CIPA"), Cal. Penal  
14 Code §§ 630-638. Google is headquartered in California; designed, contrived, and effectuated its  
15 practice of disclosing account holder information during the RTB process in California; and has  
16 adopted California substantive law to govern its relationship with Plaintiffs and all Class Members.

17 331. The California Invasion of Privacy Act states the following purpose:

18 The Legislature hereby declares that advances in science and  
19 technology have led to the development of new devices and  
20 techniques for the purpose of eavesdropping upon private  
21 communications and that the invasion of privacy resulting from the  
22 continual and increasing use of such devices and techniques has  
23 created a serious threat to the free exercise of personal liberties and  
24 cannot be tolerated in a free and civilized society.

25 Cal. Penal Code § 630.

26 332. Cal. Penal Code § 631(a) provides, in pertinent part:

27 Any person who, by means of any machine, instrument, or  
28 contrivance, or in any other manner ...willfully and without the  
consent of all parties to the communication, or in any unauthorized  
manner, reads, or attempts to read, or to learn the contents or  
meaning of any message, report, or communication while the same  
is in transit or passing over any wire, line, or cable, or is being sent  
from, or received at any place within this state; or who uses, or  
attempts to use, in any manner, or for any purpose, or to

1 communicate in any way, any information so obtained, or who aids,  
2 agrees with, employs, or conspires with any person or persons to  
3 unlawfully do, or permit, or cause to be done any of the acts or things  
4 mentioned above in this section, is punishable by a fine not  
5 exceeding two thousand five hundred dollars ....

6 333. Google is a “person” within the meaning of § 631(a).

7 334. By employing its Google RTB to sell and share Account Holder information to  
8 hundreds of Google RTB participants in real-time while communications between the Account  
9 Holders and first-party websites were still in transit or being sent or received within California,  
10 Google aided, agreed with, and conspired with Google RTB participants to aid them in reading,  
11 attempting to read, learning, or using the contents or meaning of the communications being  
12 exchanged connected to the Plaintiffs’ and Class Members’ personal information.

13 335. Plaintiffs and Class Members did not consent to Google’s aid to or agreement with  
14 Google RTB participants in reading, attempting to read, learning, or using the contents or meaning  
15 of Plaintiffs’ and Class Members’ communications with websites that Plaintiffs and Class Members  
16 were directly interacting with.

17 336. The following items constitute “machine[s], instrument[s], or contrivance[s]” under  
18 § 631(a):

- 19 a. The cookies Google used to track, share, and sell the Plaintiffs’ and Class  
20 Members’ communications to Google RTB participants;
- 21 b. The Plaintiffs’ and Class Members’ browsers;
- 22 c. The Plaintiffs’ and Class Members’ personal computing devices;
- 23 d. Google’s web servers;
- 24 e. The web servers of non-Google websites from which Google tracked,  
25 intercepted, shared, and sold the Plaintiffs’ and Class Members’  
26 communications; and
- 27 f. The web servers of the Google RTB participants to which Google sold and  
28 shared Plaintiffs’ and Class Members’ communications; and
- g. The computer code Google deployed to effectuate its scheme, including but  
not limited to Bid Requests for each Target Google caused to be submitted  
to Google RTB participants.

1 337. Even if the above-listed items do not constitute “machine[s], instrument[s], or  
2 contrivance[s],” Google’s deliberate and purposeful efforts to facilitate its conduct comprise “any  
3 other manner.”

4 338. Google’s aid to the Google RTB participants occurred in “real time,” as  
5 acknowledged by Google in its naming of the Google *Real-Time* Bidding system. As such,  
6 Google’s aid to Google RTB participants occurred while Plaintiffs’ and Class Members’  
7 communications with first-party websites were in transit or in the process of being sent or received.

8 339. Google’s RTB documentation acknowledges that the information Google aided  
9 RTB participants in reading, attempting to read, or to learn included the “contents” and “meaning”  
10 of the Plaintiffs’ and Class Members’ communications with first-party websites. The “contents” or  
11 “meaning” re-directed within Google RTB Bid Requests include:

<b>COMMUNICATIONS CONTENT</b>		
cat		Array of IAB content categories of the site or app.
sectioncat		Array of IAB content categories that describe current section of site or app.
pagecat		Array of IAB content categories that describe current site or app page or view.
page		URL of the page where the impression will be shown.
ref		Referrer URL that caused navigation to the current page.
publisher		Details about the Publisher object of the site or app.
content		Details about the Content within the site or app.
keywords		Comma-separated list of keywords about this site or app.
content id		ID uniquely identifying the content.
episode		Content episode number (typically applies to video content).
title		Content title. Video examples: “Search Committee” (television); “A New Hope (movie); or “Endgame” (made for web). Non-video example: “Why an Antarctic Glacier is Melting So Quickly” (Time magazine article).
series		Content series. Video examples: “The Office” (television); “Star Wars” (movie); or “Arby ‘N’ The Chief (made for web). Non-video example: (“Ecocentric”) (Time magazine blog).
<b>“INFORMATION THAT WE KNOW ABOUT THE WEB PAGE OR MOBILE APP”</b>		
17	Publisher ID	The publisher ID.
20	URL	The URL of the page with parameters removed.
<b>VIDEO INFORMATION</b>		
51	URL	The URL of the page that the publisher gives Google to describe the video content, with parameters removed.
61	Video title	The video title.
62	Video keywords	A list of keywords describing the video, extracted from the content management system of the video publisher.

26 340. Plaintiffs and Class Members have suffered loss by reason of these violations,  
27 including, but not limited to, violation of their rights to privacy and loss of value in their personal  
28 information.



1 341. Because Plaintiffs and Class Members have been injured by Google’s violations of  
2 Cal. Pen. Code § 631, each seeks damages of the greater of \$5,000 or three times the amount of  
3 actual damages, if any, sustained, as well as injunctive relief.

4 **COUNT NINE: VIOLATIONS OF THE ELECTRONIC COMMUNICATIONS PRIVACY**  
5 **ACT – UNAUTHORIZED INTERCEPTION, USE, AND DISCLOSURE**

6 342. Plaintiffs incorporate all preceding paragraphs as though set forth herein.

7 343. The Electronic Communications Privacy Act (“ECPA”) prohibits the unauthorized  
8 interception of the content of any communication through the use of any device, and any subsequent  
9 disclosure or use of the intercepted contents of any electronic communication. 18 U.S.C. §2511.

10 344. ECPA protects both the sending and receipt of communications.

11 345. 18 U.S.C. § 2520(a) provides a private right of action to any person whose wire,  
12 oral, or electronic communication is intercepted.

13 346. Google violated the interception provisions of the Electronic Communications  
14 Privacy Act (“ECPA”) by:

- 15 a. Intentionally disclosing, or endeavoring to disclose, to other companies the  
16 contents of Plaintiffs’ and Class Members’ electronic communications, knowing or having reason to know that the information was obtained through  
17 the interception of electronic communications, in violation of 18 U.S.C. §  
18 2511(1)(c); and/or  
19 b. Intentionally using, or endeavoring to use, the contents of Plaintiffs’ and  
20 Class Members’ electronic communications, knowing or having reason to  
21 know that the information was obtained through the interception of  
22 electronic communications, in violation of 18 U.S.C. § 2511(1) (d).

23 347. ECPA defines interception as the “acquisition of the contents of any wire, electronic,  
24 or oral communication through the use of any electronic, mechanical, or other device” and  
25 “contents ... includes any information concerning the substance, purport, or meaning of that  
26 communication.” 18 U.S.C. § 2510(4), (8).

27 348. Google intercepted Plaintiffs’ and Class Members’ electronic communications,  
28 including the following content:

- a. The precise text of GET and POST requests that Plaintiffs and Class  
Members exchanged with non-Google websites to which they navigated;

- b. The precise text of Plaintiffs’ and Class Members’ search queries at non-Google websites to which they navigated and on which they entered such queries; and
- c. Information that is a general summary or informs Google (and the Google RTB participants) of the subject of communications between Plaintiffs and Class members and the first-party websites.

349. Electronic Communications. The transmission of data between Plaintiffs and Class Members and the non-Google websites with which they chose to exchange communications are “transfer[s] of signs, signals, writing, ... data, [and] intelligence of [some] nature transmitted in whole or in part by a wire, radio, electromagnetic, photoelectronic, or photooptical system that affects interstate or foreign commerce” and are therefore “electronic communications” within the meaning of 18 U.S.C. § 2510(2).

350. Content. The ECPA defines content, when used with respect to electronic communications, to “include[] *any* information concerning the substance, purport, or meaning of that communication.” 18 U.S.C. § 2510(8) (emphasis added).

351. Google’s developer documentation details the following content of electronic communications that it redirects to other companies in the Google RTB process:

<b>COMMUNICATIONS CONTENT</b>		
cat		Array of IAB content categories of the site or app.
sectioncat		Array of IAB content categories that describe current section of site or app.
pagecat		Array of IAB content categories that describe current site or app page or view.
page		URL of the page where the impression will be shown.
ref		Referrer URL that caused navigation to the current page.
publisher		Details about the Publisher object of the site or app.
content		Details about the Content within the site or app.
keywords		Comma-separated list of keywords about this site or app.
content id		ID uniquely identifying the content.
episode		Content episode number (typically applies to video content).
title		Content tile. Video examples: “Search Committee” (television); “A New Hope (movie); or “Endgame” (made for web). Non-video example: “Why an Antarctic Glacier is Melting So Quickly” (Time magazine article).
series		Content series. Video examples: “The Office” (television); “Star Wars” (movie); or “Arby ‘N’ The Chief (made for web). Non-video example: (“Ecocentric”) (Time magazine blog).
<b>“INFORMATION THAT WE KNOW ABOUT THE WEB PAGE OR MOBILE APP”</b>		
17	Publisher ID	The publisher ID.
20	URL	The URL of the page with parameters removed.
<b>VIDEO INFORMATION</b>		
51	URL	The URL of the page that the publisher gives Google to describe the video content, with parameters removed.
61	Video title	The video title.

62	Video keywords	A list of keywords describing the video, extracted from the content management system of the video publisher.
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1  
2           352. Electronic, Mechanical, or Other Device. The ECPA defines “electronic,  
3 mechanical, or other device” as “any device ... which can be used to intercept a[n] ... electronic  
4 communication[.]” 18 U.S.C. § 2510(5).

5           353. The following constitute devices within the meaning of 18 U.S.C. § 2510(5):

- 6           a. The cookies Google used to acquire Plaintiffs’ and Class Members’  
7           communications, including cookies Google sets, acquires, and discloses or  
8           sells to other companies through cookie-sharing;
- 9           b. The Plaintiffs’ and Class Members’ browsers;
- 10           c. The Plaintiffs’ and Class Members’ computing devices;
- 11           d. Google’s web servers;
- 12           e. The web servers of the first-party non-Google websites from which Google  
13           tracked and intercepted the Plaintiffs’ and Class Members’ communications;  
14           and
- 15           f. The computer code deployed by Google to effectuate its tracking and  
16           interception of Plaintiffs’ and Class Members’ communications for purposes  
17           of forwarding them to hundreds of Google RTB participants, without  
18           authorization, including but not limited to data contained in Bid Requests.

19           354. Unauthorized Purpose. Google intentionally intercepted the contents of Plaintiffs’  
20           and Class Members’ electronic communications for the unauthorized purpose of disclosing and  
21           selling those contents to Google’s RTB participants.

22           355. Plaintiffs and Class members did not authorize Google to acquire the content of their  
23           communications for purposes of sharing and selling the personal information contained therein.  
24           Indeed, Google expressly and repeatedly promised that it would not share or sell user personal  
25           information, including browsing history.

26           356. Google’s interception of the contents of Plaintiffs’ and Class Members’  
27           communications was contemporaneous with their exchange with the websites to which they  
28           directed their communications. As described above, the Google RTB process occurs in milliseconds  
29           while the communication is still being exchanged between Plaintiffs and Class Members and the  
30           website to which they directed their communications. That is why Google itself refers to the process

1 as “Real-Time Bidding.” The signal sent out to Google RTB is sent simultaneously with the signal  
2 sent to the websites to which Plaintiffs’ and Class Members’ communications were directed.

3 357. Google is not a party to Plaintiffs’ and Class Members’ electronic communications  
4 exchanged with the non-Google websites to which Plaintiffs and Class Members directed their  
5 communications.

6 358. Google acquired the content of Plaintiffs’ and Class members’ electronic  
7 communications with the non-Google websites to which their communications were directed  
8 through the surreptitious duplication, forwarding, and re-direction of those communications to  
9 Google. After intercepting the communications without authorization, Google then disclosed, sold,  
10 and shared the contents of the intercepted communications to hundreds of Google RTB participants  
11 and used the contents of the intercepted communications in furtherance of the Google RTB auction  
12 sales system.

13 359. Exceptions Do Not Apply. The ECPA prohibition on unauthorized interception  
14 contains exceptions. The burden is on the party seeking the benefit of an exception to prove its  
15 existence. Therefore, Plaintiffs need not affirmatively plead the absence of any exception.  
16 Nevertheless, Plaintiffs plead that Google’s interceptions do not qualify for any exceptions.

17 360. ECPA provides an ordinary course of business exception for liability, under which  
18 the communications at issue are, by definition, not intercepted. 18 U.S.C. § 2510(5)(a)(ii). This  
19 exception is narrow and protects from liability only where an electronic service provider’s  
20 interception facilitates the transmission of the communication at issue or is incidental to the  
21 transmission of such communication. Google’s interception of the contents of Plaintiffs’ and Class  
22 Members’ communications with any non-Google website to which they directed their browser does  
23 not facilitate and is not incidental to that communication. Rather, Google’s interception facilitates  
24 a separate, unrelated communication – the contemporaneous communication of Plaintiffs’ and  
25 Class Members’ personal information to Google RTB participants.

26 361. ECPA provides an exception where one party to the communications provides  
27 consent to the disclosure of the communications at issue. 18 U.S.C. § 2511(2)(2). As detailed  
28 above, Plaintiffs and Class Members did not provide consent to the disclosure of the content of

1 their communications with Google RTB participants. To the contrary, Google promised in its  
2 Terms of Service and numerous other communications that it would not sell or share Account  
3 Holders' personal information absent their consent. Plaintiffs and Class Members were not asked  
4 for, and did not provide, such consent. Nor did Google procure the "lawful consent" of the websites  
5 to which Plaintiffs and Class Members directed and exchanged communications.

6 362. Similarly, the agreements that Google enters with publishers using Google's RTB  
7 process to fill ad space echo the promises Google makes to Account Holders. Google promises the  
8 website publishers that fill advertising space through Google RTB that Google's use of information  
9 will be "in accordance with Google's privacy policy" – the same privacy policy detailed above that  
10 expressly promises not to sell or share Account Holder information. Publishers who sign up for  
11 Google RTB must do so through the Google Ad Manager. At the end of the initial sign-up process,  
12 the publisher is promised, "Google's use of your information will be in accordance with Google's  
13 privacy policy." The privacy policy referenced is the same Privacy Policy that pertains to Account  
14 Holders, promising, as set forth above, that Google will not share or sell Account Holder personal  
15 information.

16 363. Likewise, the Google API Terms of Service promise, "By using our APIs, Google  
17 may use submitted information in accordance with our privacy policy." Again, the privacy policy  
18 referenced is the same Privacy Policy that pertains to Account Holders, promising, as set forth  
19 above, that Google will not share or sell Account Holder personal information.

20 364. Moreover, ECPA also contains an exception to the exception for single party  
21 consent. Under 18 U.S.C. § 2511(2)(d), an interception is unlawful and actionable even "where one  
22 of the parties to the communication has given prior consent to such interception" if the  
23 communication was "intercepted for the purpose of committing any criminal or tortious act in  
24 violation of the Constitution or laws of the United States or of any State."

25 365. As alleged throughout, Google's redirection, sale, and sharing of Plaintiffs' and  
26 Class Members' personal information and the contents of their Internet communications had the  
27 requisite criminal or tortious purpose for Plaintiffs' and Class Members' claims for intrusion upon  
28 seclusion; publication of private facts; tortious violation of Art. I, sec. 1 of the California

1 Constitution; breach of confidence; violation of the California UCL, Cal. Bus. & Prof. Code §  
2 17200; the California Invasion of Privacy Act, Cal. Penal Code § 630; the California Computer  
3 Data Access and Fraud Act, Cal. Penal Code § 502; California Statutory Larceny, Cal. Penal Code  
4 §§ 484 and 496; the Electronic Communications Privacy Act, 18 U.S.C. §2511; and the Video  
5 Privacy Protection Act, 18 U.S.C. § 2710.

6 366. For the violations set forth above, Plaintiffs and Class Members seek appropriate  
7 preliminary and other equitable or declaratory relief; the appropriate statutory measure of damages;  
8 punitive damages in an amount to be determined by a jury; and a reasonable attorney’s fee and  
9 other litigation costs reasonably incurred. 18 U.S.C § 2520.

10 **COUNT TEN: VIOLATION OF THE ECPA WIRETAP ACT – UNAUTHORIZED**  
11 **DISCLOSURE OF ELECTRONIC COMMUNICATIONS BY AN ECS**

12 ***Subclass: All Google Account Holders Who Use the Google Chrome Browser***

13 367. Plaintiffs incorporate all preceding paragraphs as though set forth herein.

14 368. Plaintiffs are Account Holders who also use the Google Chrome web browser.

15 369. This count is brought on behalf of a subclass of all Google Account Holders who  
16 use the Google Chrome web browser.

17 370. The ECPA Wiretap statute provides that “a person or entity providing an electronic  
18 communication service to the public shall not intentionally divulge the contents of any  
19 communication (other than one to such person or entity, or an agent thereof) while in transmission  
20 on that service to any person or entity other than an addressee or intended recipient of such  
21 communication or an agent of such addressee or intended recipient.” 18 U.S.C. § 2511(3)(a).

22 371. Electronic Communication Service. An “electronic communication service” is  
23 defined as “any service which provides to users thereof the ability to send or receive wire or  
24 electronic communications.” 18 U.S.C. § 2510(15).

25 372. The Google Chrome web browser is an electronic communication service. It  
26 provides to users thereof the ability to send or receive electronic communications. In the absence  
27 of a web browser or some other such system, Internet users could not send or receive  
28 communications over the Internet.



1           373. Intentional Divulgence. Google intentionally designed the Chrome web browser so  
2 that it would divulge the contents of Plaintiffs’ and Subclass Members’ communications with non-  
3 Google websites to hundreds of Google RTB participants.

4           374. While in Transmission. Google Chrome’s divulgence of the contents of Plaintiffs’  
5 and Class Members’ communications was contemporaneous with their exchange with the websites  
6 to which they directed their communications. As described above, the Google RTB process occurs  
7 in milliseconds while the communication is still being exchanged between Plaintiffs and Class  
8 Members and the websites to which they directed their communications. That is why Google itself  
9 refers to the process as “Real-Time Bidding.” The signal sent out to Google RTB is sent  
10 simultaneously with the signal sent to the websites to which Plaintiffs’ and Class Members’  
11 communications were directed.

12           375. Google Chrome is not a party to Plaintiffs’ and Class Members’ electronic  
13 communications exchanged with the non-Google websites to which Plaintiffs and Class Members  
14 directed their communications.

15           376. Google Chrome divulged the contents of Plaintiffs’ and Class members’ electronic  
16 communications with the non-Google websites to which their communications were directed  
17 through the surreptitious duplication, forwarding, and re-direction of those communications to  
18 Google. The divulgence of the contents of Plaintiffs’ and Class Members’ communications was  
19 without authorization. Google Chrome divulged the contents of Plaintiffs’ and Class Members’  
20 communications to hundreds of Google RTB participants, entities other than the intended recipient  
21 of such communication, while Plaintiffs’ and Class Members’ communications were being  
22 transmitted on Google Chrome.

23           377. Exceptions Do Not Apply. In addition to the exception for communications directly  
24 to an ECS or an agent of an ECS, the Wiretap Act states that “[a] person or entity providing  
25 electronic communication service to the public may divulge the contents of any such  
26 communication”:

27           a. “as otherwise authorized in section 2511(2)(a) or 2517 of this title;”  
28

- b. “with the lawful consent of the originator or any addressee or intended recipient of such communication;”
- c. “to a person employed or authorized, or whose facilities are used, to forward such communication to its destination;” or
- d. “which were inadvertently obtained by the service provider and which appear to pertain to the commission of a crime, if such divulgence is made to a law enforcement agency.”

18 U.S.C. § 2511(3)(b).

378. Section 2511(2)(a)(i) provides:

It shall not be unlawful under this chapter for an operator of a switchboard, or an officer, employee, or agent of a provider of wire or electronic communication service, whose facilities are used in the transmission of a wire or electronic communication, to intercept, disclose, or use that communication in the normal course of his employment while engaged in any activity which is a necessary incident to the rendition of his service or to the protection of the rights or property of the provider of that service, except that a provider of wire communication service to the public shall not utilize service observing or random monitoring except for mechanical or service quality control checks.

379. Google’s divulgence of the contents of Plaintiffs’ and Class Members’ communications on the Chrome browser to hundreds of Google RTB participants was not authorized by 18 U.S.C. § 2511(2)(a) in that it was neither a necessary incident to the rendition of the Chrome service nor necessary to the protection of the rights or property of Google.

380. Section 2517 of the ECPA relates to investigations by government officials and has no relevance here.

381. Google’s divulgences of the contents of Plaintiffs’ and Class Members’ communications on the Chrome browser to hundreds of Google RTB participants was not done “with the lawful consent of the originator or any addressee or intended recipient of such communication[s].” As alleged above, Plaintiffs and Class Members, including members of the Subclass, did not authorize Google to divulge the contents of their communications to hundreds of Google RTB participants. Nor did Google procure the “lawful consent” of the websites to which Plaintiffs and Subclass Members directed and exchanged communications.

1 382. The other companies to which Google sold, shared, and divulged Plaintiffs’ and  
2 Subclass Members’ content of communications were not “person[s] employed or authorized, or  
3 whose facilities are used, to forward such communication[s] to [their] destination.”

4 383. The contents of Plaintiffs’ and the Subclass Members’ communications did not  
5 appear to pertain to the commission of a crime, and Google Chrome did not divulge the contents of  
6 their communications to a law enforcement agency.

7 384. Plaintiffs and the Subclass Members seek appropriate preliminary and other  
8 equitable or declaratory relief; the appropriate statutory measure of damages; punitive damages in  
9 an amount to be determined by a jury; and a reasonable attorney’s fee and other litigation costs  
10 reasonably incurred. 18 U.S.C. § 2520.

11 **COUNT ELEVEN: VIOLATION OF THE ECPA STORED COMMUNICATIONS ACT –**  
12 **UNAUTHORIZED DISCLOSURE OF ELECTRONIC COMMUNICATIONS BY AN ECS**  
13 ***On Behalf of a Subclass Comprising All Google Account Holders Who Use Google Chrome***

14 385. Plaintiffs incorporate all preceding paragraphs as though set forth herein.

15 386. This count is brought on behalf of a subclass of all Google Account Holders who  
16 use the Google Chrome web browser.

17 387. The ECPA provides that “a person or entity providing an electronic communication  
18 service to the public shall not knowingly divulge to any person or entity the contents of a  
19 communication while in electronic storage by that service.” 18 U.S.C. § 2702(a)(1).

20 388. Electronic Communication Service. ECPA defines “electronic communications  
21 service” as “any service which provides to users thereof the ability to send or receive wire or  
22 electronic communications.” 18 U.S.C. § 2510(15).

23 389. The Google Chrome browser is an ECS.

24 390. Electronic Storage. ECPA defines “electronic storage” as “any temporary,  
25 intermediate storage of a wire or electronic communication incidental to the electronic transmission  
26 thereof” and “any storage of such communication by an electronic communication service for  
27 purposes of backup protection of such communication.” 18 U.S.C. § 2510(17).  
28

1 391. Google stores Plaintiffs’ and Subclass Members’ personal information and the  
2 contents of their communications in the Chrome browser and files associated with it.

3 392. Specifically, Google stores the content of Plaintiffs’ and Subclass Members’  
4 Internet communications within the Chrome browser in two ways:

- 5 a. For purposes of backup protection so that if the browser inadvertently shuts  
6 down, Plaintiffs’ and Subclass Members’ can be presented with the option  
7 to restore their previous communications; and  
8 b. For a temporary and intermediate amount of time incidental to the electronic  
9 transmission thereof when it places the contents of user communications into  
10 the browser’s web-browsing history, which is only kept on the browser for  
11 90 days.

12 393. When a Google Account Holder clicks a button or hits ENTER to exchange a  
13 communication with the website the Account Holder is interacting with while using the Chrome  
14 browser, the content of the communication is immediately placed into storage within the Chrome  
15 browser.

16 394. Google knowingly divulges the contents of Plaintiffs’ and Subclass’ members  
17 communications to hundreds of different companies through the Google RTB process while such  
18 communications are in electronic storage.

19 395. Exceptions Do Not Apply. Section 2702(b) of the Stored Communications Act  
20 provides that an electronic communication service provider “may divulge the contents of a  
21 communication—”

- 22 a. “to an addressee or intended recipient of such communication or an agent of  
23 such addressee or intended recipient;”  
24 b. “as otherwise authorized in section 2517, 2511(2)(a), or 2703 of this title;”  
25 c. “with the lawful consent of the originator or an addressee or intended  
26 recipient of such communication, or the subscriber in the case of remote  
27 computing service;”  
28 d. “to a person employed or authorized or whose facilities are used to forward  
such communication to its destination;”  
e. “as may be necessarily incident to the rendition of the service or to the  
protection of the rights or property of the provider of that service”;  
f. “to the National Center for Missing and Exploited Children, in connection  
with a reported submitted thereto under section 2258A;”

- 1           g.       “to law enforcement agency, if the contents (i) were inadvertently obtained  
2           by the service provider; and (ii) appear to pertain to the commission of a  
3           crime;”
- 4           h.       “to a governmental entity, if the provider, in good faith, believes that an  
5           emergency involving danger of death or serious physical injury to any person  
6           requires disclosure without delay of communications relating to the  
7           emergency;” or
- 8           i.       “to a foreign government pursuant to an order from a foreign government  
9           that is subject to an executive agreement that the Attorney General has  
10          determined and certified to Congress satisfies section 2523.”

11           396.    The hundreds of other companies to which Google divulges the content of Plaintiffs’  
12          and Subclass Members’ communications while stored in Chrome are not “addressees,” “intended  
13          recipients,” or “agents” of any such addressees or intended recipients of the Plaintiffs’ and Subclass  
14          members’ communications.

15           397.    Sections 2517 and 2703 of the ECPA relate to investigations by government officials  
16          and have no relevance here.

17           398.    Section 2511(2)(a)(i) provides:

18                   It shall not be unlawful under this chapter for an operator of a  
19                   switchboard, or an officer, employee, or agent of a provider of wire  
20                   or electronic communication service, whose facilities are used in the  
21                   transmission of a wire or electronic communication, to intercept,  
22                   disclose, or use that communication in the normal course of his  
23                   employment while engaged in any activity which is a necessary  
24                   incident to the rendition of his service or to the protection of the  
25                   rights or property of the provider of that service, except that a  
26                   provider of wire communication service to the public shall not  
27                   utilize service observing or random monitoring except for  
28                   mechanical or service quality control checks.

29           399.    Google’s divulgence of the contents of user communications on the Chrome browser  
30          to hundreds of other companies through the Google RTB process was not authorized by 18 U.S.C.  
31          § 2511(2)(a)(i) in that it was neither:

- 32           a.       A necessary incident to the rendition of the Chrome service; nor
- 33           b.       Necessary to the protection of the rights or property of Google.

1 400. Google’s divulgence of the contents of user communications on the Chrome browser  
2 through the Google RTB process was not done “with the lawful consent of the originator or any  
3 addressee or intended recipient of such communication[s].”

4 401. As alleged above:

- 5 a. Plaintiffs and Google Account Holders, including members of the Subclass,  
6 did not authorize Google to divulge the contents of their communications to  
7 hundreds of other companies.  
8 b. Google did not procure the “lawful consent” from the websites or apps with  
9 which Plaintiffs and Subclass Members’ were exchanging communications.

10 402. The hundreds of other companies to which Google divulges the content of Plaintiffs’  
11 and Subclass Members’ communications while in Chrome storage through the RTB process are not  
12 “person[s] employed or whose facilities are used to forward such communication to its destination.”

13 403. Google’s divulgences in the RTB system were not to governmental entities.

14 404. As a result of the above actions and pursuant to 18 U.S.C. § 2520, the Court may  
15 assess statutory damages; preliminary and other equitable or declaratory relief as may be  
16 appropriate; punitive damages in an amount to be determined by a jury; and a reasonable attorney’s  
17 fee and other litigation costs reasonably incurred.

18 **COUNT TWELVE: VIOLATION OF THE VIDEO PRIVACY PROTECTION ACT**

19 ***On Behalf of a Subclass Comprising All Google Account Holders Who Use Google Chrome,  
20 Android Operating System, or Apps that Incorporate the Google Software Development Kit  
21 (SDK)***

22 405. Plaintiffs incorporate all preceding paragraphs as though set forth herein.

23 406. The Video Privacy Protection Act, 18 U.S.C. § 2710 (“VPPA”) provides that “a  
24 video tape service provider” shall not “knowingly disclose[], to any person, personally identifiable  
25 information concerning any consumer of such provider” without informed written consent and not  
26 incident to the ordinary course of business. 18 U.S.C. § 2710(b)(1).

27 407. Video Tape Service Provider. Under the VPPA, a “video tape service provider”  
28 (“VTSP”) is “any person, engaged in the business, in or affecting interstate or foreign commerce,  
of rental, sale, or delivery of prerecorded video cassette tapes or similar audio visual materials, or  
any person or other entity to whom a disclosure is made under subparagraph (D) or (E) of subsection



1 (b)(2), but only with respect to the information contained in the disclosure.” Under subparagraph  
2 (E) of subsection (b)(2), a VTSP is extended to include any person who obtains information  
3 “incident to the ordinary course of business of” the VTSP. As used in the VPPA, “‘ordinary course  
4 of business’ means only debt collection activities, order fulfillment, request processing, and transfer  
5 of ownership.”

6 408. Google is a VTSP through its Chrome browser, Android operating system, and  
7 Google SDK that it provides to app developers:

- 8 a. Google Chrome, which establishes a supporting ecosystem to seamlessly  
9 deliver video content to consumers, is engaged in the delivery of audio visual  
10 materials similar to prerecorded video cassette tapes by providing software  
11 through which audio visual materials are requested or obtained by Plaintiffs  
12 and Subclass Members from various first-party websites accessed via the  
13 Chrome browser.
- 14 b. Google Android, which establishes a supporting ecosystem to seamlessly  
15 deliver video content to consumers, is engaged in the delivery of audio visual  
16 materials similar to prerecorded video cassette tapes by providing software  
17 through which audio visual materials are requested or obtained by Plaintiffs  
18 and Subclass Members at various first-party websites accessed via a mobile  
19 device running the Android operating system.
- 20 c. The Google SDK, which establishes a supporting ecosystem to seamlessly  
21 enable companies such as ESPN and Brid.tv, a provider of enterprise  
22 solutions for managing and monetizing customers’ video that is also a  
23 Google Ad Manager certified external vendor, to deliver video content to  
24 consumers, is engaged in the delivery of audio visual materials similar to  
25 prerecorded video cassette tapes by providing software through which audio  
26 visual materials are requested or obtained by Plaintiffs and Subclass  
27 Members at various first-party websites that make use of the Google SDK to  
28 provide such audio visual materials.
- 29 d. Google Chrome, Android, and the Google SDK each also qualify as VTSPs  
30 through 18 U.S.C. § 2710(b)(2)(E) because they are Google services that aid  
31 VTSPs in order fulfillment and request processing.

32 409. Personally Identifiable Information. Under the VPPA, “‘personally identifiable  
33 information’ includes information which identifies a person as having requested or obtained  
34 specific video materials or services from a” VTSP. 18 U.S.C. § 2710(a)(3).

35 410. The VPPA definition of “personally identifiable information” is purposefully broad  
36 and open-ended. The VPPA “prohibits ... [the disclosure of] ‘personally identifiable information’ –  
37 information that links the customer or patron to particular materials or services.” S. Rep. No. 100-  
38

1 599 at \*7. “Unlike the other definitions [in the VPPA], paragraph (a)(3) uses the word ‘includes’  
 2 to establish a minimum, but not exclusive, definition of personally identifiable information.” S.  
 3 Rep. No. 100-599 at \*12. The Act was passed in 1988 following publication of “a profile of Judge  
 4 Robert H. Bork based on the titles of 146 files *his family had rented* from a video store.” S. Rep.  
 5 100-599 at 6 (emphasis added).

6 411. Google knowingly discloses personally identifiable information about Plaintiffs’  
 7 and Subclass Members’ requests, acquisitions, and viewing records of specific video materials and  
 8 services.

9 412. The Google RTB developer documentation for Bid Requests states that it discloses  
 10 the following information about Plaintiffs and Subclass Members to hundreds of different  
 11 companies, including regarding the audio-visual materials they access through Google Chrome,  
 12 Android, and Google SDK:

<b>COMMUNICATIONS CONTENT</b>	
cat	Array of IAB content categories of the site or app.
sectioncat	Array of IAB content categories that describe current section of site or app.
pagecat	Array of IAB content categories that describe current site or app page or view.
page	URL of the page where the impression will be shown.
ref	Referrer URL that caused navigation to the current page.
publisher	Details about the Publisher object of the site or app.
content	Details about the Content within the site or app.
keywords	Comma-separated list of keywords about this site or app.
content id	ID uniquely identifying the content.
episode	Content episode number (typically applies to video content).
title	Content title. Video examples: “Search Committee” (television); “A New Hope (movie); or “Endgame” (made for web). Non-video example: “Why an Antarctic Glacier is Melting So Quickly” (Time magazine article).
series	Content series. Video examples: “The Office” (television); “Star Wars” (movie); or “Arby ‘N’ The Chief (made for web). Non-video example: (“Ecocentric”) (Time magazine blog).
<b>DEVICE</b>	
dnt	Standard ‘Do Not Track’ flag as set in the header by the browser.
ua	Browser user-agent string.
ip	IPv4 address closest to device.
geo	Location of the device assumed to be the user’s current location defined by a Geo object.
didsha1	Hardware device ID.
dpidsha1	Platform device ID (e.g. Android ID).
ipv6	IPv6 address closest to device.
carrier	Carrier or ISP, using exchange curated string names which should be published to bidders a priori.
make	Device make (e.g. Apple).
model	Device model (e.g. iPhone).

os	Device operating system (e.g. iOS).
osv	Device operating system version.
hvw	Hardware version of the device (e.g. '5S' for iPhone 5S).
devicetype	The general type of device.
ifa	ID sanctioned for advertiser use in the clear.
macsha1	MAC address of the device.
<b>GEO-LOCATION</b>	
lat	Latitude from -90.0 to 90.0, where negative is south.
lon	Longitude from -180.0 to 180.0 where negative is west.
country	Country.
region	Region.
metro	Google metro code; similar to but not exactly Nielsen DMAs.
city	City using United Nations Code for Trade & Transport.
zip	Zip/postal code.
type	Source of location data.
accuracy	Estimated location accuracy.
lastfix	Number of seconds since this geolocation fix was established.
<b>USER</b>	
Id	Exchange-specific id for the user.
Buyerid	Buyer-specific ID as mapped by the exchange for the buyer.
Gender	Gender as 'M' male, 'F' female, 'O' other.
Keywords	Comma-separated list of keywords, interests, or intent.
Customdata	Optional feature to pass bidder data set in the exchange's cookie.
Geo	Location of the user's home based defined by a Geo object. This is not necessarily their current location.
Data	Values for this field are now redacted. Segment.id references the exchange-detected vertical of the page. Segment.value corresponds to the weight of that detected vertical, a higher weight suggesting the page is more relevant for the detected vertical.

<b>"INFORMATION THAT WE KNOW ABOUT THE USER"</b>		
2	IP address	The first 3 bytes of IPv4 or first 6 bytes for IPv6.
3	Special Treatment	Reasons for special treatment of user data. For example, if the "current request should be treated as child-directed for purposes of the Children's Online Privacy Protection Act."
4	Google ID	"The Google ID for the user. ... This field may be the same as the Google ID returned by the cookie matching service."
5	Google ID Version	"The version number of the google_user_id. We may sometimes change the mapping from cookie to google user id."
6	Google ID Age	"The time in seconds since the google user id was created."
7	Match Data	"Match data stored for this google_user_id through the cookie matching service. If a match exists, then this field holds the decoded data that was passed in the google_lm parameter."
8	User-Agent	"A string that identifies the browser and type of device that sent the request."
9	FLoC	"The value of a cohort ID – a string identifier that is common to a large cohort of users with similar browsing habits. ... Experimental feature: may be subject to change."
10	User Agent Info.	"This will be populated with information about the user agent, extracted from the User-Agent header."
11	Publisher location	The billing address country of the publisher.
12	End-user location	The user's approximate geographic location.
13	Zip code	Detected postal code of the user.

14	Hyper-local	A hyperlocal targeting location when available.
15	User verticals	“List of detected user verticals. Currently unused. This field is not populated by default. We recommend that bidders instead store and look up list ids using either google_user_id or hosted-match-data as keys.”
16	User-list	The user list id.
<b>INFORMATION FOR “AD QUERIES COMING FROM MOBILE DEVICES”</b>		
41	Mobile App	The identifier of the mobile app or mobile webpage. “If the app was downloaded from the Apple iTunes app store, then this is the app-store id, e.g. 343200656. For Android devices, this is the fully qualified package name, e.g. com.rovio.angrybirds. For Windows devices, it’s the App ID, e.g. f15abcde-f6gh-47i0-j3k8-37193817mn3o. For SDK-less requests (mostly from connected TVs), the app ID provided by the publisher directly in the request.”
45	Advertising IDs	This field is used for advertising identifiers for: <ol style="list-style-type: none"> <li>1) iOS devices (This is called Identifier for Advertising or IDFA, as described at <a href="https://support.google.com/authorizedbuyers/answer/3221407">https://support.google.com/authorizedbuyers/answer/3221407</a>)</li> <li>2) Android devices;</li> <li>3) Roku devices;</li> <li>4) Microsoft Xbox devices;</li> <li>5) Amazon devices (i.e. Amazon Fire)</li> </ol>
46	App Name	App names for Android by Google Play and for iOS by App Annie.
<b>VIDEO INFORMATION</b>		
50	Placement	Where the ad is placed.
51	URL	The URL of the page that the publisher gives Google to describe the video content, with parameters removed.
52	Playback Method	How the video ad will be played.
53	Clickable	Describes whether the video ad is clickable.
54	Start-Delay	The time in milliseconds from the start of the video when the ad will be displayed.
55	Ad Duration	The minimum and maximum ad durations.
56	Skippable	Whether the publisher allows users to skip the ad.
57	Protocols	Supported video protocols.
58	File formats	Supported video file formats.
59	Companion Ads	Information about companion ad slots shown with the video.
60	Size	Height and width for the video ad.
61	Video title	The video title.
62	Video keywords	A list of keywords describing the video, extracted from the content management system of the video publisher.

413. Many of the companies to which Google knowingly discloses Plaintiffs’ and Class Members’ video purchases and viewing habits already maintain their own databases of identifiers for Plaintiffs and Class Members. For example, Google and Facebook have reached a deal worth at least \$500 million annually associated with Facebook’s use of Google RTB. Google knows that Google Chrome, Android, and Google SDK provide enough personally identifying information to Facebook to allow it to identify the individual Account Holder. Other companies to which Google discloses Plaintiffs’ and Class Members’ video purchases and viewing habits are able to identify



1 the individual Account Holder because Google provides a cookie-match system that it knows  
2 enables them to match the disclosed Google IDs to their own proprietary IDs for Plaintiffs and  
3 Class Members.

4 414. In addition, the identifiers Google discloses to the Google RTB participants are  
5 readily capable of being used by those companies to identify specific users even in the absence of  
6 a pre-existing database possessed by the recipient of Google's disclosures. For example, *The New*  
7 *York Times* investigation detailed above used the same type of data disclosed on Google RTB to  
8 identify specific people who participated in the assault on the United States Capitol on January 6,  
9 2021.

10 415. Exceptions Do Not Apply. Certain types of disclosures are permitted under the  
11 VPPA. Establishing the existence of such circumstances is an affirmative defense. Regardless,  
12 none exists here.

13 416. Google did not receive sufficient informed, written consent from Plaintiffs and Class  
14 Members to permit disclosure. 18 U.S.C. § 2710(b)(2)(B).

15 417. Disclosure was not made to law enforcement pursuant to a warrant, grand jury  
16 subpoena, or court order. 18 U.S.C. § 2710(b)(2)(C); *see* 18 U.S.C. § 2710(b)(2)(F) (permitting  
17 disclosure pursuant to a court order, in a civil proceeding, upon a showing of compelling need for  
18 the information that cannot be accommodated by other means, where the consumer is given  
19 reasonable notice of the court proceeding and afforded the opportunity to appear and contest the  
20 claim of the person seeking disclosure).

21 418. Disclosure was not solely of the names and addresses of Plaintiffs and Class  
22 Members where they were provided a clear and conspicuous opportunity to prohibit the disclosure  
23 and the disclosure did not disclose the title, description, or subject matter of any audio visual  
24 material. 18 U.S.C. § 2710(b)(2)(D).<sup>75</sup>

25  
26 \_\_\_\_\_  
27 <sup>75</sup> While the subject matter may be disclosed for the exclusive use of marketing goods and services  
28 directly to the consumer, such disclosure remains conditioned on the consumer's clear and  
conspicuous opportunity to prohibit such disclosure. *Id.* That opportunity was not made available  
to Plaintiffs and Class Members here.

1           419. Disclosure was not incident to the ordinary course of business for Google Chrome,  
2 Android, or Google SDK. 18 U.S.C. § 2710(b)(2)(E).

3           420. For Google’s VPPA violations, the Subclass who uses Google Chrome, the Android  
4 mobile operating system, or apps that incorporate the Google SDK seeks actual damages but no  
5 less than liquidated damages in an amount of \$2,500; punitive damages; reasonable attorneys’ fees  
6 and other litigation costs reasonably incurred; and such other preliminary and equitable relief as  
7 the court determines to be appropriate. 18 U.S.C. § 2710(c).

8 **VII. PRAYER FOR RELIEF**

9 WHEREFORE, Plaintiffs respectfully request that this Court:

10           A. Certify this action as a class action pursuant to Rule 23 of the Federal Rules of Civil  
11 Procedure;

12           B. Award compensatory damages, including statutory damages where available, to  
13 Plaintiffs and the Class against Defendant for all damages sustained as a result of Defendant’s  
14 wrongdoing, in an amount to be proven at trial, including interest thereon;

15           C. Award Plaintiffs and the Class the measure of unjust enrichment enjoyed by  
16 Defendant as a result of its violations identified herein, in an amount to be proven at trial, including  
17 interest thereon;

18           D. Award Plaintiffs and the Class punitive damages pursuant to Cal. Civ. Code  
19 § 3294(a), as Google acted with oppression, fraud, or malice;

20           E. Award Plaintiffs declaratory relief in the form of an order finding the following,  
21 along with all other forms of declaratory relief the Court finds appropriate:

- 22           a. Google breached the contractual rights of its users;
- 23           b. Google’s actions violated the duty of good faith and fair dealing;
- 24           c. Google’s actions violated California’s Unfair Competition Law;
- 25           d. Google’s actions violated Art. 1, § 1 of the California Constitution, Right to  
26 Privacy;
- 27           e. Google’s actions constitute an intrusion upon seclusion;
- 28           f. Google’s actions constitute publication of private information;



- g. Google’s actions violated the duty of confidence;
- h. Google’s actions violated California’s Invasion of Privacy Act;
- i. Google’s actions violated the Electronic Communications Privacy Act;
- j. Google’s actions violated the Video Privacy Protection Act;
- k. Plaintiffs have suffered privacy harm; and
- l. Plaintiffs have suffered economic harm.

E. Permanently enjoin Google, its officers, agents, servants, employees, and attorneys, from sharing or selling any existing Google account holder’s personal information without express authorization for the sale of such information;

D. Award Plaintiffs and the Class their reasonable costs and expenses incurred in this action, including counsel fees and expert fees; and

E. Grant Plaintiffs such further relief as the Court deems appropriate.

**VIII. JURY TRIAL DEMAND**

The Plaintiffs demand a trial by jury of all issues so triable.

Dated: March 26, 2021

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24 *Attorneys for Plaintiffs*

25  
26  
27  
28



# **EXHIBIT 1**

**EXHIBIT 1**  
**Documents Constituting the Relevant Contract from**  
**June 28, 2016 to Present (current as of March 26, 2021)**

Time Period	Google general Terms of Service	How our business works	Google Privacy Policy
June 28, 2016 To Aug. 28, 2016	Google Terms of Service dated April 14, 2014 (EXHIBIT 2)		Google Privacy Policy dated June 28, 2016 (EXHIBIT 6)
Aug. 29, 2016 To Feb. 28, 2017			Google Privacy Policy dated Aug. 29, 2016 (EXHIBIT 7)
March 1, 2017 To April 16, 2017			Google Privacy Policy dated March 1, 2017 (EXHIBIT 8)
April 17, 2017 To Oct. 1, 2017			Google Privacy Policy dated April 17, 2017 (EXHIBIT 9)
Oct. 2, 2017 To Oct. 24, 2017			Google Privacy Policy dated Oct. 2, 2017 (EXHIBIT 10)
Oct. 25, 2017			

Time Period	Google general Terms of Service	How our business works	Google Privacy Policy
To Dec. 17, 2017	Google Terms of Service dated Oct. 25, 2017 (EXHIBIT 3)		
Dec. 18, 2017 To May 24, 2018			Google Privacy Policy dated Dec. 18, 2017 (EXHIBIT 11)
May 25, 2018 To Jan. 21, 2019			Google Privacy Policy dated May 25, 2018 (EXHIBIT 12)
Jan. 22, 2019 To Oct. 14, 2019			Google Privacy Policy dated Jan. 22, 2019 (EXHIBIT 13)



<b>Time Period</b>	<b>Google general Terms of Service</b>	<b>How our business works</b>	<b>Google Privacy Policy</b>
Oct. 15, 2019 To Dec. 18, 2019			Google Privacy Policy dated Oct. 15, 2019 (EXHIBIT 14)
Dec. 19, 2019 To March 30, 2020			Google Privacy Policy dated Dec. 19, 2019 (EXHIBIT 15)
March 31, 2020 To March 26, 2021	Google Terms of Service dated March 31, 2020 (EXHIBIT 4)	How our business works (EXHIBIT 5)	Google Privacy Policy excluded from contract as of March 31, 2020

# **EXHIBIT 2**

## GOOGLE TERMS OF SERVICE

Last modified: April 14, 2014 ([view archived versions](#))

# Welcome to Google!

Thanks for using our products and services (“Services”). The Services are provided by Google Inc. (“Google”), located at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States.

By using our Services, you are agreeing to these terms. Please read them carefully.

Our Services are very diverse, so sometimes additional terms or product requirements (including age requirements) may apply. Additional terms will be available with the relevant Services, and those additional terms become part of your agreement with us if you use those Services.

## Using our Services

You must follow any policies made available to you within the Services.

Don’t misuse our Services. For example, don’t interfere with our Services or try to access them using a method other than the interface and the instructions that we provide. You may use our Services only as permitted by law, including applicable export and re-export control laws and regulations. We may suspend or stop providing our Services to you if you do not comply with our terms or policies or if we are investigating suspected misconduct.

Using our Services does not give you ownership of any intellectual property rights in our Services or the content you access. You may not use content from our Services unless you obtain permission from its owner or are otherwise permitted by law. These terms do not grant you the right to use any branding or logos used in our Services. Don’t remove, obscure, or alter any legal notices displayed in or along with our Services.

Our Services display some content that is not Google’s. This content is the sole responsibility of the entity that makes it available. We may review content to determine whether it is illegal or violates our policies, and we may

remove or refuse to display content that we reasonably believe violates our policies or the law. But that does not necessarily mean that we review content, so please don't assume that we do.

In connection with your use of the Services, we may send you service announcements, administrative messages, and other information. You may opt out of some of those communications.

Some of our Services are available on mobile devices. Do not use such Services in a way that distracts you and prevents you from obeying traffic or safety laws.

## Your Google Account

You may need a Google Account in order to use some of our Services. You may create your own Google Account, or your Google Account may be assigned to you by an administrator, such as your employer or educational institution. If you are using a Google Account assigned to you by an administrator, different or additional terms may apply and your administrator may be able to access or disable your account.

To protect your Google Account, keep your password confidential. You are responsible for the activity that happens on or through your Google Account. Try not to reuse your Google Account password on third-party applications. If you learn of any unauthorized use of your password or Google Account, [follow these instructions](#).

## Privacy and Copyright Protection

Google's [privacy policies](#) explain how we treat your personal data and protect your privacy when you use our Services. By using our Services, you agree that Google can use such data in accordance with our privacy policies.

We respond to notices of alleged copyright infringement and terminate accounts of repeat infringers according to the process set out in the U.S. Digital Millennium Copyright Act.

We provide information to help copyright holders manage their intellectual property online. If you think somebody is violating your copyrights and want to notify us, you can find information about submitting notices and Google's policy about responding to notices [in our Help Center](#).

## Your Content in our Services

Some of our Services allow you to upload, submit, store, send or receive content. You retain ownership of any intellectual property rights that you hold in that content. In short, what belongs to you stays yours.

When you upload, submit, store, send or receive content to or through our Services, you give Google (and those we work with) a worldwide license to use, host, store, reproduce, modify, create derivative works (such as those resulting from translations, adaptations or other changes we make so that your content works better with our Services), communicate, publish, publicly perform, publicly display and distribute such content. The rights you grant in this license are for the limited purpose of operating, promoting, and improving our Services, and to develop new ones. This license continues even if you stop using our Services (for example, for a business listing you have added to Google Maps). Some Services may offer you ways to access and remove content that has been provided to that Service. Also, in some of our Services, there are terms or settings that narrow the scope of our use of the content submitted in those Services. Make sure you have the necessary rights to grant us this license for any content that you submit to our Services.

Our automated systems analyze your content (including emails) to provide you personally relevant product features, such as customized search results, tailored advertising, and spam and malware detection. This analysis occurs as the content is sent, received, and when it is stored.

If you have a Google Account, we may display your Profile name, Profile photo, and actions you take on Google or on third-party applications connected to your Google Account (such as +1's, reviews you write and comments you post) in our Services, including displaying in ads and other commercial contexts. We will respect the choices you make to limit sharing or visibility settings in your Google Account. For example, you can choose your settings so your name and photo do not appear in an ad.

You can find more information about how Google uses and stores content in the privacy policy or additional terms for particular Services. If you submit feedback or suggestions about our Services, we may use your feedback or suggestions without obligation to you.

## About Software in our Services

When a Service requires or includes downloadable software, this software may update automatically on your device once a new version or feature is available. Some Services may let you adjust your automatic update

settings.

Google gives you a personal, worldwide, royalty-free, non-assignable and non-exclusive license to use the software provided to you by Google as part of the Services. This license is for the sole purpose of enabling you to use and enjoy the benefit of the Services as provided by Google, in the manner permitted by these terms. You may not copy, modify, distribute, sell, or lease any part of our Services or included software, nor may you reverse engineer or attempt to extract the source code of that software, unless laws prohibit those restrictions or you have our written permission.

Open source software is important to us. Some software used in our Services may be offered under an open source license that we will make available to you. There may be provisions in the open source license that expressly override some of these terms.

## Modifying and Terminating our Services

We are constantly changing and improving our Services. We may add or remove functionalities or features, and we may suspend or stop a Service altogether.

You can stop using our Services at any time, although we'll be sorry to see you go. Google may also stop providing Services to you, or add or create new limits to our Services at any time.

We believe that you own your data and preserving your access to such data is important. If we discontinue a Service, where reasonably possible, we will give you reasonable advance notice and a chance to get information out of that Service.

## Our Warranties and Disclaimers

We provide our Services using a commercially reasonable level of skill and care and we hope that you will enjoy using them. But there are certain things that we don't promise about our Services.

OTHER THAN AS EXPRESSLY SET OUT IN THESE TERMS OR ADDITIONAL TERMS, NEITHER GOOGLE NOR ITS SUPPLIERS OR DISTRIBUTORS MAKE ANY SPECIFIC PROMISES ABOUT THE SERVICES. FOR EXAMPLE, WE DON'T MAKE ANY COMMITMENTS ABOUT THE CONTENT WITHIN THE SERVICES, THE SPECIFIC FUNCTIONS OF THE SERVICES, OR THEIR RELIABILITY, AVAILABILITY, OR ABILITY TO MEET YOUR NEEDS. WE PROVIDE THE SERVICES "AS IS".



SOME JURISDICTIONS PROVIDE FOR CERTAIN WARRANTIES, LIKE THE IMPLIED WARRANTY OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE AND NON-INFRINGEMENT. TO THE EXTENT PERMITTED BY LAW, WE EXCLUDE ALL WARRANTIES.

## Liability for our Services

WHEN PERMITTED BY LAW, GOOGLE, AND GOOGLE'S SUPPLIERS AND DISTRIBUTORS, WILL NOT BE RESPONSIBLE FOR LOST PROFITS, REVENUES, OR DATA, FINANCIAL LOSSES OR INDIRECT, SPECIAL, CONSEQUENTIAL, EXEMPLARY, OR PUNITIVE DAMAGES.

TO THE EXTENT PERMITTED BY LAW, THE TOTAL LIABILITY OF GOOGLE, AND ITS SUPPLIERS AND DISTRIBUTORS, FOR ANY CLAIMS UNDER THESE TERMS, INCLUDING FOR ANY IMPLIED WARRANTIES, IS LIMITED TO THE AMOUNT YOU PAID US TO USE THE SERVICES (OR, IF WE CHOOSE, TO SUPPLYING YOU THE SERVICES AGAIN).

IN ALL CASES, GOOGLE, AND ITS SUPPLIERS AND DISTRIBUTORS, WILL NOT BE LIABLE FOR ANY LOSS OR DAMAGE THAT IS NOT REASONABLY FORESEEABLE.

## Business uses of our Services

If you are using our Services on behalf of a business, that business accepts these terms. It will hold harmless and indemnify Google and its affiliates, officers, agents, and employees from any claim, suit or action arising from or related to the use of the Services or violation of these terms, including any liability or expense arising from claims, losses, damages, suits, judgments, litigation costs and attorneys' fees.

## About these Terms

We may modify these terms or any additional terms that apply to a Service to, for example, reflect changes to the law or changes to our Services. You should look at the terms regularly. We'll post notice of modifications to these terms on this page. We'll post notice of modified additional terms in the applicable Service. Changes will not apply retroactively and will become effective no sooner than fourteen days after they are posted. However, changes addressing new functions for a Service or changes made for legal reasons will be effective

immediately. If you do not agree to the modified terms for a Service, you should discontinue your use of that Service.

If there is a conflict between these terms and the additional terms, the additional terms will control for that conflict.

These terms control the relationship between Google and you. They do not create any third party beneficiary rights.

If you do not comply with these terms, and we don't take action right away, this doesn't mean that we are giving up any rights that we may have (such as taking action in the future).

If it turns out that a particular term is not enforceable, this will not affect any other terms.

The laws of California, U.S.A., excluding California's conflict of laws rules, will apply to any disputes arising out of or relating to these terms or the Services. All claims arising out of or relating to these terms or the Services will be litigated exclusively in the federal or state courts of Santa Clara County, California, USA, and you and Google consent to personal jurisdiction in those courts.

For information about how to contact Google, please visit our [contact page](#).

# **EXHIBIT 3**

## GOOGLE TERMS OF SERVICE

Last modified: October 25, 2017 ([view archived versions](#))

# Welcome to Google!

Thanks for using our products and services (“Services”). The Services are provided by Google LLC (“Google”), located at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States.

By using our Services, you are agreeing to these terms. Please read them carefully.

Our Services are very diverse, so sometimes additional terms or product requirements (including age requirements) may apply. Additional terms will be available with the relevant Services, and those additional terms become part of your agreement with us if you use those Services.

## Using our Services

You must follow any policies made available to you within the Services.

Don’t misuse our Services. For example, don’t interfere with our Services or try to access them using a method other than the interface and the instructions that we provide. You may use our Services only as permitted by law, including applicable export and re-export control laws and regulations. We may suspend or stop providing our Services to you if you do not comply with our terms or policies or if we are investigating suspected misconduct.

Using our Services does not give you ownership of any intellectual property rights in our Services or the content you access. You may not use content from our Services unless you obtain permission from its owner or are otherwise permitted by law. These terms do not grant you the right to use any branding or logos used in our Services. Don’t remove, obscure, or alter any legal notices displayed in or along with our Services.

Our Services display some content that is not Google’s. This content is the sole responsibility of the entity that makes it available. We may review content to determine whether it is illegal or violates our policies, and we may

remove or refuse to display content that we reasonably believe violates our policies or the law. But that does not necessarily mean that we review content, so please don't assume that we do.

In connection with your use of the Services, we may send you service announcements, administrative messages, and other information. You may opt out of some of those communications.

Some of our Services are available on mobile devices. Do not use such Services in a way that distracts you and prevents you from obeying traffic or safety laws.

## Your Google Account

You may need a Google Account in order to use some of our Services. You may create your own Google Account, or your Google Account may be assigned to you by an administrator, such as your employer or educational institution. If you are using a Google Account assigned to you by an administrator, different or additional terms may apply and your administrator may be able to access or disable your account.

To protect your Google Account, keep your password confidential. You are responsible for the activity that happens on or through your Google Account. Try not to reuse your Google Account password on third-party applications. If you learn of any unauthorized use of your password or Google Account, [follow these instructions](#).

## Privacy and Copyright Protection

Google's [privacy policies](#) explain how we treat your personal data and protect your privacy when you use our Services. By using our Services, you agree that Google can use such data in accordance with our privacy policies.

We respond to notices of alleged copyright infringement and terminate accounts of repeat infringers according to the process set out in the U.S. Digital Millennium Copyright Act.

We provide information to help copyright holders manage their intellectual property online. If you think somebody is violating your copyrights and want to notify us, you can find information about submitting notices and Google's policy about responding to notices [in our Help Center](#).

## Your Content in our Services

Some of our Services allow you to upload, submit, store, send or receive content. You retain ownership of any intellectual property rights that you hold in that content. In short, what belongs to you stays yours.

When you upload, submit, store, send or receive content to or through our Services, you give Google (and those we work with) a worldwide license to use, host, store, reproduce, modify, create derivative works (such as those resulting from translations, adaptations or other changes we make so that your content works better with our Services), communicate, publish, publicly perform, publicly display and distribute such content. The rights you grant in this license are for the limited purpose of operating, promoting, and improving our Services, and to develop new ones. This license continues even if you stop using our Services (for example, for a business listing you have added to Google Maps). Some Services may offer you ways to access and remove content that has been provided to that Service. Also, in some of our Services, there are terms or settings that narrow the scope of our use of the content submitted in those Services. Make sure you have the necessary rights to grant us this license for any content that you submit to our Services.

Our automated systems analyze your content (including emails) to provide you personally relevant product features, such as customized search results, tailored advertising, and spam and malware detection. This analysis occurs as the content is sent, received, and when it is stored.

If you have a Google Account, we may display your Profile name, Profile photo, and actions you take on Google or on third-party applications connected to your Google Account (such as +1's, reviews you write and comments you post) in our Services, including displaying in ads and other commercial contexts. We will respect the choices you make to limit sharing or visibility settings in your Google Account. For example, you can choose your settings so your name and photo do not appear in an ad.

You can find more information about how Google uses and stores content in the privacy policy or additional terms for particular Services. If you submit feedback or suggestions about our Services, we may use your feedback or suggestions without obligation to you.

## About Software in our Services

When a Service requires or includes downloadable software, this software may update automatically on your device once a new version or feature is available. Some Services may let you adjust your automatic update

settings.

Google gives you a personal, worldwide, royalty-free, non-assignable and non-exclusive license to use the software provided to you by Google as part of the Services. This license is for the sole purpose of enabling you to use and enjoy the benefit of the Services as provided by Google, in the manner permitted by these terms. You may not copy, modify, distribute, sell, or lease any part of our Services or included software, nor may you reverse engineer or attempt to extract the source code of that software, unless laws prohibit those restrictions or you have our written permission.

Open source software is important to us. Some software used in our Services may be offered under an open source license that we will make available to you. There may be provisions in the open source license that expressly override some of these terms.

## Modifying and Terminating our Services

We are constantly changing and improving our Services. We may add or remove functionalities or features, and we may suspend or stop a Service altogether.

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We believe that you own your data and preserving your access to such data is important. If we discontinue a Service, where reasonably possible, we will give you reasonable advance notice and a chance to get information out of that Service.

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OTHER THAN AS EXPRESSLY SET OUT IN THESE TERMS OR ADDITIONAL TERMS, NEITHER GOOGLE NOR ITS SUPPLIERS OR DISTRIBUTORS MAKE ANY SPECIFIC PROMISES ABOUT THE SERVICES. FOR EXAMPLE, WE DON'T MAKE ANY COMMITMENTS ABOUT THE CONTENT WITHIN THE SERVICES, THE SPECIFIC FUNCTIONS OF THE SERVICES, OR THEIR RELIABILITY, AVAILABILITY, OR ABILITY TO MEET YOUR NEEDS. WE PROVIDE THE SERVICES "AS IS".



SOME JURISDICTIONS PROVIDE FOR CERTAIN WARRANTIES, LIKE THE IMPLIED WARRANTY OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE AND NON-INFRINGEMENT. TO THE EXTENT PERMITTED BY LAW, WE EXCLUDE ALL WARRANTIES.

## Liability for our Services

WHEN PERMITTED BY LAW, GOOGLE, AND GOOGLE'S SUPPLIERS AND DISTRIBUTORS, WILL NOT BE RESPONSIBLE FOR LOST PROFITS, REVENUES, OR DATA, FINANCIAL LOSSES OR INDIRECT, SPECIAL, CONSEQUENTIAL, EXEMPLARY, OR PUNITIVE DAMAGES.

TO THE EXTENT PERMITTED BY LAW, THE TOTAL LIABILITY OF GOOGLE, AND ITS SUPPLIERS AND DISTRIBUTORS, FOR ANY CLAIMS UNDER THESE TERMS, INCLUDING FOR ANY IMPLIED WARRANTIES, IS LIMITED TO THE AMOUNT YOU PAID US TO USE THE SERVICES (OR, IF WE CHOOSE, TO SUPPLYING YOU THE SERVICES AGAIN).

IN ALL CASES, GOOGLE, AND ITS SUPPLIERS AND DISTRIBUTORS, WILL NOT BE LIABLE FOR ANY LOSS OR DAMAGE THAT IS NOT REASONABLY FORESEEABLE.

## Business uses of our Services

If you are using our Services on behalf of a business, that business accepts these terms. It will hold harmless and indemnify Google and its affiliates, officers, agents, and employees from any claim, suit or action arising from or related to the use of the Services or violation of these terms, including any liability or expense arising from claims, losses, damages, suits, judgments, litigation costs and attorneys' fees.

## About these Terms

We may modify these terms or any additional terms that apply to a Service to, for example, reflect changes to the law or changes to our Services. You should look at the terms regularly. We'll post notice of modifications to these terms on this page. We'll post notice of modified additional terms in the applicable Service. Changes will not apply retroactively and will become effective no sooner than fourteen days after they are posted. However, changes addressing new functions for a Service or changes made for legal reasons will be effective

immediately. If you do not agree to the modified terms for a Service, you should discontinue your use of that Service.

If there is a conflict between these terms and the additional terms, the additional terms will control for that conflict.

These terms control the relationship between Google and you. They do not create any third party beneficiary rights.

If you do not comply with these terms, and we don't take action right away, this doesn't mean that we are giving up any rights that we may have (such as taking action in the future).

If it turns out that a particular term is not enforceable, this will not affect any other terms.

The laws of California, U.S.A., excluding California's conflict of laws rules, will apply to any disputes arising out of or relating to these terms or the Services. All claims arising out of or relating to these terms or the Services will be litigated exclusively in the federal or state courts of Santa Clara County, California, USA, and you and Google consent to personal jurisdiction in those courts.

For information about how to contact Google, please visit our [contact page](#).

# **EXHIBIT 4**

## GOOGLE TERMS OF SERVICE

Effective March 31, 2020

[Archived versions](#)

Country version: United States

## What's covered in these terms

We know it's tempting to skip these Terms of Service, but it's important to establish what you can expect from us as you use [Google services](#), and what we expect from you.

These Terms of Service reflect [the way Google's business works](#), the laws that apply to our company, and [certain things we've always believed to be true](#). As a result, these Terms of Service help define Google's relationship with you as you interact with our services. For example, these terms include the following topic headings:

- [What you can expect from us](#), which describes how we provide and develop our services
- [What we expect from you](#), which establishes certain rules for using our services
- [Content in Google services](#), which describes the intellectual property rights to the content you find in our services – whether that content belongs to you, Google, or others
- [In case of problems or disagreements](#), which describes other legal rights you have, and what to expect in case someone violates these terms

Understanding these terms is important because, by using our services, you're agreeing to these terms.

Besides these terms, we also publish a [Privacy Policy](#). Although it's not part of these terms, we encourage you to read it to better understand how you can [update, manage, export, and delete your information](#).

## Service provider

Google [services](#) are provided by, and you're contracting with:

Google LLC

organized under the laws of the State of Delaware, USA, and operating under the laws of the USA

1600 Amphitheatre Parkway

Mountain View, California 94043

USA

## Age requirements

If you're under the [age required to manage your own Google Account](#), you must have your parent or legal guardian's permission to use a Google Account. Please have your parent or legal guardian read these terms with you.

If you're a parent or legal guardian, and you allow your child to use the [services](#), then these terms apply to you and you're responsible for your child's activity on the services.

Some Google services have additional age requirements as described in their [service-specific additional terms and policies](#).

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## Your relationship with Google

These terms help define the relationship between you and Google. Broadly speaking, we give you permission to use our [services](#) if you agree to follow these terms, which reflect [how Google's business works and how we earn money](#). When we speak of "Google," "we," "us," and "our," we mean Google LLC and its [affiliates](#).

## What you can expect from us

### Provide a broad range of useful services

We provide a broad range of services that are subject to these terms, including:

- apps and sites (like Search and Maps)
- platforms (like Google Play)
- integrated services (like Maps embedded in other companies' apps or sites)
- devices (like Google Home)

Our services are designed to work together, making it easier for you to move from one activity to the next. For example, Maps can remind you to leave for an appointment that appears in your Google Calendar.

### Improve Google services

We're constantly developing new technologies and features to improve our services. For example, we invest in artificial intelligence that uses machine learning to detect and block spam and malware, and to provide you with innovative features, like simultaneous translations. As part of this continual improvement, we sometimes add or remove features and functionalities, increase or decrease limits to our services, and start offering new services or stop offering old ones.

If we make material changes that negatively impact your use of our services or if we stop offering a service, we'll provide you with reasonable advance notice and an opportunity to export [your content](#) from your Google Account using [Google Takeout](#), except in urgent situations such as preventing abuse, responding to legal requirements, or addressing security and operability issues.

## What we expect from you

## Follow these terms and service-specific additional terms

The permission we give you to use our [services](#) continues as long as you meet your responsibilities in:

- **these terms**
- **[service-specific additional terms](#)**, which could, for example, include things like additional age requirements

We also make various policies, help centers, and other resources available to you to answer common questions and to set expectations about using our services. These resources include our [Privacy Policy](#), [Copyright Help Center](#), [Safety Center](#), and other pages accessible from our [policies site](#).

Although we give you permission to use our services, we retain any [intellectual property rights](#) we have in the services.

## Respect others

Many of our services allow you to interact with others. We want to maintain a respectful environment for everyone, which means you must follow these basic rules of conduct:

- comply with applicable laws, including export control, sanctions, and human trafficking laws
- respect the rights of others, including privacy and intellectual property rights
- don't abuse or harm others or yourself (or threaten or encourage such abuse or harm) – for example, by misleading, defrauding, defaming, bullying, harassing, or stalking others
- don't abuse, harm, interfere with, or disrupt the services

Our [service-specific additional terms and policies](#) provide additional details about appropriate conduct that everyone using those services must follow. If you find that others aren't following these rules, many of our services allow you to [report abuse](#). If we act on a report of abuse, we also provide a fair process as described in the [Taking action in case of problems](#) section.



## Permission to use your content

Some of our services are designed to let you upload, submit, store, send, receive, or share your content. You have no obligation to provide any content to our services and you're free to choose the content that you want to provide. If you choose to upload or share content, please make sure you have the necessary rights to do so and that the content is lawful.

## License

Your content remains yours, which means that you retain any intellectual property rights that you have in your content. For example, you have intellectual property rights in the creative content you make, such as reviews you write. Or you may have the right to share someone else's creative content if they've given you their permission.

We need your permission if your intellectual property rights restrict our use of your content. You provide Google with that permission through this license.

## What's covered

This license covers your content if that content is protected by intellectual property rights.

## What's not covered

- This license doesn't affect your privacy rights — it's only about your intellectual property rights
- This license doesn't cover these types of content:
  - publicly-available factual information that you provide, such as corrections to the address of a local business. That information doesn't require a license because it's considered common knowledge that everyone's free to use.

- feedback that you offer, such as suggestions to improve our services. Feedback is covered in the [Service-related communications](#) section below.

## Scope

This license is:

- worldwide, which means it's valid anywhere in the world
- non-exclusive, which means you can license your content to others
- royalty-free, which means there are no fees for this license

## Rights

This license allows Google to:

- host, reproduce, distribute, communicate, and use your content – for example, to save your content on our systems and make it accessible from anywhere you go
- publish, publicly perform, or publicly display your content, if you've made it visible to others
- modify and create derivative works based on your content, such as reformatting or translating it
- sublicense these rights to:
  - other users to allow the services to work as designed, such as enabling you to share photos with people you choose
  - our contractors who've signed agreements with us that are consistent with these terms, only for the limited purposes described in the [Purpose](#) section below

## Purpose

This license is for the limited purpose of:

- **operating and improving the services**, which means allowing the services to work as designed and creating new features and functionalities. This includes using automated systems and algorithms to analyze your content:
  - for spam, malware, and illegal content
  - to recognize patterns in data, such as determining when to suggest a new album in Google Photos to keep related photos together
  - to customize our services for you, such as providing recommendations and personalized search results, content, and ads (which you can change or turn off in [Ads Settings](#))

This analysis occurs as the content is sent, received, and when it is stored.

- **using content you've shared publicly to promote the services**. For example, to promote a Google app, we might quote a review you wrote. Or to promote Google Play, we might show a screenshot of the app you offer in the Play Store.
- **developing new technologies and services** for Google consistent with these terms

## Duration

This license lasts for as long as your content is protected by intellectual property rights.

If you remove from our services any content that's covered by this license, then our systems will stop making that content publicly available in a reasonable amount of time. There are two exceptions:

- If you already shared your content with others before removing it. For example, if you shared a photo with a friend who then made a copy of it, or shared it again, then that photo may continue to appear in your friend's Google Account even after you remove it from your Google Account.
- If you make your content available through other companies' services, it's possible that search engines, including Google Search, will continue to find and display your content as part of their search results.

# Using Google services

## Your Google Account

If you meet these [age requirements](#) you can [create a Google Account](#) for your convenience. Some [services](#) require that you have a Google Account in order to work – for example, to use Gmail, you need a Google Account so that you have a place to send and receive your email.

You're responsible for what you do with your Google Account, including taking reasonable steps to keep your Google Account secure, and we encourage you to regularly use the [Security Checkup](#).

## Using Google services on behalf of an organization

Many [organizations](#), such as businesses, non-profits, and schools, take advantage of our [services](#). To use our services on behalf of an organization:

- an authorized representative of that organization must agree to these terms
- your organization's administrator may assign a Google Account to you. That administrator might require you to follow additional rules and may be able to access or disable your Google Account.

## Service-related communications

To provide you with our services, we sometimes send you service announcements and other information. To learn more about how we communicate with you, see Google's [Privacy Policy](#).

If you choose to give us feedback, such as suggestions to improve our services, we may act on your feedback without obligation to you.

# Content in Google services

## Your content

Some of our [services](#) give you the opportunity to make your content publicly available – for example, you might post a product or restaurant review that you wrote, or you might upload a blog post that you created.

- See the [Permission to use your content](#) section for more about your rights in [your content](#), and how your content is used in our services
- See the [Removing your content](#) section to learn why and how we might remove user-generated content from our services

If you think someone is infringing your [intellectual property rights](#), you can [send us notice of the infringement](#) and we'll take appropriate action. For example, we suspend or close the Google Accounts of repeat [copyright](#) infringers as described in our [Copyright Help Center](#).

## Google content

Some of our [services](#) include content that belongs to Google – for example, many of the visual illustrations you see in Google Maps. You may use Google's content as allowed by these terms and any [service-specific additional terms](#), but we retain any intellectual property rights that we have in our content. Don't remove, obscure, or alter any of our branding, logos, or legal notices. If you want to use our branding or logos, please see the [Google Brand Permissions](#) page.

## Other content

Finally, some of our [services](#) give you access to content that belongs to other people or [organizations](#) – for example, a store owner's description of their own business, or a newspaper article displayed in Google News. You may not use this content without that person or organization's permission, or as otherwise allowed by law. The views expressed in other people or organizations' content are theirs, and don't necessarily reflect Google's views.

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## Software in Google services

Some of our [services](#) include downloadable software. We give you permission to use that software as part of the services.

The license we give you is:

- worldwide, which means it's valid anywhere in the world
- non-exclusive, which means that we can license the software to others
- royalty-free, which means there are no fees for this license
- personal, which means it doesn't extend to anyone else
- non-assignable, which means you're not allowed to assign the license to anyone else

Some of our services include software that's offered under open source license terms that we make available to you. Sometimes there are provisions in the open source license that explicitly override parts of these terms, so please be sure to read those licenses.

You may not copy, modify, distribute, sell, or lease any part of our services or software. Also, you may not reverse engineer or attempt to extract any of our source code unless you have our written permission or applicable law lets you do so.

When a service requires or includes downloadable software, that software sometimes updates automatically on your device once a new version or feature is available. Some services let you adjust your automatic update settings.

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## In case of problems or disagreements

By law, you have the right to (1) a certain quality of service, and (2) ways to fix problems if things go wrong. These terms don't limit or take away any of those rights. For example, if you're a [consumer](#), then you continue to enjoy all legal rights granted to consumers under applicable law.

## Warranty

We provide our [services](#) using reasonable skill and care. If we don't meet the quality level described in this [warranty](#), you agree to tell us and we'll work with you to try to resolve the issue.

## Disclaimers

The only commitments we make about our [services](#) (including the content in the services, the specific functions of our services, or their reliability, availability, or ability to meet your needs) are (1) described in the [Warranty](#) section, (2) stated in the [service-specific additional terms](#), or (3) provided under applicable laws. We don't make any other commitments about our services.

And unless required by law, we don't provide implied warranties, such as the implied warranties of merchantability, fitness for a particular purpose, and non-infringement.

## Liabilities

### For all users

These terms only limit our responsibilities as allowed by applicable law. Specifically, these terms don't limit Google's [liability](#) for death or personal injury, fraud, fraudulent misrepresentation, gross negligence, or willful misconduct.

Other than the rights and responsibilities described in this section (In case of problems or disagreements), Google won't be responsible for any other losses, unless they're caused by our breach of these terms or [service-specific additional terms](#).



## For business users and organizations only

If you're a [business user](#) or [organization](#), then to the extent allowed by applicable law:

- You'll [indemnify](#) Google and its directors, officers, employees, and contractors for any third-party legal proceedings (including actions by government authorities) arising out of or relating to your unlawful use of the [services](#) or violation of these terms or [service-specific additional terms](#). This indemnity covers any liability or expense arising from claims, losses, damages, judgments, fines, litigation costs, and legal fees.
- Google won't be responsible for the following liabilities:
  - loss of profits, revenues, business opportunities, goodwill, or anticipated savings
  - indirect or consequential loss
  - punitive damages
- Google's total liability arising out of or relating to these terms is limited to the greater of (1) US\$500 or (2) 125% of the fees that you paid to use the relevant services in the 12 months before the breach

If you're legally exempt from certain responsibilities, including [indemnification](#), then those responsibilities don't apply to you under these terms. For example, the United Nations enjoys certain immunities from legal obligations and these terms don't override those immunities.

## Taking action in case of problems

Before taking action as described below, we'll provide you with advance notice when reasonably possible, describe the reason for our action, and give you an opportunity to fix the problem, unless we reasonably believe that doing so would:

- cause harm or [liability](#) to a user, third party, or Google
- violate the law or a legal enforcement authority's order
- compromise an investigation
- compromise the operation, integrity, or security of our [services](#)

## Removing your content

If we reasonably believe that any of [your content](#) (1) breaches these terms, [service-specific additional terms or policies](#), (2) violates applicable law, or (3) could harm our users, third parties, or Google, then we reserve the right to take down some or all of that content in accordance with applicable law. Examples include child pornography, content that facilitates human trafficking or harassment, and content that infringes someone else's [intellectual property rights](#).

## Suspending or terminating your access to Google services

Google reserves the right to suspend or terminate your access to the services or delete your Google Account if any of these things happen:

- you materially or repeatedly breach these terms, [service-specific additional terms or policies](#)
- we're required to do so to comply with a legal requirement or a court order
- we reasonably believe that your conduct causes harm or [liability](#) to a user, third party, or Google – for example, by hacking, phishing, harassing, spamming, misleading others, or scraping content that doesn't belong to you

If you believe your Google Account has been suspended or terminated in error, [you can appeal](#).

Of course, you're always free to stop using our services at any time. If you do stop using a service, we'd [appreciate knowing why](#) so that we can continue improving our services.

## Settling disputes, governing law, and courts

For information about how to contact Google, please visit our [contact page](#).

California law will govern all disputes arising out of or relating to these terms, [service-specific additional terms](#), or any related [services](#), regardless of conflict of laws rules. These disputes will be resolved exclusively in the federal or state courts of Santa Clara County, California, USA, and you and Google consent to personal jurisdiction in those courts.

To the extent that applicable local law prevents certain disputes from being resolved in a California court, then you can file those disputes in your local courts. Likewise, if applicable local law prevents your local court from applying California law to resolve these disputes, then these disputes will be governed by the applicable local laws of your country, state, or other place of residence.

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## About these terms

By law, you have certain rights that can't be limited by a contract like these terms of service. These terms are in no way intended to restrict those rights.

These terms describe the relationship between you and Google. They don't create any legal rights for other people or organizations, even if others benefit from that relationship under these terms.

We want to make these terms easy to understand, so we've used examples from our services. But not all services mentioned may be available in your country.

If these terms conflict with the [service-specific additional terms](#), the additional terms will govern for that service.

If it turns out that a particular term is not valid or enforceable, this will not affect any other terms.

If you don't follow these terms or the [service-specific additional terms](#), and we don't take action right away, that doesn't mean we're giving up any rights that we may have, such as taking action in the future.

We may update these terms and [service-specific additional terms](#) (1) to reflect changes in our services or how we do business – for example, when we add new services, features, technologies, pricing, or benefits (or remove old ones), (2) for legal, regulatory, or security reasons, or (3) to prevent abuse or harm.

If we materially change these terms or [service-specific additional terms](#), we'll provide you with reasonable advance notice and the opportunity to review the changes, except (1) when we launch a new service or feature, or (2) in urgent situations, such as preventing ongoing abuse or responding to legal requirements. If you don't agree to the new terms, you should remove your content and stop using the services. You can also end your relationship with us at any time by closing your Google Account.

## DEFINITIONS

### **affiliate**

An entity that belongs to the Google group of companies, which means Google LLC and its subsidiaries, including the following companies that provide consumer services in the EU: Google Ireland Limited, Google Commerce Ltd, and Google Dialer Inc.

### **business user**

An individual or entity who is not a consumer (see consumer).

### **consumer**

An individual who uses Google services for personal, non-commercial purposes outside of their trade, business, craft, or profession. (See business user)

### **copyright**

A legal right that allows the creator of an original work (such as a blog post, photo, or video) to decide if and how that original work may be used by others.

### **country version**

If you have a Google Account, we associate your account with a country (or territory) so that we can determine:

- the Google affiliate that provides the services to you and that processes your information as you use the services
- the version of the terms that govern our relationship

When you're signed out, your country version is determined by the location where you're using Google services. If you have an account, you can [sign in](#) and view these terms to see the country associated with it.

## disclaimer

A statement that limits someone's legal responsibilities.

## EU Platform-to-Business Regulation

The Regulation (EU) 2019/1150 on promoting fairness and transparency for business users of online intermediation services.

## indemnify or indemnity

An individual or organization's contractual obligation to compensate the losses suffered by another individual or organization from legal proceedings such as lawsuits.

## intellectual property rights (IP rights)

Rights over the creations of a person's mind, such as inventions (patent rights); literary and artistic works (copyright); designs (design rights); and symbols, names, and images used in commerce (trademarks). IP rights may belong to you, another individual, or an organization.

## liability

Losses from any type of legal claim, whether the claim is based on a contract, tort (including negligence), or other reason, and whether or not those losses could have been reasonably anticipated or foreseen.

## organization

A legal entity (such as a corporation, non-profit, or school) and not an individual person.

## services

Google services that are subject to these terms are the products and services listed at <https://policies.google.com/terms/service-specific>, including:

- Google apps and sites (like Search and Maps)
- platforms (like Google Play)
- integrated services (like Maps embedded in other companies' apps or sites)
- devices (like Google Home)

## trademark

Symbols, names, and images used in commerce that are capable of distinguishing the goods or services of one individual or organization from those of another.

## warranty

An assurance that a product or service will perform to a certain standard.

## your content

Things that you write, upload, submit, store, send, receive, or share with Google using our services, such as:

- Docs, Sheets, and Slides you create
- blog posts you upload through Blogger
- reviews you submit through Maps
- videos you store in Drive
- emails you send and receive through Gmail

- pictures you share with friends through Photos
- travel itineraries that you share with Google



# **EXHIBIT 5**



# How our business works

## Ads help fund our products

Our mission to organize the world's information and make it universally accessible and useful has always been core to everything we do at Google. It's why we make so many of our products, like Search, Maps, and Gmail, accessible and free of charge to everyone.

Advertising is what makes it possible to offer our products to everyone. While we sell things like Pixel phones, apps on the Play Store, YouTube subscriptions, and tools for businesses, we make the vast majority of our money from advertising.

So how does advertising at Google work? We make money selling ad space to businesses -- big and small, global and local -- in two key ways. First, businesses can reach potential customers by showing ads on a range of Google products such as Search, Maps, and YouTube.

Second, businesses can buy ad space that we show on sites and apps that partner with us, like news publications and blogs. In this case, most of the money goes to the partner and helps fund their content. So ads not only help support Google but also many other websites and creators.

Ultimately, we earn most of our money by showing ads alongside relevant Search results on Google.com. If you're interested, you can learn more about [how we make money with advertising](#).

## We don't sell your personal information to anyone

We use your personal information to make our products more helpful to you. It's how we can autocomplete your searches, get you home faster with Maps, or show you more useful ads based on your interests. But [we never sell your personal information to anyone](#) and you can use many of our products without signing in or saving any personal information at all.

When we show ads, advertisers pay us either for the placement of an ad -- like a banner at the top of a web page -- or for how an ad actually performs -- like when someone clicks on it. [Advertisers do not pay us for personal information, such as your name or](#)

email, and we never share that information with advertisers, [unless you ask us to](#). We also never use your emails, documents, photos, or sensitive information like race, religion, or sexual orientation, to personalize ads to you. We share reports with our advertisers to help them understand the performance of their ads, but we do so without revealing any of your personal information. At every point in the process of showing you ads, we keep your personal information protected with [industry-leading security technologies](#).

## Your data, your choice

When it comes to privacy, we know one size doesn't fit all. That's why we build [powerful, easy-to-use privacy controls](#) into your [Google Account](#) and directly into our products so you can choose the privacy settings that are right for you.

When we show you ads we give you transparency and controls so you can make informed decisions. If you're curious why you're seeing a given ad, you can select [Why this ad](#) for more information. If you no longer find a specific ad relevant, you can [mute it](#). You can use [Ad Settings](#) to control the information about you that's used to show ads. And if you don't want to see personalized ads at all, you can [turn them off](#) at any time.

Because of advertising, we're able to offer our products to users around the world free of charge, helping people find answers and get things done. But, [when you use our products you trust us with your personal information. That's why we never sell your personal information and why we give you powerful privacy controls](#). It's a responsibility that comes with creating products that are accessible for everyone, everywhere.

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Supplier responsibility

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# Google

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# **EXHIBIT 6**

## PRIVACY POLICY

Last modified: June 28, 2016 ([view archived versions](#))

There are many different ways you can use our services – to search for and share information, to communicate with other people or to create new content. When you share information with us, for example by creating a [Google Account](#), we can make those services even better – to show you [more relevant search results](#) and ads, to help you [connect with people](#) or to make [sharing with others quicker and easier](#). As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

We've tried to keep it as simple as possible, but if you're not familiar with terms like cookies, IP addresses, pixel tags and browsers, then read about these [key terms](#) first. Your privacy matters to Google so whether you are new to Google or a long-time user, please do take the time to get to know our practices – and if you have any questions [contact us](#).

## Information we collect

We collect information to provide better services to all of our users – from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like.

We collect information in the following ways:

- **Information you give us.** For example, many of our services require you to sign up for a Google Account. When you do, we'll ask for [personal information](#), like your name, email address, telephone number or [credit](#)



[card](#) to store with your account. If you want to take full advantage of the sharing features we offer, we might also ask you to create a publicly visible [Google Profile](#), which may include your name and photo.

- **Information we get from your use of our services.** We [collect information](#) about the services that you use and how you use them, like when you watch a video on YouTube, visit a website that uses our advertising services, or [view and interact with our ads](#) and content. This information includes:

- **Device information**

We collect [device-specific information](#) (such as your hardware model, operating system version, [unique device identifiers](#), and mobile network information including phone number). Google may associate your [device identifiers](#) or [phone number](#) with your Google Account.

- **Log information**

When you use our services or view content provided by Google, we automatically collect and store certain information in [server logs](#). This includes:

- details of how you used our service, such as your search queries.
  - telephony log information like your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information and types of calls.
  - [Internet protocol address](#).
  - device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.
  - cookies that may uniquely identify your browser or your Google Account.
- **Location information**

When you use Google services, we [may collect and process information about your actual location](#). We use various technologies to determine location, including IP address, GPS, and other [sensors](#) that may, for example, provide Google with information on nearby devices, [Wi-Fi access points and cell towers](#).

- **Unique application numbers**

Certain services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to Google when you install or uninstall that service or when that service periodically contacts our servers, such as for automatic updates.

- **Local storage**

We may collect and store information (including personal information) locally on your device using mechanisms such as [browser web storage](#) (including HTML 5) and [application data caches](#).

- **Cookies and similar technologies**

We [and our partners](#) use various technologies to collect and store information when you visit a Google service, and this may include using [cookies or similar technologies](#) to identify your browser or device. We also use these technologies to collect and store information when you interact with services we offer to our partners, such as [advertising services](#) or Google features that may appear on other sites. Our Google Analytics product helps businesses and site owners analyze the traffic to their websites and apps. When used in conjunction with our advertising services, such as those using the DoubleClick cookie, Google Analytics information is [linked, by the Google Analytics customer or by Google, using Google technology, with information about visits to multiple sites](#).

Information we collect when you are signed in to Google, in addition to information we obtain about you from partners, may be associated with your Google Account. When information is associated with your Google Account, we treat it as personal information. For more information about how you can access, manage or delete information that is associated with your Google Account, visit the [Transparency and choice](#) section of this policy.

## How we use information we collect

We use the information we collect from all of our services to [provide, maintain, protect](#) and improve them, to [develop new ones](#), and to [protect Google and our users](#). We also use this information to offer you tailored content – like giving you more relevant search results and ads.

We may use the name you provide for your Google Profile across all of the services we offer that require a Google Account. In addition, we may replace past names associated with your Google Account so that you are represented consistently across all our services. If other users already have your email, or other information that identifies you, we may show them your publicly visible Google Profile information, such as your name and photo.

If you have a Google Account, we may display your Profile name, Profile photo, and actions you take on Google or on third-party applications connected to your Google Account (such as +1's, reviews you write and comments you post) in our services, including displaying in ads and other commercial contexts. We will respect the choices you make to [limit sharing or visibility settings](#) in your Google Account.

When you contact Google, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

We use information collected from cookies and other technologies, like [pixel tags](#), to [improve your user experience](#) and the overall quality of our services. One of the products we use to do this on our own services is Google Analytics. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer. When showing you tailored ads, we will not associate an identifier from cookies or similar technologies with [sensitive categories](#), such as those based on race, religion, sexual orientation or health.

Our automated systems analyze your content (including emails) to provide you personally relevant product features, such as customized search results, tailored advertising, and spam and malware detection.

We may [combine personal information from one service with information, including personal information, from other Google services](#) – for example [to make it easier to share things with people you know](#). Depending on [your account settings, your activity on other sites and apps](#) may be associated with your personal information in order to improve Google's services and the ads delivered by Google.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

Google processes personal information on our servers in many countries around the world. We may process your personal information on a server located outside the country where you live.

## Transparency and choice

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. For example, you can:

- [Review and update your Google activity controls](#) to decide what types of data, such as videos you've watched on YouTube or past searches, you would like saved with your account when you use Google services. You can also visit these [controls](#) to manage whether certain activity is stored in a cookie or similar technology on your device when you use our services while signed-out of your account.
- [Review and control](#) certain types of information tied to your Google Account by using Google Dashboard.
- [View and edit](#) your preferences about the Google ads shown to you on Google and across the web, such as which categories might interest you, using Ads Settings. You can also opt out of certain Google advertising services here.
- [Adjust](#) how the Profile associated with your Google Account appears to others.
- [Control](#) who you share information with through your Google Account.
- [Take information](#) associated with your Google Account out of many of our services.
- [Choose](#) whether your Profile name and Profile photo appear in shared endorsements that appear in ads.

You may also set your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us. However, it's important to remember that many of our services [may not function properly](#) if your cookies are disabled. For example, we may not remember your language preferences.

## Information you share

Many of our services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines, including Google. Our services provide you with different options on [sharing](#) and [removing your content](#).

## Accessing and updating your personal information

Whenever you use our services, we aim to provide you with [access to your personal information](#). If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

## Information we share

We do not share personal information with companies, organizations and individuals outside of Google unless one of the following circumstances applies:

- **With your consent**

We will share personal information with companies, organizations or individuals outside of Google when we have your consent to do so. We require opt-in consent for the sharing of any [sensitive personal information](#).

- **With domain administrators**

If your Google Account is managed for you by a [domain administrator](#) (for example, for Google Apps users) then your domain administrator and resellers who provide user support to your organization will have access to your Google Account information (including your email and other data). Your domain administrator may be able to:

- view statistics regarding your account, like statistics regarding applications you install.
- change your account password.
- suspend or terminate your account access.
- access or retain information stored as part of your account.
- receive your account information in order to satisfy applicable law, regulation, [legal process or enforceable governmental request](#).
- restrict your ability to delete or edit information or privacy settings.

Please refer to your domain administrator's privacy policy for more information.

- **For external processing**

We provide personal information to our [affiliates](#) or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

- **For legal reasons**

We will share personal information with companies, organizations or individuals outside of Google if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, [legal process or enforceable governmental request](#).
- enforce applicable Terms of Service, including investigation of potential violations.
- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of Google, our users or the public as required or permitted by law.

[We may share non-personally identifiable information](#) publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly [to show trends](#) about the general use of our services.

If Google is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## Information security

We work hard to protect Google and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

- We encrypt many of our services [using SSL](#).
- We offer you [two step verification](#) when you access your Google Account, and a [Safe Browsing feature](#) in Google Chrome.
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Google employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.



## When this Privacy Policy applies

Our Privacy Policy applies to all of the services offered by Google Inc. and its affiliates, including YouTube, services Google provides on Android devices, and services offered on other sites (such as our advertising services), but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include Google services, or other sites linked from our services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

## Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy. We also adhere to several [self regulatory frameworks](#). When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

## Specific product practices

The following notices explain specific privacy practices with respect to certain Google products and services that you may use:

- [Chrome and Chrome OS](#)
- [Play Books](#)
- [Payments](#)
- [Fiber](#)
- [Project Fi](#)
- [Google Apps for Education](#)

For more information about some of our most popular services, you can visit the [Google Product Privacy Guide](#).

## Other useful privacy and security related materials

Further useful privacy and security related materials can be found through Google's [policies and principles pages](#), including:

- Information about our [technologies and principles](#), which includes, among other things, more information on
  - [how Google uses cookies](#).
  - technologies we use for [advertising](#).
  - how we [recognize patterns like faces](#).
- A [page](#) that explains what data is shared with Google when you visit websites that use our advertising, analytics and social products.
- The [Privacy Checkup](#) tool, which makes it easy to review your key privacy settings.
- Google's [safety center](#), which provides information on how to stay safe and secure online.

## "access to your personal information"

For example, with Google Dashboard you can quickly and easily see some of the data associated with your Google Account. [Learn more.](#)

## "ads you'll find most useful"

For example, if you frequently visit websites and blogs about gardening, you may see ads related to gardening as you browse the web. [Learn more.](#)

## "advertising services"

For example, if you frequently visit websites and blogs about gardening that show our ads, you may start to see ads related to this interest as you browse the web. [Learn more.](#)

## "and other sensors"

Your device may have sensors that provide information to assist in a better understanding of your location. For example, an accelerometer can be used to determine things like speed, or a gyroscope to figure out direction of travel. [Learn more.](#)

## "collect information"

This includes information like your usage data and preferences, Gmail messages, G+ profile, photos, videos, browsing history, map searches, docs, or other Google-hosted content. [Learn more.](#)

## "combine personal information from one service with information, including personal information, from other Google services"

For example, when you're signed in to your Google Account and search on Google, you can see search results from the public web, along with pages, photos, and Google+ posts from your friends and people who know you or follow you on Google+ may see your posts and profile in their results. [Learn more.](#)

## "connect with people"

For example, you could get suggestions of people you might know or want to connect with on Google+, based on the connections you have with people on other Google products, like Gmail and people who have a connection with you may see your profile as a suggestion. [Learn more.](#)

## "credit card"

Whilst we currently don't ask for a credit card during sign up, verifying your age through a small credit card transaction is one way to confirm that you meet our age requirements in case your account was disabled after you have entered a birthday indicating you are not old enough to have a Google Account. [Learn more.](#)

## "develop new ones"

For example, Google's spell checking software was developed by analyzing previous searches where users had corrected their own spelling. [Learn more.](#)

## "device identifiers"

Device identifiers let Google know which unique device you are using to access our services, which can be used to customise our service to your device or analyse any device issues related to our services. [Learn more.](#)

## "device-specific information"

For example, when you visit Google Play from your desktop, Google can use this information to help you decide on which devices you'd like your purchases to be available for use. [Learn more.](#)

## "improve your user experience"

For example, cookies allow us to analyse how users interact with our services. [Learn more.](#)

## "legal process or enforceable governmental request"

Like other technology and communications companies, Google regularly receives requests from governments and courts around the world to hand over user data. Our legal team reviews each and every request, regardless of type, and we frequently push back when the requests appear to be overly broad or don't follow the correct process. [Learn more.](#)

## "limit sharing or visibility settings"

For example, you can choose your settings so your name and photo do not appear in an ad. [Learn more.](#)

## "linked with information about visits to multiple sites"

Google Analytics is based on first-party cookies. Data generated through Google Analytics can be linked, by the Google Analytics customer or by Google, using Google technology, to third-party cookies, related to visits to other websites, for instance when an advertiser wants to use its Google Analytics data to create more relevant ads, or to further analyze its traffic. [Learn more.](#)

## "maintain"

For example, we continuously monitor our systems to check that they are working as intended and in order to detect and fix errors. [Learn more.](#)

## "may collect and process information about your actual location"

For example, Google Maps can center the maps view on your current location. [Learn more.](#)

## "may not function properly"

For example, we use a cookie called 'lbc's' which makes it possible for you to open many Google Docs in one browser. [Learn more.](#)

## "and our partners"

We allow trusted businesses to use cookies or similar technologies for advertising and research purposes on our services. [Learn more.](#)

## "phone number"

For example, if you add a phone number as a recovery option, if you forget your password Google can send you a text message with a code to enable you to reset it. [Learn more.](#)

## "protect Google and our users"

For example, if you're concerned about unauthorized access to your email, "Last account activity" in Gmail shows you information about recent activity in your email, such as the IP addresses that accessed your mail, the associated location, as well as the time and date. [Learn more.](#)

## "protect"

For example, one reason we collect and analyze IP addresses and cookies is to protect our services against automated abuse. [Learn more.](#)

## "provide"

For example, the IP address assigned to your device is used to send the data you requested back to your device. [Learn more.](#)

## "sharing"

For example, with Google+, you have many different sharing options. [Learn more.](#)

## "sharing with others quicker and easier"

For example, if someone is already a contact, Google will autocomplete their name if you want to add them to a message in Gmail. [Learn more.](#)

## "the people who matter most to you online"

For example, when you type an address in the To, Cc, or Bcc field of a message you're composing, Gmail will suggest addresses from your Contacts list. [Learn more.](#)

## "to make it easier to share things with people you know"



For example, if you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to type in their name. [Learn more.](#)

## "view and interact with our ads"

For example, we regularly report to advertisers on whether we served their ad to a page and whether that ad was likely to be seen by users (as opposed to, for example, being on part of the page to which users did not scroll). [Learn more.](#)

## "We may share aggregated, non-personally identifiable information publicly"

When lots of people start searching for something, it can provide very useful information about particular trends at that time. [Learn more.](#)

## "Wi-Fi access points and cell towers"

For example, Google can approximate your device's location based on the known location of nearby cell towers. [Learn more.](#)

## "more relevant search results"

For example, we can make search more relevant and interesting for you by including photos, posts, and more from you and your friends. [Learn more.](#)

## "removing your content"

For example, you can delete your [Web & App Activity](#), your blog, a [Google Site](#) you own, your [YouTube Channel](#), your [Google+ profile](#) or your entire [Google account](#). [Learn more](#).

## "to show trends"

You can see some of these at [Google Trends](#) and [YouTube Trends](#). [Learn more](#).

## "your activity on other sites and apps"

This activity might come from your use of Google products like Chrome Sync or from your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics). These products share information about your activity with Google and, depending on [your account settings](#) and the products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information. [Learn more](#).

# **EXHIBIT 7**

## PRIVACY POLICY

Last modified: August 29, 2016 ([view archived versions](#))

There are many different ways you can use our services – to search for and share information, to communicate with other people or to create new content. When you share information with us, for example by creating a [Google Account](#), we can make those services even better – to show you [more relevant search results](#) and ads, to help you [connect with people](#) or to make [sharing with others quicker and easier](#). As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

We've tried to keep it as simple as possible, but if you're not familiar with terms like cookies, IP addresses, pixel tags and browsers, then read about these [key terms](#) first. Your privacy matters to Google so whether you are new to Google or a long-time user, please do take the time to get to know our practices – and if you have any questions [contact us](#).

## Information we collect

We collect information to provide better services to all of our users – from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like.

We collect information in the following ways:

- **Information you give us.** For example, many of our services require you to sign up for a Google Account. When you do, we'll ask for [personal information](#), like your name, email address, telephone number or [credit](#)

[card](#) to store with your account. If you want to take full advantage of the sharing features we offer, we might also ask you to create a publicly visible [Google Profile](#), which may include your name and photo.

- **Information we get from your use of our services.** We [collect information](#) about the services that you use and how you use them, like when you watch a video on YouTube, visit a website that uses our advertising services, or [view and interact with our ads](#) and content. This information includes:

- **Device information**

We collect [device-specific information](#) (such as your hardware model, operating system version, [unique device identifiers](#), and mobile network information including phone number). Google may associate your [device identifiers](#) or [phone number](#) with your Google Account.

- **Log information**

When you use our services or view content provided by Google, we automatically collect and store certain information in [server logs](#). This includes:

- details of how you used our service, such as your search queries.
  - telephony log information like your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information and types of calls.
  - [Internet protocol address](#).
  - device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.
  - cookies that may uniquely identify your browser or your Google Account.
- **Location information**

When you use Google services, we [may collect and process information about your actual location](#). We use various technologies to determine location, including IP address, GPS, and other [sensors](#) that may, for example, provide Google with information on nearby devices, [Wi-Fi access points and cell towers](#).

- **Unique application numbers**

Certain services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to Google when you install or uninstall that service or when that service periodically contacts our servers, such as for automatic updates.

- **Local storage**

We may collect and store information (including personal information) locally on your device using mechanisms such as [browser web storage](#) (including HTML 5) and [application data caches](#).

- **Cookies and similar technologies**

We [and our partners](#) use various technologies to collect and store information when you visit a Google service, and this may include using [cookies or similar technologies](#) to identify your browser or device. We also use these technologies to collect and store information when you interact with services we offer to our partners, such as [advertising services](#) or Google features that may appear on other sites. Our Google Analytics product helps businesses and site owners analyze the traffic to their websites and apps. When used in conjunction with our advertising services, such as those using the DoubleClick cookie, Google Analytics information is [linked, by the Google Analytics customer or by Google, using Google technology, with information about visits to multiple sites](#).

Information we collect when you are signed in to Google, in addition to information we obtain about you from partners, may be associated with your Google Account. When information is associated with your Google Account, we treat it as personal information. For more information about how you can access, manage or delete information that is associated with your Google Account, visit the [Transparency and choice](#) section of this policy.

## How we use information we collect

We use the information we collect from all of our services to [provide, maintain, protect](#) and improve them, to [develop new ones](#), and to [protect Google and our users](#). We also use this information to offer you tailored content – like giving you more relevant search results and ads.

We may use the name you provide for your Google Profile across all of the services we offer that require a Google Account. In addition, we may replace past names associated with your Google Account so that you are represented consistently across all our services. If other users already have your email, or other information that identifies you, we may show them your publicly visible Google Profile information, such as your name and photo.

If you have a Google Account, we may display your Profile name, Profile photo, and actions you take on Google or on third-party applications connected to your Google Account (such as +1's, reviews you write and comments you post) in our services, including displaying in ads and other commercial contexts. We will respect the choices you make to [limit sharing or visibility settings](#) in your Google Account.

When you contact Google, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

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- [Review and control](#) certain types of information tied to your Google Account by using Google Dashboard.
- [View and edit](#) your preferences about the Google ads shown to you on Google and across the web, such as which categories might interest you, using Ads Settings. You can also visit that page to opt out of certain Google advertising services.
- [Adjust](#) how the Profile associated with your Google Account appears to others.
- [Control](#) who you share information with through your Google Account.
- [Take information](#) associated with your Google Account out of many of our services.
- [Choose](#) whether your Profile name and Profile photo appear in shared endorsements that appear in ads.

You may also set your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us. However, it's important to remember that many of our services [may not function properly](#) if your cookies are disabled. For example, we may not remember your language preferences.



## Information you share

Many of our services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines, including Google. Our services provide you with different options on [sharing](#) and [removing your content](#).

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Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

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We will share personal information with companies, organizations or individuals outside of Google when we have your consent to do so. We require opt-in consent for the sharing of any [sensitive personal information](#).

- **With domain administrators**

If your Google Account is managed for you by a [domain administrator](#) (for example, for Google Apps users) then your domain administrator and resellers who provide user support to your organization will have access to your Google Account information (including your email and other data). Your domain administrator may be able to:

- view statistics regarding your account, like statistics regarding applications you install.
- change your account password.
- suspend or terminate your account access.
- access or retain information stored as part of your account.
- receive your account information in order to satisfy applicable law, regulation, [legal process or enforceable governmental request](#).
- restrict your ability to delete or edit information or privacy settings.

Please refer to your domain administrator's privacy policy for more information.

- **For external processing**

We provide personal information to our [affiliates](#) or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

- **For legal reasons**

We will share personal information with companies, organizations or individuals outside of Google if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, [legal process or enforceable governmental request](#).
- enforce applicable Terms of Service, including investigation of potential violations.
- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of Google, our users or the public as required or permitted by law.

[We may share non-personally identifiable information](#) publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly [to show trends](#) about the general use of our services.

If Google is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## Information security

We work hard to protect Google and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

- We encrypt many of our services [using SSL](#).
- We offer you [two step verification](#) when you access your Google Account, and a [Safe Browsing feature](#) in Google Chrome.
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Google employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## When this Privacy Policy applies

Our Privacy Policy applies to all of the services offered by Google Inc. and its affiliates, including YouTube, services Google provides on Android devices, and services offered on other sites (such as our advertising services), but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include Google services, or other sites linked from our services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

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- [Play Books](#)
- [Payments](#)
- [Fiber](#)
- [Project Fi](#)
- [Google Apps for Education](#)

For more information about some of our most popular services, you can visit the [Google Product Privacy Guide](#).

## Other useful privacy and security related materials

Further useful privacy and security related materials can be found through Google's [policies and principles pages](#), including:

- Information about our [technologies and principles](#), which includes, among other things, more information on
  - [how Google uses cookies](#).
  - technologies we use for [advertising](#).
  - how we [recognize patterns like faces](#).
- A [page](#) that explains what data is shared with Google when you visit websites that use our advertising, analytics and social products.
- The [Privacy Checkup](#) tool, which makes it easy to review your key privacy settings.
- Google's [safety center](#), which provides information on how to stay safe and secure online.

## "access to your personal information"

For example, with Google Dashboard you can quickly and easily see some of the data associated with your Google Account. [Learn more.](#)

## "ads you'll find most useful"

For example, if you frequently visit websites and blogs about gardening, you may see ads related to gardening as you browse the web. [Learn more.](#)

## "advertising services"

For example, if you frequently visit websites and blogs about gardening that show our ads, you may start to see ads related to this interest as you browse the web. [Learn more.](#)

## "and other sensors"

Your device may have sensors that provide information to assist in a better understanding of your location. For example, an accelerometer can be used to determine things like speed, or a gyroscope to figure out direction of travel. [Learn more.](#)

## "collect information"

This includes information like your usage data and preferences, Gmail messages, G+ profile, photos, videos, browsing history, map searches, docs, or other Google-hosted content. [Learn more.](#)

## "combine personal information from one service with information, including personal information, from other Google services"

For example, when you're signed in to your Google Account and search on Google, you can see search results from the public web, along with pages, photos, and Google+ posts from your friends and people who know you or follow you on Google+ may see your posts and profile in their results. [Learn more.](#)

## "connect with people"

For example, you could get suggestions of people you might know or want to connect with on Google+, based on the connections you have with people on other Google products, like Gmail and people who have a connection with you may see your profile as a suggestion. [Learn more.](#)

## "credit card"

Whilst we currently don't ask for a credit card during sign up, verifying your age through a small credit card transaction is one way to confirm that you meet our age requirements in case your account was disabled after you have entered a birthday indicating you are not old enough to have a Google Account. [Learn more.](#)

## "develop new ones"

For example, Google's spell checking software was developed by analyzing previous searches where users had corrected their own spelling. [Learn more.](#)

## "device identifiers"

Device identifiers let Google know which unique device you are using to access our services, which can be used to customise our service to your device or analyse any device issues related to our services. [Learn more.](#)

## "device-specific information"

For example, when you visit Google Play from your desktop, Google can use this information to help you decide on which devices you'd like your purchases to be available for use. [Learn more.](#)

## "improve your user experience"

For example, cookies allow us to analyse how users interact with our services. [Learn more.](#)

## "legal process or enforceable governmental request"

Like other technology and communications companies, Google regularly receives requests from governments and courts around the world to hand over user data. Our legal team reviews each and every request, regardless of type, and we frequently push back when the requests appear to be overly broad or don't follow the correct process. [Learn more.](#)

## "limit sharing or visibility settings"

For example, you can choose your settings so your name and photo do not appear in an ad. [Learn more.](#)

## "linked with information about visits to multiple sites"

Google Analytics is based on first-party cookies. Data generated through Google Analytics can be linked, by the Google Analytics customer or by Google, using Google technology, to third-party cookies, related to visits to other websites, for instance when an advertiser wants to use its Google Analytics data to create more relevant ads, or to further analyze its traffic. [Learn more.](#)

## "maintain"



For example, we continuously monitor our systems to check that they are working as intended and in order to detect and fix errors. [Learn more.](#)

## "may collect and process information about your actual location"

For example, Google Maps can center the maps view on your current location. [Learn more.](#)

## "may not function properly"

For example, we use a cookie called 'lbc's' which makes it possible for you to open many Google Docs in one browser. [Learn more.](#)

## "and our partners"

We allow trusted businesses to use cookies or similar technologies for advertising and research purposes on our services. [Learn more.](#)

## "phone number"

For example, if you add a phone number as a recovery option, if you forget your password Google can send you a text message with a code to enable you to reset it. [Learn more.](#)

## "protect Google and our users"

For example, if you're concerned about unauthorized access to your email, "Last account activity" in Gmail shows you information about recent activity in your email, such as the IP addresses that accessed your mail, the associated location, as well as the time and date. [Learn more.](#)

## "protect"

For example, one reason we collect and analyze IP addresses and cookies is to protect our services against automated abuse. [Learn more.](#)

## "provide"

For example, the IP address assigned to your device is used to send the data you requested back to your device. [Learn more.](#)

## "sharing"

For example, with Google+, you have many different sharing options. [Learn more.](#)

## "sharing with others quicker and easier"

For example, if someone is already a contact, Google will autocomplete their name if you want to add them to a message in Gmail. [Learn more.](#)

## "the people who matter most to you online"

For example, when you type an address in the To, Cc, or Bcc field of a message you're composing, Gmail will suggest addresses from your Contacts list. [Learn more.](#)

## "to make it easier to share things with people you know"

For example, if you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to type in their name. [Learn more.](#)

## "view and interact with our ads"

For example, we regularly report to advertisers on whether we served their ad to a page and whether that ad was likely to be seen by users (as opposed to, for example, being on part of the page to which users did not scroll). [Learn more.](#)

## "We may share aggregated, non-personally identifiable information publicly"

When lots of people start searching for something, it can provide very useful information about particular trends at that time. [Learn more.](#)

## "Wi-Fi access points and cell towers"

For example, Google can approximate your device's location based on the known location of nearby cell towers. [Learn more.](#)

## "more relevant search results"

For example, we can make search more relevant and interesting for you by including photos, posts, and more from you and your friends. [Learn more.](#)

## "removing your content"

For example, you can delete your [Web & App Activity](#), your blog, a Google Site you own, your YouTube Channel, your Google+ profile or your entire Google account. [Learn more.](#)

## "to show trends"

You can see some of these at [Google Trends](#) and [YouTube Trending Videos](#). [Learn more.](#)

## "your activity on other sites and apps"

This activity might come from your use of Google products like Chrome Sync or from your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics). These products share information about your activity with Google and, depending on [your account settings](#) and the products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information. [Learn more.](#)

# **EXHIBIT 8**

## PRIVACY POLICY

Last modified: March 1, 2017 ([view archived versions](#))

There are many different ways you can use our services – to search for and share information, to communicate with other people or to create new content. When you share information with us, for example by creating a [Google Account](#), we can make those services even better – to show you [more relevant search results](#) and ads, to help you [connect with people](#) or to make [sharing with others quicker and easier](#). As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

We've tried to keep it as simple as possible, but if you're not familiar with terms like cookies, IP addresses, pixel tags and browsers, then read about these [key terms](#) first. Your privacy matters to Google so whether you are new to Google or a long-time user, please do take the time to get to know our practices – and if you have any questions [contact us](#).

## Information we collect

We collect information to provide better services to all of our users – from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like.

We collect information in the following ways:

- **Information you give us.** For example, many of our services require you to sign up for a Google Account. When you do, we'll ask for [personal information](#), like your name, email address, telephone number or [credit](#)

[card](#) to store with your account. If you want to take full advantage of the sharing features we offer, we might also ask you to create a publicly visible [Google Profile](#), which may include your name and photo.

- **Information we get from your use of our services.** We [collect information](#) about the services that you use and how you use them, like when you watch a video on YouTube, visit a website that uses our advertising services, or [view and interact with our ads](#) and content. This information includes:

- **Device information**

We collect [device-specific information](#) (such as your hardware model, operating system version, [unique device identifiers](#), and mobile network information including phone number). Google may associate your [device identifiers](#) or [phone number](#) with your Google Account.

- **Log information**

When you use our services or view content provided by Google, we automatically collect and store certain information in [server logs](#). This includes:

- details of how you used our service, such as your search queries.
- telephony log information like your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information and types of calls.
- [Internet protocol address](#).
- device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.
- cookies that may uniquely identify your browser or your Google Account.

- **Location information**

When you use Google services, we [may collect and process information about your actual location](#). We use various technologies to determine location, including IP address, GPS, and other [sensors](#) that may, for example, provide Google with information on nearby devices, [Wi-Fi access points and cell towers](#).

- **Unique application numbers**

Certain services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to Google when you install or uninstall that service or when that service periodically contacts our servers, such as for automatic updates.

- **Local storage**

We may collect and store information (including personal information) locally on your device using mechanisms such as [browser web storage](#) (including HTML 5) and [application data caches](#).

- **Cookies and similar technologies**

We [and our partners](#) use various technologies to collect and store information when you visit a Google service, and this may include using [cookies or similar technologies](#) to identify your browser or device. We also use these technologies to collect and store information when you interact with services we offer to our partners, such as [advertising services](#) or Google features that may appear on other sites. Our Google Analytics product helps businesses and site owners analyze the traffic to their websites and apps. When used in conjunction with our advertising services, such as those using the DoubleClick cookie, Google Analytics information is [linked, by the Google Analytics customer or by Google, using Google technology, with information about visits to multiple sites](#).

Information we collect when you are signed in to Google, in addition to information we obtain about you from partners, may be associated with your Google Account. When information is associated with your Google Account, we treat it as personal information. For more information about how you can access, manage or delete information that is associated with your Google Account, visit the [Transparency and choice](#) section of this policy.



## How we use information we collect

We use the information we collect from all of our services to [provide, maintain, protect](#) and improve them, to [develop new ones](#), and to [protect Google and our users](#). We also use this information to offer you tailored content – like giving you more relevant search results and ads.

We may use the name you provide for your Google Profile across all of the services we offer that require a Google Account. In addition, we may replace past names associated with your Google Account so that you are represented consistently across all our services. If other users already have your email, or other information that identifies you, we may show them your publicly visible Google Profile information, such as your name and photo.

If you have a Google Account, we may display your Profile name, Profile photo, and actions you take on Google or on third-party applications connected to your Google Account (such as +1's, reviews you write and comments you post) in our services, including displaying in ads and other commercial contexts. We will respect the choices you make to [limit sharing or visibility settings](#) in your Google Account.

When you contact Google, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

We use information collected from cookies and other technologies, like [pixel tags](#), to [improve your user experience](#) and the overall quality of our services. One of the products we use to do this on our own services is Google Analytics. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer. When showing you tailored ads, we will not associate an identifier from cookies or similar technologies with [sensitive categories](#), such as those based on race, religion, sexual orientation or health.

Our automated systems analyze your content (including emails) to provide you personally relevant product features, such as customized search results, tailored advertising, and spam and malware detection.

We may [combine personal information from one service with information, including personal information, from other Google services](#) – for example [to make it easier to share things with people you know](#). Depending on [your account settings, your activity on other sites and apps](#) may be associated with your personal information in order to improve Google's services and the ads delivered by Google.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

Google processes personal information on our servers in many countries around the world. We may process your personal information on a server located outside the country where you live.

## Transparency and choice

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. For example, you can:

- [Review and update your Google activity controls](#) to decide what types of data, such as videos you've watched on YouTube or past searches, you would like saved with your account when you use Google services. You can also visit these [controls](#) to manage whether certain activity is stored in a cookie or similar technology on your device when you use our services while signed-out of your account.
- [Review and control](#) certain types of information tied to your Google Account by using Google Dashboard.
- [View and edit](#) your preferences about the Google ads shown to you on Google and across the web, such as which categories might interest you, using Ads Settings. You can also visit that page to opt out of certain Google advertising services.
- [Adjust](#) how the Profile associated with your Google Account appears to others.
- [Control](#) who you share information with through your Google Account.
- [Take information](#) associated with your Google Account out of many of our services.
- [Choose](#) whether your Profile name and Profile photo appear in shared endorsements that appear in ads.

You may also set your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us. However, it's important to remember that many of our services [may not function properly](#) if your cookies are disabled. For example, we may not remember your language preferences.

## Information you share

Many of our services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines, including Google. Our services provide you with different options on [sharing](#) and [removing your content](#).

## Accessing and updating your personal information

Whenever you use our services, we aim to provide you with [access to your personal information](#). If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

## Information we share

We do not share personal information with companies, organizations and individuals outside of Google unless one of the following circumstances applies:

- **With your consent**

We will share personal information with companies, organizations or individuals outside of Google when we have your consent to do so. We require opt-in consent for the sharing of any [sensitive personal information](#).

- **With domain administrators**

If your Google Account is managed for you by a [domain administrator](#) (for example, for G Suite users) then your domain administrator and resellers who provide user support to your organization will have access to your Google Account information (including your email and other data). Your domain administrator may be able to:

- view statistics regarding your account, like statistics regarding applications you install.
- change your account password.
- suspend or terminate your account access.
- access or retain information stored as part of your account.
- receive your account information in order to satisfy applicable law, regulation, [legal process or enforceable governmental request](#).
- restrict your ability to delete or edit information or privacy settings.

Please refer to your domain administrator's privacy policy for more information.

- **For external processing**

We provide personal information to our [affiliates](#) or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

- **For legal reasons**

We will share personal information with companies, organizations or individuals outside of Google if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, [legal process or enforceable governmental request](#).
- enforce applicable Terms of Service, including investigation of potential violations.
- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of Google, our users or the public as required or permitted by law.

[We may share non-personally identifiable information](#) publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly [to show trends](#) about the general use of our services.

If Google is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## Information security

We work hard to protect Google and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

- We encrypt many of our services [using SSL](#).
- We offer you [two step verification](#) when you access your Google Account, and a [Safe Browsing feature](#) in Google Chrome.
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Google employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## When this Privacy Policy applies

Our Privacy Policy applies to all of the services offered by Google Inc. and its affiliates, including YouTube, services Google provides on Android devices, and services offered on other sites (such as our advertising services), but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include Google services, or other sites linked from our services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

## Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy. We also adhere to several [self regulatory frameworks](#), including the EU-US Privacy Shield Framework. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

## Specific product practices

The following notices explain specific privacy practices with respect to certain Google products and services that you may use:

- [Chrome and Chrome OS](#)
- [Play Books](#)
- [Payments](#)
- [Fiber](#)
- [Project Fi](#)
- [G Suite for Education](#)

For more information about some of our most popular services, you can visit the [Google Product Privacy Guide](#).

## Other useful privacy and security related materials

Further useful privacy and security related materials can be found through Google's [policies and principles pages](#), including:

- Information about our [technologies and principles](#), which includes, among other things, more information on
  - [how Google uses cookies](#).
  - technologies we use for [advertising](#).
  - how we [recognize patterns like faces](#).
- A [page](#) that explains what data is shared with Google when you visit websites that use our advertising, analytics and social products.
- The [Privacy Checkup](#) tool, which makes it easy to review your key privacy settings.
- Google's [safety center](#), which provides information on how to stay safe and secure online.

## "access to your personal information"

For example, with Google Dashboard you can quickly and easily see some of the data associated with your Google Account. [Learn more.](#)

## "ads you'll find most useful"

For example, if you frequently visit websites and blogs about gardening, you may see ads related to gardening as you browse the web. [Learn more.](#)

## "advertising services"

For example, if you frequently visit websites and blogs about gardening that show our ads, you may start to see ads related to this interest as you browse the web. [Learn more.](#)

## "and other sensors"

Your device may have sensors that provide information to assist in a better understanding of your location. For example, an accelerometer can be used to determine things like speed, or a gyroscope to figure out direction of travel. [Learn more.](#)

## "collect information"

This includes information like your usage data and preferences, Gmail messages, G+ profile, photos, videos, browsing history, map searches, docs, or other Google-hosted content. [Learn more.](#)

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Device identifiers let Google know which unique device you are using to access our services, which can be used to customise our service to your device or analyse any device issues related to our services. [Learn more.](#)

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For example, when you visit Google Play from your desktop, Google can use this information to help you decide on which devices you'd like your purchases to be available for use. [Learn more.](#)

## "improve your user experience"

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## "limit sharing or visibility settings"

For example, you can choose your settings so your name and photo do not appear in an ad. [Learn more.](#)

## "linked with information about visits to multiple sites"

Google Analytics is based on first-party cookies. Data generated through Google Analytics can be linked, by the Google Analytics customer or by Google, using Google technology, to third-party cookies, related to visits to other websites, for instance when an advertiser wants to use its Google Analytics data to create more relevant ads, or to further analyze its traffic. [Learn more.](#)

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For example, we continuously monitor our systems to check that they are working as intended and in order to detect and fix errors. [Learn more.](#)

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## "the people who matter most to you online"

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## "to make it easier to share things with people you know"

For example, if you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to type in their name. [Learn more.](#)

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For example, we can make search more relevant and interesting for you by including photos, posts, and more from you and your friends. [Learn more.](#)

## "removing your content"

For example, you can delete your [Web & App Activity](#), your blog, a Google Site you own, your YouTube Channel, your Google+ profile or your entire Google account. [Learn more.](#)

## "to show trends"

You can see some of these at [Google Trends](#) and [YouTube Trending Videos](#). [Learn more.](#)

## "your activity on other sites and apps"

This activity might come from your use of Google products like Chrome Sync or from your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics). These products share information about your activity with Google and, depending on [your account settings](#) and the products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information. [Learn more.](#)

# **EXHIBIT 9**

## PRIVACY POLICY

Last modified: April 17, 2017 ([view archived versions](#))

There are many different ways you can use our services – to search for and share information, to communicate with other people or to create new content. When you share information with us, for example by creating a [Google Account](#), we can make those services even better – to show you [more relevant search results](#) and ads, to help you [connect with people](#) or to make [sharing with others quicker and easier](#). As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

We've tried to keep it as simple as possible, but if you're not familiar with terms like cookies, IP addresses, pixel tags and browsers, then read about these [key terms](#) first. Your privacy matters to Google so whether you are new to Google or a long-time user, please do take the time to get to know our practices – and if you have any questions [contact us](#).

## Information we collect

We collect information to provide better services to all of our users – from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like.

We collect information in the following ways:

- **Information you give us.** For example, many of our services require you to sign up for a Google Account. When you do, we'll ask for [personal information](#), like your name, email address, telephone number or [credit](#)



[card](#) to store with your account. If you want to take full advantage of the sharing features we offer, we might also ask you to create a publicly visible [Google Profile](#), which may include your name and photo.

- **Information we get from your use of our services.** We [collect information](#) about the services that you use and how you use them, like when you watch a video on YouTube, visit a website that uses our advertising services, or [view and interact with our ads](#) and content. This information includes:

- **Device information**

We collect [device-specific information](#) (such as your hardware model, operating system version, [unique device identifiers](#), and mobile network information including phone number). Google may associate your [device identifiers](#) or [phone number](#) with your Google Account.

- **Log information**

When you use our services or view content provided by Google, we automatically collect and store certain information in [server logs](#). This includes:

- details of how you used our service, such as your search queries.
  - telephony log information like your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information and types of calls.
  - [Internet protocol address](#).
  - device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.
  - cookies that may uniquely identify your browser or your Google Account.
- **Location information**

When you use Google services, we [may collect and process information about your actual location](#). We use various technologies to determine location, including IP address, GPS, [and other sensors](#) that may, for example, provide Google with information on nearby devices, [Wi-Fi access points and cell towers](#).

- **Unique application numbers**

Certain services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to Google when you install or uninstall that service or when that service periodically contacts our servers, such as for automatic updates.

- **Local storage**

We may collect and store information (including personal information) locally on your device using mechanisms such as [browser web storage](#) (including HTML 5) and [application data caches](#).

- **Cookies and similar technologies**

We [and our partners](#) use various technologies to collect and store information when you visit a Google service, and this may include using [cookies or similar technologies](#) to identify your browser or device. We also use these technologies to collect and store information when you interact with services we offer to our partners, such as [advertising services](#) or Google features that may appear on other sites. Our Google Analytics product helps businesses and site owners analyze the traffic to their websites and apps. When used in conjunction with our advertising services, such as those using the DoubleClick cookie, Google Analytics information is [linked, by the Google Analytics customer or by Google, using Google technology, with information about visits to multiple sites](#).

Information we collect when you are signed in to Google, in addition to information we obtain about you from partners, may be associated with your Google Account. When information is associated with your Google Account, we treat it as personal information. For more information about how you can access, manage or delete information that is associated with your Google Account, visit the [Transparency and choice](#) section of this policy.

## How we use information we collect

We use the information we collect from all of our services to [provide, maintain, protect](#) and improve them, to [develop new ones](#), and to [protect Google and our users](#). We also use this information to offer you tailored content – like giving you more relevant search results and ads.

We may use the name you provide for your Google Profile across all of the services we offer that require a Google Account. In addition, we may replace past names associated with your Google Account so that you are represented consistently across all our services. If other users already have your email, or other information that identifies you, we may show them your publicly visible Google Profile information, such as your name and photo.

If you have a Google Account, we may display your Profile name, Profile photo, and actions you take on Google or on third-party applications connected to your Google Account (such as +1's, reviews you write and comments you post) in our services, including displaying in ads and other commercial contexts. We will respect the choices you make to [limit sharing or visibility settings](#) in your Google Account.

When you contact Google, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

We use information collected from cookies and other technologies, like [pixel tags](#), to [improve your user experience](#) and the overall quality of our services. One of the products we use to do this on our own services is Google Analytics. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer. When showing you tailored ads, we will not associate an identifier from cookies or similar technologies with [sensitive categories](#), such as those based on race, religion, sexual orientation or health.

Our automated systems analyze your content (including emails) to provide you personally relevant product features, such as customized search results, tailored advertising, and spam and malware detection.

We may [combine personal information from one service with information, including personal information, from other Google services](#) – for example [to make it easier to share things with people you know](#). Depending on [your account settings, your activity on other sites and apps](#) may be associated with your personal information in order to improve Google's services and the ads delivered by Google.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

Google processes personal information on our servers in many countries around the world. We may process your personal information on a server located outside the country where you live.

## Transparency and choice

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. For example, you can:

- [Review and update your Google activity controls](#) to decide what types of data, such as videos you've watched on YouTube or past searches, you would like saved with your account when you use Google services. You can also visit these [controls](#) to manage whether certain activity is stored in a cookie or similar technology on your device when you use our services while signed-out of your account.
- [Review and control](#) certain types of information tied to your Google Account by using Google Dashboard.
- [View and edit](#) your preferences about the Google ads shown to you on Google and across the web, such as which categories might interest you, using Ads Settings. You can also visit that page to opt out of certain Google advertising services.
- [Adjust](#) how the Profile associated with your Google Account appears to others.
- [Control](#) who you share information with through your Google Account.
- [Take information](#) associated with your Google Account out of many of our services.
- [Choose](#) whether your Profile name and Profile photo appear in shared endorsements that appear in ads.

You may also set your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us. However, it's important to remember that many of our services [may not function properly](#) if your cookies are disabled. For example, we may not remember your language preferences.

## Information you share

Many of our services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines, including Google. Our services provide you with different options on [sharing](#) and [removing your content](#).

## Accessing and updating your personal information

Whenever you use our services, we aim to provide you with [access to your personal information](#). If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

## Information we share

We do not share personal information with companies, organizations and individuals outside of Google unless one of the following circumstances applies:

- **With your consent**

We will share personal information with companies, organizations or individuals outside of Google when we have your consent to do so. We require opt-in consent for the sharing of any [sensitive personal information](#).

- **With domain administrators**

If your Google Account is managed for you by a [domain administrator](#) (for example, for G Suite users) then your domain administrator and resellers who provide user support to your organization will have access to your Google Account information (including your email and other data). Your domain administrator may be able to:

- view statistics regarding your account, like statistics regarding applications you install.
- change your account password.
- suspend or terminate your account access.
- access or retain information stored as part of your account.
- receive your account information in order to satisfy applicable law, regulation, [legal process or enforceable governmental request](#).
- restrict your ability to delete or edit information or privacy settings.

Please refer to your domain administrator's privacy policy for more information.

- **For external processing**

We provide personal information to our [affiliates](#) or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

- **For legal reasons**

We will share personal information with companies, organizations or individuals outside of Google if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, [legal process or enforceable governmental request](#).
- enforce applicable Terms of Service, including investigation of potential violations.
- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of Google, our users or the public as required or permitted by law.

[We may share non-personally identifiable information](#) publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly [to show trends](#) about the general use of our services.

If Google is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## Information security

We work hard to protect Google and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

- We encrypt many of our services [using SSL](#).
- We offer you [two step verification](#) when you access your Google Account, and a [Safe Browsing feature](#) in Google Chrome.
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Google employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## When this Privacy Policy applies

Our Privacy Policy applies to all of the services offered by Google Inc. and its affiliates, including YouTube, services Google provides on Android devices, and services offered on other sites (such as our advertising services), but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include Google services, or other sites linked from our services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

## Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy. We also adhere to several [self regulatory frameworks](#), including the EU-US and Swiss-US Privacy Shield Frameworks. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

## Specific product practices

The following notices explain specific privacy practices with respect to certain Google products and services that you may use:



- [Chrome and Chrome OS](#)
- [Play Books](#)
- [Payments](#)
- [Fiber](#)
- [Project Fi](#)
- [G Suite for Education](#)

For more information about some of our most popular services, you can visit the [Google Product Privacy Guide](#).

## Other useful privacy and security related materials

Further useful privacy and security related materials can be found through Google's [policies and principles pages](#), including:

- Information about our [technologies and principles](#), which includes, among other things, more information on
  - [how Google uses cookies](#).
  - technologies we use for [advertising](#).
  - how we [recognize patterns like faces](#).
- A [page](#) that explains what data is shared with Google when you visit websites that use our advertising, analytics and social products.
- The [Privacy Checkup](#) tool, which makes it easy to review your key privacy settings.
- Google's [safety center](#), which provides information on how to stay safe and secure online.

## "access to your personal information"

For example, with Google Dashboard you can quickly and easily see some of the data associated with your Google Account. [Learn more.](#)

## "ads you'll find most useful"

For example, if you frequently visit websites and blogs about gardening, you may see ads related to gardening as you browse the web. [Learn more.](#)

## "advertising services"

For example, if you frequently visit websites and blogs about gardening that show our ads, you may start to see ads related to this interest as you browse the web. [Learn more.](#)

## "and other sensors"

Your device may have sensors that provide information to assist in a better understanding of your location. For example, an accelerometer can be used to determine things like speed, or a gyroscope to figure out direction of travel. [Learn more.](#)

## "collect information"

This includes information like your usage data and preferences, Gmail messages, G+ profile, photos, videos, browsing history, map searches, docs, or other Google-hosted content. [Learn more.](#)

## "combine personal information from one service with information, including personal information, from other Google services"

For example, when you're signed in to your Google Account and search on Google, you can see search results from the public web, along with pages, photos, and Google+ posts from your friends and people who know you or follow you on Google+ may see your posts and profile in their results. [Learn more.](#)

## "connect with people"

For example, you could get suggestions of people you might know or want to connect with on Google+, based on the connections you have with people on other Google products, like Gmail; and people who have a connection with you may see your profile as a suggestion. [Learn more.](#)

## "credit card"

Whilst we currently don't ask for a credit card during sign up, verifying your age through a small credit card transaction is one way to confirm that you meet our age requirements in case your account was disabled after you have entered a birthday indicating you are not old enough to have a Google Account. [Learn more.](#)

## "develop new ones"

For example, Google's spell checking software was developed by analyzing previous searches where users had corrected their own spelling. [Learn more.](#)

## "device identifiers"

Device identifiers let Google know which unique device you are using to access our services, which can be used to customise our service to your device or analyse any device issues related to our services. [Learn more.](#)

## "device-specific information"

For example, when you visit Google Play from your desktop, Google can use this information to help you decide on which devices you'd like your purchases to be available for use. [Learn more.](#)

## "improve your user experience"

For example, cookies allow us to analyse how users interact with our services. [Learn more.](#)

## "legal process or enforceable governmental request"

Like other technology and communications companies, Google regularly receives requests from governments and courts around the world to hand over user data. Our legal team reviews each and every request, regardless of type, and we frequently push back when the requests appear to be overly broad or don't follow the correct process. [Learn more.](#)

## "limit sharing or visibility settings"

For example, you can choose your settings so your name and photo do not appear in an ad. [Learn more.](#)

## "linked with information about visits to multiple sites"

Google Analytics is based on first-party cookies. Data generated through Google Analytics can be linked, by the Google Analytics customer or by Google, using Google technology, to third-party cookies, related to visits to other websites, for instance when an advertiser wants to use its Google Analytics data to create more relevant ads, or to further analyze its traffic. [Learn more.](#)

## "maintain"

For example, we continuously monitor our systems to check that they are working as intended and in order to detect and fix errors. [Learn more.](#)

## "may collect and process information about your actual location"

For example, Google Maps can center the maps view on your current location. [Learn more.](#)

## "may not function properly"

For example, we use a cookie called 'lbc's' which makes it possible for you to open many Google Docs in one browser. [Learn more.](#)

## "and our partners"

We allow trusted businesses to use cookies or similar technologies for advertising and research purposes on our services. [Learn more.](#)

## "phone number"

For example, if you add a phone number as a recovery option, if you forget your password Google can send you a text message with a code to enable you to reset it. [Learn more.](#)

## "protect Google and our users"

For example, if you're concerned about unauthorized access to your email, "Last account activity" in Gmail shows you information about recent activity in your email, such as the IP addresses that accessed your mail, the associated location, as well as the time and date. [Learn more.](#)

## "protect"

For example, one reason we collect and analyze IP addresses and cookies is to protect our services against automated abuse. [Learn more.](#)

## "provide"

For example, the IP address assigned to your device is used to send the data you requested back to your device. [Learn more.](#)

## "sharing"

For example, with Google+, you have many different sharing options. [Learn more.](#)

## "sharing with others quicker and easier"

For example, if someone is already a contact, Google will autocomplete their name if you want to add them to a message in Gmail. [Learn more.](#)

## "the people who matter most to you online"

For example, when you type an address in the To, Cc, or Bcc field of a message you're composing, Gmail will suggest addresses from your Contacts list. [Learn more.](#)

## "to make it easier to share things with people you know"

For example, if you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to type in their name. [Learn more.](#)

## "view and interact with our ads"

For example, we regularly report to advertisers on whether we served their ad to a page and whether that ad was likely to be seen by users (as opposed to, for example, being on part of the page to which users did not scroll). [Learn more.](#)

## "We may share aggregated, non-personally identifiable information publicly"

When lots of people start searching for something, it can provide very useful information about particular trends at that time. [Learn more.](#)

## "Wi-Fi access points and cell towers"

For example, Google can approximate your device's location based on the known location of nearby cell towers. [Learn more.](#)

## "more relevant search results"

For example, we can make search more relevant and interesting for you by including photos, posts, and more from you and your friends. [Learn more.](#)

## "removing your content"

For example, you can delete your [Web & App Activity](#), your blog, a Google Site you own, your YouTube Channel, your Google+ profile or your entire Google account. [Learn more.](#)

## "to show trends"

You can see some of these at [Google Trends](#) and [YouTube Trending Videos](#). [Learn more.](#)

## "your activity on other sites and apps"

This activity might come from your use of Google products like Chrome Sync or from your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics). These products share information about your activity with Google and, depending on [your account settings](#) and the products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information. [Learn more.](#)



# **EXHIBIT 10**

## PRIVACY POLICY

Last modified: October 2, 2017 ([view archived versions](#))

There are many different ways you can use our services – to search for and share information, to communicate with other people or to create new content. When you share information with us, for example by creating a [Google Account](#), we can make those services even better – to show you [more relevant search results](#) and ads, to help you [connect with people](#) or to make [sharing with others quicker and easier](#). As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

We've tried to keep it as simple as possible, but if you're not familiar with terms like cookies, IP addresses, pixel tags and browsers, then read about these [key terms](#) first. Your privacy matters to Google so whether you are new to Google or a long-time user, please do take the time to get to know our practices – and if you have any questions [contact us](#).

## Information we collect

We collect information to provide better services to all of our users – from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like.

We collect information in the following ways:

- **Information you give us.** For example, many of our services require you to sign up for a Google Account. When you do, we'll ask for [personal information](#), like your name, email address, telephone number or [credit](#)

[card](#) to store with your account. If you want to take full advantage of the sharing features we offer, we might also ask you to create a publicly visible [Google Profile](#), which may include your name and photo.

- **Information we get from your use of our services.** We [collect information](#) about the services that you use and how you use them, like when you watch a video on YouTube, visit a website that uses our advertising services, or [view and interact with our ads](#) and content. This information includes:

- **Device information**

We collect [device-specific information](#) (such as your hardware model, operating system version, [unique device identifiers](#), and mobile network information including phone number). Google may associate your [device identifiers](#) or [phone number](#) with your Google Account.

- **Log information**

When you use our services or view content provided by Google, we automatically collect and store certain information in [server logs](#). This includes:

- details of how you used our service, such as your search queries.
  - telephony log information like your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information and types of calls.
  - [Internet protocol address](#).
  - device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.
  - cookies that may uniquely identify your browser or your Google Account.
- **Location information**

When you use Google services, we [may collect and process information about your actual location](#). We use various technologies to determine location, including IP address, GPS, [and other sensors](#) that may, for example, provide Google with information on nearby devices, [Wi-Fi access points and cell towers](#).

- **Unique application numbers**

Certain services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to Google when you install or uninstall that service or when that service periodically contacts our servers, such as for automatic updates.

- **Local storage**

We may collect and store information (including personal information) locally on your device using mechanisms such as [browser web storage](#) (including HTML 5) and [application data caches](#).

- **Cookies and similar technologies**

We [and our partners](#) use various technologies to collect and store information when you visit a Google service, and this may include using [cookies or similar technologies](#) to identify your browser or device. We also use these technologies to collect and store information when you interact with services we offer to our partners, such as [advertising services](#) or Google features that may appear on other sites. Our Google Analytics product helps businesses and site owners analyze the traffic to their websites and apps. When used in conjunction with our advertising services, such as those using the DoubleClick cookie, Google Analytics information is [linked, by the Google Analytics customer or by Google, using Google technology, with information about visits to multiple sites](#).

Information we collect when you are signed in to Google, in addition to information we obtain about you from partners, may be associated with your Google Account. When information is associated with your Google Account, we treat it as personal information. For more information about how you can access, manage or delete information that is associated with your Google Account, visit the [Transparency and choice](#) section of this policy.

## How we use information we collect

We use the information we collect from all of our services to [provide, maintain, protect](#) and improve them, to [develop new ones](#), and to [protect Google and our users](#). We also use this information to offer you tailored content – like giving you more relevant search results and ads.

We may use the name you provide for your Google Profile across all of the services we offer that require a Google Account. In addition, we may replace past names associated with your Google Account so that you are represented consistently across all our services. If other users already have your email, or other information that identifies you, we may show them your publicly visible Google Profile information, such as your name and photo.

If you have a Google Account, we may display your Profile name, Profile photo, and actions you take on Google or on third-party applications connected to your Google Account (such as +1's, reviews you write and comments you post) in our services, including displaying in ads and other commercial contexts. We will respect the choices you make to [limit sharing or visibility settings](#) in your Google Account.

When you contact Google, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

We use information collected from cookies and other technologies, like [pixel tags](#), to [improve your user experience](#) and the overall quality of our services. One of the products we use to do this on our own services is Google Analytics. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer. When showing you tailored ads, we will not associate an identifier from cookies or similar technologies with [sensitive categories](#), such as those based on race, religion, sexual orientation or health.

Our automated systems analyze your content (including emails) to provide you personally relevant product features, such as customized search results, tailored advertising, and spam and malware detection.

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- [Review and update your Google activity controls](#) to decide what types of data, such as videos you've watched on YouTube or past searches, you would like saved with your account when you use Google services. You can also visit these [controls](#) to manage whether certain activity is stored in a cookie or similar technology on your device when you use our services while signed-out of your account.
- [Review and control](#) certain types of information tied to your Google Account by using Google Dashboard.
- [View and edit](#) your preferences about the Google ads shown to you on Google and across the web, such as which categories might interest you, using Ads Settings. You can also visit that page to opt out of certain Google advertising services.
- [Adjust](#) how the Profile associated with your Google Account appears to others.
- [Control](#) who you share information with through your Google Account.
- [Take information](#) associated with your Google Account out of many of our services.
- [Choose](#) whether your Profile name and Profile photo appear in shared endorsements that appear in ads.

You may also set your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us. However, it's important to remember that many of our services [may not function properly](#) if your cookies are disabled. For example, we may not remember your language preferences.

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- **With domain administrators**

If your Google Account is managed for you by a [domain administrator](#) (for example, for G Suite users) then your domain administrator and resellers who provide user support to your organization will have access to your Google Account information (including your email and other data). Your domain administrator may be able to:

- view statistics regarding your account, like statistics regarding applications you install.
- change your account password.
- suspend or terminate your account access.
- access or retain information stored as part of your account.
- receive your account information in order to satisfy applicable law, regulation, [legal process or enforceable governmental request](#).
- restrict your ability to delete or edit information or privacy settings.

Please refer to your domain administrator's privacy policy for more information.

- **For external processing**

We provide personal information to our [affiliates](#) or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

- **For legal reasons**



We will share personal information with companies, organizations or individuals outside of Google if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, [legal process or enforceable governmental request](#).
- enforce applicable Terms of Service, including investigation of potential violations.
- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of Google, our users or the public as required or permitted by law.

[We may share non-personally identifiable information](#) publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly [to show trends](#) about the general use of our services.

If Google is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## Information security

We work hard to protect Google and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

- We encrypt many of our services [using SSL](#).
- We offer you [two step verification](#) when you access your Google Account, and a [Safe Browsing feature](#) in Google Chrome.
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Google employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## When this Privacy Policy applies

Our Privacy Policy applies to all of the services offered by Google LLC and its affiliates, including YouTube, services Google provides on Android devices, and services offered on other sites (such as our advertising services), but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include Google services, or other sites linked from our services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

## Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy. We also adhere to several [self regulatory frameworks](#), including the EU-US and Swiss-US Privacy Shield Frameworks. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

## Specific product practices

The following notices explain specific privacy practices with respect to certain Google products and services that you may use:

- [Chrome and Chrome OS](#)
- [Play Books](#)
- [Payments](#)
- [Fiber](#)
- [Project Fi](#)
- [G Suite for Education](#)
- [YouTube Kids](#)
- [Google Accounts Managed with Family Link](#)

For more information about some of our most popular services, you can visit the [Google Product Privacy Guide](#).

## Other useful privacy and security related materials

Further useful privacy and security related materials can be found through Google's [policies and principles pages](#), including:

- Information about our [technologies and principles](#), which includes, among other things, more information on
  - [how Google uses cookies](#).
  - technologies we use for [advertising](#).
  - how we [recognize patterns like faces](#).
- A [page](#) that explains what data is shared with Google when you visit websites that use our advertising, analytics and social products.
- The [Privacy Checkup](#) tool, which makes it easy to review your key privacy settings.
- Google's [safety center](#), which provides information on how to stay safe and secure online.

## "access to your personal information"

For example, with Google Dashboard you can quickly and easily see some of the data associated with your Google Account. [Learn more.](#)

## "ads you'll find most useful"

For example, if you frequently visit websites and blogs about gardening, you may see ads related to gardening as you browse the web. [Learn more.](#)

## "advertising services"

For example, if you frequently visit websites and blogs about gardening that show our ads, you may start to see ads related to this interest as you browse the web. [Learn more.](#)

## "and other sensors"

Your device may have sensors that provide information to assist in a better understanding of your location. For example, an accelerometer can be used to determine things like speed, or a gyroscope to figure out direction of travel. [Learn more.](#)

## "collect information"

This includes information like your usage data and preferences, Gmail messages, G+ profile, photos, videos, browsing history, map searches, docs, or other Google-hosted content. [Learn more.](#)

## "combine personal information from one service with information, including personal information, from other Google services"

For example, when you're signed in to your Google Account and search on Google, you can see search results from the public web, along with pages, photos, and Google+ posts from your friends and people who know you or follow you on Google+ may see your posts and profile in their results. [Learn more.](#)

## "connect with people"

For example, you could get suggestions of people you might know or want to connect with on Google+, based on the connections you have with people on other Google products, like Gmail; and people who have a connection with you may see your profile as a suggestion. [Learn more.](#)

## "credit card"

Whilst we currently don't ask for a credit card during sign up, verifying your age through a small credit card transaction is one way to confirm that you meet our age requirements in case your account was disabled after you have entered a birthday indicating you are not old enough to have a Google Account. [Learn more.](#)

## "develop new ones"

For example, Google's spell checking software was developed by analyzing previous searches where users had corrected their own spelling. [Learn more.](#)

## "device identifiers"

Device identifiers let Google know which unique device you are using to access our services, which can be used to customise our service to your device or analyse any device issues related to our services. [Learn more.](#)

## "device-specific information"

For example, when you visit Google Play from your desktop, Google can use this information to help you decide on which devices you'd like your purchases to be available for use. [Learn more.](#)

## "improve your user experience"

For example, cookies allow us to analyse how users interact with our services. [Learn more.](#)

## "legal process or enforceable governmental request"

Like other technology and communications companies, Google regularly receives requests from governments and courts around the world to hand over user data. Our legal team reviews each and every request, regardless of type, and we frequently push back when the requests appear to be overly broad or don't follow the correct process. [Learn more.](#)

## "limit sharing or visibility settings"

For example, you can choose your settings so your name and photo do not appear in an ad. [Learn more.](#)

## "linked with information about visits to multiple sites"

Google Analytics is based on first-party cookies. Data generated through Google Analytics can be linked, by the Google Analytics customer or by Google, using Google technology, to third-party cookies, related to visits to

other websites, for instance when an advertiser wants to use its Google Analytics data to create more relevant ads, or to further analyze its traffic. [Learn more.](#)

## "maintain"

For example, we continuously monitor our systems to check that they are working as intended and in order to detect and fix errors. [Learn more.](#)

## "may collect and process information about your actual location"

For example, Google Maps can center the maps view on your current location. [Learn more.](#)

## "may not function properly"

For example, we use a cookie called 'lbc's' which makes it possible for you to open many Google Docs in one browser. [Learn more.](#)

## "and our partners"

We allow trusted businesses to use cookies or similar technologies for advertising and research purposes on our services. [Learn more.](#)

## "phone number"

For example, if you add a phone number as a recovery option, if you forget your password Google can send you a text message with a code to enable you to reset it. [Learn more.](#)

## "protect Google and our users"

For example, if you're concerned about unauthorized access to your email, "Last account activity" in Gmail shows you information about recent activity in your email, such as the IP addresses that accessed your mail, the associated location, as well as the time and date. [Learn more.](#)

## "protect"

For example, one reason we collect and analyze IP addresses and cookies is to protect our services against automated abuse. [Learn more.](#)

## "provide"

For example, the IP address assigned to your device is used to send the data you requested back to your device. [Learn more.](#)

## "sharing"

For example, with Google+, you have many different sharing options. [Learn more.](#)

## "sharing with others quicker and easier"

For example, if someone is already a contact, Google will autocomplete their name if you want to add them to a message in Gmail. [Learn more.](#)

## "the people who matter most to you online"



For example, when you type an address in the To, Cc, or Bcc field of a message you're composing, Gmail will suggest addresses from your Contacts list. [Learn more.](#)

## "to make it easier to share things with people you know"

For example, if you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to type in their name. [Learn more.](#)

## "view and interact with our ads"

For example, we regularly report to advertisers on whether we served their ad to a page and whether that ad was likely to be seen by users (as opposed to, for example, being on part of the page to which users did not scroll). [Learn more.](#)

## "We may share aggregated, non-personally identifiable information publicly"

When lots of people start searching for something, it can provide very useful information about particular trends at that time. [Learn more.](#)

## "Wi-Fi access points and cell towers"

For example, Google can approximate your device's location based on the known location of nearby cell towers. [Learn more.](#)

## "more relevant search results"

For example, we can make search more relevant and interesting for you by including photos, posts, and more from you and your friends. [Learn more.](#)

## "removing your content"

For example, you can delete your [Web & App Activity](#), [your blog](#), [a Google Site you own](#), [your YouTube Channel](#), [your Google+ profile](#) or [your entire Google account](#). [Learn more.](#)

## "to show trends"

You can see some of these at [Google Trends](#) and [YouTube Trending Videos](#). [Learn more.](#)

## "your activity on other sites and apps"

This activity might come from your use of Google products like Chrome Sync or from your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics). These products share information about your activity with Google and, depending on [your account settings](#) and the products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information. [Learn more.](#)

# **EXHIBIT 11**

## PRIVACY POLICY

Last modified: December 18, 2017 ([view archived versions](#))

There are many different ways you can use our services – to search for and share information, to communicate with other people or to create new content. When you share information with us, for example by creating a [Google Account](#), we can make those services even better – to show you [more relevant search results](#) and ads, to help you [connect with people](#) or to make [sharing with others quicker and easier](#). As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

We've tried to keep it as simple as possible, but if you're not familiar with terms like cookies, IP addresses, pixel tags and browsers, then read about these [key terms](#) first. Your privacy matters to Google so whether you are new to Google or a long-time user, please do take the time to get to know our practices – and if you have any questions [contact us](#).

## Information we collect

We collect information to provide better services to all of our users – from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like.

We collect information in the following ways:

- **Information you give us.** For example, many of our services require you to sign up for a Google Account. When you do, we'll ask for [personal information](#), like your name, email address, telephone number or [credit](#)

[card](#) to store with your account. If you want to take full advantage of the sharing features we offer, we might also ask you to create a publicly visible [Google Profile](#), which may include your name and photo.

- **Information we get from your use of our services.** We [collect information](#) about the services that you use and how you use them, like when you watch a video on YouTube, visit a website that uses our advertising services, or [view and interact with our ads](#) and content. This information includes:

- **Device information**

We collect [device-specific information](#) (such as your hardware model, operating system version, [unique device identifiers](#), and mobile network information including phone number). Google may associate your [device identifiers](#) or [phone number](#) with your Google Account.

- **Log information**

When you use our services or view content provided by Google, we automatically collect and store certain information in [server logs](#). This includes:

- details of how you used our service, such as your search queries.
- telephony log information like your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information and types of calls.
- [Internet protocol address](#).
- device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.
- cookies that may uniquely identify your browser or your Google Account.

- **Location information**

When you use Google services, we [may collect and process information about your actual location](#). We use various technologies to determine location, including IP address, GPS, [and other sensors](#) that may, for example, provide Google with information on nearby devices, [Wi-Fi access points and cell towers](#).

- **Unique application numbers**

Certain services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to Google when you install or uninstall that service or when that service periodically contacts our servers, such as for automatic updates.

- **Local storage**

We may collect and store information (including personal information) locally on your device using mechanisms such as [browser web storage](#) (including HTML 5) and [application data caches](#).

- **Cookies and similar technologies**

We [and our partners](#) use various technologies to collect and store information when you visit a Google service, and this may include using [cookies or similar technologies](#) to identify your browser or device. We also use these technologies to collect and store information when you interact with services we offer to our partners, such as [advertising services](#) or Google features that may appear on other sites. Our Google Analytics product helps businesses and site owners analyze the traffic to their websites and apps. When used in conjunction with our advertising services, such as those using the DoubleClick cookie, Google Analytics information is [linked, by the Google Analytics customer or by Google, using Google technology, with information about visits to multiple sites](#).

Information we collect when you are signed in to Google, in addition to information we obtain about you from partners, may be associated with your Google Account. When information is associated with your Google Account, we treat it as personal information. For more information about how you can access, manage or delete information that is associated with your Google Account, visit the [Transparency and choice](#) section of this policy.

## How we use information we collect

We use the information we collect from all of our services to [provide, maintain, protect](#) and improve them, to [develop new ones](#), and to [protect Google and our users](#). We also use this information to offer you tailored content – like giving you more relevant search results and ads.

We may use the name you provide for your Google Profile across all of the services we offer that require a Google Account. In addition, we may replace past names associated with your Google Account so that you are represented consistently across all our services. If other users already have your email, or other information that identifies you, we may show them your publicly visible Google Profile information, such as your name and photo.

If you have a Google Account, we may display your Profile name, Profile photo, and actions you take on Google or on third-party applications connected to your Google Account (such as +1's, reviews you write and comments you post) in our services, including displaying in ads and other commercial contexts. We will respect the choices you make to [limit sharing or visibility settings](#) in your Google Account.

When you contact Google, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

We use information collected from cookies and other technologies, like [pixel tags](#), to [improve your user experience](#) and the overall quality of our services. One of the products we use to do this on our own services is Google Analytics. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer. When showing you tailored ads, we will not associate an identifier from cookies or similar technologies with [sensitive categories](#), such as those based on race, religion, sexual orientation or health.

Our automated systems analyze your content (including emails) to provide you personally relevant product features, such as customized search results, tailored advertising, and spam and malware detection.

We may [combine personal information from one service with information, including personal information, from other Google services](#) – for example [to make it easier to share things with people you know](#). Depending on [your account settings, your activity on other sites and apps](#) may be associated with your personal information in order to improve Google's services and the ads delivered by Google.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

Google processes personal information on our servers in many countries around the world. We may process your personal information on a server located outside the country where you live.

## Transparency and choice

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. For example, you can:

- [Review and update your Google activity controls](#) to decide what types of data, such as videos you've watched on YouTube or past searches, you would like saved with your account when you use Google services. You can also visit these [controls](#) to manage whether certain activity is stored in a cookie or similar technology on your device when you use our services while signed-out of your account.
- [Review and control](#) certain types of information tied to your Google Account by using Google Dashboard.
- [View and edit](#) your preferences about the Google ads shown to you on Google and across the web, such as which categories might interest you, using Ads Settings. You can also visit that page to opt out of certain Google advertising services.
- [Adjust](#) how the Profile associated with your Google Account appears to others.
- [Control](#) who you share information with through your Google Account.
- [Take information](#) associated with your Google Account out of many of our services.
- [Choose](#) whether your Profile name and Profile photo appear in shared endorsements that appear in ads.

You may also set your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us. However, it's important to remember that many of our services [may not function properly](#) if your cookies are disabled. For example, we may not remember your language preferences.



## Information you share

Many of our services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines, including Google. Our services provide you with different options on [sharing](#) and [removing your content](#).

## Accessing and updating your personal information

Whenever you use our services, we aim to provide you with [access to your personal information](#). If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes.

We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

## Information we share

We do not share personal information with companies, organizations and individuals outside of Google unless one of the following circumstances applies:

- **With your consent**

We will share personal information with companies, organizations or individuals outside of Google when we have your consent to do so. We require opt-in consent for the sharing of any [sensitive personal information](#).

- **With domain administrators**

If your Google Account is managed for you by a [domain administrator](#) (for example, for G Suite users) then your domain administrator and resellers who provide user support to your organization will have access to your Google Account information (including your email and other data). Your domain administrator may be able to:

- view statistics regarding your account, like statistics regarding applications you install.
- change your account password.
- suspend or terminate your account access.
- access or retain information stored as part of your account.
- receive your account information in order to satisfy applicable law, regulation, [legal process or enforceable governmental request](#).
- restrict your ability to delete or edit information or privacy settings.

Please refer to your domain administrator's privacy policy for more information.

- **For external processing**

We provide personal information to our [affiliates](#) or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

- **For legal reasons**

We will share personal information with companies, organizations or individuals outside of Google if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, [legal process or enforceable governmental request](#).
- enforce applicable Terms of Service, including investigation of potential violations.

- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of Google, our users or the public as required or permitted by law.

We may share non-personally identifiable information publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly to show trends about the general use of our services.

If Google is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## Information security

We work hard to protect Google and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

- We encrypt many of our services using SSL.
- We offer you two step verification when you access your Google Account, and a Safe Browsing feature in Google Chrome.
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Google employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## When this Privacy Policy applies

Our Privacy Policy applies to all of the services offered by Google LLC and its affiliates, including YouTube, services Google provides on Android devices, and services offered on other sites (such as our advertising services), but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include Google services, or other sites linked from our services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

## Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy. We also adhere to several [self regulatory frameworks](#), including the EU-US and Swiss-US Privacy Shield Frameworks. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

## Specific product practices

The following notices explain specific privacy practices with respect to certain Google products and services that you may use:

- [Chrome and Chrome OS](#)
- [Play Books](#)
- [Payments](#)
- [Fiber](#)

- [Project Fi](#)
- [G Suite for Education](#)
- [YouTube Kids](#)
- [Google Accounts Managed with Family Link](#)

For more information about some of our most popular services, you can visit the [Google Product Privacy Guide](#).

## Other useful privacy and security related materials

Further useful privacy and security related materials can be found through Google's [policies and principles pages](#), including:

- Information about our [technologies and principles](#), which includes, among other things, more information on
  - [how Google uses cookies](#).
  - technologies we use for [advertising](#).
  - how we [recognize patterns like faces](#).
- A [page](#) that explains what data is shared with Google when you visit websites that use our advertising, analytics and social products.
- The [Privacy Checkup](#) tool, which makes it easy to review your key privacy settings.
- Google's [safety center](#), which provides information on how to stay safe and secure online.

# **EXHIBIT 12**

## GOOGLE PRIVACY POLICY

When you use our services, you're trusting us with your information. We understand this is a big responsibility and work hard to protect your information and put you in control.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

Effective May 25, 2018 | [Archived versions](#) | [Download PDF](#)

We build a range of services that help millions of people daily to explore and interact with the world in new ways. Our services include:

- Google apps, sites, and devices, like Search, YouTube, and Google Home
- Platforms like the Chrome browser and Android operating system
- Products that are integrated into third-party apps and sites, like ads and embedded Google Maps

You can use our services in a variety of ways to manage your privacy. For example, you can sign up for a Google Account if you want to create and manage content like emails and photos, or see more relevant search results. And you can use many Google services when you're signed out or without creating an account at all, like searching on Google or watching YouTube videos. You can also choose to browse the web privately using Chrome in Incognito mode. And across our services, you can adjust your privacy settings to control what we collect and how your information is used.

To help explain things as clearly as possible, we've added examples, explanatory videos, and definitions for [key terms](#). And if you have any questions about this Privacy Policy, you can [contact us](#).

## INFORMATION GOOGLE COLLECTS

We want you to understand the types of information we collect as you use our services

We collect information to provide better services to all our users — from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like. The information Google collects, and how that information is used, depends on how you use our services and how you manage your privacy controls.

When you're not signed in to a Google Account, we store the information we collect with [unique identifiers](#) tied to the browser, application, or [device](#) you're using. This helps us do things like maintain your language preferences across browsing sessions.

When you're signed in, we also collect information that we store with your Google Account, which we treat as [personal information](#).

## Things you create or provide to us

When you create a Google Account, you provide us with [personal information](#) that includes your name and a password. You can also choose to add a [phone number](#) or [payment information](#) to your account. Even if you aren't signed in to a Google Account, you might choose to provide us with information – like an email address to receive updates about our services.

We also collect the content you create, upload, or receive from others when using our services. This includes things like email you write and receive, photos and videos you save, docs and spreadsheets you create, and comments you make on YouTube videos.

## Information we collect as you use our services

### Your apps, browsers & devices

We collect information about the apps, browsers, and [devices](#) you use to access Google services, which helps us provide features like automatic product updates and dimming your screen if your battery runs low.

The information we collect includes [unique identifiers](#), browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application version number. We also collect information about the interaction of your apps, browsers, and devices with our services, including [IP address](#), crash reports, system activity, and the date, time, and referrer URL of your request.

We collect this information when a Google service on your device contacts our servers – for example, when you install an app from the Play Store or when a service checks for automatic updates. If you're using an [Android device with Google apps](#), your device periodically contacts Google servers to provide information about your



device and connection to our services. This information includes things like your device type, carrier name, crash reports, and which apps you've installed.

## Your activity

We collect information about your activity in our services, which we use to do things like recommend a YouTube video you might like. The activity information we collect may include:

- Terms you search for
- Videos you watch
- [Views and interactions with content and ads](#)
- Voice and audio information when you use audio features
- Purchase activity
- People with whom you communicate or share content
- Activity on third-party sites and apps that use our services
- Chrome browsing history you've [synced with your Google Account](#)

If you use our [services to make and receive calls or send and receive messages](#), we may collect telephony log information like your phone number, calling-party number, receiving-party number, forwarding numbers, time and date of calls and messages, duration of calls, routing information, and types of calls.

You can visit your Google Account to find and manage activity information that's saved in your account.

[Go to Google Account](#)

## Your location information

We collect information about your location when you use our services, which helps us offer features like driving directions for your weekend getaway or showtimes for movies playing near you.

Your location can be determined with varying degrees of accuracy by:

- [GPS](#)
- [IP address](#)
- [Sensor data from your device](#)
- [Information about things near your device](#), such as Wi-Fi access points, cell towers, and Bluetooth-enabled devices

The types of location data we collect depend in part on your device and account settings. For example, you can [turn your Android device's location on or off](#) using the device's settings app. You can also turn on [Location History](#) if you want to save and manage your location information in your account.

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In some circumstances, Google also collects information about you from [publicly accessible sources](#). For example, if your name appears in your local newspaper, Google's Search engine may index that article and display it to other people if they search for your name. We may also collect information about you from trusted partners, including marketing partners who provide us with information about potential customers of our business services, and security partners who provide us with information to [protect against abuse](#). We also receive information from advertisers to provide [advertising and research services on their behalf](#).

We use various technologies to collect and store information, including [cookies](#), [pixel tags](#), local storage, such as [browser web storage](#) or [application data caches](#), databases, and [server logs](#).

#### WHY GOOGLE COLLECTS DATA

We use data to build better services

We use the information we collect from all our services for the following purposes:

#### Provide our services

We use your information to [deliver our services](#), like processing the terms you search for in order to return results or helping you share content by suggesting recipients from your contacts.

## Maintain & improve our services

We also use your information to [ensure our services are working as intended](#), such as tracking outages or troubleshooting issues that you report to us. And we use your information to [make improvements](#) to our services – for example, understanding which search terms are most frequently misspelled helps us improve spell-check features used across our services.

## Develop new services

We use the information we collect in existing services to help us develop new ones. For example, understanding how people organized their photos in Picasa, Google's first photos app, helped us design and launch Google Photos.

## Provide personalized services, including content and ads

We use the information we collect to customize our services for you, including providing recommendations, personalized content, and [customized search results](#). For example, [Security Checkup](#) provides security tips adapted to how you use Google products. And Google Play uses information like apps you've already installed and videos you've watched on YouTube to suggest new apps you might like.

Depending on your settings, we may also show you [personalized ads](#) based on your interests. For example, if you search for "mountain bikes," you may see an ad for sports equipment when you're browsing a site that shows ads served by Google. You can control what information we use to show you ads by visiting your ad settings.

- We don't show you personalized ads based on [sensitive categories](#), such as race, religion, sexual orientation, or health.
- We don't share information that personally identifies you with advertisers, such as your name or email, unless you ask us to. For example, if you see an ad for a nearby flower shop and select the "tap to call" button, we'll connect your call and may share your phone number with the flower shop.

[Go to Ad Settings](#)

## Measure performance

We use data for analytics and measurement to understand how our services are used. For example, we analyze data about your visits to our sites to do things like optimize product design. And we also use data about the ads you interact with to help advertisers understand the performance of their ad campaigns. We use a variety of tools to do this, including Google Analytics. When you visit sites that use Google Analytics, Google and a Google Analytics customer [may link information](#) about your activity from that site with activity from other sites that use our ad services.

## Communicate with you

We use information we collect, like your email address, to interact with you directly. For example, we may send you a notification if we detect suspicious activity, like an attempt to sign in to your Google Account from an unusual location. Or we may let you know about upcoming changes or improvements to our services. And if you contact Google, we'll keep a record of your request in order to help solve any issues you might be facing.

## Protect Google, our users, and the public

We use information to help improve the [safety and reliability](#) of our services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm Google, our users, or the public.

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We use different technologies to process your information for these purposes. We use automated systems that analyze your content to provide you with things like customized search results, personalized ads, or other features tailored to how you use our services. And we analyze your content to help us [detect abuse](#) such as spam, malware, and illegal content. We also use [algorithms](#) to recognize patterns in data. For example, Google Translate helps people communicate across languages by detecting common language patterns in phrases you ask it to translate.

We may [combine the information we collect](#) among our services and across your devices for the purposes described above. For example, if you watch videos of guitar players on YouTube, you might see an ad for guitar lessons on a site that uses our ad products. Depending on your account settings, [your activity on other sites](#)

[and apps](#) may be associated with your personal information in order to improve Google's services and the ads delivered by Google.

If other users already have your email address or other information that identifies you, we may show them your publicly visible Google Account information, such as your name and photo. This helps people identify an email coming from you, for example.

We'll ask for your consent before using your information for a purpose that isn't covered in this Privacy Policy.

## YOUR PRIVACY CONTROLS

You have choices regarding the information we collect and how it's used

This section describes key controls for managing your privacy across our services. You can also visit the [Privacy Checkup](#), which provides an opportunity to review and adjust important privacy settings. In addition to these tools, we also offer specific privacy settings in our products — you can learn more in our [Product Privacy Guide](#).

[Go to Privacy Checkup](#)

## Managing, reviewing, and updating your information

When you're signed in, you can always review and update information by visiting the services you use. For example, Photos and Drive are both designed to help you manage specific types of content you've saved with Google.

We also built a place for you to review and control information saved in your Google Account. Your [Google Account](#) includes:

### Privacy controls

### Activity Controls

Decide what types of activity you'd like saved in your account. For example, you can turn on Location History if you want traffic predictions for your daily commute, or you can save your YouTube Watch History to get better video suggestions.

[Go to Activity Controls](#)

## Ad settings

Manage your preferences about the ads shown to you on Google and on sites and apps that [partner with Google](#) to show ads. You can modify your interests, choose whether your personal information is used to make ads more relevant to you, and turn on or off certain advertising services.

[Go to Ad Settings](#)

## About you

Control what others see about you across Google services.

[Go to About You](#)

## Shared endorsements

Choose whether your name and photo appear next to your activity, like reviews and recommendations, that appear in ads.

[Go to Shared Endorsements](#)

## Information you share

Control whom you share information with through your account on Google+.

[Go to Information You Share](#)

## Ways to review & update your information

### My Activity

My Activity allows you to review and control data that's created when you use Google services, like searches you've done or your visits to Google Play. You can browse by date and by topic, and delete part or all of your activity.

[Go to My Activity](#)

### Google Dashboard

Google Dashboard allows you to manage information associated with specific products.

[Go to Dashboard](#)

### Your personal information

Manage your contact information, such as your name, email, and phone number.

[Go to Personal Info](#)

When you're signed out, you can manage information associated with your browser or device, including:

- Signed-out search personalization: [Choose](#) whether your search activity is used to offer you more relevant results and recommendations.
- YouTube settings: Pause and delete your [YouTube Search History](#) and your [YouTube Watch History](#).
- Ad Settings: [Manage](#) your preferences about the ads shown to you on Google and on sites and apps that partner with Google to show ads.

## Exporting, removing & deleting your information

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

### [Export your data](#)

You can also [request to remove content](#) from specific Google services based on applicable law.

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

### [Delete your information](#)

And finally, [Inactive Account Manager](#) allows you to give someone else access to parts of your Google Account in case you're unexpectedly unable to use your account.

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There are other ways to control the information Google collects whether or not you're signed in to a Google Account, including:

- **Browser settings:** For example, you can configure your browser to indicate when Google has set a [cookie](#) in your browser. You can also configure your browser to block all cookies from a specific domain or all domains. But remember that our services [rely on cookies to function properly](#), for things like remembering your language preferences.
- **Device-level settings:** Your device may have controls that determine what information we collect. For example, you can [modify location settings](#) on your Android device.



## SHARING YOUR INFORMATION

### When you share your information

Many of our services let you share information with other people, and you have control over how you share. For example, you can share videos on YouTube publicly or you can decide to keep your videos private. Remember, when you share information publicly, your content may become accessible through search engines, including Google Search.

When you're signed in and interact with some Google services, like leaving comments on a YouTube video or reviewing a song in Play, your name and photo appear next to your activity. We may also display this information in [ads depending on your Shared endorsements setting](#).

### When Google shares your information

We do not share your personal information with companies, organizations, or individuals outside of Google except in the following cases:

#### With your consent

We'll share personal information outside of Google when we have your consent. For example, if you [use Google Home to request a ride](#) from a ride-sharing service, we'll get your permission before sharing your address with that service. We'll ask for your explicit consent to share any [sensitive personal information](#).

#### With domain administrators

If you're a student or work for an organization that uses Google services (like G Suite), your [domain administrator](#) and resellers who manage your account will have access to your Google Account. They may be able to:

- Access and retain information stored in your account, like your email
- View statistics regarding your account, like how many apps you install

- Change your account password
- Suspend or terminate your account access
- Receive your account information in order to satisfy applicable law, regulation, legal process, or enforceable governmental request
- Restrict your ability to delete or edit your information or your privacy settings

## For external processing

We provide personal information to our [affiliates](#) and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with customer support.

## For legal reasons

We will share personal information outside of Google if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, [legal process, or enforceable governmental request](#). We share information about the number and type of requests we receive from governments in our [Transparency Report](#).
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security, or technical issues.
- Protect against harm to the rights, property or safety of Google, our users, or the public as required or permitted by law.

We may share [non-personally identifiable information](#) publicly and with our partners — like publishers, advertisers, developers, or rights holders. For example, we share information publicly to [show trends](#) about the general use of our services. We also allow [specific partners](#) to collect information from your browser or device for advertising and measurement purposes using their own cookies or similar technologies.

If Google is involved in a merger, acquisition, or sale of assets, we'll continue to ensure the confidentiality of your personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## KEEPING YOUR INFORMATION SECURE

We build security into our services to protect your information

All Google products are built with strong security features that continuously protect your information. The insights we gain from maintaining our services help us detect and automatically block security threats from ever reaching you. And if we do detect something risky that we think you should know about, we'll notify you and help guide you through steps to stay better protected.

We work hard to protect you and Google from unauthorized access, alteration, disclosure, or destruction of information we hold, including:

- We use encryption to keep your data private while in transit
- We offer a range of security features, like [Safe Browsing](#), Security Checkup, and [2 Step Verification](#) to help you protect your account
- We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems
- We restrict access to personal information to Google employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## EXPORTING & DELETING YOUR INFORMATION

You can export a copy of your information or delete it from your Google Account at any time

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

[Export your data](#)

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

### Delete your information

In some cases, we retain data for limited periods when it needs to be kept for legitimate business or legal purposes. You can read about Google's [data retention periods](#), including how long it takes us to delete your information.

We try to ensure that our services protect information from accidental or malicious deletion. Because of this, there may be delays between when you delete something and when copies are deleted from our active and backup systems.

### COMPLIANCE & COOPERATION WITH REGULATORS

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

## Data transfers

We maintain [servers around the world](#) and your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this policy. We also comply with certain [legal frameworks](#) relating to the transfer of data, such as the EU-US and Swiss-US Privacy Shield Frameworks.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

### ABOUT THIS POLICY

## When this policy applies

This Privacy Policy applies to all of the services offered by Google LLC and its [affiliates](#), including YouTube, Android, and services offered on third-party sites, such as advertising services. This Privacy Policy doesn't apply to services that have separate privacy policies that do not incorporate this Privacy Policy.

This Privacy Policy doesn't apply to:

- The information practices of other companies and organizations that advertise our services
- Services offered by other companies or individuals, including products or sites that may include Google services, be displayed to you in search results, or be linked from our services

## Changes to this policy

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date the last changes were published and we offer access to [archived versions](#) for your review. If changes are significant, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

### RELATED PRIVACY PRACTICES

## Specific Google services

The following privacy notices provide additional information about some Google services:

- [Chrome & the Chrome Operating System](#)
- [Play Books](#)
- [Payments](#)
- [Fiber](#)
- [Project Fi](#)
- [G Suite for Education](#)

- [YouTube Kids](#)
- [Google Accounts Managed with Family Link](#)

## Other useful resources

The following links highlight useful resources for you to learn more about our practices and privacy settings.

- [Your Google Account](#) is home to many of the settings you can use to manage your account
- [Privacy Checkup](#) guides you through key privacy settings for your Google Account
- [Google's safety center](#) offers advice for staying safe & secure
- [Google's privacy site](#) provides more information about how we keep your information private and safe
- [Privacy & Terms](#) provides more context regarding this Privacy Policy and our Terms of Service
- [Technologies and Principles](#) includes more information about:
  - [How Google uses cookies](#)
  - Technologies used for [Advertising](#)
  - [How Google uses pattern recognition](#) to recognize things like faces in photos
  - A page that explains what data is shared with Google when you visit websites that use our advertising, analytics and social products.
  - [How Google uses data when you use our partners' sites or apps](#)

## ads you'll find most useful

For example, if you watch videos about baking on YouTube, you may see more ads that relate to baking as you browse the web. We also may use your IP address to determine your approximate location, so that we can serve you ads for a nearby pizza delivery service if you search for "pizza." Learn more [about Google ads](#) and [why you may see particular ads](#).

## the people who matter most to you online

For example, when you type an address in the To, Cc, or Bcc field of an email you're composing, Gmail will suggest addresses based on the people you [contact most frequently](#).

## phone number

If you add your phone number to your account, it can be used for different purposes across Google services, depending on your settings. For example, your phone number can be used to help you access your account if you forget your password, help people find and connect with you, and make the ads you see more relevant to you. [Learn more](#)

## payment information

For example, if you add a credit card or other payment method to your Google Account, you can use it to buy things across our services, like apps in the Play Store. We may also ask for other information, like a business tax ID, to help process your payment. In some cases, we may also need to verify your identity and may ask you for information to do this.

We may also use payment information to verify that you meet age requirements, if, for example, you enter an incorrect birthday indicating you're not old enough to have a Google Account. [Learn more](#)

## devices

For example, we can use information from your devices to help you decide which device you'd like to use to install an app or view a movie you buy from Google Play. We also use this information to help protect your account.

## Android device with Google apps

Android devices with Google apps include devices sold by Google or one of our partners and include phones, cameras, vehicles, wearables, and televisions. These devices use Google Play Services and other pre-installed

apps that include services like Gmail, Maps, your phone's camera and phone dialer, text-to-speech conversion, keyboard input, and security features.

## Views and interactions with content and ads

For example, we collect information about views and interactions with ads so we can provide aggregated reports to advertisers, like telling them whether we served their ad on a page and whether the ad was likely seen by a viewer. We may also measure other interactions, such as how you move your mouse over an ad or if you interact with the page on which the ad appears.

## synced with your Google Account

Your Chrome browsing history is only saved to your account if you've enabled Chrome synchronization with your Google Account. [Learn more](#)

## services to make and receive calls or send and receive messages

Examples of these services include:

- Google Hangouts, for making domestic and international calls
- Google Voice, for making calls, sending text messages, and managing voicemail
- Project Fi, for a phone plan

## Sensor data from your device

Your device may have sensors that can be used to better understand your location and movement. For example, an accelerometer can be used to determine your speed and a gyroscope to figure out your direction of travel.

## Information about things near your device



If you use Google's Location services on Android, we can improve the performance of apps that rely on your location, like Google Maps. If you use Google's Location services, your device sends information to Google about its location, sensors (like accelerometer), and nearby cell towers and Wi-Fi access points (like MAC address and signal strength). All these things help to determine your location. You can use your device settings to enable Google Location services. [Learn more](#)

## publicly accessible sources

For example, we may collect information that's publicly available online or from other public sources to help train Google's language models and build features like Google Translate.

## protect against abuse

For example, information about security threats can help us notify you if we think your account has been compromised (at which point we can help you take steps to protect your account).

## advertising and research services on their behalf

For example, advertisers may upload data from their loyalty-card programs so that they can better understand the performance of their ad campaigns. We only provide aggregated reports to advertisers that don't reveal information about individual people.

## deliver our services

Examples of how we use your information to deliver our services include:

- We use the IP address assigned to your device to send you the data you requested, such as loading a YouTube video
- We use unique identifiers stored in cookies on your device to help us authenticate you as the person who should have access to your Google Account
- Photos and videos you upload to Google Photos are used to help you create albums, animations, and other creations that you can share. [Learn more](#)

- A flight confirmation email you receive may be used to create a “check-in” button that appears in your Gmail

## ensure our services are working as intended

For example, we continuously monitor our systems to look for problems. And if we find something wrong with a specific feature, reviewing activity information collected before the problem started allows us to fix things more quickly.

## make improvements

For example, we use cookies to analyze how people interact with our services. And that analysis can help us build better products. For example, it may help us discover that it’s taking people too long to complete a certain task or that they have trouble finishing steps at all. We can then redesign that feature and improve the product for everyone.

## customized search results

For example, when you’re signed in to your Google Account and have the Web & App Activity control enabled, you can get more relevant search results that are based on your previous searches and activity from other Google services. You can [learn more here](#). You may also get customized search results even when you’re signed out. If you don’t want this level of search customization, you can [search and browse privately](#) or turn off [signed-out search personalization](#).

## personalized ads

You may also see personalized ads based on information from the advertiser. If you shopped on an advertiser's website, for example, they can use that visit information to show you ads. [Learn more](#)

## sensitive categories

When showing you personalized ads, we use topics that we think might be of interest to you based on your activity. For example, you may see ads for things like "Cooking and Recipes" or "Air Travel." We don't use topics or show personalized ads based on sensitive categories like race, religion, sexual orientation, or health. And we require the same from advertisers that use our services.

## may link information

Google Analytics relies on first-party cookies, which means the cookies are set by the Google Analytics customer. Using our systems, data generated through Google Analytics can be linked by the Google Analytics customer and by Google to third-party cookies that are related to visits to other websites. For example, an advertiser may want to use its Google Analytics data to create more relevant ads, or to further analyze its traffic.

[Learn more](#)

## safety and reliability

Some examples of how we use your information to help keep our services safe and reliable include:

- Collecting and analyzing IP addresses and cookie data to protect against automated abuse. This abuse takes many forms, such as sending spam to Gmail users, stealing money from advertisers by fraudulently clicking on ads, or censoring content by launching a Distributed Denial of Service (DDoS) attack.
- The "last account activity" feature in Gmail can help you find out if and when someone accessed your email without your knowledge. This feature shows you information about recent activity in Gmail, such as the IP addresses that accessed your mail, the associated location, and the date and time of access. [Learn more](#)

## detect abuse

When we detect spam, malware, illegal content, and other forms of abuse on our systems in violation of our policies, we may disable your account or take other appropriate action. In certain circumstances, we may also report the violation to appropriate authorities.

## combine the information we collect

Some examples of how we combine the information we collect include:

- When you're signed in to your Google Account and search on Google, you can see search results from the public web, along with relevant information from the content you have in other Google products, like Gmail or Google Calendar. This can include things like the status of your upcoming flights, restaurant, and hotel reservations, or your photos. [Learn more](#)
- If you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to type in their name. This feature makes it easier to share things with people you know. [Learn more](#)
- The Google app can use data that you have stored in other Google products to show you personalized content, depending on your settings. For example, if you have searches stored in your Web & App Activity, the Google app can show you news articles and other information about your interests, like sports scores, based your activity. [Learn more](#)
- If you link your Google Account to your Google Home, you can manage your information and get things done through the Google Assistant. For example, you can add events to your Google Calendar or get your schedule for the day, ask for status updates on your upcoming flight, or send information like driving directions to your phone. [Learn more](#)

## your activity on other sites and apps

This activity might come from your use of Google services, like from syncing your account with Chrome or your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics), or it might embed other content (such as videos from YouTube). These services may share information about your activity with Google and, depending on your [account settings](#) and the products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information.

[Learn more](#) about how Google uses data when you use our partners' sites or apps.

## partner with Google

There are over 2 million non-Google websites and apps that partner with Google to show ads. [Learn more](#)

## specific Google services

For example, you can delete [your blog](#) from Blogger or [a Google Site you own](#) from Google Sites. You can also delete [reviews](#) you've left on apps, games, and other content in the Play Store.

## rely on cookies to function properly

For example, we use a cookie called 'lbc's' that makes it possible for you to open many Google Docs in one browser. Blocking this cookie would prevent Google Docs from working as expected. [Learn more](#)

## legal process, or enforceable governmental request

Like other technology and communications companies, Google regularly receives requests from governments and courts around the world to disclose user data. Respect for the privacy and security of data you store with Google underpins our approach to complying with these legal requests. Our legal team reviews each and every request, regardless of type, and we frequently push back when a request appears to be overly broad or doesn't follow the correct process. Learn more in our [Transparency Report](#).

## show trends

When lots of people start searching for something, it can provide useful information about particular trends at that time. Google Trends samples Google web searches to estimate the popularity of searches over a certain period of time and shares those results publicly in aggregated terms. [Learn more](#)

## specific partners

For example, we allow YouTube creators and advertisers to work with measurement companies to learn about the audience of their YouTube videos or ads, using cookies or similar technologies. Another example is merchants on our shopping pages, who use cookies to understand how many different people see their product listings. [Learn more](#) about these partners and how they use your information.

## servers around the world

For example, we operate data centers located [around the world](#) to help keep our products continuously available for users.

## third parties

For example, we process your information to report use statistics to rights holders about how their content was used in our services. We may also process your information if people search for your name and we display search results for sites containing publicly available information about you.

## appropriate safeguards

For example, we may anonymize data, or encrypt data to ensure it can't be linked to other information about you. [Learn more](#)

## ensure and improve

For example, we analyze how people interact with advertising to improve the performance of our ads.

## Customizing our services

For example, we may display a Google Doodle on the Search homepage to celebrate an event specific to your country.

## Affiliates

An affiliate is an entity that belongs to the Google group of companies, including the following companies that provide consumer services in the EU: Google Commerce Ltd, Google Payment Corp, and Google Dialer Inc. Learn more about the [companies providing business services in the EU](#).

## Algorithm

A process or set of rules followed by a computer in performing problem-solving operations.

## Application data cache

An application data cache is a data repository on a device. It can, for example, enable a web application to run without an internet connection and improve the performance of the application by enabling faster loading of content.

## Browser web storage

Browser web storage enables websites to store data in a browser on a device. When used in "local storage" mode, it enables data to be stored across sessions. This makes data retrievable even after a browser has been closed and reopened. One technology that facilitates web storage is HTML 5.

## Cookies and similar technologies

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. Learn more about [how Google uses cookies](#) and how Google uses data, including cookies, [when you use our partners' sites or apps](#).

## Device

A device is a computer that can be used to access Google services. For example, desktop computers, tablets, smart speakers, and smartphones are all considered devices.

## Non-personally identifiable information

This is information that is recorded about users so that it no longer reflects or references an individually-identifiable user.

## IP address

Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.

## Pixel tag

A pixel tag is a type of technology placed on a website or within the body of an email for the purpose of tracking certain activity, such as views of a website or when an email is opened. Pixel tags are often used in combination with cookies.

## Personal information

This is information that you provide to us which personally identifies you, such as your name, email address, or billing information, or other data that can be reasonably linked to such information by Google, such as information we associate with your Google Account.

## Sensitive personal information

This is a particular category of personal information relating to topics such as confidential medical facts, racial or ethnic origins, political or religious beliefs, or sexuality.

## Server logs

Like most websites, our servers automatically record the page requests made when you visit our sites. These “server logs” typically include your web request, Internet Protocol address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser.



A typical log entry for a search for “cars” looks like this:

```
123.45.67.89 - 25/Mar/2003 10:15:32 -  
http://www.google.com/search?q=cars -  
Firefox 1.0.7; Windows NT 5.1 -  
740674ce2123e969
```

- `123.45.67.89` is the Internet Protocol address assigned to the user by the user’s ISP. Depending on the user’s service, a different address may be assigned to the user by their service provider each time they connect to the Internet.
- `25/Mar/2003 10:15:32` is the date and time of the query.
- `http://www.google.com/search?q=cars` is the requested URL, including the search query.
- `Firefox 1.0.7; Windows NT 5.1` is the browser and operating system being used.
- `740674ce2123a969` is the unique cookie ID assigned to this particular computer the first time it visited Google. (Cookies can be deleted by users. If the user has deleted the cookie from the computer since the last time they’ve visited Google, then it will be the unique cookie ID assigned to their device the next time they visit Google from that particular device).

## Unique identifiers

A unique identifier is a string of characters that can be used to uniquely identify a browser, app, or device.

Different identifiers vary in how permanent they are, whether they can be reset by users, and how they can be accessed.

Unique identifiers can be used for various purposes, including security and fraud detection, syncing services such as your email inbox, remembering your preferences, and providing personalized advertising. For example, unique identifiers stored in cookies help sites display content in your browser in your preferred language. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. Learn more about [how Google uses cookies](#).

On other platforms besides browsers, unique identifiers are used to recognize a specific device or app on that device. For example, a unique identifier such as the Advertising ID is used to provide relevant advertising on Android devices, and can be [managed](#) in your device’s settings. Unique identifiers may also be incorporated into a device by its manufacturer (sometimes called a universally unique ID or UUID), such as the IMEI-number of a mobile phone. For example, a device’s unique identifier can be used to customize our service to your device or analyze device issues related to our services.



# **EXHIBIT 13**

## GOOGLE PRIVACY POLICY

When you use our services, you're trusting us with your information. We understand this is a big responsibility and work hard to protect your information and put you in control.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

Effective January 22, 2019 | [Archived versions](#) | [Download PDF](#)

We build a range of services that help millions of people daily to explore and interact with the world in new ways. Our services include:

- Google apps, sites, and devices, like Search, YouTube, and Google Home
- Platforms like the Chrome browser and Android operating system
- Products that are integrated into third-party apps and sites, like ads and embedded Google Maps

You can use our services in a variety of ways to manage your privacy. For example, you can sign up for a Google Account if you want to create and manage content like emails and photos, or see more relevant search results. And you can use many Google services when you're signed out or without creating an account at all, like searching on Google or watching YouTube videos. You can also choose to browse the web privately using Chrome in Incognito mode. And across our services, you can adjust your privacy settings to control what we collect and how your information is used.

To help explain things as clearly as possible, we've added examples, explanatory videos, and definitions for [key terms](#). And if you have any questions about this Privacy Policy, you can [contact us](#).

## INFORMATION GOOGLE COLLECTS

We want you to understand the types of information we collect as you use our services

We collect information to provide better services to all our users — from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like. The information Google collects, and how that information is used, depends on how you use our services and how you manage your privacy controls.

When you're not signed in to a Google Account, we store the information we collect with [unique identifiers](#) tied to the browser, application, or [device](#) you're using. This helps us do things like maintain your language preferences across browsing sessions.

When you're signed in, we also collect information that we store with your Google Account, which we treat as [personal information](#).

## Things you create or provide to us

When you create a Google Account, you provide us with [personal information](#) that includes your name and a password. You can also choose to add a [phone number](#) or [payment information](#) to your account. Even if you aren't signed in to a Google Account, you might choose to provide us with information – like an email address to receive updates about our services.

We also collect the content you create, upload, or receive from others when using our services. This includes things like email you write and receive, photos and videos you save, docs and spreadsheets you create, and comments you make on YouTube videos.

## Information we collect as you use our services

### Your apps, browsers & devices

We collect information about the apps, browsers, and [devices](#) you use to access Google services, which helps us provide features like automatic product updates and dimming your screen if your battery runs low.

The information we collect includes [unique identifiers](#), browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application version number. We also collect information about the interaction of your apps, browsers, and devices with our services, including [IP address](#), crash reports, system activity, and the date, time, and referrer URL of your request.

We collect this information when a Google service on your device contacts our servers – for example, when you install an app from the Play Store or when a service checks for automatic updates. If you're using an [Android device with Google apps](#), your device periodically contacts Google servers to provide information about your

device and connection to our services. This information includes things like your device type, carrier name, crash reports, and which apps you've installed.

## Your activity

We collect information about your activity in our services, which we use to do things like recommend a YouTube video you might like. The activity information we collect may include:

- Terms you search for
- Videos you watch
- [Views and interactions with content and ads](#)
- Voice and audio information when you use audio features
- Purchase activity
- People with whom you communicate or share content
- Activity on third-party sites and apps that use our services
- Chrome browsing history you've [synced with your Google Account](#)

If you use our [services to make and receive calls or send and receive messages](#), we may collect telephony log information like your phone number, calling-party number, receiving-party number, forwarding numbers, time and date of calls and messages, duration of calls, routing information, and types of calls.

You can visit your Google Account to find and manage activity information that's saved in your account.

[Go to Google Account](#)

## Your location information

We collect information about your location when you use our services, which helps us offer features like driving directions for your weekend getaway or showtimes for movies playing near you.

Your location can be determined with varying degrees of accuracy by:

- [GPS](#)
- [IP address](#)
- [Sensor data from your device](#)
- [Information about things near your device](#), such as Wi-Fi access points, cell towers, and Bluetooth-enabled devices

The types of location data we collect depend in part on your device and account settings. For example, you can [turn your Android device's location on or off](#) using the device's settings app. You can also turn on [Location History](#) if you want to create a private map of where you go with your signed-in devices.

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In some circumstances, Google also collects information about you from [publicly accessible sources](#). For example, if your name appears in your local newspaper, Google's Search engine may index that article and display it to other people if they search for your name. We may also collect information about you from trusted partners, including marketing partners who provide us with information about potential customers of our business services, and security partners who provide us with information to [protect against abuse](#). We also receive information from advertisers to provide [advertising and research services on their behalf](#).

We use various technologies to collect and store information, including [cookies](#), [pixel tags](#), local storage, such as [browser web storage](#) or [application data caches](#), databases, and [server logs](#).

#### WHY GOOGLE COLLECTS DATA

We use data to build better services

We use the information we collect from all our services for the following purposes:

#### Provide our services

We use your information to [deliver our services](#), like processing the terms you search for in order to return results or helping you share content by suggesting recipients from your contacts.

## Maintain & improve our services

We also use your information to [ensure our services are working as intended](#), such as tracking outages or troubleshooting issues that you report to us. And we use your information to [make improvements](#) to our services – for example, understanding which search terms are most frequently misspelled helps us improve spell-check features used across our services.

## Develop new services

We use the information we collect in existing services to help us develop new ones. For example, understanding how people organized their photos in Picasa, Google's first photos app, helped us design and launch Google Photos.

## Provide personalized services, including content and ads

We use the information we collect to customize our services for you, including providing recommendations, personalized content, and [customized search results](#). For example, [Security Checkup](#) provides security tips adapted to how you use Google products. And Google Play uses information like apps you've already installed and videos you've watched on YouTube to suggest new apps you might like.

Depending on your settings, we may also show you [personalized ads](#) based on your interests. For example, if you search for "mountain bikes," you may see an ad for sports equipment when you're browsing a site that shows ads served by Google. You can control what information we use to show you ads by visiting your ad settings.

- We don't show you personalized ads based on [sensitive categories](#), such as race, religion, sexual orientation, or health.
- We don't share information that personally identifies you with advertisers, such as your name or email, unless you ask us to. For example, if you see an ad for a nearby flower shop and select the "tap to call" button, we'll connect your call and may share your phone number with the flower shop.

[Go to Ad Settings](#)



## Measure performance

We use data for analytics and measurement to understand how our services are used. For example, we analyze data about your visits to our sites to do things like optimize product design. And we also use data about the ads you interact with to help advertisers understand the performance of their ad campaigns. We use a variety of tools to do this, including Google Analytics. When you visit sites that use Google Analytics, Google and a Google Analytics customer [may link information](#) about your activity from that site with activity from other sites that use our ad services.

## Communicate with you

We use information we collect, like your email address, to interact with you directly. For example, we may send you a notification if we detect suspicious activity, like an attempt to sign in to your Google Account from an unusual location. Or we may let you know about upcoming changes or improvements to our services. And if you contact Google, we'll keep a record of your request in order to help solve any issues you might be facing.

## Protect Google, our users, and the public

We use information to help improve the [safety and reliability](#) of our services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm Google, our users, or the public.

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We use different technologies to process your information for these purposes. We use automated systems that analyze your content to provide you with things like customized search results, personalized ads, or other features tailored to how you use our services. And we analyze your content to help us [detect abuse](#) such as spam, malware, and illegal content. We also use [algorithms](#) to recognize patterns in data. For example, Google Translate helps people communicate across languages by detecting common language patterns in phrases you ask it to translate.

We may [combine the information we collect](#) among our services and across your devices for the purposes described above. For example, if you watch videos of guitar players on YouTube, you might see an ad for guitar lessons on a site that uses our ad products. Depending on your account settings, [your activity on other sites](#)

[and apps](#) may be associated with your personal information in order to improve Google's services and the ads delivered by Google.

If other users already have your email address or other information that identifies you, we may show them your publicly visible Google Account information, such as your name and photo. This helps people identify an email coming from you, for example.

We'll ask for your consent before using your information for a purpose that isn't covered in this Privacy Policy.

## YOUR PRIVACY CONTROLS

You have choices regarding the information we collect and how it's used

This section describes key controls for managing your privacy across our services. You can also visit the [Privacy Checkup](#), which provides an opportunity to review and adjust important privacy settings. In addition to these tools, we also offer specific privacy settings in our products — you can learn more in our [Product Privacy Guide](#).

[Go to Privacy Checkup](#)

## Managing, reviewing, and updating your information

When you're signed in, you can always review and update information by visiting the services you use. For example, Photos and Drive are both designed to help you manage specific types of content you've saved with Google.

We also built a place for you to review and control information saved in your Google Account. Your [Google Account](#) includes:

### Privacy controls

### Activity Controls

Decide what types of activity you'd like saved in your account. For example, you can turn on Location History if you want traffic predictions for your daily commute, or you can save your YouTube Watch History to get better video suggestions.

[Go to Activity Controls](#)

## Ad settings

Manage your preferences about the ads shown to you on Google and on sites and apps that [partner with Google](#) to show ads. You can modify your interests, choose whether your personal information is used to make ads more relevant to you, and turn on or off certain advertising services.

[Go to Ad Settings](#)

## About you

Control what others see about you across Google services.

[Go to About You](#)

## Shared endorsements

Choose whether your name and photo appear next to your activity, like reviews and recommendations, that appear in ads.

[Go to Shared Endorsements](#)

## Information you share

Control whom you share information with through your account on Google+.

[Go to Information You Share](#)

## Ways to review & update your information

### My Activity

My Activity allows you to review and control data that's created when you use Google services, like searches you've done or your visits to Google Play. You can browse by date and by topic, and delete part or all of your activity.

[Go to My Activity](#)

### Google Dashboard

Google Dashboard allows you to manage information associated with specific products.

[Go to Dashboard](#)

### Your personal information

Manage your contact information, such as your name, email, and phone number.

[Go to Personal Info](#)

When you're signed out, you can manage information associated with your browser or device, including:

- Signed-out search personalization: [Choose](#) whether your search activity is used to offer you more relevant results and recommendations.
- YouTube settings: Pause and delete your [YouTube Search History](#) and your [YouTube Watch History](#).
- Ad Settings: [Manage](#) your preferences about the ads shown to you on Google and on sites and apps that partner with Google to show ads.

## Exporting, removing & deleting your information

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

### [Export your data](#)

You can also [request to remove content](#) from specific Google services based on applicable law.

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

### [Delete your information](#)

And finally, [Inactive Account Manager](#) allows you to give someone else access to parts of your Google Account in case you're unexpectedly unable to use your account.

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There are other ways to control the information Google collects whether or not you're signed in to a Google Account, including:

- **Browser settings:** For example, you can configure your browser to indicate when Google has set a [cookie](#) in your browser. You can also configure your browser to block all cookies from a specific domain or all domains. But remember that our services [rely on cookies to function properly](#), for things like remembering your language preferences.
- **Device-level settings:** Your device may have controls that determine what information we collect. For example, you can [modify location settings](#) on your Android device.

## SHARING YOUR INFORMATION

### When you share your information

Many of our services let you share information with other people, and you have control over how you share. For example, you can share videos on YouTube publicly or you can decide to keep your videos private. Remember, when you share information publicly, your content may become accessible through search engines, including Google Search.

When you're signed in and interact with some Google services, like leaving comments on a YouTube video or reviewing a song in Play, your name and photo appear next to your activity. We may also display this information in [ads depending on your Shared endorsements setting](#).

### When Google shares your information

We do not share your personal information with companies, organizations, or individuals outside of Google except in the following cases:

#### With your consent

We'll share personal information outside of Google when we have your consent. For example, if you [use Google Home to make a reservation](#) through a booking service, we'll get your permission before sharing your name or phone number with the restaurant. We'll ask for your explicit consent to share any [sensitive personal information](#).

#### With domain administrators

If you're a student or work for an organization that uses Google services (like G Suite), your [domain administrator](#) and resellers who manage your account will have access to your Google Account. They may be able to:

- Access and retain information stored in your account, like your email
- View statistics regarding your account, like how many apps you install

- Change your account password
- Suspend or terminate your account access
- Receive your account information in order to satisfy applicable law, regulation, legal process, or enforceable governmental request
- Restrict your ability to delete or edit your information or your privacy settings

## For external processing

We provide personal information to our [affiliates](#) and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with customer support.

## For legal reasons

We will share personal information outside of Google if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, [legal process, or enforceable governmental request](#). We share information about the number and type of requests we receive from governments in our [Transparency Report](#).
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security, or technical issues.
- Protect against harm to the rights, property or safety of Google, our users, or the public as required or permitted by law.

We may share [non-personally identifiable information](#) publicly and with our partners — like publishers, advertisers, developers, or rights holders. For example, we share information publicly to [show trends](#) about the general use of our services. We also allow [specific partners](#) to collect information from your browser or device for advertising and measurement purposes using their own cookies or similar technologies.

If Google is involved in a merger, acquisition, or sale of assets, we'll continue to ensure the confidentiality of your personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## KEEPING YOUR INFORMATION SECURE

We build security into our services to protect your information

All Google products are built with strong security features that continuously protect your information. The insights we gain from maintaining our services help us detect and automatically block security threats from ever reaching you. And if we do detect something risky that we think you should know about, we'll notify you and help guide you through steps to stay better protected.

We work hard to protect you and Google from unauthorized access, alteration, disclosure, or destruction of information we hold, including:

- We use encryption to keep your data private while in transit
- We offer a range of security features, like [Safe Browsing](#), Security Checkup, and [2 Step Verification](#) to help you protect your account
- We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems
- We restrict access to personal information to Google employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## EXPORTING & DELETING YOUR INFORMATION

You can export a copy of your information or delete it from your Google Account at any time

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

[Export your data](#)

To delete your information, you can:



- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

## Delete your information

In some cases, we retain data for limited periods when it needs to be kept for legitimate business or legal purposes. You can read about Google's [data retention periods](#), including how long it takes us to delete your information.

We try to ensure that our services protect information from accidental or malicious deletion. Because of this, there may be delays between when you delete something and when copies are deleted from our active and backup systems.

## COMPLIANCE & COOPERATION WITH REGULATORS

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

## Data transfers

We maintain [servers around the world](#) and your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this policy. We also comply with certain [legal frameworks](#) relating to the transfer of data, such as the EU-US and Swiss-US Privacy Shield Frameworks.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

## ABOUT THIS POLICY

## When this policy applies

This Privacy Policy applies to all of the services offered by Google LLC and its [affiliates](#), including YouTube, Android, and services offered on third-party sites, such as advertising services. This Privacy Policy doesn't apply to services that have separate privacy policies that do not incorporate this Privacy Policy.

This Privacy Policy doesn't apply to:

- The information practices of other companies and organizations that advertise our services
- Services offered by other companies or individuals, including products or sites that may include Google services, be displayed to you in search results, or be linked from our services

## Changes to this policy

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date the last changes were published and we offer access to [archived versions](#) for your review. If changes are significant, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

### RELATED PRIVACY PRACTICES

## Specific Google services

The following privacy notices provide additional information about some Google services:

- [Chrome & the Chrome Operating System](#)
- [Play Books](#)
- [Payments](#)
- [Fiber](#)
- [Google Fi](#)
- [G Suite for Education](#)

- [YouTube Kids](#)
- [Google Accounts Managed with Family Link, for Children under 13 \(or applicable age in your country\)](#)

## Other useful resources

The following links highlight useful resources for you to learn more about our practices and privacy settings.

- [Your Google Account](#) is home to many of the settings you can use to manage your account
- [Privacy Checkup](#) guides you through key privacy settings for your Google Account
- [Google's safety center](#) helps you learn more about our built-in security, privacy controls, and tools to help set digital ground rules for your family online
- [Privacy & Terms](#) provides more context regarding this Privacy Policy and our Terms of Service
- [Technologies](#) includes more information about:
  - [How Google uses cookies](#)
  - Technologies used for [Advertising](#)
  - [How Google uses pattern recognition](#) to recognize things like faces in photos
  - [How Google uses information from sites or apps that use our services](#)

## ads you'll find most useful

For example, if you watch videos about baking on YouTube, you may see more ads that relate to baking as you browse the web. We also may use your IP address to determine your approximate location, so that we can serve you ads for a nearby pizza delivery service if you search for "pizza." Learn more [about Google ads](#) and [why you may see particular ads](#).

## the people who matter most to you online

For example, when you type an address in the To, Cc, or Bcc field of an email you're composing, Gmail will suggest addresses based on the people you [contact most frequently](#).

## phone number

If you add your phone number to your account, it can be used for different purposes across Google services, depending on your settings. For example, your phone number can be used to help you access your account if you forget your password, help people find and connect with you, and make the ads you see more relevant to you. [Learn more](#)

## payment information

For example, if you add a credit card or other payment method to your Google Account, you can use it to buy things across our services, like apps in the Play Store. We may also ask for other information, like a business tax ID, to help process your payment. In some cases, we may also need to verify your identity and may ask you for information to do this.

We may also use payment information to verify that you meet age requirements, if, for example, you enter an incorrect birthday indicating you're not old enough to have a Google Account. [Learn more](#)

## devices

For example, we can use information from your devices to help you decide which device you'd like to use to install an app or view a movie you buy from Google Play. We also use this information to help protect your account.

### Android device with Google apps

Android devices with Google apps include devices sold by Google or one of our partners and include phones, cameras, vehicles, wearables, and televisions. These devices use Google Play Services and other pre-installed apps that include services like Gmail, Maps, your phone's camera and phone dialer, text-to-speech conversion, keyboard input, and security features.

## Views and interactions with content and ads

For example, we collect information about views and interactions with ads so we can provide aggregated reports to advertisers, like telling them whether we served their ad on a page and whether the ad was likely seen by a viewer. We may also measure other interactions, such as how you move your mouse over an ad or if you interact with the page on which the ad appears.

## synced with your Google Account

Your Chrome browsing history is only saved to your account if you've enabled Chrome synchronization with your Google Account. [Learn more](#)

## services to make and receive calls or send and receive messages

Examples of these services include:

- Google Hangouts, for making domestic and international calls
- Google Voice, for making calls, sending text messages, and managing voicemail
- Google Fi, for a phone plan

## Sensor data from your device

Your device may have sensors that can be used to better understand your location and movement. For example, an accelerometer can be used to determine your speed and a gyroscope to figure out your direction of travel.

## Information about things near your device

If you use Google's Location services on Android, we can improve the performance of apps that rely on your location, like Google Maps. If you use Google's Location services, your device sends information to Google about its location, sensors (like accelerometer), and nearby cell towers and Wi-Fi access points (like MAC

address and signal strength). All these things help to determine your location. You can use your device settings to enable Google Location services. [Learn more](#)

## publicly accessible sources

For example, we may collect information that's publicly available online or from other public sources to help train Google's language models and build features like Google Translate.

## protect against abuse

For example, information about security threats can help us notify you if we think your account has been compromised (at which point we can help you take steps to protect your account).

## advertising and research services on their behalf

For example, advertisers may upload data from their loyalty-card programs so that they can better understand the performance of their ad campaigns. We only provide aggregated reports to advertisers that don't reveal information about individual people.

## deliver our services

Examples of how we use your information to deliver our services include:

- We use the IP address assigned to your device to send you the data you requested, such as loading a YouTube video
- We use unique identifiers stored in cookies on your device to help us authenticate you as the person who should have access to your Google Account
- Photos and videos you upload to Google Photos are used to help you create albums, animations, and other creations that you can share. [Learn more](#)
- A flight confirmation email you receive may be used to create a "check-in" button that appears in your Gmail

- When you purchase services or physical goods from us, you may provide us information like your shipping address or delivery instructions. We use this information for things like processing, fulfilling, and delivering your order, and to provide support in connection with the product or service you purchase.

## ensure our services are working as intended

For example, we continuously monitor our systems to look for problems. And if we find something wrong with a specific feature, reviewing activity information collected before the problem started allows us to fix things more quickly.

## make improvements

For example, we use cookies to analyze how people interact with our services. And that analysis can help us build better products. For example, it may help us discover that it's taking people too long to complete a certain task or that they have trouble finishing steps at all. We can then redesign that feature and improve the product for everyone.

## customized search results

For example, when you're signed in to your Google Account and have the Web & App Activity control enabled, you can get more relevant search results that are based on your previous searches and activity from other Google services. You can [learn more here](#). You may also get customized search results even when you're signed out. If you don't want this level of search customization, you can [search and browse privately](#) or turn off [signed-out search personalization](#).

## personalized ads

You may also see personalized ads based on information from the advertiser. If you shopped on an advertiser's website, for example, they can use that visit information to show you ads. [Learn more](#)

## sensitive categories

When showing you personalized ads, we use topics that we think might be of interest to you based on your activity. For example, you may see ads for things like "Cooking and Recipes" or "Air Travel." We don't use topics or show personalized ads based on sensitive categories like race, religion, sexual orientation, or health. And we require the same from advertisers that use our services.

## may link information

Google Analytics relies on first-party cookies, which means the cookies are set by the Google Analytics customer. Using our systems, data generated through Google Analytics can be linked by the Google Analytics customer and by Google to third-party cookies that are related to visits to other websites. For example, an advertiser may want to use its Google Analytics data to create more relevant ads, or to further analyze its traffic.

[Learn more](#)

## safety and reliability

Some examples of how we use your information to help keep our services safe and reliable include:

- Collecting and analyzing IP addresses and cookie data to protect against automated abuse. This abuse takes many forms, such as sending spam to Gmail users, stealing money from advertisers by fraudulently clicking on ads, or censoring content by launching a Distributed Denial of Service (DDoS) attack.
- The "last account activity" feature in Gmail can help you find out if and when someone accessed your email without your knowledge. This feature shows you information about recent activity in Gmail, such as the IP addresses that accessed your mail, the associated location, and the date and time of access. [Learn more](#)

## detect abuse

When we detect spam, malware, illegal content, and other forms of abuse on our systems in violation of our policies, we may disable your account or take other appropriate action. In certain circumstances, we may also report the violation to appropriate authorities.

## combine the information we collect



Some examples of how we combine the information we collect include:

- When you're signed in to your Google Account and search on Google, you can see search results from the public web, along with relevant information from the content you have in other Google products, like Gmail or Google Calendar. This can include things like the status of your upcoming flights, restaurant, and hotel reservations, or your photos. [Learn more](#)
- If you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to type in their name. This feature makes it easier to share things with people you know. [Learn more](#)
- The Google app can use data that you have stored in other Google products to show you personalized content, depending on your settings. For example, if you have searches stored in your Web & App Activity, the Google app can show you news articles and other information about your interests, like sports scores, based your activity. [Learn more](#)
- If you link your Google Account to your Google Home, you can manage your information and get things done through the Google Assistant. For example, you can add events to your Google Calendar or get your schedule for the day, ask for status updates on your upcoming flight, or send information like driving directions to your phone. [Learn more](#)

## your activity on other sites and apps

This activity might come from your use of Google services, like from syncing your account with Chrome or your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics), or it might embed other content (such as videos from YouTube). These services may share information about your activity with Google and, depending on your [account settings](#) and the products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information.

[Learn more](#) about how Google uses data when you use our partners' sites or apps.

## partner with Google

There are over 2 million non-Google websites and apps that partner with Google to show ads. [Learn more](#)

## specific Google services

For example, you can delete [your blog](#) from Blogger or [a Google Site you own](#) from Google Sites. You can also delete [reviews](#) you've left on apps, games, and other content in the Play Store.

## rely on cookies to function properly

For example, we use a cookie called 'lbc's' that makes it possible for you to open many Google Docs in one browser. Blocking this cookie would prevent Google Docs from working as expected. [Learn more](#)

## legal process, or enforceable governmental request

Like other technology and communications companies, Google regularly receives requests from governments and courts around the world to disclose user data. Respect for the privacy and security of data you store with Google underpins our approach to complying with these legal requests. Our legal team reviews each and every request, regardless of type, and we frequently push back when a request appears to be overly broad or doesn't follow the correct process. Learn more in our [Transparency Report](#).

## show trends

When lots of people start searching for something, it can provide useful information about particular trends at that time. Google Trends samples Google web searches to estimate the popularity of searches over a certain period of time and shares those results publicly in aggregated terms. [Learn more](#)

## specific partners

For example, we allow YouTube creators and advertisers to work with measurement companies to learn about the audience of their YouTube videos or ads, using cookies or similar technologies. Another example is merchants on our shopping pages, who use cookies to understand how many different people see their product listings. [Learn more](#) about these partners and how they use your information.

## servers around the world

For example, we operate data centers located [around the world](#) to help keep our products continuously available for users.

## third parties

For example, we process your information to report use statistics to rights holders about how their content was used in our services. We may also process your information if people search for your name and we display search results for sites containing publicly available information about you.

## appropriate safeguards

For example, we may anonymize data, or encrypt data to ensure it can't be linked to other information about you. [Learn more](#)

## ensure and improve

For example, we analyze how people interact with advertising to improve the performance of our ads.

## Customizing our services

For example, we may display a Google Doodle on the Search homepage to celebrate an event specific to your country.

## Affiliates

An affiliate is an entity that belongs to the Google group of companies, including the following companies that provide consumer services in the EU: Google Ireland Limited, Google Commerce Ltd, Google Payment Corp, and Google Dialer Inc. Learn more about the [companies providing business services in the EU](#).

## Algorithm

A process or set of rules followed by a computer in performing problem-solving operations.

## Application data cache

An application data cache is a data repository on a device. It can, for example, enable a web application to run without an internet connection and improve the performance of the application by enabling faster loading of content.

## Browser web storage

Browser web storage enables websites to store data in a browser on a device. When used in "local storage" mode, it enables data to be stored across sessions. This makes data retrievable even after a browser has been closed and reopened. One technology that facilitates web storage is HTML 5.

## Cookies and similar technologies

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. Learn more about [how Google uses cookies](#) and how Google uses data, including cookies, [when you use our partners' sites or apps](#).

## Device

A device is a computer that can be used to access Google services. For example, desktop computers, tablets, smart speakers, and smartphones are all considered devices.

## Non-personally identifiable information

This is information that is recorded about users so that it no longer reflects or references an individually-identifiable user.

## IP address

Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.

## Pixel tag

A pixel tag is a type of technology placed on a website or within the body of an email for the purpose of tracking certain activity, such as views of a website or when an email is opened. Pixel tags are often used in combination with cookies.

## Personal information

This is information that you provide to us which personally identifies you, such as your name, email address, or billing information, or other data that can be reasonably linked to such information by Google, such as information we associate with your Google Account.

## Sensitive personal information

This is a particular category of personal information relating to topics such as confidential medical facts, racial or ethnic origins, political or religious beliefs, or sexuality.

## Server logs

Like most websites, our servers automatically record the page requests made when you visit our sites. These “server logs” typically include your web request, Internet Protocol address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser.

A typical log entry for a search for “cars” looks like this:

```
123.45.67.89 - 25/Mar/2003 10:15:32 -  
http://www.google.com/search?q=cars -  
Firefox 1.0.7; Windows NT 5.1 -  
740674ce2123e969
```

- `123.45.67.89` is the Internet Protocol address assigned to the user by the user’s ISP. Depending on the user’s service, a different address may be assigned to the user by their service provider each time they connect to the Internet.
- `25/Mar/2003 10:15:32` is the date and time of the query.
- `http://www.google.com/search?q=cars` is the requested URL, including the search query.
- `Firefox 1.0.7; Windows NT 5.1` is the browser and operating system being used.
- `740674ce2123a969` is the unique cookie ID assigned to this particular computer the first time it visited Google. (Cookies can be deleted by users. If the user has deleted the cookie from the computer since the last time they’ve visited Google, then it will be the unique cookie ID assigned to their device the next time they visit Google from that particular device).

## Unique identifiers

A unique identifier is a string of characters that can be used to uniquely identify a browser, app, or device.

Different identifiers vary in how permanent they are, whether they can be reset by users, and how they can be accessed.

Unique identifiers can be used for various purposes, including security and fraud detection, syncing services such as your email inbox, remembering your preferences, and providing personalized advertising. For example, unique identifiers stored in cookies help sites display content in your browser in your preferred language. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. Learn more about [how Google uses cookies](#).

On other platforms besides browsers, unique identifiers are used to recognize a specific device or app on that device. For example, a unique identifier such as the Advertising ID is used to provide relevant advertising on Android devices, and can be [managed](#) in your device’s settings. Unique identifiers may also be incorporated into a device by its manufacturer (sometimes called a universally unique ID or UUID), such as the IMEI-number of a mobile phone. For example, a device’s unique identifier can be used to customize our service to your device or analyze device issues related to our services.



# **EXHIBIT 14**



## GOOGLE PRIVACY POLICY

When you use our services, you're trusting us with your information. We understand this is a big responsibility and work hard to protect your information and put you in control.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

Effective October 15, 2019 | [Archived versions](#) | [Download PDF](#)

We build a range of services that help millions of people daily to explore and interact with the world in new ways. Our services include:

- Google apps, sites, and devices, like Search, YouTube, and Google Home
- Platforms like the Chrome browser and Android operating system
- Products that are integrated into third-party apps and sites, like ads and embedded Google Maps

You can use our services in a variety of ways to manage your privacy. For example, you can sign up for a Google Account if you want to create and manage content like emails and photos, or see more relevant search results. And you can use many Google services when you're signed out or without creating an account at all, like searching on Google or watching YouTube videos. You can also choose to browse the web privately using Chrome in Incognito mode. And across our services, you can adjust your privacy settings to control what we collect and how your information is used.

To help explain things as clearly as possible, we've added examples, explanatory videos, and definitions for [key terms](#). And if you have any questions about this Privacy Policy, you can [contact us](#).

## INFORMATION GOOGLE COLLECTS

We want you to understand the types of information we collect as you use our services

We collect information to provide better services to all our users — from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like. The information Google collects, and how that information is used, depends on how you use our services and how you manage your privacy controls.

When you're not signed in to a Google Account, we store the information we collect with [unique identifiers](#) tied to the browser, application, or [device](#) you're using. This helps us do things like maintain your language preferences across browsing sessions.

When you're signed in, we also collect information that we store with your Google Account, which we treat as [personal information](#).

## Things you create or provide to us

When you create a Google Account, you provide us with [personal information](#) that includes your name and a password. You can also choose to add a [phone number](#) or [payment information](#) to your account. Even if you aren't signed in to a Google Account, you might choose to provide us with information – like an email address to receive updates about our services.

We also collect the content you create, upload, or receive from others when using our services. This includes things like email you write and receive, photos and videos you save, docs and spreadsheets you create, and comments you make on YouTube videos.

## Information we collect as you use our services

### Your apps, browsers & devices

We collect information about the apps, browsers, and [devices](#) you use to access Google services, which helps us provide features like automatic product updates and dimming your screen if your battery runs low.

The information we collect includes [unique identifiers](#), browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application version number. We also collect information about the interaction of your apps, browsers, and devices with our services, including [IP address](#), crash reports, system activity, and the date, time, and referrer URL of your request.

We collect this information when a Google service on your device contacts our servers – for example, when you install an app from the Play Store or when a service checks for automatic updates. If you're using an [Android device with Google apps](#), your device periodically contacts Google servers to provide information about your

device and connection to our services. This information includes things like your device type, carrier name, crash reports, and which apps you've installed.

## Your activity

We collect information about your activity in our services, which we use to do things like recommend a YouTube video you might like. The activity information we collect may include:

- Terms you search for
- Videos you watch
- [Views and interactions with content and ads](#)
- Voice and audio information when you use audio features
- Purchase activity
- People with whom you communicate or share content
- Activity on third-party sites and apps that use our services
- Chrome browsing history you've [synced with your Google Account](#)

If you use our [services to make and receive calls or send and receive messages](#), we may collect telephony log information like your phone number, calling-party number, receiving-party number, forwarding numbers, time and date of calls and messages, duration of calls, routing information, and types of calls.

You can visit your Google Account to find and manage activity information that's saved in your account.

[Go to Google Account](#)

## Your location information

We collect information about your location when you use our services, which helps us offer features like driving directions for your weekend getaway or showtimes for movies playing near you.

Your location can be determined with varying degrees of accuracy by:

- [GPS](#)
- [IP address](#)
- [Sensor data from your device](#)
- [Information about things near your device](#), such as Wi-Fi access points, cell towers, and Bluetooth-enabled devices

The types of location data we collect depend in part on your device and account settings. For example, you can [turn your Android device's location on or off](#) using the device's settings app. You can also turn on [Location History](#) if you want to create a private map of where you go with your signed-in devices.

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In some circumstances, Google also collects information about you from [publicly accessible sources](#). For example, if your name appears in your local newspaper, Google's Search engine may index that article and display it to other people if they search for your name. We may also collect information about you from trusted partners, including marketing partners who provide us with information about potential customers of our business services, and security partners who provide us with information to [protect against abuse](#). We also receive information from advertisers to provide [advertising and research services on their behalf](#).

We use various technologies to collect and store information, including [cookies](#), [pixel tags](#), local storage, such as [browser web storage](#) or [application data caches](#), databases, and [server logs](#).

#### WHY GOOGLE COLLECTS DATA

We use data to build better services

We use the information we collect from all our services for the following purposes:

#### Provide our services

We use your information to [deliver our services](#), like processing the terms you search for in order to return results or helping you share content by suggesting recipients from your contacts.

## Maintain & improve our services

We also use your information to [ensure our services are working as intended](#), such as tracking outages or troubleshooting issues that you report to us. And we use your information to [make improvements](#) to our services – for example, understanding which search terms are most frequently misspelled helps us improve spell-check features used across our services.

## Develop new services

We use the information we collect in existing services to help us develop new ones. For example, understanding how people organized their photos in Picasa, Google's first photos app, helped us design and launch Google Photos.

## Provide personalized services, including content and ads

We use the information we collect to customize our services for you, including providing recommendations, personalized content, and [customized search results](#). For example, [Security Checkup](#) provides security tips adapted to how you use Google products. And Google Play uses information like apps you've already installed and videos you've watched on YouTube to suggest new apps you might like.

Depending on your settings, we may also show you [personalized ads](#) based on your interests. For example, if you search for "mountain bikes," you may see an ad for sports equipment when you're browsing a site that shows ads served by Google. You can control what information we use to show you ads by visiting your ad settings.

- We don't show you personalized ads based on [sensitive categories](#), such as race, religion, sexual orientation, or health.
- We don't share information that personally identifies you with advertisers, such as your name or email, unless you ask us to. For example, if you see an ad for a nearby flower shop and select the "tap to call" button, we'll connect your call and may share your phone number with the flower shop.

[Go to Ad Settings](#)

## Measure performance

We use data for analytics and measurement to understand how our services are used. For example, we analyze data about your visits to our sites to do things like optimize product design. And we also use data about the ads you interact with to help advertisers understand the performance of their ad campaigns. We use a variety of tools to do this, including Google Analytics. When you visit sites that use Google Analytics, Google and a Google Analytics customer [may link information](#) about your activity from that site with activity from other sites that use our ad services.

## Communicate with you

We use information we collect, like your email address, to interact with you directly. For example, we may send you a notification if we detect suspicious activity, like an attempt to sign in to your Google Account from an unusual location. Or we may let you know about upcoming changes or improvements to our services. And if you contact Google, we'll keep a record of your request in order to help solve any issues you might be facing.

## Protect Google, our users, and the public

We use information to help improve the [safety and reliability](#) of our services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm Google, our users, or the public.

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We use different technologies to process your information for these purposes. We use automated systems that analyze your content to provide you with things like customized search results, personalized ads, or other features tailored to how you use our services. And we analyze your content to help us [detect abuse](#) such as spam, malware, and illegal content. We also use [algorithms](#) to recognize patterns in data. For example, Google Translate helps people communicate across languages by detecting common language patterns in phrases you ask it to translate.

We may [combine the information we collect](#) among our services and across your devices for the purposes described above. For example, if you watch videos of guitar players on YouTube, you might see an ad for guitar lessons on a site that uses our ad products. Depending on your account settings, [your activity on other sites](#)

[and apps](#) may be associated with your personal information in order to improve Google's services and the ads delivered by Google.

If other users already have your email address or other information that identifies you, we may show them your publicly visible Google Account information, such as your name and photo. This helps people identify an email coming from you, for example.

We'll ask for your consent before using your information for a purpose that isn't covered in this Privacy Policy.

## YOUR PRIVACY CONTROLS

You have choices regarding the information we collect and how it's used

This section describes key controls for managing your privacy across our services. You can also visit the [Privacy Checkup](#), which provides an opportunity to review and adjust important privacy settings. In addition to these tools, we also offer specific privacy settings in our products — you can learn more in our [Product Privacy Guide](#).

[Go to Privacy Checkup](#)

## Managing, reviewing, and updating your information

When you're signed in, you can always review and update information by visiting the services you use. For example, Photos and Drive are both designed to help you manage specific types of content you've saved with Google.

We also built a place for you to review and control information saved in your Google Account. Your [Google Account](#) includes:

### Privacy controls

### Activity Controls

Decide what types of activity you'd like saved in your account. For example, you can turn on Location History if you want traffic predictions for your daily commute, or you can save your YouTube Watch History to get better video suggestions.

[Go to Activity Controls](#)

## Ad settings

Manage your preferences about the ads shown to you on Google and on sites and apps that [partner with Google](#) to show ads. You can modify your interests, choose whether your personal information is used to make ads more relevant to you, and turn on or off certain advertising services.

[Go to Ad Settings](#)

## About you

Control what others see about you across Google services.

[Go to About You](#)

## Shared endorsements

Choose whether your name and photo appear next to your activity, like reviews and recommendations, that appear in ads.

[Go to Shared Endorsements](#)

## Information you share

If you're a G Suite user, control whom you share information with through your account on Google+.

[Go to Information You Share](#)



## Ways to review & update your information

### My Activity

My Activity allows you to review and control data that's created when you use Google services, like searches you've done or your visits to Google Play. You can browse by date and by topic, and delete part or all of your activity.

[Go to My Activity](#)

### Google Dashboard

Google Dashboard allows you to manage information associated with specific products.

[Go to Dashboard](#)

### Your personal information

Manage your contact information, such as your name, email, and phone number.

[Go to Personal Info](#)

When you're signed out, you can manage information associated with your browser or device, including:

- Signed-out search personalization: [Choose](#) whether your search activity is used to offer you more relevant results and recommendations.
- YouTube settings: Pause and delete your [YouTube Search History](#) and your [YouTube Watch History](#).
- Ad Settings: [Manage](#) your preferences about the ads shown to you on Google and on sites and apps that partner with Google to show ads.

## Exporting, removing & deleting your information

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

### [Export your data](#)

You can also [request to remove content](#) from specific Google services based on applicable law.

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

### [Delete your information](#)

And finally, [Inactive Account Manager](#) allows you to give someone else access to parts of your Google Account in case you're unexpectedly unable to use your account.

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There are other ways to control the information Google collects whether or not you're signed in to a Google Account, including:

- **Browser settings:** For example, you can configure your browser to indicate when Google has set a [cookie](#) in your browser. You can also configure your browser to block all cookies from a specific domain or all domains. But remember that our services [rely on cookies to function properly](#), for things like remembering your language preferences.
- **Device-level settings:** Your device may have controls that determine what information we collect. For example, you can [modify location settings](#) on your Android device.

## SHARING YOUR INFORMATION

### When you share your information

Many of our services let you share information with other people, and you have control over how you share. For example, you can share videos on YouTube publicly or you can decide to keep your videos private. Remember, when you share information publicly, your content may become accessible through search engines, including Google Search.

When you're signed in and interact with some Google services, like leaving comments on a YouTube video or reviewing an app in Play, your name and photo appear next to your activity. We may also display this information in [ads depending on your Shared endorsements setting](#).

### When Google shares your information

We do not share your personal information with companies, organizations, or individuals outside of Google except in the following cases:

#### With your consent

We'll share personal information outside of Google when we have your consent. For example, if you [use Google Home to make a reservation](#) through a booking service, we'll get your permission before sharing your name or phone number with the restaurant. We'll ask for your explicit consent to share any [sensitive personal information](#).

#### With domain administrators

If you're a student or work for an organization that uses Google services (like G Suite), your [domain administrator](#) and resellers who manage your account will have access to your Google Account. They may be able to:

- Access and retain information stored in your account, like your email
- View statistics regarding your account, like how many apps you install

- Change your account password
- Suspend or terminate your account access
- Receive your account information in order to satisfy applicable law, regulation, legal process, or enforceable governmental request
- Restrict your ability to delete or edit your information or your privacy settings

## For external processing

We provide personal information to our [affiliates](#) and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with customer support.

## For legal reasons

We will share personal information outside of Google if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, [legal process, or enforceable governmental request](#). We share information about the number and type of requests we receive from governments in our [Transparency Report](#).
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security, or technical issues.
- Protect against harm to the rights, property or safety of Google, our users, or the public as required or permitted by law.

We may share [non-personally identifiable information](#) publicly and with our partners — like publishers, advertisers, developers, or rights holders. For example, we share information publicly to [show trends](#) about the general use of our services. We also allow [specific partners](#) to collect information from your browser or device for advertising and measurement purposes using their own cookies or similar technologies.

If Google is involved in a merger, acquisition, or sale of assets, we'll continue to ensure the confidentiality of your personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## KEEPING YOUR INFORMATION SECURE

We build security into our services to protect your information

All Google products are built with strong security features that continuously protect your information. The insights we gain from maintaining our services help us detect and automatically block security threats from ever reaching you. And if we do detect something risky that we think you should know about, we'll notify you and help guide you through steps to stay better protected.

We work hard to protect you and Google from unauthorized access, alteration, disclosure, or destruction of information we hold, including:

- We use encryption to keep your data private while in transit
- We offer a range of security features, like [Safe Browsing](#), Security Checkup, and [2 Step Verification](#) to help you protect your account
- We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems
- We restrict access to personal information to Google employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## EXPORTING & DELETING YOUR INFORMATION

You can export a copy of your information or delete it from your Google Account at any time

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

[Export your data](#)

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

[Delete your information](#)

## Retaining your information

We retain the data we collect for different periods of time depending on what it is, how we use it, and how you configure your settings:

- Some data you can delete whenever you like, such as the content you create or upload. You can also delete [activity information](#) saved in your account, or [choose to have it deleted automatically](#) after a set period of time.
- Other data is deleted or anonymized automatically after a set period of time, such as [advertising data](#) in server logs.
- We keep some data until you delete your Google Account, such as information about how often you use our services.
- And some data we retain for longer periods of time when necessary for legitimate business or legal purposes, such as security, fraud and abuse prevention, or financial record-keeping.

When you delete data, we follow a deletion process to make sure that your data is safely and completely removed from our servers or retained only in anonymized form. We try to ensure that our services protect information from accidental or malicious deletion. Because of this, there may be delays between when you delete something and when copies are deleted from our active and backup systems.

You can read more about Google's [data retention periods](#), including how long it takes us to delete your information.

### COMPLIANCE & COOPERATION WITH REGULATORS

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

## Data transfers

We maintain [servers around the world](#) and your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this policy. We also comply with certain [legal frameworks](#) relating to the transfer of data, such as the EU-US and Swiss-US Privacy Shield Frameworks.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

### ABOUT THIS POLICY

## When this policy applies

This Privacy Policy applies to all of the services offered by Google LLC and its [affiliates](#), including YouTube, Android, and services offered on third-party sites, such as advertising services. This Privacy Policy doesn't apply to services that have separate privacy policies that do not incorporate this Privacy Policy.

This Privacy Policy doesn't apply to:

- The information practices of other companies and organizations that advertise our services
- Services offered by other companies or individuals, including products or sites that may include Google services, be displayed to you in search results, or be linked from our services

## Changes to this policy

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date the last changes were published and we offer access to

[archived versions](#) for your review. If changes are significant, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

## RELATED PRIVACY PRACTICES

# Specific Google services

The following privacy notices provide additional information about some Google services:

- [Chrome & the Chrome Operating System](#)
- [Play Books](#)
- [Payments](#)
- [Fiber](#)
- [Google Fi](#)
- [G Suite for Education](#)
- [YouTube Kids](#)
- [Google Accounts Managed with Family Link, for Children under 13 \(or applicable age in your country\)](#)
- [Voice and Audio Collection from Children's Features on the Google Assistant](#)

# Other useful resources

The following links highlight useful resources for you to learn more about our practices and privacy settings.

- [Your Google Account](#) is home to many of the settings you can use to manage your account
- [Privacy Checkup](#) guides you through key privacy settings for your Google Account
- [Google's safety center](#) helps you learn more about our built-in security, privacy controls, and tools to help set digital ground rules for your family online
- [Privacy & Terms](#) provides more context regarding this Privacy Policy and our Terms of Service



- [Technologies](#) includes more information about:
  - [How Google uses cookies](#)
  - Technologies used for [Advertising](#)
  - [How Google uses pattern recognition](#) to recognize things like faces in photos
  - [How Google uses information from sites or apps that use our services](#)

## ads you'll find most useful

For example, if you watch videos about baking on YouTube, you may see more ads that relate to baking as you browse the web. We also may use your IP address to determine your approximate location, so that we can serve you ads for a nearby pizza delivery service if you search for "pizza." Learn more [about Google ads](#) and [why you may see particular ads](#).

## the people who matter most to you online

For example, when you type an address in the To, Cc, or Bcc field of an email you're composing, Gmail will suggest addresses based on the people you [contact most frequently](#).

## phone number

If you add your phone number to your account, it can be used for different purposes across Google services, depending on your settings. For example, your phone number can be used to help you access your account if you forget your password, help people find and connect with you, and make the ads you see more relevant to you. [Learn more](#)

## payment information

For example, if you add a credit card or other payment method to your Google Account, you can use it to buy things across our services, like apps in the Play Store. We may also ask for other information, like a business tax ID, to help process your payment. In some cases, we may also need to verify your identity and may ask you for information to do this.

We may also use payment information to verify that you meet age requirements, if, for example, you enter an incorrect birthday indicating you're not old enough to have a Google Account. [Learn more](#)

## devices

For example, we can use information from your devices to help you decide which device you'd like to use to install an app or view a movie you buy from Google Play. We also use this information to help protect your account.

### Android device with Google apps

Android devices with Google apps include devices sold by Google or one of our partners and include phones, cameras, vehicles, wearables, and televisions. These devices use Google Play Services and other pre-installed apps that include services like Gmail, Maps, your phone's camera and phone dialer, text-to-speech conversion, keyboard input, and security features.

### Views and interactions with content and ads

For example, we collect information about views and interactions with ads so we can provide aggregated reports to advertisers, like telling them whether we served their ad on a page and whether the ad was likely seen by a viewer. We may also measure other interactions, such as how you move your mouse over an ad or if you interact with the page on which the ad appears.

### synced with your Google Account

Your Chrome browsing history is only saved to your account if you've enabled Chrome synchronization with your Google Account. [Learn more](#)

### services to make and receive calls or send and receive messages

Examples of these services include:

- Google Hangouts, for making domestic and international calls
- Google Voice, for making calls, sending text messages, and managing voicemail
- Google Fi, for a phone plan

## Sensor data from your device

Your device may have sensors that can be used to better understand your location and movement. For example, an accelerometer can be used to determine your speed and a gyroscope to figure out your direction of travel.

## Information about things near your device

If you use Google's Location services on Android, we can improve the performance of apps that rely on your location, like Google Maps. If you use Google's Location services, your device sends information to Google about its location, sensors (like accelerometer), and nearby cell towers and Wi-Fi access points (like MAC address and signal strength). All these things help to determine your location. You can use your device settings to enable Google Location services. [Learn more](#)

## publicly accessible sources

For example, we may collect information that's publicly available online or from other public sources to help train Google's language models and build features like Google Translate.

## protect against abuse

For example, information about security threats can help us notify you if we think your account has been compromised (at which point we can help you take steps to protect your account).

## advertising and research services on their behalf

For example, advertisers may upload data from their loyalty-card programs so that they can better understand the performance of their ad campaigns. We only provide aggregated reports to advertisers that don't reveal

information about individual people.

## deliver our services

Examples of how we use your information to deliver our services include:

- We use the IP address assigned to your device to send you the data you requested, such as loading a YouTube video
- We use unique identifiers stored in cookies on your device to help us authenticate you as the person who should have access to your Google Account
- Photos and videos you upload to Google Photos are used to help you create albums, animations, and other creations that you can share. [Learn more](#)
- A flight confirmation email you receive may be used to create a “check-in” button that appears in your Gmail
- When you purchase services or physical goods from us, you may provide us information like your shipping address or delivery instructions. We use this information for things like processing, fulfilling, and delivering your order, and to provide support in connection with the product or service you purchase.

## ensure our services are working as intended

For example, we continuously monitor our systems to look for problems. And if we find something wrong with a specific feature, reviewing activity information collected before the problem started allows us to fix things more quickly.

## make improvements

For example, we use cookies to analyze how people interact with our services. And that analysis can help us build better products. For example, it may help us discover that it's taking people too long to complete a certain task or that they have trouble finishing steps at all. We can then redesign that feature and improve the product for everyone.

## customized search results

For example, when you're signed in to your Google Account and have the Web & App Activity control enabled, you can get more relevant search results that are based on your previous searches and activity from other Google services. You can [learn more here](#). You may also get customized search results even when you're signed out. If you don't want this level of search customization, you can [search and browse privately](#) or turn off [signed-out search personalization](#).

## personalized ads

You may also see personalized ads based on information from the advertiser. If you shopped on an advertiser's website, for example, they can use that visit information to show you ads. [Learn more](#)

## sensitive categories

When showing you personalized ads, we use topics that we think might be of interest to you based on your activity. For example, you may see ads for things like "Cooking and Recipes" or "Air Travel." [We don't use topics or show personalized ads based on sensitive categories like race, religion, sexual orientation, or health. And we require the same from advertisers that use our services.](#)

## may link information

Google Analytics relies on first-party cookies, which means the cookies are set by the Google Analytics customer. Using our systems, data generated through Google Analytics can be linked by the Google Analytics customer and by Google to third-party cookies that are related to visits to other websites. For example, an advertiser may want to use its Google Analytics data to create more relevant ads, or to further analyze its traffic. [Learn more](#)

## safety and reliability

Some examples of how we use your information to help keep our services safe and reliable include:

- Collecting and analyzing IP addresses and cookie data to protect against automated abuse. This abuse takes many forms, such as sending spam to Gmail users, stealing money from advertisers by fraudulently clicking on ads, or censoring content by launching a Distributed Denial of Service (DDoS) attack.
- The “last account activity” feature in Gmail can help you find out if and when someone accessed your email without your knowledge. This feature shows you information about recent activity in Gmail, such as the IP addresses that accessed your mail, the associated location, and the date and time of access. [Learn more](#)

## detect abuse

When we detect spam, malware, illegal content, and other forms of abuse on our systems in violation of our policies, we may disable your account or take other appropriate action. In certain circumstances, we may also report the violation to appropriate authorities.

## combine the information we collect

Some examples of how we combine the information we collect include:

- When you're signed in to your Google Account and search on Google, you can see search results from the public web, along with relevant information from the content you have in other Google products, like Gmail or Google Calendar. This can include things like the status of your upcoming flights, restaurant, and hotel reservations, or your photos. [Learn more](#)
- If you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to type in their name. This feature makes it easier to share things with people you know. [Learn more](#)
- The Google app can use data that you have stored in other Google products to show you personalized content, depending on your settings. For example, if you have searches stored in your Web & App Activity, the Google app can show you news articles and other information about your interests, like sports scores, based your activity. [Learn more](#)
- If you link your Google Account to your Google Home, you can manage your information and get things done through the Google Assistant. For example, you can add events to your Google Calendar or get your schedule for the day, ask for status updates on your upcoming flight, or send information like driving directions to your phone. [Learn more](#)

## your activity on other sites and apps

This activity might come from your use of Google services, like from syncing your account with Chrome or your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics), or it might embed other content (such as videos from YouTube). These services may share information about your activity with Google and, depending on your [account settings](#) and the products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information.

[Learn more](#) about how Google uses data when you use our partners' sites or apps.

## partner with Google

There are over 2 million non-Google websites and apps that partner with Google to show ads. [Learn more](#)

## specific Google services

For example, you can delete [your blog](#) from Blogger or [a Google Site you own](#) from Google Sites. You can also delete [reviews](#) you've left on apps, games, and other content in the Play Store.

## rely on cookies to function properly

For example, we use a cookie called 'lbc's' that makes it possible for you to open many Google Docs in one browser. Blocking this cookie would prevent Google Docs from working as expected. [Learn more](#)

## legal process, or enforceable governmental request

Like other technology and communications companies, Google regularly receives requests from governments and courts around the world to disclose user data. Respect for the privacy and security of data you store with Google underpins our approach to complying with these legal requests. Our legal team reviews each and every

request, regardless of type, and we frequently push back when a request appears to be overly broad or doesn't follow the correct process. Learn more in our [Transparency Report](#).

## show trends

When lots of people start searching for something, it can provide useful information about particular trends at that time. Google Trends samples Google web searches to estimate the popularity of searches over a certain period of time and shares those results publicly in aggregated terms. [Learn more](#)

## specific partners

For example, we allow YouTube creators and advertisers to work with measurement companies to learn about the audience of their YouTube videos or ads, using cookies or similar technologies. Another example is merchants on our shopping pages, who use cookies to understand how many different people see their product listings. [Learn more](#) about these partners and how they use your information.

## servers around the world

For example, we operate data centers located [around the world](#) to help keep our products continuously available for users.

## third parties

For example, we process your information to report use statistics to rights holders about how their content was used in our services. We may also process your information if people search for your name and we display search results for sites containing publicly available information about you.

## appropriate safeguards

For example, we may anonymize data, or encrypt data to ensure it can't be linked to other information about you. [Learn more](#)



## ensure and improve

For example, we analyze how people interact with advertising to improve the performance of our ads.

## Customizing our services

For example, we may display a Google Doodle on the Search homepage to celebrate an event specific to your country.

## Affiliates

An affiliate is an entity that belongs to the Google group of companies, including the following companies that provide consumer services in the EU: Google Ireland Limited, Google Commerce Ltd, Google Payment Corp, and Google Dialer Inc. Learn more about the [companies providing business services in the EU](#).

## Algorithm

A process or set of rules followed by a computer in performing problem-solving operations.

## Application data cache

An application data cache is a data repository on a device. It can, for example, enable a web application to run without an internet connection and improve the performance of the application by enabling faster loading of content.

## Browser web storage

Browser web storage enables websites to store data in a browser on a device. When used in "local storage" mode, it enables data to be stored across sessions. This makes data retrievable even after a browser has been closed and reopened. One technology that facilitates web storage is HTML 5.

## Cookies and similar technologies

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. Learn more about [how Google uses cookies](#) and how Google uses data, including cookies, [when you use our partners' sites or apps](#).

## Device

A device is a computer that can be used to access Google services. For example, desktop computers, tablets, smart speakers, and smartphones are all considered devices.

## Non-personally identifiable information

This is information that is recorded about users so that it no longer reflects or references an individually-identifiable user.

## IP address

Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.

## Pixel tag

A pixel tag is a type of technology placed on a website or within the body of an email for the purpose of tracking certain activity, such as views of a website or when an email is opened. Pixel tags are often used in combination with cookies.

## Personal information

This is information that you provide to us which personally identifies you, such as your name, email address, or billing information, or other data that can be reasonably linked to such information by Google, such as information we associate with your Google Account.

## Sensitive personal information

This is a particular category of personal information relating to topics such as confidential medical facts, racial or ethnic origins, political or religious beliefs, or sexuality.

## Server logs

Like most websites, our servers automatically record the page requests made when you visit our sites. These “server logs” typically include your web request, Internet Protocol address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser.

A typical log entry for a search for “cars” looks like this:

```
123.45.67.89 - 25/Mar/2003 10:15:32 -  
http://www.google.com/search?q=cars -  
Firefox 1.0.7; Windows NT 5.1 -  
740674ce2123e969
```

- `123.45.67.89` is the Internet Protocol address assigned to the user by the user’s ISP. Depending on the user’s service, a different address may be assigned to the user by their service provider each time they connect to the Internet.
- `25/Mar/2003 10:15:32` is the date and time of the query.
- `http://www.google.com/search?q=cars` is the requested URL, including the search query.
- `Firefox 1.0.7; Windows NT 5.1` is the browser and operating system being used.
- `740674ce2123a969` is the unique cookie ID assigned to this particular computer the first time it visited Google. (Cookies can be deleted by users. If the user has deleted the cookie from the computer since the

last time they've visited Google, then it will be the unique cookie ID assigned to their device the next time they visit Google from that particular device).

## Unique identifiers

A unique identifier is a string of characters that can be used to uniquely identify a browser, app, or device.

Different identifiers vary in how permanent they are, whether they can be reset by users, and how they can be accessed.

Unique identifiers can be used for various purposes, including security and fraud detection, syncing services such as your email inbox, remembering your preferences, and providing personalized advertising. For example, unique identifiers stored in cookies help sites display content in your browser in your preferred language. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. Learn more about [how Google uses cookies](#).

On other platforms besides browsers, unique identifiers are used to recognize a specific device or app on that device. For example, a unique identifier such as the Advertising ID is used to provide relevant advertising on Android devices, and can be [managed](#) in your device's settings. Unique identifiers may also be incorporated into a device by its manufacturer (sometimes called a universally unique ID or UUID), such as the IMEI-number of a mobile phone. For example, a device's unique identifier can be used to customize our service to your device or analyze device issues related to our services.

# **EXHIBIT 15**

## GOOGLE PRIVACY POLICY

When you use our services, you're trusting us with your information. We understand this is a big responsibility and work hard to protect your information and put you in control.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

Effective December 19, 2019 | [Archived versions](#) | [Download PDF](#)

We build a range of services that help millions of people daily to explore and interact with the world in new ways. Our services include:

- Google apps, sites, and devices, like Search, YouTube, and Google Home
- Platforms like the Chrome browser and Android operating system
- Products that are integrated into third-party apps and sites, like ads and embedded Google Maps

You can use our services in a variety of ways to manage your privacy. For example, you can sign up for a Google Account if you want to create and manage content like emails and photos, or see more relevant search results. And you can use many Google services when you're signed out or without creating an account at all, like searching on Google or watching YouTube videos. You can also choose to browse the web privately using Chrome in Incognito mode. And across our services, you can adjust your privacy settings to control what we collect and how your information is used.

To help explain things as clearly as possible, we've added examples, explanatory videos, and definitions for [key terms](#). And if you have any questions about this Privacy Policy, you can [contact us](#).

## INFORMATION GOOGLE COLLECTS

We want you to understand the types of information we collect as you use our services

We collect information to provide better services to all our users — from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like. The information Google collects, and how that information is used, depends on how you use our services and how you manage your privacy controls.

When you're not signed in to a Google Account, we store the information we collect with [unique identifiers](#) tied to the browser, application, or [device](#) you're using. This helps us do things like maintain your language preferences across browsing sessions.

When you're signed in, we also collect information that we store with your Google Account, which we treat as [personal information](#).

## Things you create or provide to us

When you create a Google Account, you provide us with [personal information](#) that includes your name and a password. You can also choose to add a [phone number](#) or [payment information](#) to your account. Even if you aren't signed in to a Google Account, you might choose to provide us with information – like an email address to receive updates about our services.

We also collect the content you create, upload, or receive from others when using our services. This includes things like email you write and receive, photos and videos you save, docs and spreadsheets you create, and comments you make on YouTube videos.

## Information we collect as you use our services

### Your apps, browsers & devices

We collect information about the apps, browsers, and [devices](#) you use to access Google services, which helps us provide features like automatic product updates and dimming your screen if your battery runs low.

The information we collect includes [unique identifiers](#), browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application version number. We also collect information about the interaction of your apps, browsers, and devices with our services, including [IP address](#), crash reports, system activity, and the date, time, and referrer URL of your request.

We collect this information when a Google service on your device contacts our servers – for example, when you install an app from the Play Store or when a service checks for automatic updates. If you're using an [Android device with Google apps](#), your device periodically contacts Google servers to provide information about your

device and connection to our services. This information includes things like your device type, carrier name, crash reports, and which apps you've installed.

## Your activity

We collect information about your activity in our services, which we use to do things like recommend a YouTube video you might like. The activity information we collect may include:

- Terms you search for
- Videos you watch
- [Views and interactions with content and ads](#)
- Voice and audio information when you use audio features
- Purchase activity
- People with whom you communicate or share content
- Activity on third-party sites and apps that use our services
- Chrome browsing history you've [synced with your Google Account](#)

If you use our [services to make and receive calls or send and receive messages](#), we may collect telephony log information like your phone number, calling-party number, receiving-party number, forwarding numbers, time and date of calls and messages, duration of calls, routing information, and types of calls.

You can visit your Google Account to find and manage activity information that's saved in your account.

[Go to Google Account](#)

## Your location information

We collect information about your location when you use our services, which helps us offer features like driving directions for your weekend getaway or showtimes for movies playing near you.



Your location can be determined with varying degrees of accuracy by:

- [GPS](#)
- [IP address](#)
- [Sensor data from your device](#)
- [Information about things near your device](#), such as Wi-Fi access points, cell towers, and Bluetooth-enabled devices

The types of location data we collect depend in part on your device and account settings. For example, you can [turn your Android device's location on or off](#) using the device's settings app. You can also turn on [Location History](#) if you want to create a private map of where you go with your signed-in devices.

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In some circumstances, Google also collects information about you from [publicly accessible sources](#). For example, if your name appears in your local newspaper, Google's Search engine may index that article and display it to other people if they search for your name. We may also collect information about you from trusted partners, including marketing partners who provide us with information about potential customers of our business services, and security partners who provide us with information to [protect against abuse](#). We also receive information from advertisers to provide [advertising and research services on their behalf](#).

We use various technologies to collect and store information, including [cookies](#), [pixel tags](#), local storage, such as [browser web storage](#) or [application data caches](#), databases, and [server logs](#).

#### WHY GOOGLE COLLECTS DATA

We use data to build better services

We use the information we collect from all our services for the following purposes:

#### Provide our services

We use your information to [deliver our services](#), like processing the terms you search for in order to return results or helping you share content by suggesting recipients from your contacts.

## Maintain & improve our services

We also use your information to [ensure our services are working as intended](#), such as tracking outages or troubleshooting issues that you report to us. And we use your information to [make improvements](#) to our services – for example, understanding which search terms are most frequently misspelled helps us improve spell-check features used across our services.

## Develop new services

We use the information we collect in existing services to help us develop new ones. For example, understanding how people organized their photos in Picasa, Google's first photos app, helped us design and launch Google Photos.

## Provide personalized services, including content and ads

We use the information we collect to customize our services for you, including providing recommendations, personalized content, and [customized search results](#). For example, [Security Checkup](#) provides security tips adapted to how you use Google products. And Google Play uses information like apps you've already installed and videos you've watched on YouTube to suggest new apps you might like.

Depending on your settings, we may also show you [personalized ads](#) based on your interests. For example, if you search for "mountain bikes," you may see an ad for sports equipment when you're browsing a site that shows ads served by Google. You can control what information we use to show you ads by visiting your ad settings.

- We don't show you personalized ads based on [sensitive categories](#), such as race, religion, sexual orientation, or health.
- We don't share information that personally identifies you with advertisers, such as your name or email, unless you ask us to. For example, if you see an ad for a nearby flower shop and select the "tap to call" button, we'll connect your call and may share your phone number with the flower shop.

[Go to Ad Settings](#)

## Measure performance

We use data for analytics and measurement to understand how our services are used. For example, we analyze data about your visits to our sites to do things like optimize product design. And we also use data about the ads you interact with to help advertisers understand the performance of their ad campaigns. We use a variety of tools to do this, including Google Analytics. When you visit sites that use Google Analytics, Google and a Google Analytics customer [may link information](#) about your activity from that site with activity from other sites that use our ad services.

## Communicate with you

We use information we collect, like your email address, to interact with you directly. For example, we may send you a notification if we detect suspicious activity, like an attempt to sign in to your Google Account from an unusual location. Or we may let you know about upcoming changes or improvements to our services. And if you contact Google, we'll keep a record of your request in order to help solve any issues you might be facing.

## Protect Google, our users, and the public

We use information to help improve the [safety and reliability](#) of our services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm Google, our users, or the public.

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We use different technologies to process your information for these purposes. We use automated systems that analyze your content to provide you with things like customized search results, personalized ads, or other features tailored to how you use our services. And we analyze your content to help us [detect abuse](#) such as spam, malware, and illegal content. We also use [algorithms](#) to recognize patterns in data. For example, Google Translate helps people communicate across languages by detecting common language patterns in phrases you ask it to translate.

We may [combine the information we collect](#) among our services and across your devices for the purposes described above. For example, if you watch videos of guitar players on YouTube, you might see an ad for guitar lessons on a site that uses our ad products. Depending on your account settings, [your activity on other sites](#)

[and apps](#) may be associated with your personal information in order to improve Google's services and the ads delivered by Google.

If other users already have your email address or other information that identifies you, we may show them your publicly visible Google Account information, such as your name and photo. This helps people identify an email coming from you, for example.

We'll ask for your consent before using your information for a purpose that isn't covered in this Privacy Policy.

## YOUR PRIVACY CONTROLS

You have choices regarding the information we collect and how it's used

This section describes key controls for managing your privacy across our services. You can also visit the [Privacy Checkup](#), which provides an opportunity to review and adjust important privacy settings. In addition to these tools, we also offer specific privacy settings in our products — you can learn more in our [Product Privacy Guide](#).

[Go to Privacy Checkup](#)

## Managing, reviewing, and updating your information

When you're signed in, you can always review and update information by visiting the services you use. For example, Photos and Drive are both designed to help you manage specific types of content you've saved with Google.

We also built a place for you to review and control information saved in your Google Account. Your [Google Account](#) includes:

### Privacy controls

### Activity Controls

Decide what types of activity you'd like saved in your account. For example, you can turn on Location History if you want traffic predictions for your daily commute, or you can save your YouTube Watch History to get better video suggestions.

[Go to Activity Controls](#)

## Ad settings

Manage your preferences about the ads shown to you on Google and on sites and apps that [partner with Google](#) to show ads. You can modify your interests, choose whether your personal information is used to make ads more relevant to you, and turn on or off certain advertising services.

[Go to Ad Settings](#)

## About you

Control what others see about you across Google services.

[Go to About You](#)

## Shared endorsements

Choose whether your name and photo appear next to your activity, like reviews and recommendations, that appear in ads.

[Go to Shared Endorsements](#)

## Information you share

If you're a G Suite user, control whom you share information with through your account on Google+.

[Go to Information You Share](#)

## Ways to review & update your information

### My Activity

My Activity allows you to review and control data that's created when you use Google services, like searches you've done or your visits to Google Play. You can browse by date and by topic, and delete part or all of your activity.

[Go to My Activity](#)

### Google Dashboard

Google Dashboard allows you to manage information associated with specific products.

[Go to Dashboard](#)

### Your personal information

Manage your contact information, such as your name, email, and phone number.

[Go to Personal Info](#)

When you're signed out, you can manage information associated with your browser or device, including:

- Signed-out search personalization: [Choose](#) whether your search activity is used to offer you more relevant results and recommendations.
- YouTube settings: Pause and delete your [YouTube Search History](#) and your [YouTube Watch History](#).
- Ad Settings: [Manage](#) your preferences about the ads shown to you on Google and on sites and apps that partner with Google to show ads.

## Exporting, removing & deleting your information

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

### [Export your data](#)

You can also [request to remove content](#) from specific Google services based on applicable law.

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

### [Delete your information](#)

And finally, [Inactive Account Manager](#) allows you to give someone else access to parts of your Google Account in case you're unexpectedly unable to use your account.

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There are other ways to control the information Google collects whether or not you're signed in to a Google Account, including:

- **Browser settings:** For example, you can configure your browser to indicate when Google has set a [cookie](#) in your browser. You can also configure your browser to block all cookies from a specific domain or all domains. But remember that our services [rely on cookies to function properly](#), for things like remembering your language preferences.
- **Device-level settings:** Your device may have controls that determine what information we collect. For example, you can [modify location settings](#) on your Android device.

## SHARING YOUR INFORMATION

### When you share your information

Many of our services let you share information with other people, and you have control over how you share. For example, you can share videos on YouTube publicly or you can decide to keep your videos private. Remember, when you share information publicly, your content may become accessible through search engines, including Google Search.

When you're signed in and interact with some Google services, like leaving comments on a YouTube video or reviewing an app in Play, your name and photo appear next to your activity. We may also display this information in [ads depending on your Shared endorsements setting](#).

### When Google shares your information

We do not share your personal information with companies, organizations, or individuals outside of Google except in the following cases:

#### With your consent

We'll share personal information outside of Google when we have your consent. For example, if you [use Google Home to make a reservation](#) through a booking service, we'll get your permission before sharing your name or phone number with the restaurant. We'll ask for your explicit consent to share any [sensitive personal information](#).

#### With domain administrators

If you're a student or work for an organization that uses Google services (like G Suite), your [domain administrator](#) and resellers who manage your account will have access to your Google Account. They may be able to:

- Access and retain information stored in your account, like your email
- View statistics regarding your account, like how many apps you install



- Change your account password
- Suspend or terminate your account access
- Receive your account information in order to satisfy applicable law, regulation, legal process, or enforceable governmental request
- Restrict your ability to delete or edit your information or your privacy settings

## For external processing

We provide personal information to our [affiliates](#) and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with customer support.

## For legal reasons

We will share personal information outside of Google if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, [legal process, or enforceable governmental request](#). We share information about the number and type of requests we receive from governments in our [Transparency Report](#).
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security, or technical issues.
- Protect against harm to the rights, property or safety of Google, our users, or the public as required or permitted by law.

We may share [non-personally identifiable information](#) publicly and with our partners — like publishers, advertisers, developers, or rights holders. For example, we share information publicly to [show trends](#) about the general use of our services. We also allow [specific partners](#) to collect information from your browser or device for advertising and measurement purposes using their own cookies or similar technologies.

If Google is involved in a merger, acquisition, or sale of assets, we'll continue to ensure the confidentiality of your personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## KEEPING YOUR INFORMATION SECURE

We build security into our services to protect your information

All Google products are built with strong security features that continuously protect your information. The insights we gain from maintaining our services help us detect and automatically block security threats from ever reaching you. And if we do detect something risky that we think you should know about, we'll notify you and help guide you through steps to stay better protected.

We work hard to protect you and Google from unauthorized access, alteration, disclosure, or destruction of information we hold, including:

- We use encryption to keep your data private while in transit
- We offer a range of security features, like [Safe Browsing](#), Security Checkup, and [2 Step Verification](#) to help you protect your account
- We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems
- We restrict access to personal information to Google employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## EXPORTING & DELETING YOUR INFORMATION

You can export a copy of your information or delete it from your Google Account at any time

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

[Export your data](#)

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

## Delete your information

### RETAINING YOUR INFORMATION

We retain the data we collect for different periods of time depending on what it is, how we use it, and how you configure your settings:

- Some data you can delete whenever you like, such as the content you create or upload. You can also delete [activity information](#) saved in your account, or [choose to have it deleted automatically](#) after a set period of time.
- Other data is deleted or anonymized automatically after a set period of time, such as [advertising data](#) in server logs.
- We keep some data until you delete your Google Account, such as information about how often you use our services.
- And some data we retain for longer periods of time when necessary for legitimate business or legal purposes, such as security, fraud and abuse prevention, or financial record-keeping.

When you delete data, we follow a deletion process to make sure that your data is safely and completely removed from our servers or retained only in anonymized form. We try to ensure that our services protect information from accidental or malicious deletion. Because of this, there may be delays between when you delete something and when copies are deleted from our active and backup systems.

You can read more about Google's [data retention periods](#), including how long it takes us to delete your information.

### COMPLIANCE & COOPERATION WITH REGULATORS

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

## Data transfers

We maintain [servers around the world](#) and your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this policy. We also comply with certain [legal frameworks](#) relating to the transfer of data, such as the EU-US and Swiss-US Privacy Shield Frameworks.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

## California requirements

If the California Consumer Privacy Act (CCPA) applies to your information, we provide these disclosures and the [tools](#) described in this policy so you can exercise your rights to receive information about our data practices, as well as to request access to and deletion of your information. These tools allow you to review, update and delete your information, as well as export and download a copy of it. You can also [read more](#) about Google's data retention periods, and the process we follow to delete your information.

Google does not sell your personal information. We only [share your information](#) as described in this policy. Google [processes your information](#) for the purposes described in this policy, which include "business purposes" under the CCPA. These purposes include:

- **Protecting against security threats, abuse, and illegal activity.** Google uses and may disclose information to detect, prevent and respond to security incidents, and for protecting against other malicious, deceptive, fraudulent, or illegal activity. For example, to protect our services, Google may receive or disclose information about IP addresses that malicious actors have compromised.
- **Auditing and measurement.** Google uses information for analytics and measurement to understand how our services are used, as well as to fulfill obligations to our partners like publishers, advertisers,

developers, or rights holders. We may disclose non-personally identifiable information publicly and with these partners, including for auditing purposes.

- **Maintaining our services.** Google uses information to ensure our services are working as intended, such as tracking outages or troubleshooting bugs and other issues that you report to us.
- **Research and development.** Google uses information to improve our services and to develop new products, features and technologies that benefit our users and the public. For example, we use publicly available information to help train Google's language models and build features like Google Translate.
- **Use of service providers.** Google shares information with service providers to perform services on our behalf, in compliance with our Privacy Policy and other appropriate confidentiality and security measures. For example, we may rely on service providers to help provide customer support.
- **Advertising.** Google processes information, including online identifiers and information about your interactions with advertisements, to provide advertising. This keeps many of our services freely available for users. You can control what information we use to show you ads by visiting your [ad settings](#).

Google also uses information to satisfy applicable laws or regulations, and discloses information in response to legal process or enforceable government requests, including to law enforcement. We provide information about the number and type of requests we receive from governments in our [Transparency Report](#).

If you have additional questions or requests related to your rights under the CCPA, [you can contact Google](#).

#### ABOUT THIS POLICY

## When this policy applies

This Privacy Policy applies to all of the services offered by Google LLC and its [affiliates](#), including YouTube, Android, and services offered on third-party sites, such as advertising services. This Privacy Policy doesn't apply to services that have separate privacy policies that do not incorporate this Privacy Policy.

This Privacy Policy doesn't apply to:

- The information practices of other companies and organizations that advertise our services
- Services offered by other companies or individuals, including products or sites that may include Google services, be displayed to you in search results, or be linked from our services

## Changes to this policy

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date the last changes were published and we offer access to [archived versions](#) for your review. If changes are significant, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

### RELATED PRIVACY PRACTICES

## Specific Google services

The following privacy notices provide additional information about some Google services:

- [Chrome & the Chrome Operating System](#)
- [Play Books](#)
- [Payments](#)
- [Fiber](#)
- [Google Fi](#)
- [G Suite for Education](#)
- [YouTube Kids](#)
- [Google Accounts Managed with Family Link, for Children under 13 \(or applicable age in your country\)](#)
- [Voice and Audio Collection from Children's Features on the Google Assistant](#)

## Other useful resources

The following links highlight useful resources for you to learn more about our practices and privacy settings.

- [Your Google Account](#) is home to many of the settings you can use to manage your account

- [Privacy Checkup](#) guides you through key privacy settings for your Google Account
- [Google's safety center](#) helps you learn more about our built-in security, privacy controls, and tools to help set digital ground rules for your family online
- [Privacy & Terms](#) provides more context regarding this Privacy Policy and our Terms of Service
- [Technologies](#) includes more information about:
  - [How Google uses cookies](#)
  - Technologies used for [Advertising](#)
  - [How Google uses pattern recognition](#) to recognize things like faces in photos
  - [How Google uses information from sites or apps that use our services](#)

## ads you'll find most useful

For example, if you watch videos about baking on YouTube, you may see more ads that relate to baking as you browse the web. We also may use your IP address to determine your approximate location, so that we can serve you ads for a nearby pizza delivery service if you search for "pizza." Learn more [about Google ads](#) and [why you may see particular ads](#).

## the people who matter most to you online

For example, when you type an address in the To, Cc, or Bcc field of an email you're composing, Gmail will suggest addresses based on the people you [contact most frequently](#).

## phone number

If you add your phone number to your account, it can be used for different purposes across Google services, depending on your settings. For example, your phone number can be used to help you access your account if you forget your password, help people find and connect with you, and make the ads you see more relevant to you. [Learn more](#)

## payment information

For example, if you add a credit card or other payment method to your Google Account, you can use it to buy things across our services, like apps in the Play Store. We may also ask for other information, like a business tax ID, to help process your payment. In some cases, we may also need to verify your identity and may ask you for information to do this.

We may also use payment information to verify that you meet age requirements, if, for example, you enter an incorrect birthday indicating you're not old enough to have a Google Account. [Learn more](#)

## devices

For example, we can use information from your devices to help you decide which device you'd like to use to install an app or view a movie you buy from Google Play. We also use this information to help protect your account.

## Android device with Google apps

Android devices with Google apps include devices sold by Google or one of our partners and include phones, cameras, vehicles, wearables, and televisions. These devices use Google Play Services and other pre-installed apps that include services like Gmail, Maps, your phone's camera and phone dialer, text-to-speech conversion, keyboard input, and security features.

## Views and interactions with content and ads

For example, we collect information about views and interactions with ads so we can provide aggregated reports to advertisers, like telling them whether we served their ad on a page and whether the ad was likely seen by a viewer. We may also measure other interactions, such as how you move your mouse over an ad or if you interact with the page on which the ad appears.

## synced with your Google Account



Your Chrome browsing history is only saved to your account if you've enabled Chrome synchronization with your Google Account. [Learn more](#)

## services to make and receive calls or send and receive messages

Examples of these services include:

- Google Hangouts, for making domestic and international calls
- Google Voice, for making calls, sending text messages, and managing voicemail
- Google Fi, for a phone plan

## Sensor data from your device

Your device may have sensors that can be used to better understand your location and movement. For example, an accelerometer can be used to determine your speed and a gyroscope to figure out your direction of travel.

## Information about things near your device

If you use Google's Location services on Android, we can improve the performance of apps that rely on your location, like Google Maps. If you use Google's Location services, your device sends information to Google about its location, sensors (like accelerometer), and nearby cell towers and Wi-Fi access points (like MAC address and signal strength). All these things help to determine your location. You can use your device settings to enable Google Location services. [Learn more](#)

## publicly accessible sources

For example, we may collect information that's publicly available online or from other public sources to help train Google's language models and build features like Google Translate.

## protect against abuse

For example, information about security threats can help us notify you if we think your account has been compromised (at which point we can help you take steps to protect your account).

## advertising and research services on their behalf

For example, advertisers may upload data from their loyalty-card programs so that they can better understand the performance of their ad campaigns. We only provide aggregated reports to advertisers that don't reveal information about individual people.

## deliver our services

Examples of how we use your information to deliver our services include:

- We use the IP address assigned to your device to send you the data you requested, such as loading a YouTube video
- We use unique identifiers stored in cookies on your device to help us authenticate you as the person who should have access to your Google Account
- Photos and videos you upload to Google Photos are used to help you create albums, animations, and other creations that you can share. [Learn more](#)
- A flight confirmation email you receive may be used to create a "check-in" button that appears in your Gmail
- When you purchase services or physical goods from us, you may provide us information like your shipping address or delivery instructions. We use this information for things like processing, fulfilling, and delivering your order, and to provide support in connection with the product or service you purchase.

## ensure our services are working as intended

For example, we continuously monitor our systems to look for problems. And if we find something wrong with a specific feature, reviewing activity information collected before the problem started allows us to fix things more quickly.

## make improvements

For example, we use cookies to analyze how people interact with our services. And that analysis can help us build better products. For example, it may help us discover that it's taking people too long to complete a certain task or that they have trouble finishing steps at all. We can then redesign that feature and improve the product for everyone.

## customized search results

For example, when you're signed in to your Google Account and have the Web & App Activity control enabled, you can get more relevant search results that are based on your previous searches and activity from other Google services. You can [learn more here](#). You may also get customized search results even when you're signed out. If you don't want this level of search customization, you can [search and browse privately](#) or turn off [signed-out search personalization](#).

## personalized ads

You may also see personalized ads based on information from the advertiser. If you shopped on an advertiser's website, for example, they can use that visit information to show you ads. [Learn more](#)

## sensitive categories

When showing you personalized ads, we use topics that we think might be of interest to you based on your activity. For example, you may see ads for things like "Cooking and Recipes" or "Air Travel." We don't use topics or show personalized ads based on sensitive categories like race, religion, sexual orientation, or health. And we require the same from advertisers that use our services.

## may link information

Google Analytics relies on first-party cookies, which means the cookies are set by the Google Analytics customer. Using our systems, data generated through Google Analytics can be linked by the Google Analytics customer and by Google to third-party cookies that are related to visits to other websites. For example, an

advertiser may want to use its Google Analytics data to create more relevant ads, or to further analyze its traffic.

[Learn more](#)

## safety and reliability

Some examples of how we use your information to help keep our services safe and reliable include:

- Collecting and analyzing IP addresses and cookie data to protect against automated abuse. This abuse takes many forms, such as sending spam to Gmail users, stealing money from advertisers by fraudulently clicking on ads, or censoring content by launching a Distributed Denial of Service (DDoS) attack.
- The “last account activity” feature in Gmail can help you find out if and when someone accessed your email without your knowledge. This feature shows you information about recent activity in Gmail, such as the IP addresses that accessed your mail, the associated location, and the date and time of access. [Learn more](#)

## detect abuse

When we detect spam, malware, illegal content, and other forms of abuse on our systems in violation of our policies, we may disable your account or take other appropriate action. In certain circumstances, we may also report the violation to appropriate authorities.

## combine the information we collect

Some examples of how we combine the information we collect include:

- When you’re signed in to your Google Account and search on Google, you can see search results from the public web, along with relevant information from the content you have in other Google products, like Gmail or Google Calendar. This can include things like the status of your upcoming flights, restaurant, and hotel reservations, or your photos. [Learn more](#)
- If you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to type in their name. This feature makes it easier to share things with people you know. [Learn more](#)

- The Google app can use data that you have stored in other Google products to show you personalized content, depending on your settings. For example, if you have searches stored in your Web & App Activity, the Google app can show you news articles and other information about your interests, like sports scores, based your activity. [Learn more](#)
- If you link your Google Account to your Google Home, you can manage your information and get things done through the Google Assistant. For example, you can add events to your Google Calendar or get your schedule for the day, ask for status updates on your upcoming flight, or send information like driving directions to your phone. [Learn more](#)

## your activity on other sites and apps

This activity might come from your use of Google services, like from syncing your account with Chrome or your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics), or it might embed other content (such as videos from YouTube). These services may share information about your activity with Google and, depending on your [account settings](#) and the products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information.

[Learn more](#) about how Google uses data when you use our partners' sites or apps.

## partner with Google

There are over 2 million non-Google websites and apps that partner with Google to show ads. [Learn more](#)

## specific Google services

For example, you can delete [your blog](#) from Blogger or [a Google Site you own](#) from Google Sites. You can also delete [reviews](#) you've left on apps, games, and other content in the Play Store.

## rely on cookies to function properly

For example, we use a cookie called 'lbc's' that makes it possible for you to open many Google Docs in one browser. Blocking this cookie would prevent Google Docs from working as expected. [Learn more](#)

## legal process, or enforceable governmental request

Like other technology and communications companies, Google regularly receives requests from governments and courts around the world to disclose user data. Respect for the privacy and security of data you store with Google underpins our approach to complying with these legal requests. Our legal team reviews each and every request, regardless of type, and we frequently push back when a request appears to be overly broad or doesn't follow the correct process. Learn more in our [Transparency Report](#).

## show trends

When lots of people start searching for something, it can provide useful information about particular trends at that time. Google Trends samples Google web searches to estimate the popularity of searches over a certain period of time and shares those results publicly in aggregated terms. [Learn more](#)

## specific partners

For example, we allow YouTube creators and advertisers to work with measurement companies to learn about the audience of their YouTube videos or ads, using cookies or similar technologies. Another example is merchants on our shopping pages, who use cookies to understand how many different people see their product listings. [Learn more](#) about these partners and how they use your information.

## servers around the world

For example, we operate data centers located [around the world](#) to help keep our products continuously available for users.

## third parties

For example, we process your information to report use statistics to rights holders about how their content was used in our services. We may also process your information if people search for your name and we display search results for sites containing publicly available information about you.

## appropriate safeguards

For example, we may anonymize data, or encrypt data to ensure it can't be linked to other information about you. [Learn more](#)

## ensure and improve

For example, we analyze how people interact with advertising to improve the performance of our ads.

## Customizing our services

For example, we may display a Google Doodle on the Search homepage to celebrate an event specific to your country.

## Affiliates

An affiliate is an entity that belongs to the Google group of companies, including the following companies that provide consumer services in the EU: Google Ireland Limited, Google Commerce Ltd, Google Payment Corp, and Google Dialer Inc. Learn more about the [companies providing business services in the EU](#).

## Algorithm

A process or set of rules followed by a computer in performing problem-solving operations.

## Application data cache

An application data cache is a data repository on a device. It can, for example, enable a web application to run without an internet connection and improve the performance of the application by enabling faster loading of content.

## Browser web storage

Browser web storage enables websites to store data in a browser on a device. When used in "local storage" mode, it enables data to be stored across sessions. This makes data retrievable even after a browser has been closed and reopened. One technology that facilitates web storage is HTML 5.

## Cookies and similar technologies

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. Learn more about [how Google uses cookies](#) and how Google uses data, including cookies, [when you use our partners' sites or apps](#).

## Device

A device is a computer that can be used to access Google services. For example, desktop computers, tablets, smart speakers, and smartphones are all considered devices.

## Non-personally identifiable information

This is information that is recorded about users so that it no longer reflects or references an individually-identifiable user.

## IP address



Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.

## Pixel tag

A pixel tag is a type of technology placed on a website or within the body of an email for the purpose of tracking certain activity, such as views of a website or when an email is opened. Pixel tags are often used in combination with cookies.

## Personal information

This is information that you provide to us which personally identifies you, such as your name, email address, or billing information, or other data that can be reasonably linked to such information by Google, such as information we associate with your Google Account.

## Sensitive personal information

This is a particular category of personal information relating to topics such as confidential medical facts, racial or ethnic origins, political or religious beliefs, or sexuality.

## Server logs

Like most websites, our servers automatically record the page requests made when you visit our sites. These “server logs” typically include your web request, Internet Protocol address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser.

A typical log entry for a search for “cars” looks like this:

```
123.45.67.89 - 25/Mar/2003 10:15:32 -  
http://www.google.com/search?q=cars -  
Firefox 1.0.7; Windows NT 5.1 -  
740674ce2123e969
```

- `123.45.67.89` is the Internet Protocol address assigned to the user by the user's ISP. Depending on the user's service, a different address may be assigned to the user by their service provider each time they connect to the Internet.
- `25/Mar/2003 10:15:32` is the date and time of the query.
- `http://www.google.com/search?q=cars` is the requested URL, including the search query.
- `Firefox 1.0.7; Windows NT 5.1` is the browser and operating system being used.
- `740674ce2123a969` is the unique cookie ID assigned to this particular computer the first time it visited Google. (Cookies can be deleted by users. If the user has deleted the cookie from the computer since the last time they've visited Google, then it will be the unique cookie ID assigned to their device the next time they visit Google from that particular device).

## Unique identifiers

A unique identifier is a string of characters that can be used to uniquely identify a browser, app, or device.

Different identifiers vary in how permanent they are, whether they can be reset by users, and how they can be accessed.

Unique identifiers can be used for various purposes, including security and fraud detection, syncing services such as your email inbox, remembering your preferences, and providing personalized advertising. For example, unique identifiers stored in cookies help sites display content in your browser in your preferred language. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. Learn more about [how Google uses cookies](#).

On other platforms besides browsers, unique identifiers are used to recognize a specific device or app on that device. For example, a unique identifier such as the Advertising ID is used to provide relevant advertising on Android devices, and can be [managed](#) in your device's settings. Unique identifiers may also be incorporated into a device by its manufacturer (sometimes called a universally unique ID or UUID), such as the IMEI-number of a mobile phone. For example, a device's unique identifier can be used to customize our service to your device or analyze device issues related to our services.

# **EXHIBIT 16**

## GOOGLE PRIVACY POLICY

When you use our services, you're trusting us with your information. We understand this is a big responsibility and work hard to protect your information and put you in control.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

Effective March 31, 2020 | [Archived versions](#) | [Download PDF](#)

We build a range of services that help millions of people daily to explore and interact with the world in new ways. Our services include:

- Google apps, sites, and devices, like Search, YouTube, and Google Home
- Platforms like the Chrome browser and Android operating system
- Products that are integrated into third-party apps and sites, like ads and embedded Google Maps

You can use our services in a variety of ways to manage your privacy. For example, you can sign up for a Google Account if you want to create and manage content like emails and photos, or see more relevant search results. And you can use many Google services when you're signed out or without creating an account at all, like searching on Google or watching YouTube videos. You can also choose to browse the web privately using Chrome in Incognito mode. And across our services, you can adjust your privacy settings to control what we collect and how your information is used.

To help explain things as clearly as possible, we've added examples, explanatory videos, and definitions for [key terms](#). And if you have any questions about this Privacy Policy, you can [contact us](#).

## INFORMATION GOOGLE COLLECTS

We want you to understand the types of information we collect as you use our services

We collect information to provide better services to all our users — from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like. The information Google collects, and how that information is used, depends on how you use our services and how you manage your privacy controls.

When you're not signed in to a Google Account, we store the information we collect with [unique identifiers](#) tied to the browser, application, or [device](#) you're using. This helps us do things like maintain your language preferences across browsing sessions.

When you're signed in, we also collect information that we store with your Google Account, which we treat as [personal information](#).

## Things you create or provide to us

When you create a Google Account, you provide us with [personal information](#) that includes your name and a password. You can also choose to add a [phone number](#) or [payment information](#) to your account. Even if you aren't signed in to a Google Account, you might choose to provide us with information – like an email address to receive updates about our services.

We also collect the content you create, upload, or receive from others when using our services. This includes things like email you write and receive, photos and videos you save, docs and spreadsheets you create, and comments you make on YouTube videos.

## Information we collect as you use our services

### Your apps, browsers & devices

We collect information about the apps, browsers, and [devices](#) you use to access Google services, which helps us provide features like automatic product updates and dimming your screen if your battery runs low.

The information we collect includes [unique identifiers](#), browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application version number. We also collect information about the interaction of your apps, browsers, and devices with our services, including [IP address](#), crash reports, system activity, and the date, time, and referrer URL of your request.

We collect this information when a Google service on your device contacts our servers – for example, when you install an app from the Play Store or when a service checks for automatic updates. If you're using an [Android device with Google apps](#), your device periodically contacts Google servers to provide information about your

device and connection to our services. This information includes things like your device type, carrier name, crash reports, and which apps you've installed.

## Your activity

We collect information about your activity in our services, which we use to do things like recommend a YouTube video you might like. The activity information we collect may include:

- Terms you search for
- Videos you watch
- [Views and interactions with content and ads](#)
- Voice and audio information when you use audio features
- Purchase activity
- People with whom you communicate or share content
- Activity on third-party sites and apps that use our services
- Chrome browsing history you've [synced with your Google Account](#)

If you use our [services to make and receive calls or send and receive messages](#), we may collect telephony log information like your phone number, calling-party number, receiving-party number, forwarding numbers, time and date of calls and messages, duration of calls, routing information, and types of calls.

You can visit your Google Account to find and manage activity information that's saved in your account.

[Go to Google Account](#)

## Your location information

We collect information about your location when you use our services, which helps us offer features like driving directions for your weekend getaway or showtimes for movies playing near you.

Your location can be determined with varying degrees of accuracy by:

- [GPS](#)
- [IP address](#)
- [Sensor data from your device](#)
- [Information about things near your device](#), such as Wi-Fi access points, cell towers, and Bluetooth-enabled devices

The types of location data we collect depend in part on your device and account settings. For example, you can [turn your Android device's location on or off](#) using the device's settings app. You can also turn on [Location History](#) if you want to create a private map of where you go with your signed-in devices.

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In some circumstances, Google also collects information about you from [publicly accessible sources](#). For example, if your name appears in your local newspaper, Google's Search engine may index that article and display it to other people if they search for your name. We may also collect information about you from trusted partners, including marketing partners who provide us with information about potential customers of our business services, and security partners who provide us with information to [protect against abuse](#). We also receive information from advertisers to provide [advertising and research services on their behalf](#).

We use various technologies to collect and store information, including [cookies](#), [pixel tags](#), local storage, such as [browser web storage](#) or [application data caches](#), databases, and [server logs](#).

#### WHY GOOGLE COLLECTS DATA

We use data to build better services

We use the information we collect from all our services for the following purposes:

#### Provide our services

We use your information to [deliver our services](#), like processing the terms you search for in order to return results or helping you share content by suggesting recipients from your contacts.

## Maintain & improve our services

We also use your information to [ensure our services are working as intended](#), such as tracking outages or troubleshooting issues that you report to us. And we use your information to [make improvements](#) to our services – for example, understanding which search terms are most frequently misspelled helps us improve spell-check features used across our services.

## Develop new services

We use the information we collect in existing services to help us develop new ones. For example, understanding how people organized their photos in Picasa, Google's first photos app, helped us design and launch Google Photos.

## Provide personalized services, including content and ads

We use the information we collect to customize our services for you, including providing recommendations, personalized content, and [customized search results](#). For example, [Security Checkup](#) provides security tips adapted to how you use Google products. And Google Play uses information like apps you've already installed and videos you've watched on YouTube to suggest new apps you might like.

Depending on your settings, we may also show you [personalized ads](#) based on your interests. For example, if you search for "mountain bikes," you may see an ad for sports equipment when you're browsing a site that shows ads served by Google. You can control what information we use to show you ads by visiting your ad settings.

- We don't show you personalized ads based on [sensitive categories](#), such as race, religion, sexual orientation, or health.
- We don't share information that personally identifies you with advertisers, such as your name or email, unless you ask us to. For example, if you see an ad for a nearby flower shop and select the "tap to call" button, we'll connect your call and may share your phone number with the flower shop.

[Go to Ad Settings](#)



## Measure performance

We use data for analytics and measurement to understand how our services are used. For example, we analyze data about your visits to our sites to do things like optimize product design. And we also use data about the ads you interact with to help advertisers understand the performance of their ad campaigns. We use a variety of tools to do this, including Google Analytics. When you visit sites that use Google Analytics, Google and a Google Analytics customer [may link information](#) about your activity from that site with activity from other sites that use our ad services.

## Communicate with you

We use information we collect, like your email address, to interact with you directly. For example, we may send you a notification if we detect suspicious activity, like an attempt to sign in to your Google Account from an unusual location. Or we may let you know about upcoming changes or improvements to our services. And if you contact Google, we'll keep a record of your request in order to help solve any issues you might be facing.

## Protect Google, our users, and the public

We use information to help improve the [safety and reliability](#) of our services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm Google, our users, or the public.

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We use different technologies to process your information for these purposes. We use automated systems that analyze your content to provide you with things like customized search results, personalized ads, or other features tailored to how you use our services. And we analyze your content to help us [detect abuse](#) such as spam, malware, and illegal content. We also use [algorithms](#) to recognize patterns in data. For example, Google Translate helps people communicate across languages by detecting common language patterns in phrases you ask it to translate.

We may [combine the information we collect](#) among our services and across your devices for the purposes described above. For example, if you watch videos of guitar players on YouTube, you might see an ad for guitar lessons on a site that uses our ad products. Depending on your account settings, [your activity on other sites](#)

[and apps](#) may be associated with your personal information in order to improve Google's services and the ads delivered by Google.

If other users already have your email address or other information that identifies you, we may show them your publicly visible Google Account information, such as your name and photo. This helps people identify an email coming from you, for example.

We'll ask for your consent before using your information for a purpose that isn't covered in this Privacy Policy.

## YOUR PRIVACY CONTROLS

You have choices regarding the information we collect and how it's used

This section describes key controls for managing your privacy across our services. You can also visit the [Privacy Checkup](#), which provides an opportunity to review and adjust important privacy settings. In addition to these tools, we also offer specific privacy settings in our products — you can learn more in our [Product Privacy Guide](#).

[Go to Privacy Checkup](#)

## Managing, reviewing, and updating your information

When you're signed in, you can always review and update information by visiting the services you use. For example, Photos and Drive are both designed to help you manage specific types of content you've saved with Google.

We also built a place for you to review and control information saved in your Google Account. Your [Google Account](#) includes:

### Privacy controls

### Activity Controls

Decide what types of activity you'd like saved in your account. For example, you can turn on Location History if you want traffic predictions for your daily commute, or you can save your YouTube Watch History to get better video suggestions.

[Go to Activity Controls](#)

## Ad settings

Manage your preferences about the ads shown to you on Google and on sites and apps that [partner with Google](#) to show ads. You can modify your interests, choose whether your personal information is used to make ads more relevant to you, and turn on or off certain advertising services.

[Go to Ad Settings](#)

## About you

Control what others see about you across Google services.

[Go to About You](#)

## Shared endorsements

Choose whether your name and photo appear next to your activity, like reviews and recommendations, that appear in ads.

[Go to Shared Endorsements](#)

## Information you share

If you're a G Suite user, control whom you share information with through your account on Google+.

[Go to Information You Share](#)

## Ways to review & update your information

### My Activity

My Activity allows you to review and control data that's created when you use Google services, like searches you've done or your visits to Google Play. You can browse by date and by topic, and delete part or all of your activity.

[Go to My Activity](#)

### Google Dashboard

Google Dashboard allows you to manage information associated with specific products.

[Go to Dashboard](#)

### Your personal information

Manage your contact information, such as your name, email, and phone number.

[Go to Personal Info](#)

When you're signed out, you can manage information associated with your browser or device, including:

- Signed-out search personalization: [Choose](#) whether your search activity is used to offer you more relevant results and recommendations.
- YouTube settings: Pause and delete your [YouTube Search History](#) and your [YouTube Watch History](#).
- Ad Settings: [Manage](#) your preferences about the ads shown to you on Google and on sites and apps that partner with Google to show ads.

## Exporting, removing & deleting your information

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

### [Export your data](#)

You can also [request to remove content](#) from specific Google services based on applicable law.

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

### [Delete your information](#)

And finally, [Inactive Account Manager](#) allows you to give someone else access to parts of your Google Account in case you're unexpectedly unable to use your account.

---

There are other ways to control the information Google collects whether or not you're signed in to a Google Account, including:

- **Browser settings:** For example, you can configure your browser to indicate when Google has set a [cookie](#) in your browser. You can also configure your browser to block all cookies from a specific domain or all domains. But remember that our services [rely on cookies to function properly](#), for things like remembering your language preferences.
- **Device-level settings:** Your device may have controls that determine what information we collect. For example, you can [modify location settings](#) on your Android device.

## SHARING YOUR INFORMATION

### When you share your information

Many of our services let you share information with other people, and you have control over how you share. For example, you can share videos on YouTube publicly or you can decide to keep your videos private. Remember, when you share information publicly, your content may become accessible through search engines, including Google Search.

When you're signed in and interact with some Google services, like leaving comments on a YouTube video or reviewing an app in Play, your name and photo appear next to your activity. We may also display this information in [ads depending on your Shared endorsements setting](#).

### When Google shares your information

We do not share your personal information with companies, organizations, or individuals outside of Google except in the following cases:

#### With your consent

We'll share personal information outside of Google when we have your consent. For example, if you [use Google Home to make a reservation](#) through a booking service, we'll get your permission before sharing your name or phone number with the restaurant. We'll ask for your explicit consent to share any [sensitive personal information](#).

#### With domain administrators

If you're a student or work for an organization that uses Google services (like G Suite), your [domain administrator](#) and resellers who manage your account will have access to your Google Account. They may be able to:

- Access and retain information stored in your account, like your email
- View statistics regarding your account, like how many apps you install

- Change your account password
- Suspend or terminate your account access
- Receive your account information in order to satisfy applicable law, regulation, legal process, or enforceable governmental request
- Restrict your ability to delete or edit your information or your privacy settings

## For external processing

We provide personal information to our [affiliates](#) and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with customer support.

## For legal reasons

We will share personal information outside of Google if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, [legal process, or enforceable governmental request](#). We share information about the number and type of requests we receive from governments in our [Transparency Report](#).
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security, or technical issues.
- Protect against harm to the rights, property or safety of Google, our users, or the public as required or permitted by law.

We may share [non-personally identifiable information](#) publicly and with our partners — like publishers, advertisers, developers, or rights holders. For example, we share information publicly to [show trends](#) about the general use of our services. We also allow [specific partners](#) to collect information from your browser or device for advertising and measurement purposes using their own cookies or similar technologies.

If Google is involved in a merger, acquisition, or sale of assets, we'll continue to ensure the confidentiality of your personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## KEEPING YOUR INFORMATION SECURE

We build security into our services to protect your information

All Google products are built with strong security features that continuously protect your information. The insights we gain from maintaining our services help us detect and automatically block security threats from ever reaching you. And if we do detect something risky that we think you should know about, we'll notify you and help guide you through steps to stay better protected.

We work hard to protect you and Google from unauthorized access, alteration, disclosure, or destruction of information we hold, including:

- We use encryption to keep your data private while in transit
- We offer a range of security features, like [Safe Browsing](#), Security Checkup, and [2 Step Verification](#) to help you protect your account
- We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems
- We restrict access to personal information to Google employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## EXPORTING & DELETING YOUR INFORMATION

You can export a copy of your information or delete it from your Google Account at any time

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

[Export your data](#)

To delete your information, you can:



- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

## Delete your information

### RETAINING YOUR INFORMATION

We retain the data we collect for different periods of time depending on what it is, how we use it, and how you configure your settings:

- Some data you can delete whenever you like, such as the content you create or upload. You can also delete [activity information](#) saved in your account, or [choose to have it deleted automatically](#) after a set period of time.
- Other data is deleted or anonymized automatically after a set period of time, such as [advertising data](#) in server logs.
- We keep some data until you delete your Google Account, such as information about how often you use our services.
- And some data we retain for longer periods of time when necessary for legitimate business or legal purposes, such as security, fraud and abuse prevention, or financial record-keeping.

When you delete data, we follow a deletion process to make sure that your data is safely and completely removed from our servers or retained only in anonymized form. We try to ensure that our services protect information from accidental or malicious deletion. Because of this, there may be delays between when you delete something and when copies are deleted from our active and backup systems.

You can read more about Google's [data retention periods](#), including how long it takes us to delete your information.

### COMPLIANCE & COOPERATION WITH REGULATORS

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

## Data transfers

We maintain [servers around the world](#) and your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this policy. We also comply with certain [legal frameworks](#) relating to the transfer of data, such as the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

## California requirements

If the California Consumer Privacy Act (CCPA) applies to your information, we provide these disclosures and the [tools](#) described in this policy so you can exercise your rights to receive information about our data practices, as well as to request access to and deletion of your information. These tools allow you to review, update and delete your information, as well as export and download a copy of it. You can also [read more](#) about Google's data retention periods, and the process we follow to delete your information.

Google does not sell your personal information. We only [share your information](#) as described in this policy. Google [processes your information](#) for the purposes described in this policy, which include "business purposes" under the CCPA. These purposes include:

- **Protecting against security threats, abuse, and illegal activity.** Google uses and may disclose information to detect, prevent and respond to security incidents, and for protecting against other malicious, deceptive, fraudulent, or illegal activity. For example, to protect our services, Google may receive or disclose information about IP addresses that malicious actors have compromised.
- **Auditing and measurement.** Google uses information for analytics and measurement to understand how our services are used, as well as to fulfill obligations to our partners like publishers, advertisers,

developers, or rights holders. We may disclose non-personally identifiable information publicly and with these partners, including for auditing purposes.

- **Maintaining our services.** Google uses information to ensure our services are working as intended, such as tracking outages or troubleshooting bugs and other issues that you report to us.
- **Research and development.** Google uses information to improve our services and to develop new products, features and technologies that benefit our users and the public. For example, we use publicly available information to help train Google's language models and build features like Google Translate.
- **Use of service providers.** Google shares information with service providers to perform services on our behalf, in compliance with our Privacy Policy and other appropriate confidentiality and security measures. For example, we may rely on service providers to help provide customer support.
- **Advertising.** Google processes information, including online identifiers and information about your interactions with advertisements, to provide advertising. This keeps many of our services freely available for users. You can control what information we use to show you ads by visiting your [ad settings](#).

Google also uses information to satisfy applicable laws or regulations, and discloses information in response to legal process or enforceable government requests, including to law enforcement. We provide information about the number and type of requests we receive from governments in our [Transparency Report](#).

If you have additional questions or requests related to your rights under the CCPA, [you can contact Google](#).

#### ABOUT THIS POLICY

## When this policy applies

This Privacy Policy applies to all of the services offered by Google LLC and its [affiliates](#), including YouTube, Android, and services offered on third-party sites, such as advertising services. This Privacy Policy doesn't apply to services that have separate privacy policies that do not incorporate this Privacy Policy.

This Privacy Policy doesn't apply to:

- The information practices of other companies and organizations that advertise our services
- Services offered by other companies or individuals, including products or sites that may include Google services, be displayed to you in search results, or be linked from our services

## Changes to this policy

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date the last changes were published and we offer access to [archived versions](#) for your review. If changes are significant, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

### RELATED PRIVACY PRACTICES

## Specific Google services

The following privacy notices provide additional information about some Google services:

- [Chrome & the Chrome Operating System](#)
- [Play Books](#)
- [Payments](#)
- [Fiber](#)
- [Google Fi](#)
- [G Suite for Education](#)
- [YouTube Kids](#)
- [Google Accounts Managed with Family Link, for Children under 13 \(or applicable age in your country\)](#)
- [Voice and Audio Collection from Children's Features on the Google Assistant](#)

## Other useful resources

The following links highlight useful resources for you to learn more about our practices and privacy settings.

- [Your Google Account](#) is home to many of the settings you can use to manage your account

- [Privacy Checkup](#) guides you through key privacy settings for your Google Account
- [Google's safety center](#) helps you learn more about our built-in security, privacy controls, and tools to help set digital ground rules for your family online
- [Privacy & Terms](#) provides more context regarding this Privacy Policy and our Terms of Service
- [Technologies](#) includes more information about:
  - [How Google uses cookies](#)
  - Technologies used for [Advertising](#)
  - [How Google uses pattern recognition](#) to recognize things like faces in photos
  - [How Google uses information from sites or apps that use our services](#)

## Key terms

### Affiliates

An affiliate is an entity that belongs to the Google group of companies, including the following companies that provide consumer services in the EU: Google Ireland Limited, Google Commerce Ltd, Google Payment Corp, and Google Dialer Inc. Learn more about the [companies providing business services in the EU](#).

### Algorithm

A process or set of rules followed by a computer in performing problem-solving operations.

### Application data cache

An application data cache is a data repository on a device. It can, for example, enable a web application to run without an internet connection and improve the performance of the application by enabling faster loading of content.

## Browser web storage

Browser web storage enables websites to store data in a browser on a device. When used in "local storage" mode, it enables data to be stored across sessions. This makes data retrievable even after a browser has been closed and reopened. One technology that facilitates web storage is HTML 5.

## Cookies

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. Learn more about [how Google uses cookies](#) and how Google uses data, including cookies, [when you use our partners' sites or apps](#).

## Device

A device is a computer that can be used to access Google services. For example, desktop computers, tablets, smart speakers, and smartphones are all considered devices.

## Google Account

You may access some of our services by signing up for a [Google Account](#) and providing us with some personal information (typically your name, email address, and a password). This account information is used to authenticate you when you access Google services and protect your account from unauthorized access by others. You can edit or delete your account at any time through your Google Account settings.

## IP address

Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.

## Non-personally identifiable information

This is information that is recorded about users so that it no longer reflects or references an individually-identifiable user.

## Personal information

This is information that you provide to us which personally identifies you, such as your name, email address, or billing information, or other data that can be reasonably linked to such information by Google, such as information we associate with your Google Account.

## Pixel tag

A pixel tag is a type of technology placed on a website or within the body of an email for the purpose of tracking certain activity, such as views of a website or when an email is opened. Pixel tags are often used in combination with cookies.

## Referrer URL

A Referrer URL (Uniform Resource Locator) is information transmitted to a destination webpage by a web browser, typically when you click a link to that page. The Referrer URL contains the URL of the last webpage the browser visited.

## Sensitive personal information

This is a particular category of personal information relating to topics such as confidential medical facts, racial or ethnic origins, political or religious beliefs, or sexuality.

## Server logs

Like most websites, our servers automatically record the page requests made when you visit our sites. These “server logs” typically include your web request, Internet Protocol address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser.

A typical log entry for a search for “cars” looks like this:

```
123.45.67.89 - 25/Mar/2003 10:15:32 -  
http://www.google.com/search?q=cars -  
Firefox 1.0.7; Windows NT 5.1 -  
740674ce2123e969
```

- `123.45.67.89` is the Internet Protocol address assigned to the user by the user’s ISP. Depending on the user’s service, a different address may be assigned to the user by their service provider each time they connect to the Internet.
- `25/Mar/2003 10:15:32` is the date and time of the query.
- `http://www.google.com/search?q=cars` is the requested URL, including the search query.
- `Firefox 1.0.7; Windows NT 5.1` is the browser and operating system being used.
- `740674ce2123a969` is the unique cookie ID assigned to this particular computer the first time it visited Google. (Cookies can be deleted by users. If the user has deleted the cookie from the computer since the last time they’ve visited Google, then it will be the unique cookie ID assigned to their device the next time they visit Google from that particular device).

## Unique identifiers

A unique identifier is a string of characters that can be used to uniquely identify a browser, app, or device.

Different identifiers vary in how permanent they are, whether they can be reset by users, and how they can be accessed.

Unique identifiers can be used for various purposes, including security and fraud detection, syncing services such as your email inbox, remembering your preferences, and providing personalized advertising. For example, unique identifiers stored in cookies help sites display content in your browser in your preferred language. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. Learn more about [how Google uses cookies](#).



On other platforms besides browsers, unique identifiers are used to recognize a specific device or app on that device. For example, a unique identifier such as the Advertising ID is used to provide relevant advertising on Android devices, and can be [managed](#) in your device's settings. Unique identifiers may also be incorporated into a device by its manufacturer (sometimes called a universally unique ID or UUID), such as the IMEI-number of a mobile phone. For example, a device's unique identifier can be used to customize our service to your device or analyze device issues related to our services.

## ads you'll find most useful

For example, if you watch videos about baking on YouTube, you may see more ads that relate to baking as you browse the web. We also may use your IP address to determine your approximate location, so that we can serve you ads for a nearby pizza delivery service if you search for "pizza." Learn more [about Google ads](#) and [why you may see particular ads](#).

## advertising and research services on their behalf

For example, advertisers may upload data from their loyalty-card programs so that they can better understand the performance of their ad campaigns. We only provide aggregated reports to advertisers that don't reveal information about individual people.

## Android device with Google apps

Android devices with Google apps include devices sold by Google or one of our partners and include phones, cameras, vehicles, wearables, and televisions. These devices use Google Play Services and other pre-installed apps that include services like Gmail, Maps, your phone's camera and phone dialer, text-to-speech conversion, keyboard input, and security features.

## combine the information we collect

Some examples of how we combine the information we collect include:

- When you're signed in to your Google Account and search on Google, you can see search results from the public web, along with relevant information from the content you have in other Google products, like Gmail

or Google Calendar. This can include things like the status of your upcoming flights, restaurant, and hotel reservations, or your photos. [Learn more](#)

- If you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to type in their name. This feature makes it easier to share things with people you know. [Learn more](#)
- The Google app can use data that you have stored in other Google products to show you personalized content, depending on your settings. For example, if you have searches stored in your Web & App Activity, the Google app can show you news articles and other information about your interests, like sports scores, based your activity. [Learn more](#)
- If you link your Google Account to your Google Home, you can manage your information and get things done through the Google Assistant. For example, you can add events to your Google Calendar or get your schedule for the day, ask for status updates on your upcoming flight, or send information like driving directions to your phone. [Learn more](#)

## customized search results

For example, when you're signed in to your Google Account and have the Web & App Activity control enabled, you can get more relevant search results that are based on your previous searches and activity from other Google services. You can [learn more here](#). You may also get customized search results even when you're signed out. If you don't want this level of search customization, you can [search and browse privately](#) or turn off [signed-out search personalization](#).

## deliver our services

Examples of how we use your information to deliver our services include:

- We use the IP address assigned to your device to send you the data you requested, such as loading a YouTube video
- We use unique identifiers stored in cookies on your device to help us authenticate you as the person who should have access to your Google Account
- Photos and videos you upload to Google Photos are used to help you create albums, animations, and other creations that you can share. [Learn more](#)

- A flight confirmation email you receive may be used to create a “check-in” button that appears in your Gmail
- When you purchase services or physical goods from us, you may provide us information like your shipping address or delivery instructions. We use this information for things like processing, fulfilling, and delivering your order, and to provide support in connection with the product or service you purchase.

## detect abuse

When we detect spam, malware, illegal content, and other forms of abuse on our systems in violation of our policies, we may disable your account or take other appropriate action. In certain circumstances, we may also report the violation to appropriate authorities.

## devices

For example, we can use information from your devices to help you decide which device you’d like to use to install an app or view a movie you buy from Google Play. We also use this information to help protect your account.

## ensure and improve

For example, we analyze how people interact with advertising to improve the performance of our ads.

## ensure our services are working as intended

For example, we continuously monitor our systems to look for problems. And if we find something wrong with a specific feature, reviewing activity information collected before the problem started allows us to fix things more quickly.

## Information about things near your device

If you use Google’s Location services on Android, we can improve the performance of apps that rely on your location, like Google Maps. If you use Google’s Location services, your device sends information to Google

about its location, sensors (like accelerometer), and nearby cell towers and Wi-Fi access points (like MAC address and signal strength). All these things help to determine your location. You can use your device settings to enable Google Location services. [Learn more](#)

## legal process, or enforceable governmental request

Like other technology and communications companies, Google regularly receives requests from governments and courts around the world to disclose user data. Respect for the privacy and security of data you store with Google underpins our approach to complying with these legal requests. Our legal team reviews each and every request, regardless of type, and we frequently push back when a request appears to be overly broad or doesn't follow the correct process. Learn more in our [Transparency Report](#).

## make improvements

For example, we use cookies to analyze how people interact with our services. And that analysis can help us build better products. For example, it may help us discover that it's taking people too long to complete a certain task or that they have trouble finishing steps at all. We can then redesign that feature and improve the product for everyone.

## may link information

Google Analytics relies on first-party cookies, which means the cookies are set by the Google Analytics customer. Using our systems, data generated through Google Analytics can be linked by the Google Analytics customer and by Google to third-party cookies that are related to visits to other websites. For example, an advertiser may want to use its Google Analytics data to create more relevant ads, or to further analyze its traffic. [Learn more](#)

## partner with Google

There are over 2 million non-Google websites and apps that partner with Google to show ads. [Learn more](#)

## payment information

For example, if you add a credit card or other payment method to your Google Account, you can use it to buy things across our services, like apps in the Play Store. We may also ask for other information, like a business tax ID, to help process your payment. In some cases, we may also need to verify your identity and may ask you for information to do this.

We may also use payment information to verify that you meet age requirements, if, for example, you enter an incorrect birthday indicating you're not old enough to have a Google Account. [Learn more](#)

## personalized ads

You may also see personalized ads based on information from the advertiser. If you shopped on an advertiser's website, for example, they can use that visit information to show you ads. [Learn more](#)

## phone number

If you add your phone number to your account, it can be used for different purposes across Google services, depending on your settings. For example, your phone number can be used to help you access your account if you forget your password, help people find and connect with you, and make the ads you see more relevant to you. [Learn more](#)

## protect against abuse

For example, information about security threats can help us notify you if we think your account has been compromised (at which point we can help you take steps to protect your account).

## publicly accessible sources

For example, we may collect information that's publicly available online or from other public sources to help train Google's language models and build features like Google Translate.

## rely on cookies to function properly

For example, we use a cookie called 'lbcS' that makes it possible for you to open many Google Docs in one browser. Blocking this cookie would prevent Google Docs from working as expected. [Learn more](#)

## safety and reliability

Some examples of how we use your information to help keep our services safe and reliable include:

- Collecting and analyzing IP addresses and cookie data to protect against automated abuse. This abuse takes many forms, such as sending spam to Gmail users, stealing money from advertisers by fraudulently clicking on ads, or censoring content by launching a Distributed Denial of Service (DDoS) attack.
- The "last account activity" feature in Gmail can help you find out if and when someone accessed your email without your knowledge. This feature shows you information about recent activity in Gmail, such as the IP addresses that accessed your mail, the associated location, and the date and time of access. [Learn more](#)

## sensitive categories

When showing you personalized ads, we use topics that we think might be of interest to you based on your activity. For example, you may see ads for things like "Cooking and Recipes" or "Air Travel." We don't use topics or show personalized ads based on sensitive categories like race, religion, sexual orientation, or health. And we require the same from advertisers that use our services.

## Sensor data from your device

Your device may have sensors that can be used to better understand your location and movement. For example, an accelerometer can be used to determine your speed and a gyroscope to figure out your direction of travel.

## servers around the world

For example, we operate data centers located [around the world](#) to help keep our products continuously available for users.

## services to make and receive calls or send and receive messages

Examples of these services include:

- Google Hangouts, for making domestic and international calls
- Google Voice, for making calls, sending text messages, and managing voicemail
- Google Fi, for a phone plan

## show trends

When lots of people start searching for something, it can provide useful information about particular trends at that time. Google Trends samples Google web searches to estimate the popularity of searches over a certain period of time and shares those results publicly in aggregated terms. [Learn more](#)

## specific Google services

For example, you can delete [your blog](#) from Blogger or [a Google Site you own](#) from Google Sites. You can also delete [reviews](#) you've left on apps, games, and other content in the Play Store.

## specific partners

For example, we allow YouTube creators and advertisers to work with measurement companies to learn about the audience of their YouTube videos or ads, using cookies or similar technologies. Another example is merchants on our shopping pages, who use cookies to understand how many different people see their product listings. [Learn more](#) about these partners and how they use your information.

## synced with your Google Account

Your Chrome browsing history is only saved to your account if you've enabled Chrome synchronization with your Google Account. [Learn more](#)

## the people who matter most to you online

For example, when you type an address in the To, Cc, or Bcc field of an email you're composing, Gmail will suggest addresses based on the people you [contact most frequently](#).

## third parties

For example, we process your information to report use statistics to rights holders about how their content was used in our services. We may also process your information if people search for your name and we display search results for sites containing publicly available information about you.

## Views and interactions with content and ads

For example, we collect information about views and interactions with ads so we can provide aggregated reports to advertisers, like telling them whether we served their ad on a page and whether the ad was likely seen by a viewer. We may also measure other interactions, such as how you move your mouse over an ad or if you interact with the page on which the ad appears.

## your activity on other sites and apps

This activity might come from your use of Google services, like from syncing your account with Chrome or your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics), or it might embed other content (such as videos from YouTube). These services may share information about your activity with Google and, depending on your [account settings](#) and the products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information.

[Learn more](#) about how Google uses data when you use our partners' sites or apps.



# **EXHIBIT 17**

## GOOGLE PRIVACY POLICY

When you use our services, you're trusting us with your information. We understand this is a big responsibility and work hard to protect your information and put you in control.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

Effective July 1, 2020 | [Archived versions](#) | [Download PDF](#)

We build a range of services that help millions of people daily to explore and interact with the world in new ways. Our services include:

- Google apps, sites, and devices, like Search, YouTube, and Google Home
- Platforms like the Chrome browser and Android operating system
- Products that are integrated into third-party apps and sites, like ads and embedded Google Maps

You can use our services in a variety of ways to manage your privacy. For example, you can sign up for a Google Account if you want to create and manage content like emails and photos, or see more relevant search results. And you can use many Google services when you're signed out or without creating an account at all, like searching on Google or watching YouTube videos. You can also choose to browse the web privately using Chrome in Incognito mode. And across our services, you can adjust your privacy settings to control what we collect and how your information is used.

To help explain things as clearly as possible, we've added examples, explanatory videos, and definitions for [key terms](#). And if you have any questions about this Privacy Policy, you can [contact us](#).

## INFORMATION GOOGLE COLLECTS

We want you to understand the types of information we collect as you use our services

We collect information to provide better services to all our users — from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like. The information Google collects, and how that information is used, depends on how you use our services and how you manage your privacy controls.

When you're not signed in to a Google Account, we store the information we collect with [unique identifiers](#) tied to the browser, application, or [device](#) you're using. This helps us do things like maintain your language preferences across browsing sessions.

When you're signed in, we also collect information that we store with your Google Account, which we treat as [personal information](#).

## Things you create or provide to us

When you create a Google Account, you provide us with [personal information](#) that includes your name and a password. You can also choose to add a [phone number](#) or [payment information](#) to your account. Even if you aren't signed in to a Google Account, you might choose to provide us with information – like an email address to receive updates about our services.

We also collect the content you create, upload, or receive from others when using our services. This includes things like email you write and receive, photos and videos you save, docs and spreadsheets you create, and comments you make on YouTube videos.

## Information we collect as you use our services

### Your apps, browsers & devices

We collect information about the apps, browsers, and [devices](#) you use to access Google services, which helps us provide features like automatic product updates and dimming your screen if your battery runs low.

The information we collect includes [unique identifiers](#), browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application version number. We also collect information about the interaction of your apps, browsers, and devices with our services, including [IP address](#), crash reports, system activity, and the date, time, and [referrer URL](#) of your request.

We collect this information when a Google service on your device contacts our servers – for example, when you install an app from the Play Store or when a service checks for automatic updates. If you're using an [Android device with Google apps](#), your device periodically contacts Google servers to provide information about your

device and connection to our services. This information includes things like your device type, carrier name, crash reports, and which apps you've installed.

## Your activity

We collect information about your activity in our services, which we use to do things like recommend a YouTube video you might like. The activity information we collect may include:

- Terms you search for
- Videos you watch
- [Views and interactions with content and ads](#)
- Voice and audio information when you use audio features
- Purchase activity
- People with whom you communicate or share content
- Activity on third-party sites and apps that use our services
- Chrome browsing history you've [synced with your Google Account](#)

If you use our [services to make and receive calls or send and receive messages](#), we may collect telephony log information like your phone number, calling-party number, receiving-party number, forwarding numbers, time and date of calls and messages, duration of calls, routing information, and types of calls.

You can visit your Google Account to find and manage activity information that's saved in your account.

[Go to Google Account](#)

## Your location information

We collect information about your location when you use our services, which helps us offer features like driving directions for your weekend getaway or showtimes for movies playing near you.

Your location can be determined with varying degrees of accuracy by:

- [GPS](#)
- [IP address](#)
- [Sensor data from your device](#)
- [Information about things near your device](#), such as Wi-Fi access points, cell towers, and Bluetooth-enabled devices

The types of location data we collect depend in part on your device and account settings. For example, you can [turn your Android device's location on or off](#) using the device's settings app. You can also turn on [Location History](#) if you want to create a private map of where you go with your signed-in devices.

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In some circumstances, Google also collects information about you from [publicly accessible sources](#). For example, if your name appears in your local newspaper, Google's Search engine may index that article and display it to other people if they search for your name. We may also collect information about you from trusted partners, including marketing partners who provide us with information about potential customers of our business services, and security partners who provide us with information to [protect against abuse](#). We also receive information from advertisers to provide [advertising and research services on their behalf](#).

We use various technologies to collect and store information, including [cookies](#), [pixel tags](#), local storage, such as [browser web storage](#) or [application data caches](#), databases, and [server logs](#).

#### WHY GOOGLE COLLECTS DATA

We use data to build better services

We use the information we collect from all our services for the following purposes:

#### Provide our services

We use your information to [deliver our services](#), like processing the terms you search for in order to return results or helping you share content by suggesting recipients from your contacts.

## Maintain & improve our services

We also use your information to [ensure our services are working as intended](#), such as tracking outages or troubleshooting issues that you report to us. And we use your information to [make improvements](#) to our services – for example, understanding which search terms are most frequently misspelled helps us improve spell-check features used across our services.

## Develop new services

We use the information we collect in existing services to help us develop new ones. For example, understanding how people organized their photos in Picasa, Google's first photos app, helped us design and launch Google Photos.

## Provide personalized services, including content and ads

We use the information we collect to customize our services for you, including providing recommendations, personalized content, and [customized search results](#). For example, [Security Checkup](#) provides security tips adapted to how you use Google products. And Google Play uses information like apps you've already installed and videos you've watched on YouTube to suggest new apps you might like.

Depending on your settings, we may also show you [personalized ads](#) based on your interests. For example, if you search for "mountain bikes," you may see an ad for sports equipment when you're browsing a site that shows ads served by Google. You can control what information we use to show you ads by visiting your ad settings.

- We don't show you personalized ads based on [sensitive categories](#), such as race, religion, sexual orientation, or health.
- We don't share information that personally identifies you with advertisers, such as your name or email, unless you ask us to. For example, if you see an ad for a nearby flower shop and select the "tap to call" button, we'll connect your call and may share your phone number with the flower shop.

[Go to Ad Settings](#)

## Measure performance

We use data for analytics and measurement to understand how our services are used. For example, we analyze data about your visits to our sites to do things like optimize product design. And we also use data about the ads you interact with to help advertisers understand the performance of their ad campaigns. We use a variety of tools to do this, including Google Analytics. When you visit sites that use Google Analytics, Google and a Google Analytics customer [may link information](#) about your activity from that site with activity from other sites that use our ad services.

## Communicate with you

We use information we collect, like your email address, to interact with you directly. For example, we may send you a notification if we detect suspicious activity, like an attempt to sign in to your Google Account from an unusual location. Or we may let you know about upcoming changes or improvements to our services. And if you contact Google, we'll keep a record of your request in order to help solve any issues you might be facing.

## Protect Google, our users, and the public

We use information to help improve the [safety and reliability](#) of our services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm Google, our users, or the public.

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We use different technologies to process your information for these purposes. We use automated systems that analyze your content to provide you with things like customized search results, personalized ads, or other features tailored to how you use our services. And we analyze your content to help us [detect abuse](#) such as spam, malware, and illegal content. We also use [algorithms](#) to recognize patterns in data. For example, Google Translate helps people communicate across languages by detecting common language patterns in phrases you ask it to translate.

We may [combine the information we collect](#) among our services and across your devices for the purposes described above. For example, if you watch videos of guitar players on YouTube, you might see an ad for guitar lessons on a site that uses our ad products. Depending on your account settings, [your activity on other sites](#)

[and apps](#) may be associated with your personal information in order to improve Google's services and the ads delivered by Google.

If other users already have your email address or other information that identifies you, we may show them your publicly visible Google Account information, such as your name and photo. This helps people identify an email coming from you, for example.

We'll ask for your consent before using your information for a purpose that isn't covered in this Privacy Policy.

## YOUR PRIVACY CONTROLS

You have choices regarding the information we collect and how it's used

This section describes key controls for managing your privacy across our services. You can also visit the [Privacy Checkup](#), which provides an opportunity to review and adjust important privacy settings. In addition to these tools, we also offer specific privacy settings in our products — you can learn more in our [Product Privacy Guide](#).

[Go to Privacy Checkup](#)

## Managing, reviewing, and updating your information

When you're signed in, you can always review and update information by visiting the services you use. For example, Photos and Drive are both designed to help you manage specific types of content you've saved with Google.

We also built a place for you to review and control information saved in your Google Account. Your [Google Account](#) includes:

### Privacy controls

### Activity Controls



Decide what types of activity you'd like saved in your account. For example, you can turn on Location History if you want traffic predictions for your daily commute, or you can save your YouTube Watch History to get better video suggestions.

[Go to Activity Controls](#)

## Ad settings

Manage your preferences about the ads shown to you on Google and on sites and apps that [partner with Google](#) to show ads. You can modify your interests, choose whether your personal information is used to make ads more relevant to you, and turn on or off certain advertising services.

[Go to Ad Settings](#)

## About you

Control what others see about you across Google services.

[Go to About You](#)

## Shared endorsements

Choose whether your name and photo appear next to your activity, like reviews and recommendations, that appear in ads.

[Go to Shared Endorsements](#)

## Information you share

If you're a G Suite user, control whom you share information with through your account on Google+.

[Go to Information You Share](#)

## Ways to review & update your information

### My Activity

My Activity allows you to review and control data that's created when you use Google services, like searches you've done or your visits to Google Play. You can browse by date and by topic, and delete part or all of your activity.

[Go to My Activity](#)

### Google Dashboard

Google Dashboard allows you to manage information associated with specific products.

[Go to Dashboard](#)

### Your personal information

Manage your contact information, such as your name, email, and phone number.

[Go to Personal Info](#)

When you're signed out, you can manage information associated with your browser or device, including:

- Signed-out search personalization: [Choose](#) whether your search activity is used to offer you more relevant results and recommendations.
- YouTube settings: Pause and delete your [YouTube Search History](#) and your [YouTube Watch History](#).
- Ad Settings: [Manage](#) your preferences about the ads shown to you on Google and on sites and apps that partner with Google to show ads.

## Exporting, removing & deleting your information

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

### [Export your data](#)

You can also [request to remove content](#) from specific Google services based on applicable law.

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

### [Delete your information](#)

And finally, [Inactive Account Manager](#) allows you to give someone else access to parts of your Google Account in case you're unexpectedly unable to use your account.

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There are other ways to control the information Google collects whether or not you're signed in to a Google Account, including:

- **Browser settings:** For example, you can configure your browser to indicate when Google has set a [cookie](#) in your browser. You can also configure your browser to block all cookies from a specific domain or all domains. But remember that our services [rely on cookies to function properly](#), for things like remembering your language preferences.
- **Device-level settings:** Your device may have controls that determine what information we collect. For example, you can [modify location settings](#) on your Android device.

## SHARING YOUR INFORMATION

### When you share your information

Many of our services let you share information with other people, and you have control over how you share. For example, you can share videos on YouTube publicly or you can decide to keep your videos private. Remember, when you share information publicly, your content may become accessible through search engines, including Google Search.

When you're signed in and interact with some Google services, like leaving comments on a YouTube video or reviewing an app in Play, your name and photo appear next to your activity. We may also display this information in [ads depending on your Shared endorsements setting](#).

### When Google shares your information

We do not share your personal information with companies, organizations, or individuals outside of Google except in the following cases:

#### With your consent

We'll share personal information outside of Google when we have your consent. For example, if you [use Google Home to make a reservation](#) through a booking service, we'll get your permission before sharing your name or phone number with the restaurant. We'll ask for your explicit consent to share any [sensitive personal information](#).

#### With domain administrators

If you're a student or work for an organization that uses Google services (like G Suite), your [domain administrator](#) and resellers who manage your account will have access to your Google Account. They may be able to:

- Access and retain information stored in your account, like your email
- View statistics regarding your account, like how many apps you install

- Change your account password
- Suspend or terminate your account access
- Receive your account information in order to satisfy applicable law, regulation, legal process, or enforceable governmental request
- Restrict your ability to delete or edit your information or your privacy settings

## For external processing

We provide personal information to our [affiliates](#) and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with customer support.

## For legal reasons

We will share personal information outside of Google if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, [legal process, or enforceable governmental request](#). We share information about the number and type of requests we receive from governments in our [Transparency Report](#).
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security, or technical issues.
- Protect against harm to the rights, property or safety of Google, our users, or the public as required or permitted by law.

We may share [non-personally identifiable information](#) publicly and with our partners — like publishers, advertisers, developers, or rights holders. For example, we share information publicly to [show trends](#) about the general use of our services. We also allow [specific partners](#) to collect information from your browser or device for advertising and measurement purposes using their own cookies or similar technologies.

If Google is involved in a merger, acquisition, or sale of assets, we'll continue to ensure the confidentiality of your personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## KEEPING YOUR INFORMATION SECURE

We build security into our services to protect your information

All Google products are built with strong security features that continuously protect your information. The insights we gain from maintaining our services help us detect and automatically block security threats from ever reaching you. And if we do detect something risky that we think you should know about, we'll notify you and help guide you through steps to stay better protected.

We work hard to protect you and Google from unauthorized access, alteration, disclosure, or destruction of information we hold, including:

- We use encryption to keep your data private while in transit
- We offer a range of security features, like [Safe Browsing](#), Security Checkup, and [2 Step Verification](#) to help you protect your account
- We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems
- We restrict access to personal information to Google employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## EXPORTING & DELETING YOUR INFORMATION

You can export a copy of your information or delete it from your Google Account at any time

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

[Export your data](#)

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

## Delete your information

### RETAINING YOUR INFORMATION

We retain the data we collect for different periods of time depending on what it is, how we use it, and how you configure your settings:

- Some data you can delete whenever you like, such as the content you create or upload. You can also delete [activity information](#) saved in your account, or [choose to have it deleted automatically](#) after a set period of time.
- Other data is deleted or anonymized automatically after a set period of time, such as [advertising data](#) in server logs.
- We keep some data until you delete your Google Account, such as information about how often you use our services.
- And some data we retain for longer periods of time when necessary for legitimate business or legal purposes, such as security, fraud and abuse prevention, or financial record-keeping.

When you delete data, we follow a deletion process to make sure that your data is safely and completely removed from our servers or retained only in anonymized form. We try to ensure that our services protect information from accidental or malicious deletion. Because of this, there may be delays between when you delete something and when copies are deleted from our active and backup systems.

You can read more about Google's [data retention periods](#), including how long it takes us to delete your information.

### COMPLIANCE & COOPERATION WITH REGULATORS

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

## Data transfers

We maintain [servers around the world](#) and your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this policy. We also comply with certain [legal frameworks](#) relating to the transfer of data, such as the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

## California requirements

The California Consumer Privacy Act (CCPA) requires specific disclosures for California residents.

This Privacy Policy is designed to help you understand how Google handles your information:

- We explain the categories of information Google collects and the sources of that information in [Information Google collects](#).
- We explain how Google uses information in [Why Google collects data](#).
- We explain when Google may share information in [Sharing your information](#). Google does not sell your personal information.

The CCPA also provides the right to request information about how Google collects, uses, and discloses your personal information. And it gives you the right to access your information and request that Google delete that information. Finally, the CCPA provides the right to not be discriminated against for exercising your privacy rights.



We describe the choices you have to manage your privacy and data across Google's services in [Your privacy controls](#). You can exercise your rights by using these controls, which allow you to access, review, update and delete your information, as well as [export and download](#) a copy of it. When you use them, we'll validate your request by verifying that you're signed in to your Google Account. If you have questions or requests related to your rights under the CCPA, you (or your authorized agent) can also [contact Google](#).

The CCPA requires a description of data practices using specific categories. This table uses these categories to organize the information in this Privacy Policy.

## Categories of personal information we collect

**Identifiers** such as your [name, phone number](#), and address, as well as [unique identifiers](#) tied to the browser, application, or device you're using.

**Demographic information**, such as your [age, gender](#) and [language](#).

**Commercial information** such as your [payment information](#) and a history of [purchases](#) you make on Google's services.

**Biometric information** if you choose to provide it, such as fingerprints in Google's product development studies.

**Internet, network, and other activity information** such as your search terms; views and interactions with content and ads; Chrome browsing history you've synced with your Google Account; information about the interaction of your apps, browsers, and devices with our services (like IP address, crash reports, and system activity); and activity on third-party sites and apps that use our services. You can review and control activity data stored in your Google Account in [My Activity](#).

**Geolocation data**, such as may be determined by GPS, IP address, and other data from sensors on or around your device, depending in part on your device and account settings. Learn more about [Google's use of location information](#).

**Audio, electronic, visual and similar information**, such as [voice and audio information](#) when you use audio features.

**Professional, employment, and education information**, such as information [you provide](#) or that is maintained through a G Suite account by an organization at which you study or work.

**Other information you create or provide**, such as the content you create, upload, or receive (like photos and videos or emails, docs and spreadsheets). [Google Dashboard](#) allows you to manage information associated with specific products.

**Inferences** drawn from the above, like your [ads interest categories](#).

## Business purposes for which information may be used or disclosed

**Protecting against security threats, abuse, and illegal activity:** Google uses and may disclose information to detect, prevent and respond to security incidents, and for protecting against other malicious, deceptive, fraudulent, or illegal activity. For example, to protect our services, Google may receive or disclose information about IP addresses that malicious actors have compromised.

**Auditing and measurement:** Google uses information for analytics and measurement to understand how our services are used, as well as to fulfill obligations to our partners like publishers, advertisers, developers, or rights holders. We may disclose non-personally identifiable information publicly and with these partners, including for auditing purposes.

**Maintaining our services:** Google uses information to ensure our services are working as intended, such as tracking outages or troubleshooting bugs and other issues that you report to us.

**Research and development:** Google uses information to improve our services and to develop new products, features and technologies that benefit our users and the public. For example, we use publicly available information to help train Google's language models and build features like Google Translate.

**Use of service providers:** Google shares information with service providers to perform services on our behalf, in compliance with our Privacy Policy and other appropriate confidentiality and security measures. For example, we may rely on service providers to help provide customer support.

**Advertising:** Google processes information, including online identifiers and information about your interactions with advertisements, to provide advertising. This keeps Google's services and many of the websites and services you use free of charge. You can control what information we use to show you ads by visiting your [ad settings](#).

**Legal reasons:** Google also uses information to satisfy applicable laws or regulations, and discloses information in response to legal process or enforceable government requests, including to law enforcement. We

provide information about the number and type of requests we receive from governments in our [Transparency Report](#).

## Parties with whom information may be shared

**Other people with whom you choose to share your information**, like docs or photos, and videos or comments on YouTube.

**Third parties to whom you consent to sharing your information**, such as services that integrate with Google's services. You can [review and manage third party apps and sites](#) with access to data in your Google Account.

**Service providers**, trusted businesses or persons that process information on Google's behalf, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

**Domain administrators**, if you work or study at an organization that uses Google services like G Suite.

**Law enforcement or other third parties**, for the legal reasons described in [Sharing your information](#).

### ABOUT THIS POLICY

## When this policy applies

This Privacy Policy applies to all of the services offered by Google LLC and its [affiliates](#), including YouTube, Android, and services offered on third-party sites, such as advertising services. This Privacy Policy doesn't apply to services that have separate privacy policies that do not incorporate this Privacy Policy.

This Privacy Policy doesn't apply to:

- The information practices of other companies and organizations that advertise our services
- Services offered by other companies or individuals, including products or sites that may include Google services, be displayed to you in search results, or be linked from our services

## Changes to this policy

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date the last changes were published and we offer access to [archived versions](#) for your review. If changes are significant, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

## RELATED PRIVACY PRACTICES

# Specific Google services

The following privacy notices provide additional information about some Google services:

- [Chrome & the Chrome Operating System](#)
- [Play Books](#)
- [Payments](#)
- [Fiber](#)
- [Google Fi](#)
- [G Suite for Education](#)
- [YouTube Kids](#)
- [Google Accounts Managed with Family Link, for Children under 13 \(or applicable age in your country\)](#)
- [Voice and Audio Collection from Children's Features on the Google Assistant](#)

# Other useful resources

The following links highlight useful resources for you to learn more about our practices and privacy settings.

- [Your Google Account](#) is home to many of the settings you can use to manage your account
- [Privacy Checkup](#) guides you through key privacy settings for your Google Account

- [Google's safety center](#) helps you learn more about our built-in security, privacy controls, and tools to help set digital ground rules for your family online
- [Privacy & Terms](#) provides more context regarding this Privacy Policy and our Terms of Service
- [Technologies](#) includes more information about:
  - [How Google uses cookies](#)
  - Technologies used for [Advertising](#)
  - [How Google uses pattern recognition](#) to recognize things like faces in photos
  - [How Google uses information from sites or apps that use our services](#)

## Key terms

### Affiliates

An affiliate is an entity that belongs to the Google group of companies, including the following companies that provide consumer services in the EU: Google Ireland Limited, Google Commerce Ltd, Google Payment Corp, and Google Dialer Inc. Learn more about the [companies providing business services in the EU](#).

### Algorithm

A process or set of rules followed by a computer in performing problem-solving operations.

### Application data cache

An application data cache is a data repository on a device. It can, for example, enable a web application to run without an internet connection and improve the performance of the application by enabling faster loading of content.

### Browser web storage

Browser web storage enables websites to store data in a browser on a device. When used in "local storage" mode, it enables data to be stored across sessions. This makes data retrievable even after a browser has been closed and reopened. One technology that facilitates web storage is HTML 5.

## Cookies

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. Learn more about [how Google uses cookies](#) and how Google uses data, including cookies, [when you use our partners' sites or apps](#).

## Device

A device is a computer that can be used to access Google services. For example, desktop computers, tablets, smart speakers, and smartphones are all considered devices.

## Google Account

You may access some of our services by signing up for a [Google Account](#) and providing us with some personal information (typically your name, email address, and a password). This account information is used to authenticate you when you access Google services and protect your account from unauthorized access by others. You can edit or delete your account at any time through your Google Account settings.

## IP address

Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.

## Non-personally identifiable information

This is information that is recorded about users so that it no longer reflects or references an individually-identifiable user.

## Personal information

This is information that you provide to us which personally identifies you, such as your name, email address, or billing information, or other data that can be reasonably linked to such information by Google, such as information we associate with your Google Account.

## Pixel tag

A pixel tag is a type of technology placed on a website or within the body of an email for the purpose of tracking certain activity, such as views of a website or when an email is opened. Pixel tags are often used in combination with cookies.

## Referrer URL

A Referrer URL (Uniform Resource Locator) is information transmitted to a destination webpage by a web browser, typically when you click a link to that page. The Referrer URL contains the URL of the last webpage the browser visited.

## Sensitive personal information

This is a particular category of personal information relating to topics such as confidential medical facts, racial or ethnic origins, political or religious beliefs, or sexuality.

## Server logs

Like most websites, our servers automatically record the page requests made when you visit our sites. These “server logs” typically include your web request, Internet Protocol address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser.

A typical log entry for a search for “cars” looks like this:

```
123.45.67.89 - 25/Mar/2003 10:15:32 -  
http://www.google.com/search?q=cars -  
Firefox 1.0.7; Windows NT 5.1 -  
740674ce2123e969
```

- `123.45.67.89` is the Internet Protocol address assigned to the user by the user’s ISP. Depending on the user’s service, a different address may be assigned to the user by their service provider each time they connect to the Internet.
- `25/Mar/2003 10:15:32` is the date and time of the query.
- `http://www.google.com/search?q=cars` is the requested URL, including the search query.
- `Firefox 1.0.7; Windows NT 5.1` is the browser and operating system being used.
- `740674ce2123a969` is the unique cookie ID assigned to this particular computer the first time it visited Google. (Cookies can be deleted by users. If the user has deleted the cookie from the computer since the last time they’ve visited Google, then it will be the unique cookie ID assigned to their device the next time they visit Google from that particular device).

## Unique identifiers

A unique identifier is a string of characters that can be used to uniquely identify a browser, app, or device.

Different identifiers vary in how permanent they are, whether they can be reset by users, and how they can be accessed.

Unique identifiers can be used for various purposes, including security and fraud detection, syncing services such as your email inbox, remembering your preferences, and providing personalized advertising. For example, unique identifiers stored in cookies help sites display content in your browser in your preferred language. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. Learn more about [how Google uses cookies](#).

On other platforms besides browsers, unique identifiers are used to recognize a specific device or app on that device. For example, a unique identifier such as the Advertising ID is used to provide relevant advertising on Android devices, and can be [managed](#) in your device’s settings. Unique identifiers may also be incorporated into a device by its manufacturer (sometimes called a universally unique ID or UUID), such as the IMEI-number of a mobile phone. For example, a device’s unique identifier can be used to customize our service to your device or analyze device issues related to our services.



## Additional Context

### ads you'll find most useful

For example, if you watch videos about baking on YouTube, you may see more ads that relate to baking as you browse the web. We also may use your IP address to determine your approximate location, so that we can serve you ads for a nearby pizza delivery service if you search for "pizza." Learn more [about Google ads](#) and [why you may see particular ads](#).

### advertising and research services on their behalf

For example, advertisers may upload data from their loyalty-card programs so that they can better understand the performance of their ad campaigns. We only provide aggregated reports to advertisers that don't reveal information about individual people.

### Android device with Google apps

Android devices with Google apps include devices sold by Google or one of our partners and include phones, cameras, vehicles, wearables, and televisions. These devices use Google Play Services and other pre-installed apps that include services like Gmail, Maps, your phone's camera and phone dialer, text-to-speech conversion, keyboard input, and security features.

### combine the information we collect

Some examples of how we combine the information we collect include:

- When you're signed in to your Google Account and search on Google, you can see search results from the public web, along with relevant information from the content you have in other Google products, like Gmail or Google Calendar. This can include things like the status of your upcoming flights, restaurant, and hotel reservations, or your photos. [Learn more](#)
- If you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to

type in their name. This feature makes it easier to share things with people you know. [Learn more](#)

- The Google app can use data that you have stored in other Google products to show you personalized content, depending on your settings. For example, if you have searches stored in your Web & App Activity, the Google app can show you news articles and other information about your interests, like sports scores, based your activity. [Learn more](#)
- If you link your Google Account to your Google Home, you can manage your information and get things done through the Google Assistant. For example, you can add events to your Google Calendar or get your schedule for the day, ask for status updates on your upcoming flight, or send information like driving directions to your phone. [Learn more](#)

## customized search results

For example, when you're signed in to your Google Account and have the Web & App Activity control enabled, you can get more relevant search results that are based on your previous searches and activity from other Google services. You can [learn more here](#). You may also get customized search results even when you're signed out. If you don't want this level of search customization, you can [search and browse privately](#) or turn off [signed-out search personalization](#).

## deliver our services

Examples of how we use your information to deliver our services include:

- We use the IP address assigned to your device to send you the data you requested, such as loading a YouTube video
- We use unique identifiers stored in cookies on your device to help us authenticate you as the person who should have access to your Google Account
- Photos and videos you upload to Google Photos are used to help you create albums, animations, and other creations that you can share. [Learn more](#)
- A flight confirmation email you receive may be used to create a "check-in" button that appears in your Gmail
- When you purchase services or physical goods from us, you may provide us information like your shipping address or delivery instructions. We use this information for things like processing, fulfilling, and delivering your order, and to provide support in connection with the product or service you purchase.

## detect abuse

When we detect spam, malware, illegal content, and other forms of abuse on our systems in violation of our policies, we may disable your account or take other appropriate action. In certain circumstances, we may also report the violation to appropriate authorities.

## devices

For example, we can use information from your devices to help you decide which device you'd like to use to install an app or view a movie you buy from Google Play. We also use this information to help protect your account.

## ensure and improve

For example, we analyze how people interact with advertising to improve the performance of our ads.

## ensure our services are working as intended

For example, we continuously monitor our systems to look for problems. And if we find something wrong with a specific feature, reviewing activity information collected before the problem started allows us to fix things more quickly.

## Information about things near your device

If you use Google's Location services on Android, we can improve the performance of apps that rely on your location, like Google Maps. If you use Google's Location services, your device sends information to Google about its location, sensors (like accelerometer), and nearby cell towers and Wi-Fi access points (like MAC address and signal strength). All these things help to determine your location. You can use your device settings to enable Google Location services. [Learn more](#)

## legal process, or enforceable governmental request

Like other technology and communications companies, Google regularly receives requests from governments and courts around the world to disclose user data. Respect for the privacy and security of data you store with Google underpins our approach to complying with these legal requests. Our legal team reviews each and every request, regardless of type, and we frequently push back when a request appears to be overly broad or doesn't follow the correct process. Learn more in our [Transparency Report](#).

## make improvements

For example, we use cookies to analyze how people interact with our services. And that analysis can help us build better products. For example, it may help us discover that it's taking people too long to complete a certain task or that they have trouble finishing steps at all. We can then redesign that feature and improve the product for everyone.

## may link information

Google Analytics relies on first-party cookies, which means the cookies are set by the Google Analytics customer. Using our systems, data generated through Google Analytics can be linked by the Google Analytics customer and by Google to third-party cookies that are related to visits to other websites. For example, an advertiser may want to use its Google Analytics data to create more relevant ads, or to further analyze its traffic. [Learn more](#)

## partner with Google

There are over 2 million non-Google websites and apps that partner with Google to show ads. [Learn more](#)

## payment information

For example, if you add a credit card or other payment method to your Google Account, you can use it to buy things across our services, like apps in the Play Store. We may also ask for other information, like a business tax ID, to help process your payment. In some cases, we may also need to verify your identity and may ask you for information to do this.

We may also use payment information to verify that you meet age requirements, if, for example, you enter an incorrect birthday indicating you're not old enough to have a Google Account. [Learn more](#)

## personalized ads

You may also see personalized ads based on information from the advertiser. If you shopped on an advertiser's website, for example, they can use that visit information to show you ads. [Learn more](#)

## phone number

If you add your phone number to your account, it can be used for different purposes across Google services, depending on your settings. For example, your phone number can be used to help you access your account if you forget your password, help people find and connect with you, and make the ads you see more relevant to you. [Learn more](#)

## protect against abuse

For example, information about security threats can help us notify you if we think your account has been compromised (at which point we can help you take steps to protect your account).

## publicly accessible sources

For example, we may collect information that's publicly available online or from other public sources to help train Google's language models and build features like Google Translate.

## rely on cookies to function properly

For example, we use a cookie called 'lbcS' that makes it possible for you to open many Google Docs in one browser. Blocking this cookie would prevent Google Docs from working as expected. [Learn more](#)

## safety and reliability

Some examples of how we use your information to help keep our services safe and reliable include:

- Collecting and analyzing IP addresses and cookie data to protect against automated abuse. This abuse takes many forms, such as sending spam to Gmail users, stealing money from advertisers by fraudulently clicking on ads, or censoring content by launching a Distributed Denial of Service (DDoS) attack.
- The “last account activity” feature in Gmail can help you find out if and when someone accessed your email without your knowledge. This feature shows you information about recent activity in Gmail, such as the IP addresses that accessed your mail, the associated location, and the date and time of access. [Learn more](#)

## sensitive categories

When showing you personalized ads, we use topics that we think might be of interest to you based on your activity. For example, you may see ads for things like "Cooking and Recipes" or "Air Travel." We don't use topics or show personalized ads based on sensitive categories like race, religion, sexual orientation, or health. And we require the same from advertisers that use our services.

## Sensor data from your device

Your device may have sensors that can be used to better understand your location and movement. For example, an accelerometer can be used to determine your speed and a gyroscope to figure out your direction of travel.

## servers around the world

For example, we operate data centers located [around the world](#) to help keep our products continuously available for users.

## services to make and receive calls or send and receive messages

Examples of these services include:

- Google Hangouts, for making domestic and international calls
- Google Voice, for making calls, sending text messages, and managing voicemail
- Google Fi, for a phone plan

## show trends

When lots of people start searching for something, it can provide useful information about particular trends at that time. Google Trends samples Google web searches to estimate the popularity of searches over a certain period of time and shares those results publicly in aggregated terms. [Learn more](#)

## specific Google services

For example, you can delete [your blog](#) from Blogger or [a Google Site you own](#) from Google Sites. You can also delete [reviews](#) you've left on apps, games, and other content in the Play Store.

## specific partners

For example, we allow YouTube creators and advertisers to work with measurement companies to learn about the audience of their YouTube videos or ads, using cookies or similar technologies. Another example is merchants on our shopping pages, who use cookies to understand how many different people see their product listings. [Learn more](#) about these partners and how they use your information.

## synced with your Google Account

Your Chrome browsing history is only saved to your account if you've enabled Chrome synchronization with your Google Account. [Learn more](#)

## the people who matter most to you online

For example, when you type an address in the To, Cc, or Bcc field of an email you're composing, Gmail will suggest addresses based on the people you [contact most frequently](#).

## third parties

For example, we process your information to report use statistics to rights holders about how their content was used in our services. We may also process your information if people search for your name and we display search results for sites containing publicly available information about you.

## Views and interactions with content and ads

For example, we collect information about views and interactions with ads so we can provide aggregated reports to advertisers, like telling them whether we served their ad on a page and whether the ad was likely seen by a viewer. We may also measure other interactions, such as how you move your mouse over an ad or if you interact with the page on which the ad appears.

## your activity on other sites and apps

This activity might come from your use of Google services, like from syncing your account with Chrome or your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics), or it might embed other content (such as videos from YouTube). These services may share information about your activity with Google and, depending on your [account settings](#) and the products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information.

[Learn more](#) about how Google uses data when you use our partners' sites or apps.



# **EXHIBIT 18**

## GOOGLE PRIVACY POLICY

When you use our services, you're trusting us with your information. We understand this is a big responsibility and work hard to protect your information and put you in control.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

Privacy Checkup

Looking to change your privacy settings?

[Take the Privacy Checkup](#)

Effective August 28, 2020 | [Archived versions](#) | [Download PDF](#)

We build a range of services that help millions of people daily to explore and interact with the world in new ways. Our services include:

- Google apps, sites, and devices, like Search, YouTube, and Google Home
- Platforms like the Chrome browser and Android operating system
- Products that are integrated into third-party apps and sites, like ads and embedded Google Maps

You can use our services in a variety of ways to manage your privacy. For example, you can sign up for a Google Account if you want to create and manage content like emails and photos, or see more relevant search results. And you can use many Google services when you're signed out or without creating an account at all, like searching on Google or watching YouTube videos. You can also choose to browse the web privately using Chrome in Incognito mode. And across our services, you can adjust your privacy settings to control what we collect and how your information is used.

To help explain things as clearly as possible, we've added examples, explanatory videos, and definitions for [key terms](#). And if you have any questions about this Privacy Policy, you can [contact us](#).

## INFORMATION GOOGLE COLLECTS

We want you to understand the types of information we collect as you use our services

We collect information to provide better services to all our users — from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like. The information Google collects, and how that information is used, depends on how you use our services and how you manage your privacy controls.

When you're not signed in to a Google Account, we store the information we collect with [unique identifiers](#) tied to the browser, application, or [device](#) you're using. This helps us do things like maintain your language preferences across browsing sessions.

When you're signed in, we also collect information that we store with your Google Account, which we treat as [personal information](#).

## Things you create or provide to us

When you create a Google Account, you provide us with [personal information](#) that includes your name and a password. You can also choose to add a [phone number](#) or [payment information](#) to your account. Even if you aren't signed in to a Google Account, you might choose to provide us with information — like an email address to receive updates about our services.

We also collect the content you create, upload, or receive from others when using our services. This includes things like email you write and receive, photos and videos you save, docs and spreadsheets you create, and comments you make on YouTube videos.

## Information we collect as you use our services

### Your apps, browsers & devices

We collect information about the apps, browsers, and [devices](#) you use to access Google services, which helps us provide features like automatic product updates and dimming your screen if your battery runs low.

The information we collect includes [unique identifiers](#), browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application

version number. We also collect information about the interaction of your apps, browsers, and devices with our services, including IP address, crash reports, system activity, and the date, time, and referrer URL of your request.

We collect this information when a Google service on your device contacts our servers — for example, when you install an app from the Play Store or when a service checks for automatic updates. If you're using an [Android device with Google apps](#), your device periodically contacts Google servers to provide information about your device and connection to our services. This information includes things like your device type, carrier name, crash reports, and which apps you've installed.

## Your activity

We collect information about your activity in our services, which we use to do things like recommend a YouTube video you might like. The activity information we collect may include:

- Terms you search for
- Videos you watch
- [Views and interactions with content and ads](#)
- Voice and audio information when you use audio features
- Purchase activity
- People with whom you communicate or share content
- Activity on third-party sites and apps that use our services
- Chrome browsing history you've [synced with your Google Account](#)

If you use our [services to make and receive calls or send and receive messages](#), we may collect telephony log information like your phone number, calling-party number, receiving-party number, forwarding numbers, time and date of calls and messages, duration of calls, routing information, and types of calls.

You can visit your Google Account to find and manage activity information that's saved in your account.

[Go to Google Account](#)

## Your location information

We collect information about your location when you use our services, which helps us offer features like driving directions for your weekend getaway or showtimes for movies playing near you.

Your location can be determined with varying degrees of accuracy by:

- GPS
- [IP address](#)
- [Sensor data from your device](#)
- [Information about things near your device](#), such as Wi-Fi access points, cell towers, and Bluetooth-enabled devices

The types of location data we collect depend in part on your device and account settings. For example, you can [turn your Android device's location on or off](#) using the device's settings app. You can also turn on [Location History](#) if you want to create a private map of where you go with your signed-in devices.

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In some circumstances, Google also collects information about you from [publicly accessible sources](#). For example, if your name appears in your local newspaper, Google's Search engine may index that article and display it to other people if they search for your name. We may also collect information about you from trusted partners, including marketing partners who provide us with information about potential customers of our business services, and security partners who provide us with information to [protect against abuse](#). We also receive information from advertisers to provide [advertising and research services on their behalf](#).

We use various technologies to collect and store information, including [cookies](#), [pixel tags](#), local storage, such as [browser web storage](#) or [application data caches](#), databases, and [server logs](#).

### WHY GOOGLE COLLECTS DATA

We use data to build better services

We use the information we collect from all our services for the following purposes:

## Provide our services

We use your information to [deliver our services](#), like processing the terms you search for in order to return results or helping you share content by suggesting recipients from your contacts.

## Maintain & improve our services

We also use your information to [ensure our services are working as intended](#), such as tracking outages or troubleshooting issues that you report to us. And we use your information to [make improvements](#) to our services – for example, understanding which search terms are most frequently misspelled helps us improve spell-check features used across our services.

## Develop new services

We use the information we collect in existing services to help us develop new ones. For example, understanding how people organized their photos in Picasa, Google's first photos app, helped us design and launch Google Photos.

## Provide personalized services, including content and ads

We use the information we collect to customize our services for you, including providing recommendations, personalized content, and [customized search results](#). For example, [Security Checkup](#) provides security tips adapted to how you use Google products. And Google Play uses information like apps you've already installed and videos you've watched on YouTube to suggest new apps you might like.

Depending on your settings, we may also show you [personalized ads](#) based on your interests. For example, if you search for "mountain bikes," you may see an ad for sports equipment when you're browsing a site that shows ads served by Google. You can control what information we use to show you ads by visiting your ad settings.

- We don't show you personalized ads based on [sensitive categories](#), such as race, religion, sexual orientation, or health.

- We don't share information that personally identifies you with advertisers, such as your name or email, unless you ask us to. For example, if you see an ad for a nearby flower shop and select the "tap to call" button, we'll connect your call and may share your phone number with the flower shop.

[Go to Ad Settings](#)

## Measure performance

We use data for analytics and measurement to understand how our services are used. For example, we analyze data about your visits to our sites to do things like optimize product design. And we also use data about the ads you interact with to help advertisers understand the performance of their ad campaigns. We use a variety of tools to do this, including Google Analytics. When you visit sites that use Google Analytics, Google and a Google Analytics customer [may link information](#) about your activity from that site with activity from other sites that use our ad services.

## Communicate with you

We use information we collect, like your email address, to interact with you directly. For example, we may send you a notification if we detect suspicious activity, like an attempt to sign in to your Google Account from an unusual location. Or we may let you know about upcoming changes or improvements to our services. And if you contact Google, we'll keep a record of your request in order to help solve any issues you might be facing.

## Protect Google, our users, and the public

We use information to help improve the [safety and reliability](#) of our services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm Google, our users, or the public.

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We use different technologies to process your information for these purposes. We use automated systems that analyze your content to provide you with things like customized search results, personalized ads, or other features tailored to how you use our services. And we analyze your content to help us [detect abuse](#) such as spam, malware, and illegal content. We also use [algorithms](#) to recognize patterns in data. For example, Google

Translate helps people communicate across languages by detecting common language patterns in phrases you ask it to translate.

We may [combine the information we collect](#) among our services and across your devices for the purposes described above. For example, if you watch videos of guitar players on YouTube, you might see an ad for guitar lessons on a site that uses our ad products. Depending on your account settings, [your activity on other sites and apps](#) may be associated with your personal information in order to improve Google's services and the ads delivered by Google.

If other users already have your email address or other information that identifies you, we may show them your publicly visible Google Account information, such as your name and photo. This helps people identify an email coming from you, for example.

We'll ask for your consent before using your information for a purpose that isn't covered in this Privacy Policy.

## YOUR PRIVACY CONTROLS

You have choices regarding the information we collect and how it's used

This section describes key controls for managing your privacy across our services. You can also visit the [Privacy Checkup](#), which provides an opportunity to review and adjust important privacy settings. In addition to these tools, we also offer specific privacy settings in our products — you can learn more in our [Product Privacy Guide](#).

[Go to Privacy Checkup](#)

## Managing, reviewing, and updating your information

When you're signed in, you can always review and update information by visiting the services you use. For example, Photos and Drive are both designed to help you manage specific types of content you've saved with Google.

We also built a place for you to review and control information saved in your Google Account. Your [Google Account](#) includes:



## Privacy controls

### Activity Controls

Decide what types of activity you'd like saved in your account. For example, you can turn on Location History if you want traffic predictions for your daily commute, or you can save your YouTube Watch History to get better video suggestions.

[Go to Activity Controls](#)

### Ad settings

Manage your preferences about the ads shown to you on Google and on sites and apps that [partner with Google](#) to show ads. You can modify your interests, choose whether your personal information is used to make ads more relevant to you, and turn on or off certain advertising services.

[Go to Ad Settings](#)

### About you

Control what others see about you across Google services.

[Go to About You](#)

### Shared endorsements

Choose whether your name and photo appear next to your activity, like reviews and recommendations, that appear in ads.

[Go to Shared Endorsements](#)

## Information you share

If you're a G Suite user, control whom you share information with through your account on Google+.

[Go to Information You Share](#)

## Ways to review & update your information

### My Activity

My Activity allows you to review and control data that's created when you use Google services, like searches you've done or your visits to Google Play. You can browse by date and by topic, and delete part or all of your activity.

[Go to My Activity](#)

### Google Dashboard

Google Dashboard allows you to manage information associated with specific products.

[Go to Dashboard](#)

### Your personal information

Manage your contact information, such as your name, email, and phone number.

[Go to Personal Info](#)

When you're signed out, you can manage information associated with your browser or device, including:

- Signed-out search personalization: [Choose](#) whether your search activity is used to offer you more relevant results and recommendations.
- YouTube settings: Pause and delete your [YouTube Search History](#) and your [YouTube Watch History](#).
- Ad Settings: [Manage](#) your preferences about the ads shown to you on Google and on sites and apps that partner with Google to show ads.

## Exporting, removing & deleting your information

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

### [Export your data](#)

You can also [request to remove content](#) from specific Google services based on applicable law.

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

### [Delete your information](#)

And finally, [Inactive Account Manager](#) allows you to give someone else access to parts of your Google Account in case you're unexpectedly unable to use your account.

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There are other ways to control the information Google collects whether or not you're signed in to a Google Account, including:

- Browser settings: For example, you can configure your browser to indicate when Google has set a [cookie](#) in your browser. You can also configure your browser to block all cookies from a specific domain or all domains. But remember that our services [rely on cookies to function properly](#), for things like remembering your language preferences.
- Device-level settings: Your device may have controls that determine what information we collect. For example, you can [modify location settings](#) on your Android device.

## SHARING YOUR INFORMATION

### When you share your information

Many of our services let you share information with other people, and you have control over how you share. For example, you can share videos on YouTube publicly or you can decide to keep your videos private. Remember, when you share information publicly, your content may become accessible through search engines, including Google Search.

When you're signed in and interact with some Google services, like leaving comments on a YouTube video or reviewing an app in Play, your name and photo appear next to your activity. We may also display this information in [ads depending on your Shared endorsements setting](#).

### When Google shares your information

We do not share your personal information with companies, organizations, or individuals outside of Google except in the following cases:

#### With your consent

We'll share personal information outside of Google when we have your consent. For example, if you [use Google Home to make a reservation](#) through a booking service, we'll get your permission before sharing your name or phone number with the restaurant. We'll ask for your explicit consent to share any [sensitive personal information](#).

#### With domain administrators

If you're a student or work for an organization that uses Google services (like G Suite), your [domain administrator](#) and resellers who manage your account will have access to your Google Account. They may be able to:

- Access and retain information stored in your account, like your email
- View statistics regarding your account, like how many apps you install
- Change your account password
- Suspend or terminate your account access
- Receive your account information in order to satisfy applicable law, regulation, legal process, or enforceable governmental request
- Restrict your ability to delete or edit your information or your privacy settings

## For external processing

We provide personal information to our [affiliates](#) and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with customer support.

## For legal reasons

We will share personal information outside of Google if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, [legal process, or enforceable governmental request](#). We share information about the number and type of requests we receive from governments in our [Transparency Report](#).
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security, or technical issues.
- Protect against harm to the rights, property or safety of Google, our users, or the public as required or permitted by law.

We may share [non-personally identifiable information](#) publicly and with our partners — like publishers, advertisers, developers, or rights holders. For example, we share information publicly to [show trends](#) about the general use of our services. We also allow [specific partners](#) to collect information from your browser or device for advertising and measurement purposes using their own cookies or similar technologies.

If Google is involved in a merger, acquisition, or sale of assets, we'll continue to ensure the confidentiality of your personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## KEEPING YOUR INFORMATION SECURE

We build security into our services to protect your information

All Google products are built with strong security features that continuously protect your information. The insights we gain from maintaining our services help us detect and automatically block security threats from ever reaching you. And if we do detect something risky that we think you should know about, we'll notify you and help guide you through steps to stay better protected.

We work hard to protect you and Google from unauthorized access, alteration, disclosure, or destruction of information we hold, including:

- We use encryption to keep your data private while in transit
- We offer a range of security features, like [Safe Browsing](#), Security Checkup, and [2 Step Verification](#) to help you protect your account
- We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems
- We restrict access to personal information to Google employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## EXPORTING & DELETING YOUR INFORMATION

You can export a copy of your information or delete it from your Google Account at any time

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

## Export your data

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

## Delete your information

### RETAINING YOUR INFORMATION

We retain the data we collect for different periods of time depending on what it is, how we use it, and how you configure your settings:

- Some data you can delete whenever you like, such as the content you create or upload. You can also delete [activity information](#) saved in your account, or [choose to have it deleted automatically](#) after a set period of time.
- Other data is deleted or anonymized automatically after a set period of time, such as [advertising data](#) in server logs.
- We keep some data until you delete your Google Account, such as information about how often you use our services.
- And some data we retain for longer periods of time when necessary for legitimate business or legal purposes, such as security, fraud and abuse prevention, or financial record-keeping.

When you delete data, we follow a deletion process to make sure that your data is safely and completely removed from our servers or retained only in anonymized form. We try to ensure that our services protect information from accidental or malicious deletion. Because of this, there may be delays between when you delete something and when copies are deleted from our active and backup systems.

You can read more about Google's [data retention periods](#), including how long it takes us to delete your information.

## COMPLIANCE & COOPERATION WITH REGULATORS

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

## Data transfers

We maintain [servers around the world](#) and your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this policy. We also comply with certain [legal frameworks](#) relating to the transfer of data, such as the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

## California requirements

The California Consumer Privacy Act (CCPA) requires specific disclosures for California residents.

This Privacy Policy is designed to help you understand how Google handles your information:

- We explain the categories of information Google collects and the sources of that information in [Information Google collects](#).
- We explain how Google uses information in [Why Google collects data](#).
- We explain when Google may share information in [Sharing your information](#). Google does not sell your personal information.

The CCPA also provides the right to request information about how Google collects, uses, and discloses your personal information. And it gives you the right to access your information and request that Google delete that information. Finally, the CCPA provides the right to not be discriminated against for exercising your privacy rights.



We describe the choices you have to manage your privacy and data across Google's services in [Your privacy controls](#). You can exercise your rights by using these controls, which allow you to access, review, update and delete your information, as well as [export and download](#) a copy of it. When you use them, we'll validate your request by verifying that you're signed in to your Google Account. If you have questions or requests related to your rights under the CCPA, you (or your authorized agent) can also [contact Google](#).

The CCPA requires a description of data practices using specific categories. This table uses these categories to organize the information in this Privacy Policy.

## Categories of personal information we collect

**Identifiers** such as your [name, phone number](#), and address, as well as [unique identifiers](#) tied to the browser, application, or device you're using.

**Demographic information**, such as your [age, gender](#) and [language](#).

**Commercial information** such as your [payment information](#) and a history of [purchases](#) you make on Google's services.

**Biometric information** if you choose to provide it, such as fingerprints in Google's product development studies.

**Internet, network, and other activity information** such as your search terms; views and interactions with content and ads; Chrome browsing history you've synced with your Google Account; information about the interaction of your apps, browsers, and devices with our services (like IP address, crash reports, and system activity); and activity on third-party sites and apps that use our services. You can review and control activity data stored in your Google Account in [My Activity](#).

**Geolocation data**, such as may be determined by GPS, IP address, and other data from sensors on or around your device, depending in part on your device and account settings. Learn more about [Google's use of location information](#).

**Audio, electronic, visual and similar information**, such as [voice and audio information](#) when you use audio features.

**Professional, employment, and education information**, such as information [you provide](#) or that is maintained through a G Suite account by an organization at which you study or work.

**Other information you create or provide**, such as the content you create, upload, or receive (like photos and videos or emails, docs and spreadsheets). [Google Dashboard](#) allows you to manage information associated with specific products.

**Inferences** drawn from the above, like your [ads interest categories](#).

## Business purposes for which information may be used or disclosed

**Protecting against security threats, abuse, and illegal activity:** Google uses and may disclose information to detect, prevent and respond to security incidents, and for protecting against other malicious, deceptive, fraudulent, or illegal activity. For example, to protect our services, Google may receive or disclose information about IP addresses that malicious actors have compromised.

**Auditing and measurement:** Google uses information for analytics and measurement to understand how our services are used, as well as to fulfill obligations to our partners like publishers, advertisers, developers, or rights holders. We may disclose non-personally identifiable information publicly and with these partners, including for auditing purposes.

**Maintaining our services:** Google uses information to ensure our services are working as intended, such as tracking outages or troubleshooting bugs and other issues that you report to us.

**Research and development:** Google uses information to improve our services and to develop new products, features and technologies that benefit our users and the public. For example, we use publicly available information to help train Google's language models and build features like Google Translate.

**Use of service providers:** Google shares information with service providers to perform services on our behalf, in compliance with our Privacy Policy and other appropriate confidentiality and security measures. For example, we may rely on service providers to help provide customer support.

**Advertising:** Google processes information, including online identifiers and information about your interactions with advertisements, to provide advertising. This keeps Google's services and many of the websites and services you use free of charge. You can control what information we use to show you ads by visiting your [ad settings](#).

**Legal reasons:** Google also uses information to satisfy applicable laws or regulations, and discloses information in response to legal process or enforceable government requests, including to law enforcement. We

provide information about the number and type of requests we receive from governments in our [Transparency Report](#).

## Parties with whom information may be shared

**Other people with whom you choose to share your information**, like docs or photos, and videos or comments on YouTube.

**Third parties to whom you consent to sharing your information**, such as services that integrate with Google's services. You can [review and manage third party apps and sites](#) with access to data in your Google Account.

**Service providers**, trusted businesses or persons that process information on Google's behalf, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

**Domain administrators**, if you work or study at an organization that uses Google services like G Suite.

**Law enforcement or other third parties**, for the legal reasons described in [Sharing your information](#).

### ABOUT THIS POLICY

## When this policy applies

This Privacy Policy applies to all of the services offered by Google LLC and its [affiliates](#), including YouTube, Android, and services offered on third-party sites, such as advertising services. This Privacy Policy doesn't apply to services that have separate privacy policies that do not incorporate this Privacy Policy.

This Privacy Policy doesn't apply to:

- The information practices of other companies and organizations that advertise our services
- Services offered by other companies or individuals, including products or sites that may include Google services, be displayed to you in search results, or be linked from our services

## Changes to this policy

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date the last changes were published and we offer access to [archived versions](#) for your review. If changes are significant, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

## RELATED PRIVACY PRACTICES

# Specific Google services

The following privacy notices provide additional information about some Google services:

- [Chrome & the Chrome Operating System](#)
- [Payments](#)
- [Fiber](#)
- [Google Fi](#)
- [G Suite for Education](#)
- [Read Along](#)
- [YouTube Kids](#)
- [Google Accounts Managed with Family Link, for Children under 13 \(or applicable age in your country\)](#)
- [Voice and Audio Collection from Children's Features on the Google Assistant](#)

# Other useful resources

The following links highlight useful resources for you to learn more about our practices and privacy settings.

- [Your Google Account](#) is home to many of the settings you can use to manage your account
- [Privacy Checkup](#) guides you through key privacy settings for your Google Account

- [Google's safety center](#) helps you learn more about our built-in security, privacy controls, and tools to help set digital ground rules for your family online
- [Privacy & Terms](#) provides more context regarding this Privacy Policy and our Terms of Service
- [Technologies](#) includes more information about:
  - [How Google uses cookies](#)
  - Technologies used for [Advertising](#)
  - [How Google uses pattern recognition](#) to recognize things like faces in photos
  - [How Google uses information from sites or apps that use our services](#)

## Key terms

### Affiliates

An affiliate is an entity that belongs to the Google group of companies, including the following companies that provide consumer services in the EU: Google Ireland Limited, Google Commerce Ltd, Google Payment Corp, and Google Dialer Inc. Learn more about the [companies providing business services in the EU](#).

### Algorithm

A process or set of rules followed by a computer in performing problem-solving operations.

### Application data cache

An application data cache is a data repository on a device. It can, for example, enable a web application to run without an internet connection and improve the performance of the application by enabling faster loading of content.

### Browser web storage

Browser web storage enables websites to store data in a browser on a device. When used in "local storage" mode, it enables data to be stored across sessions. This makes data retrievable even after a browser has been closed and reopened. One technology that facilitates web storage is HTML 5.

## Cookies

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. Learn more about [how Google uses cookies](#) and how Google uses data, including cookies, [when you use our partners' sites or apps](#).

## Device

A device is a computer that can be used to access Google services. For example, desktop computers, tablets, smart speakers, and smartphones are all considered devices.

## Google Account

You may access some of our services by signing up for a [Google Account](#) and providing us with some personal information (typically your name, email address, and a password). This account information is used to authenticate you when you access Google services and protect your account from unauthorized access by others. You can edit or delete your account at any time through your Google Account settings.

## IP address

Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.

## Non-personally identifiable information

This is information that is recorded about users so that it no longer reflects or references an individually-identifiable user.

## Personal information

This is information that you provide to us which personally identifies you, such as your name, email address, or billing information, or other data that can be reasonably linked to such information by Google, such as information we associate with your Google Account.

## Pixel tag

A pixel tag is a type of technology placed on a website or within the body of an email for the purpose of tracking certain activity, such as views of a website or when an email is opened. Pixel tags are often used in combination with cookies.

## Referrer URL

A Referrer URL (Uniform Resource Locator) is information transmitted to a destination webpage by a web browser, typically when you click a link to that page. The Referrer URL contains the URL of the last webpage the browser visited.

## Sensitive personal information

This is a particular category of personal information relating to topics such as confidential medical facts, racial or ethnic origins, political or religious beliefs, or sexuality.

## Server logs

Like most websites, our servers automatically record the page requests made when you visit our sites. These “server logs” typically include your web request, Internet Protocol address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser.

A typical log entry for a search for “cars” looks like this:

```
123.45.67.89 - 25/Mar/2003 10:15:32 -  
http://www.google.com/search?q=cars -  
Firefox 1.0.7; Windows NT 5.1 -  
740674ce2123e969
```

- `123.45.67.89` is the Internet Protocol address assigned to the user by the user’s ISP. Depending on the user’s service, a different address may be assigned to the user by their service provider each time they connect to the Internet.
- `25/Mar/2003 10:15:32` is the date and time of the query.
- `http://www.google.com/search?q=cars` is the requested URL, including the search query.
- `Firefox 1.0.7; Windows NT 5.1` is the browser and operating system being used.
- `740674ce2123a969` is the unique cookie ID assigned to this particular computer the first time it visited Google. (Cookies can be deleted by users. If the user has deleted the cookie from the computer since the last time they’ve visited Google, then it will be the unique cookie ID assigned to their device the next time they visit Google from that particular device).

## Unique identifiers

A unique identifier is a string of characters that can be used to uniquely identify a browser, app, or device.

Different identifiers vary in how permanent they are, whether they can be reset by users, and how they can be accessed.

Unique identifiers can be used for various purposes, including security and fraud detection, syncing services such as your email inbox, remembering your preferences, and providing personalized advertising. For example, unique identifiers stored in cookies help sites display content in your browser in your preferred language. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. Learn more about [how Google uses cookies](#).

On other platforms besides browsers, unique identifiers are used to recognize a specific device or app on that device. For example, a unique identifier such as the Advertising ID is used to provide relevant advertising on Android devices, and can be [managed](#) in your device’s settings. Unique identifiers may also be incorporated into a device by its manufacturer (sometimes called a universally unique ID or UUID), such as the IMEI-number of a mobile phone. For example, a device’s unique identifier can be used to customize our service to your device or analyze device issues related to our services.



## Additional Context

### ads you'll find most useful

For example, if you watch videos about baking on YouTube, you may see more ads that relate to baking as you browse the web. We also may use your IP address to determine your approximate location, so that we can serve you ads for a nearby pizza delivery service if you search for "pizza." Learn more [about Google ads](#) and [why you may see particular ads](#).

### advertising and research services on their behalf

For example, advertisers may upload data from their loyalty-card programs so that they can better understand the performance of their ad campaigns. We only provide aggregated reports to advertisers that don't reveal information about individual people.

### Android device with Google apps

Android devices with Google apps include devices sold by Google or one of our partners and include phones, cameras, vehicles, wearables, and televisions. These devices use Google Play Services and other pre-installed apps that include services like Gmail, Maps, your phone's camera and phone dialer, text-to-speech conversion, keyboard input, and security features.

### combine the information we collect

Some examples of how we combine the information we collect include:

- When you're signed in to your Google Account and search on Google, you can see search results from the public web, along with relevant information from the content you have in other Google products, like Gmail or Google Calendar. This can include things like the status of your upcoming flights, restaurant, and hotel reservations, or your photos. [Learn more](#)
- If you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to

type in their name. This feature makes it easier to share things with people you know. [Learn more](#)

- The Google app can use data that you have stored in other Google products to show you personalized content, depending on your settings. For example, if you have searches stored in your Web & App Activity, the Google app can show you news articles and other information about your interests, like sports scores, based your activity. [Learn more](#)
- If you link your Google Account to your Google Home, you can manage your information and get things done through the Google Assistant. For example, you can add events to your Google Calendar or get your schedule for the day, ask for status updates on your upcoming flight, or send information like driving directions to your phone. [Learn more](#)

## customized search results

For example, when you're signed in to your Google Account and have the Web & App Activity control enabled, you can get more relevant search results that are based on your previous searches and activity from other Google services. You can [learn more here](#). You may also get customized search results even when you're signed out. If you don't want this level of search customization, you can [search and browse privately](#) or turn off [signed-out search personalization](#).

## deliver our services

Examples of how we use your information to deliver our services include:

- We use the IP address assigned to your device to send you the data you requested, such as loading a YouTube video
- We use unique identifiers stored in cookies on your device to help us authenticate you as the person who should have access to your Google Account
- Photos and videos you upload to Google Photos are used to help you create albums, animations, and other creations that you can share. [Learn more](#)
- A flight confirmation email you receive may be used to create a "check-in" button that appears in your Gmail
- When you purchase services or physical goods from us, you may provide us information like your shipping address or delivery instructions. We use this information for things like processing, fulfilling, and delivering your order, and to provide support in connection with the product or service you purchase.

## detect abuse

When we detect spam, malware, illegal content, and other forms of abuse on our systems in violation of our policies, we may disable your account or take other appropriate action. In certain circumstances, we may also report the violation to appropriate authorities.

## devices

For example, we can use information from your devices to help you decide which device you'd like to use to install an app or view a movie you buy from Google Play. We also use this information to help protect your account.

## ensure and improve

For example, we analyze how people interact with advertising to improve the performance of our ads.

## ensure our services are working as intended

For example, we continuously monitor our systems to look for problems. And if we find something wrong with a specific feature, reviewing activity information collected before the problem started allows us to fix things more quickly.

## Information about things near your device

If you use Google's Location services on Android, we can improve the performance of apps that rely on your location, like Google Maps. If you use Google's Location services, your device sends information to Google about its location, sensors (like accelerometer), and nearby cell towers and Wi-Fi access points (like MAC address and signal strength). All these things help to determine your location. You can use your device settings to enable Google Location services. [Learn more](#)

## legal process, or enforceable governmental request

Like other technology and communications companies, Google regularly receives requests from governments and courts around the world to disclose user data. Respect for the privacy and security of data you store with Google underpins our approach to complying with these legal requests. Our legal team reviews each and every request, regardless of type, and we frequently push back when a request appears to be overly broad or doesn't follow the correct process. Learn more in our [Transparency Report](#).

## make improvements

For example, we use cookies to analyze how people interact with our services. And that analysis can help us build better products. For example, it may help us discover that it's taking people too long to complete a certain task or that they have trouble finishing steps at all. We can then redesign that feature and improve the product for everyone.

## may link information

Google Analytics relies on first-party cookies, which means the cookies are set by the Google Analytics customer. Using our systems, data generated through Google Analytics can be linked by the Google Analytics customer and by Google to third-party cookies that are related to visits to other websites. For example, an advertiser may want to use its Google Analytics data to create more relevant ads, or to further analyze its traffic. [Learn more](#)

## partner with Google

There are over 2 million non-Google websites and apps that partner with Google to show ads. [Learn more](#)

## payment information

For example, if you add a credit card or other payment method to your Google Account, you can use it to buy things across our services, like apps in the Play Store. We may also ask for other information, like a business tax ID, to help process your payment. In some cases, we may also need to verify your identity and may ask you for information to do this.

We may also use payment information to verify that you meet age requirements, if, for example, you enter an incorrect birthday indicating you're not old enough to have a Google Account. [Learn more](#)

## personalized ads

You may also see personalized ads based on information from the advertiser. If you shopped on an advertiser's website, for example, they can use that visit information to show you ads. [Learn more](#)

## phone number

If you add your phone number to your account, it can be used for different purposes across Google services, depending on your settings. For example, your phone number can be used to help you access your account if you forget your password, help people find and connect with you, and make the ads you see more relevant to you. [Learn more](#)

## protect against abuse

For example, information about security threats can help us notify you if we think your account has been compromised (at which point we can help you take steps to protect your account).

## publicly accessible sources

For example, we may collect information that's publicly available online or from other public sources to help train Google's language models and build features like Google Translate.

## rely on cookies to function properly

For example, we use a cookie called 'lbcS' that makes it possible for you to open many Google Docs in one browser. Blocking this cookie would prevent Google Docs from working as expected. [Learn more](#)

## safety and reliability

Some examples of how we use your information to help keep our services safe and reliable include:

- Collecting and analyzing IP addresses and cookie data to protect against automated abuse. This abuse takes many forms, such as sending spam to Gmail users, stealing money from advertisers by fraudulently clicking on ads, or censoring content by launching a Distributed Denial of Service (DDoS) attack.
- The “last account activity” feature in Gmail can help you find out if and when someone accessed your email without your knowledge. This feature shows you information about recent activity in Gmail, such as the IP addresses that accessed your mail, the associated location, and the date and time of access. [Learn more](#)

## sensitive categories

When showing you personalized ads, we use topics that we think might be of interest to you based on your activity. For example, you may see ads for things like "Cooking and Recipes" or "Air Travel." We don't use topics or show personalized ads based on sensitive categories like race, religion, sexual orientation, or health. And we require the same from advertisers that use our services.

## Sensor data from your device

Your device may have sensors that can be used to better understand your location and movement. For example, an accelerometer can be used to determine your speed and a gyroscope to figure out your direction of travel.

## servers around the world

For example, we operate data centers located [around the world](#) to help keep our products continuously available for users.

## services to make and receive calls or send and receive messages

Examples of these services include:

- Google Hangouts, for making domestic and international calls
- Google Voice, for making calls, sending text messages, and managing voicemail
- Google Fi, for a phone plan

## show trends

When lots of people start searching for something, it can provide useful information about particular trends at that time. Google Trends samples Google web searches to estimate the popularity of searches over a certain period of time and shares those results publicly in aggregated terms. [Learn more](#)

## specific Google services

For example, you can delete [your blog](#) from Blogger or [a Google Site you own](#) from Google Sites. You can also delete [reviews](#) you've left on apps, games, and other content in the Play Store.

## specific partners

For example, we allow YouTube creators and advertisers to work with measurement companies to learn about the audience of their YouTube videos or ads, using cookies or similar technologies. Another example is merchants on our shopping pages, who use cookies to understand how many different people see their product listings. [Learn more](#) about these partners and how they use your information.

## synced with your Google Account

Your Chrome browsing history is only saved to your account if you've enabled Chrome synchronization with your Google Account. [Learn more](#)

## the people who matter most to you online

For example, when you type an address in the To, Cc, or Bcc field of an email you're composing, Gmail will suggest addresses based on the people you [contact most frequently](#).

## third parties

For example, we process your information to report use statistics to rights holders about how their content was used in our services. We may also process your information if people search for your name and we display search results for sites containing publicly available information about you.

## Views and interactions with content and ads

For example, we collect information about views and interactions with ads so we can provide aggregated reports to advertisers, like telling them whether we served their ad on a page and whether the ad was likely seen by a viewer. We may also measure other interactions, such as how you move your mouse over an ad or if you interact with the page on which the ad appears.

## your activity on other sites and apps

This activity might come from your use of Google services, like from syncing your account with Chrome or your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics), or it might embed other content (such as videos from YouTube). These services may share information about your activity with Google and, depending on your [account settings](#) and the products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information.

[Learn more](#) about how Google uses data when you use our partners' sites or apps.



# **EXHIBIT 19**

## GOOGLE PRIVACY POLICY

When you use our services, you're trusting us with your information. We understand this is a big responsibility and work hard to protect your information and put you in control.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

Privacy Checkup

Looking to change your privacy settings?

[Take the Privacy Checkup](#)

Effective September 30, 2020 | [Archived versions](#) | [Download PDF](#)

We build a range of services that help millions of people daily to explore and interact with the world in new ways. Our services include:

- Google apps, sites, and devices, like Search, YouTube, and Google Home
- Platforms like the Chrome browser and Android operating system
- Products that are integrated into third-party apps and sites, like ads and embedded Google Maps

You can use our services in a variety of ways to manage your privacy. For example, you can sign up for a Google Account if you want to create and manage content like emails and photos, or see more relevant search results. And you can use many Google services when you're signed out or without creating an account at all, like searching on Google or watching YouTube videos. You can also choose to browse the web privately using Chrome in Incognito mode. And across our services, you can adjust your privacy settings to control what we collect and how your information is used.

To help explain things as clearly as possible, we've added examples, explanatory videos, and definitions for [key terms](#). And if you have any questions about this Privacy Policy, you can [contact us](#).

## INFORMATION GOOGLE COLLECTS

We want you to understand the types of information we collect as you use our services

We collect information to provide better services to all our users — from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like. The information Google collects, and how that information is used, depends on how you use our services and how you manage your privacy controls.

When you're not signed in to a Google Account, we store the information we collect with [unique identifiers](#) tied to the browser, application, or [device](#) you're using. This helps us do things like maintain your language preferences across browsing sessions.

When you're signed in, we also collect information that we store with your Google Account, which we treat as [personal information](#).

## Things you create or provide to us

When you create a Google Account, you provide us with [personal information](#) that includes your name and a password. You can also choose to add a [phone number](#) or [payment information](#) to your account. Even if you aren't signed in to a Google Account, you might choose to provide us with information — like an email address to receive updates about our services.

We also collect the content you create, upload, or receive from others when using our services. This includes things like email you write and receive, photos and videos you save, docs and spreadsheets you create, and comments you make on YouTube videos.

## Information we collect as you use our services

### Your apps, browsers & devices

We collect information about the apps, browsers, and [devices](#) you use to access Google services, which helps us provide features like automatic product updates and dimming your screen if your battery runs low.

The information we collect includes [unique identifiers](#), browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application

version number. We also collect information about the interaction of your apps, browsers, and devices with our services, including IP address, crash reports, system activity, and the date, time, and referrer URL of your request.

We collect this information when a Google service on your device contacts our servers – for example, when you install an app from the Play Store or when a service checks for automatic updates. If you're using an [Android device with Google apps](#), your device periodically contacts Google servers to provide information about your device and connection to our services. This information includes things like your device type, carrier name, crash reports, and which apps you've installed.

## Your activity

We collect information about your activity in our services, which we use to do things like recommend a YouTube video you might like. The activity information we collect may include:

- Terms you search for
- Videos you watch
- [Views and interactions with content and ads](#)
- Voice and audio information when you use audio features
- Purchase activity
- People with whom you communicate or share content
- Activity on third-party sites and apps that use our services
- Chrome browsing history you've [synced with your Google Account](#)

If you use our [services to make and receive calls or send and receive messages](#), we may collect telephony log information like your phone number, calling-party number, receiving-party number, forwarding numbers, time and date of calls and messages, duration of calls, routing information, and types of calls.

You can visit your Google Account to find and manage activity information that's saved in your account.

[Go to Google Account](#)

## Your location information

We collect information about your location when you use our services, which helps us offer features like driving directions for your weekend getaway or showtimes for movies playing near you.

Your location can be determined with varying degrees of accuracy by:

- GPS
- [IP address](#)
- [Sensor data from your device](#)
- [Information about things near your device](#), such as Wi-Fi access points, cell towers, and Bluetooth-enabled devices

The types of location data we collect depend in part on your device and account settings. For example, you can [turn your Android device's location on or off](#) using the device's settings app. You can also turn on [Location History](#) if you want to create a private map of where you go with your signed-in devices.

---

In some circumstances, Google also collects information about you from [publicly accessible sources](#). For example, if your name appears in your local newspaper, Google's Search engine may index that article and display it to other people if they search for your name. We may also collect information about you from trusted partners, including marketing partners who provide us with information about potential customers of our business services, and security partners who provide us with information to [protect against abuse](#). We also receive information from advertisers to provide [advertising and research services on their behalf](#).

We use various technologies to collect and store information, including [cookies](#), [pixel tags](#), local storage, such as [browser web storage](#) or [application data caches](#), databases, and [server logs](#).

### WHY GOOGLE COLLECTS DATA

We use data to build better services

We use the information we collect from all our services for the following purposes:

## Provide our services

We use your information to [deliver our services](#), like processing the terms you search for in order to return results or helping you share content by suggesting recipients from your contacts.

## Maintain & improve our services

We also use your information to [ensure our services are working as intended](#), such as tracking outages or troubleshooting issues that you report to us. And we use your information to [make improvements](#) to our services – for example, understanding which search terms are most frequently misspelled helps us improve spell-check features used across our services.

## Develop new services

We use the information we collect in existing services to help us develop new ones. For example, understanding how people organized their photos in Picasa, Google's first photos app, helped us design and launch Google Photos.

## Provide personalized services, including content and ads

We use the information we collect to customize our services for you, including providing recommendations, personalized content, and [customized search results](#). For example, [Security Checkup](#) provides security tips adapted to how you use Google products. And Google Play uses information like apps you've already installed and videos you've watched on YouTube to suggest new apps you might like.

Depending on your settings, we may also show you [personalized ads](#) based on your interests. For example, if you search for "mountain bikes," you may see an ad for sports equipment when you're browsing a site that shows ads served by Google. You can control what information we use to show you ads by visiting your ad settings.

- We don't show you personalized ads based on [sensitive categories](#), such as race, religion, sexual orientation, or health.

- We don't share information that personally identifies you with advertisers, such as your name or email, unless you ask us to. For example, if you see an ad for a nearby flower shop and select the "tap to call" button, we'll connect your call and may share your phone number with the flower shop.

[Go to Ad Settings](#)

## Measure performance

We use data for analytics and measurement to understand how our services are used. For example, we analyze data about your visits to our sites to do things like optimize product design. And we also use data about the ads you interact with to help advertisers understand the performance of their ad campaigns. We use a variety of tools to do this, including Google Analytics. When you visit sites that use Google Analytics, Google and a Google Analytics customer [may link information](#) about your activity from that site with activity from other sites that use our ad services.

## Communicate with you

We use information we collect, like your email address, to interact with you directly. For example, we may send you a notification if we detect suspicious activity, like an attempt to sign in to your Google Account from an unusual location. Or we may let you know about upcoming changes or improvements to our services. And if you contact Google, we'll keep a record of your request in order to help solve any issues you might be facing.

## Protect Google, our users, and the public

We use information to help improve the [safety and reliability](#) of our services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm Google, our users, or the public.

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We use different technologies to process your information for these purposes. We use automated systems that analyze your content to provide you with things like customized search results, personalized ads, or other features tailored to how you use our services. And we analyze your content to help us [detect abuse](#) such as spam, malware, and illegal content. We also use [algorithms](#) to recognize patterns in data. For example, Google

Translate helps people communicate across languages by detecting common language patterns in phrases you ask it to translate.

We may [combine the information we collect](#) among our services and across your devices for the purposes described above. For example, if you watch videos of guitar players on YouTube, you might see an ad for guitar lessons on a site that uses our ad products. Depending on your account settings, [your activity on other sites and apps](#) may be associated with your personal information in order to improve Google's services and the ads delivered by Google.

If other users already have your email address or other information that identifies you, we may show them your publicly visible Google Account information, such as your name and photo. This helps people identify an email coming from you, for example.

We'll ask for your consent before using your information for a purpose that isn't covered in this Privacy Policy.

## YOUR PRIVACY CONTROLS

You have choices regarding the information we collect and how it's used

This section describes key controls for managing your privacy across our services. You can also visit the [Privacy Checkup](#), which provides an opportunity to review and adjust important privacy settings. In addition to these tools, we also offer specific privacy settings in our products — you can learn more in our [Product Privacy Guide](#).

[Go to Privacy Checkup](#)

## Managing, reviewing, and updating your information

When you're signed in, you can always review and update information by visiting the services you use. For example, Photos and Drive are both designed to help you manage specific types of content you've saved with Google.

We also built a place for you to review and control information saved in your Google Account. Your [Google Account](#) includes:



## Privacy controls

### Activity Controls

Decide what types of activity you'd like saved in your account. For example, you can turn on Location History if you want traffic predictions for your daily commute, or you can save your YouTube Watch History to get better video suggestions.

[Go to Activity Controls](#)

### Ad settings

Manage your preferences about the ads shown to you on Google and on sites and apps that [partner with Google](#) to show ads. You can modify your interests, choose whether your personal information is used to make ads more relevant to you, and turn on or off certain advertising services.

[Go to Ad Settings](#)

### About you

Control what others see about you across Google services.

[Go to About You](#)

### Shared endorsements

Choose whether your name and photo appear next to your activity, like reviews and recommendations, that appear in ads.

[Go to Shared Endorsements](#)

## Ways to review & update your information

### My Activity

My Activity allows you to review and control data that's created when you use Google services, like searches you've done or your visits to Google Play. You can browse by date and by topic, and delete part or all of your activity.

[Go to My Activity](#)

### Google Dashboard

Google Dashboard allows you to manage information associated with specific products.

[Go to Dashboard](#)

### Your personal information

Manage your contact information, such as your name, email, and phone number.

[Go to Personal Info](#)

When you're signed out, you can manage information associated with your browser or device, including:

- Signed-out search personalization: [Choose](#) whether your search activity is used to offer you more relevant results and recommendations.
- YouTube settings: Pause and delete your [YouTube Search History](#) and your [YouTube Watch History](#).
- Ad Settings: [Manage](#) your preferences about the ads shown to you on Google and on sites and apps that partner with Google to show ads.

## Exporting, removing & deleting your information

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

### [Export your data](#)

You can also [request to remove content](#) from specific Google services based on applicable law.

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

### [Delete your information](#)

And finally, [Inactive Account Manager](#) allows you to give someone else access to parts of your Google Account in case you're unexpectedly unable to use your account.

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There are other ways to control the information Google collects whether or not you're signed in to a Google Account, including:

- **Browser settings:** For example, you can configure your browser to indicate when Google has set a [cookie](#) in your browser. You can also configure your browser to block all cookies from a specific domain or all domains. But remember that our services [rely on cookies to function properly](#), for things like remembering your language preferences.
- **Device-level settings:** Your device may have controls that determine what information we collect. For example, you can [modify location settings](#) on your Android device.

## SHARING YOUR INFORMATION

### When you share your information

Many of our services let you share information with other people, and you have control over how you share. For example, you can share videos on YouTube publicly or you can decide to keep your videos private. Remember, when you share information publicly, your content may become accessible through search engines, including Google Search.

When you're signed in and interact with some Google services, like leaving comments on a YouTube video or reviewing an app in Play, your name and photo appear next to your activity. We may also display this information in [ads depending on your Shared endorsements setting](#).

### When Google shares your information

We do not share your personal information with companies, organizations, or individuals outside of Google except in the following cases:

#### With your consent

We'll share personal information outside of Google when we have your consent. For example, if you [use Google Home to make a reservation](#) through a booking service, we'll get your permission before sharing your name or phone number with the restaurant. We'll ask for your explicit consent to share any [sensitive personal information](#).

#### With domain administrators

If you're a student or work for an organization that uses Google services, your [domain administrator](#) and resellers who manage your account will have access to your Google Account. They may be able to:

- Access and retain information stored in your account, like your email
- View statistics regarding your account, like how many apps you install

- Change your account password
- Suspend or terminate your account access
- Receive your account information in order to satisfy applicable law, regulation, legal process, or enforceable governmental request
- Restrict your ability to delete or edit your information or your privacy settings

## For external processing

We provide personal information to our [affiliates](#) and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with customer support.

## For legal reasons

We will share personal information outside of Google if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, [legal process, or enforceable governmental request](#). We share information about the number and type of requests we receive from governments in our [Transparency Report](#).
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security, or technical issues.
- Protect against harm to the rights, property or safety of Google, our users, or the public as required or permitted by law.

We may share [non-personally identifiable information](#) publicly and with our partners — like publishers, advertisers, developers, or rights holders. For example, we share information publicly to [show trends](#) about the general use of our services. We also allow [specific partners](#) to collect information from your browser or device for advertising and measurement purposes using their own cookies or similar technologies.

If Google is involved in a merger, acquisition, or sale of assets, we'll continue to ensure the confidentiality of your personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## KEEPING YOUR INFORMATION SECURE

We build security into our services to protect your information

All Google products are built with strong security features that continuously protect your information. The insights we gain from maintaining our services help us detect and automatically block security threats from ever reaching you. And if we do detect something risky that we think you should know about, we'll notify you and help guide you through steps to stay better protected.

We work hard to protect you and Google from unauthorized access, alteration, disclosure, or destruction of information we hold, including:

- We use encryption to keep your data private while in transit
- We offer a range of security features, like [Safe Browsing](#), Security Checkup, and [2 Step Verification](#) to help you protect your account
- We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems
- We restrict access to personal information to Google employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## EXPORTING & DELETING YOUR INFORMATION

You can export a copy of your information or delete it from your Google Account at any time

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.

[Export your data](#)

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)

## Delete your information

### RETAINING YOUR INFORMATION

We retain the data we collect for different periods of time depending on what it is, how we use it, and how you configure your settings:

- Some data you can delete whenever you like, such as the content you create or upload. You can also delete [activity information](#) saved in your account, or [choose to have it deleted automatically](#) after a set period of time.
- Other data is deleted or anonymized automatically after a set period of time, such as [advertising data](#) in server logs.
- We keep some data until you delete your Google Account, such as information about how often you use our services.
- And some data we retain for longer periods of time when necessary for legitimate business or legal purposes, such as security, fraud and abuse prevention, or financial record-keeping.

When you delete data, we follow a deletion process to make sure that your data is safely and completely removed from our servers or retained only in anonymized form. We try to ensure that our services protect information from accidental or malicious deletion. Because of this, there may be delays between when you delete something and when copies are deleted from our active and backup systems.

You can read more about Google's [data retention periods](#), including how long it takes us to delete your information.

### COMPLIANCE & COOPERATION WITH REGULATORS

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

## Data transfers

We maintain [servers around the world](#) and your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this policy. We also comply with certain [legal frameworks](#) relating to the transfer of data.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

## California requirements

The California Consumer Privacy Act (CCPA) requires specific disclosures for California residents.

This Privacy Policy is designed to help you understand how Google handles your information:

- We explain the categories of information Google collects and the sources of that information in [Information Google collects](#).
- We explain how Google uses information in [Why Google collects data](#).
- We explain when Google may share information in [Sharing your information](#). Google does not sell your personal information.

The CCPA also provides the right to request information about how Google collects, uses, and discloses your personal information. And it gives you the right to access your information and request that Google delete that information. Finally, the CCPA provides the right to not be discriminated against for exercising your privacy rights.



We describe the choices you have to manage your privacy and data across Google's services in [Your privacy controls](#). You can exercise your rights by using these controls, which allow you to access, review, update and delete your information, as well as [export and download](#) a copy of it. When you use them, we'll validate your request by verifying that you're signed in to your Google Account. If you have questions or requests related to your rights under the CCPA, you (or your authorized agent) can also [contact Google](#).

The CCPA requires a description of data practices using specific categories. This table uses these categories to organize the information in this Privacy Policy.

## Categories of personal information we collect

**Identifiers** such as your [name, phone number](#), and address, as well as [unique identifiers](#) tied to the browser, application, or device you're using.

**Demographic information**, such as your [age, gender](#) and [language](#).

**Commercial information** such as your [payment information](#) and a history of [purchases](#) you make on Google's services.

**Biometric information** if you choose to provide it, such as fingerprints in Google's product development studies.

**Internet, network, and other activity information** such as your search terms; views and interactions with content and ads; Chrome browsing history you've synced with your Google Account; information about the interaction of your apps, browsers, and devices with our services (like IP address, crash reports, and system activity); and activity on third-party sites and apps that use our services. You can review and control activity data stored in your Google Account in [My Activity](#).

**Geolocation data**, such as may be determined by GPS, IP address, and other data from sensors on or around your device, depending in part on your device and account settings. Learn more about [Google's use of location information](#).

**Audio, electronic, visual and similar information**, such as [voice and audio information](#) when you use audio features.

**Professional, employment, and education information**, such as information [you provide](#) or that is maintained through a G Suite account by an organization at which you study or work.

**Other information you create or provide**, such as the content you create, upload, or receive (like photos and videos or emails, docs and spreadsheets). [Google Dashboard](#) allows you to manage information associated with specific products.

**Inferences** drawn from the above, like your [ads interest categories](#).

## Business purposes for which information may be used or disclosed

**Protecting against security threats, abuse, and illegal activity:** Google uses and may disclose information to detect, prevent and respond to security incidents, and for protecting against other malicious, deceptive, fraudulent, or illegal activity. For example, to protect our services, Google may receive or disclose information about IP addresses that malicious actors have compromised.

**Auditing and measurement:** Google uses information for analytics and measurement to understand how our services are used, as well as to fulfill obligations to our partners like publishers, advertisers, developers, or rights holders. We may disclose non-personally identifiable information publicly and with these partners, including for auditing purposes.

**Maintaining our services:** Google uses information to ensure our services are working as intended, such as tracking outages or troubleshooting bugs and other issues that you report to us.

**Research and development:** Google uses information to improve our services and to develop new products, features and technologies that benefit our users and the public. For example, we use publicly available information to help train Google's language models and build features like Google Translate.

**Use of service providers:** Google shares information with service providers to perform services on our behalf, in compliance with our Privacy Policy and other appropriate confidentiality and security measures. For example, we may rely on service providers to help provide customer support.

**Advertising:** Google processes information, including online identifiers and information about your interactions with advertisements, to provide advertising. This keeps Google's services and many of the websites and services you use free of charge. You can control what information we use to show you ads by visiting your [ad settings](#).

**Legal reasons:** Google also uses information to satisfy applicable laws or regulations, and discloses information in response to legal process or enforceable government requests, including to law enforcement. We

provide information about the number and type of requests we receive from governments in our [Transparency Report](#).

## Parties with whom information may be shared

**Other people with whom you choose to share your information**, like docs or photos, and videos or comments on YouTube.

**Third parties to whom you consent to sharing your information**, such as services that integrate with Google's services. You can [review and manage third party apps and sites](#) with access to data in your Google Account.

**Service providers**, trusted businesses or persons that process information on Google's behalf, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

**Domain administrators**, if you work or study at an organization that uses Google services like G Suite.

**Law enforcement or other third parties**, for the legal reasons described in [Sharing your information](#).

### ABOUT THIS POLICY

## When this policy applies

This Privacy Policy applies to all of the services offered by Google LLC and its [affiliates](#), including YouTube, Android, and services offered on third-party sites, such as advertising services. This Privacy Policy doesn't apply to services that have separate privacy policies that do not incorporate this Privacy Policy.

This Privacy Policy doesn't apply to:

- The information practices of other companies and organizations that advertise our services
- Services offered by other companies or individuals, including products or sites that may include Google services, be displayed to you in search results, or be linked from our services

## Changes to this policy

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date the last changes were published and we offer access to [archived versions](#) for your review. If changes are significant, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

## RELATED PRIVACY PRACTICES

# Specific Google services

The following privacy notices provide additional information about some Google services:

- [Chrome & the Chrome Operating System](#)
- [Payments](#)
- [Fiber](#)
- [Google Fi](#)
- [G Suite for Education](#)
- [Read Along](#)
- [YouTube Kids](#)
- [Google Accounts Managed with Family Link, for Children under 13 \(or applicable age in your country\)](#)
- [Voice and Audio Collection from Children's Features on the Google Assistant](#)

# Other useful resources

The following links highlight useful resources for you to learn more about our practices and privacy settings.

- [Your Google Account](#) is home to many of the settings you can use to manage your account
- [Privacy Checkup](#) guides you through key privacy settings for your Google Account

- [Google's safety center](#) helps you learn more about our built-in security, privacy controls, and tools to help set digital ground rules for your family online
- [Privacy & Terms](#) provides more context regarding this Privacy Policy and our Terms of Service
- [Technologies](#) includes more information about:
  - [How Google uses cookies](#)
  - Technologies used for [Advertising](#)
  - [How Google uses pattern recognition](#) to recognize things like faces in photos
  - [How Google uses information from sites or apps that use our services](#)

## Key terms

### Affiliates

An affiliate is an entity that belongs to the Google group of companies, including the following companies that provide consumer services in the EU: Google Ireland Limited, Google Commerce Ltd, Google Payment Corp, and Google Dialer Inc. Learn more about the [companies providing business services in the EU](#).

### Algorithm

A process or set of rules followed by a computer in performing problem-solving operations.

### Application data cache

An application data cache is a data repository on a device. It can, for example, enable a web application to run without an internet connection and improve the performance of the application by enabling faster loading of content.

### Browser web storage

Browser web storage enables websites to store data in a browser on a device. When used in "local storage" mode, it enables data to be stored across sessions. This makes data retrievable even after a browser has been closed and reopened. One technology that facilitates web storage is HTML 5.

## Cookies

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. Learn more about [how Google uses cookies](#) and how Google uses data, including cookies, [when you use our partners' sites or apps](#).

## Device

A device is a computer that can be used to access Google services. For example, desktop computers, tablets, smart speakers, and smartphones are all considered devices.

## Google Account

You may access some of our services by signing up for a [Google Account](#) and providing us with some personal information (typically your name, email address, and a password). This account information is used to authenticate you when you access Google services and protect your account from unauthorized access by others. You can edit or delete your account at any time through your Google Account settings.

## IP address

Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.

## Non-personally identifiable information

This is information that is recorded about users so that it no longer reflects or references an individually-identifiable user.

## Personal information

This is information that you provide to us which personally identifies you, such as your name, email address, or billing information, or other data that can be reasonably linked to such information by Google, such as information we associate with your Google Account.

## Pixel tag

A pixel tag is a type of technology placed on a website or within the body of an email for the purpose of tracking certain activity, such as views of a website or when an email is opened. Pixel tags are often used in combination with cookies.

## Referrer URL

A Referrer URL (Uniform Resource Locator) is information transmitted to a destination webpage by a web browser, typically when you click a link to that page. The Referrer URL contains the URL of the last webpage the browser visited.

## Sensitive personal information

This is a particular category of personal information relating to topics such as confidential medical facts, racial or ethnic origins, political or religious beliefs, or sexuality.

## Server logs

Like most websites, our servers automatically record the page requests made when you visit our sites. These “server logs” typically include your web request, Internet Protocol address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser.

A typical log entry for a search for “cars” looks like this:

```
123.45.67.89 - 25/Mar/2003 10:15:32 -  
http://www.google.com/search?q=cars -  
Firefox 1.0.7; Windows NT 5.1 -  
740674ce2123e969
```

- `123.45.67.89` is the Internet Protocol address assigned to the user by the user’s ISP. Depending on the user’s service, a different address may be assigned to the user by their service provider each time they connect to the Internet.
- `25/Mar/2003 10:15:32` is the date and time of the query.
- `http://www.google.com/search?q=cars` is the requested URL, including the search query.
- `Firefox 1.0.7; Windows NT 5.1` is the browser and operating system being used.
- `740674ce2123a969` is the unique cookie ID assigned to this particular computer the first time it visited Google. (Cookies can be deleted by users. If the user has deleted the cookie from the computer since the last time they’ve visited Google, then it will be the unique cookie ID assigned to their device the next time they visit Google from that particular device).

## Unique identifiers

A unique identifier is a string of characters that can be used to uniquely identify a browser, app, or device.

Different identifiers vary in how permanent they are, whether they can be reset by users, and how they can be accessed.

Unique identifiers can be used for various purposes, including security and fraud detection, syncing services such as your email inbox, remembering your preferences, and providing personalized advertising. For example, unique identifiers stored in cookies help sites display content in your browser in your preferred language. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. Learn more about [how Google uses cookies](#).

On other platforms besides browsers, unique identifiers are used to recognize a specific device or app on that device. For example, a unique identifier such as the Advertising ID is used to provide relevant advertising on Android devices, and can be [managed](#) in your device’s settings. Unique identifiers may also be incorporated into a device by its manufacturer (sometimes called a universally unique ID or UUID), such as the IMEI-number of a mobile phone. For example, a device’s unique identifier can be used to customize our service to your device or analyze device issues related to our services.



## Additional Context

### ads you'll find most useful

For example, if you watch videos about baking on YouTube, you may see more ads that relate to baking as you browse the web. We also may use your IP address to determine your approximate location, so that we can serve you ads for a nearby pizza delivery service if you search for "pizza." Learn more [about Google ads](#) and [why you may see particular ads](#).

### advertising and research services on their behalf

For example, advertisers may upload data from their loyalty-card programs so that they can better understand the performance of their ad campaigns. We only provide aggregated reports to advertisers that don't reveal information about individual people.

### Android device with Google apps

Android devices with Google apps include devices sold by Google or one of our partners and include phones, cameras, vehicles, wearables, and televisions. These devices use Google Play Services and other pre-installed apps that include services like Gmail, Maps, your phone's camera and phone dialer, text-to-speech conversion, keyboard input, and security features.

### combine the information we collect

Some examples of how we combine the information we collect include:

- When you're signed in to your Google Account and search on Google, you can see search results from the public web, along with relevant information from the content you have in other Google products, like Gmail or Google Calendar. This can include things like the status of your upcoming flights, restaurant, and hotel reservations, or your photos. [Learn more](#)
- If you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to

type in their name. This feature makes it easier to share things with people you know. [Learn more](#)

- The Google app can use data that you have stored in other Google products to show you personalized content, depending on your settings. For example, if you have searches stored in your Web & App Activity, the Google app can show you news articles and other information about your interests, like sports scores, based your activity. [Learn more](#)
- If you link your Google Account to your Google Home, you can manage your information and get things done through the Google Assistant. For example, you can add events to your Google Calendar or get your schedule for the day, ask for status updates on your upcoming flight, or send information like driving directions to your phone. [Learn more](#)

## customized search results

For example, when you're signed in to your Google Account and have the Web & App Activity control enabled, you can get more relevant search results that are based on your previous searches and activity from other Google services. You can [learn more here](#). You may also get customized search results even when you're signed out. If you don't want this level of search customization, you can [search and browse privately](#) or turn off [signed-out search personalization](#).

## deliver our services

Examples of how we use your information to deliver our services include:

- We use the IP address assigned to your device to send you the data you requested, such as loading a YouTube video
- We use unique identifiers stored in cookies on your device to help us authenticate you as the person who should have access to your Google Account
- Photos and videos you upload to Google Photos are used to help you create albums, animations, and other creations that you can share. [Learn more](#)
- A flight confirmation email you receive may be used to create a "check-in" button that appears in your Gmail
- When you purchase services or physical goods from us, you may provide us information like your shipping address or delivery instructions. We use this information for things like processing, fulfilling, and delivering your order, and to provide support in connection with the product or service you purchase.

## detect abuse

When we detect spam, malware, illegal content, and other forms of abuse on our systems in violation of our policies, we may disable your account or take other appropriate action. In certain circumstances, we may also report the violation to appropriate authorities.

## devices

For example, we can use information from your devices to help you decide which device you'd like to use to install an app or view a movie you buy from Google Play. We also use this information to help protect your account.

## ensure and improve

For example, we analyze how people interact with advertising to improve the performance of our ads.

## ensure our services are working as intended

For example, we continuously monitor our systems to look for problems. And if we find something wrong with a specific feature, reviewing activity information collected before the problem started allows us to fix things more quickly.

## Information about things near your device

If you use Google's Location services on Android, we can improve the performance of apps that rely on your location, like Google Maps. If you use Google's Location services, your device sends information to Google about its location, sensors (like accelerometer), and nearby cell towers and Wi-Fi access points (like MAC address and signal strength). All these things help to determine your location. You can use your device settings to enable Google Location services. [Learn more](#)

## legal process, or enforceable governmental request

Like other technology and communications companies, Google regularly receives requests from governments and courts around the world to disclose user data. Respect for the privacy and security of data you store with Google underpins our approach to complying with these legal requests. Our legal team reviews each and every request, regardless of type, and we frequently push back when a request appears to be overly broad or doesn't follow the correct process. Learn more in our [Transparency Report](#).

## make improvements

For example, we use cookies to analyze how people interact with our services. And that analysis can help us build better products. For example, it may help us discover that it's taking people too long to complete a certain task or that they have trouble finishing steps at all. We can then redesign that feature and improve the product for everyone.

## may link information

Google Analytics relies on first-party cookies, which means the cookies are set by the Google Analytics customer. Using our systems, data generated through Google Analytics can be linked by the Google Analytics customer and by Google to third-party cookies that are related to visits to other websites. For example, an advertiser may want to use its Google Analytics data to create more relevant ads, or to further analyze its traffic. [Learn more](#)

## partner with Google

There are over 2 million non-Google websites and apps that partner with Google to show ads. [Learn more](#)

## payment information

For example, if you add a credit card or other payment method to your Google Account, you can use it to buy things across our services, like apps in the Play Store. We may also ask for other information, like a business tax ID, to help process your payment. In some cases, we may also need to verify your identity and may ask you for information to do this.

We may also use payment information to verify that you meet age requirements, if, for example, you enter an incorrect birthday indicating you're not old enough to have a Google Account. [Learn more](#)

## personalized ads

You may also see personalized ads based on information from the advertiser. If you shopped on an advertiser's website, for example, they can use that visit information to show you ads. [Learn more](#)

## phone number

If you add your phone number to your account, it can be used for different purposes across Google services, depending on your settings. For example, your phone number can be used to help you access your account if you forget your password, help people find and connect with you, and make the ads you see more relevant to you. [Learn more](#)

## protect against abuse

For example, information about security threats can help us notify you if we think your account has been compromised (at which point we can help you take steps to protect your account).

## publicly accessible sources

For example, we may collect information that's publicly available online or from other public sources to help train Google's language models and build features like Google Translate.

## rely on cookies to function properly

For example, we use a cookie called 'lbc's' that makes it possible for you to open many Google Docs in one browser. Blocking this cookie would prevent Google Docs from working as expected. [Learn more](#)

## safety and reliability

Some examples of how we use your information to help keep our services safe and reliable include:

- Collecting and analyzing IP addresses and cookie data to protect against automated abuse. This abuse takes many forms, such as sending spam to Gmail users, stealing money from advertisers by fraudulently clicking on ads, or censoring content by launching a Distributed Denial of Service (DDoS) attack.
- The “last account activity” feature in Gmail can help you find out if and when someone accessed your email without your knowledge. This feature shows you information about recent activity in Gmail, such as the IP addresses that accessed your mail, the associated location, and the date and time of access. [Learn more](#)

## sensitive categories

When showing you personalized ads, we use topics that we think might be of interest to you based on your activity. For example, you may see ads for things like "Cooking and Recipes" or "Air Travel." We don't use topics or show personalized ads based on sensitive categories like race, religion, sexual orientation, or health. And we require the same from advertisers that use our services.

## Sensor data from your device

Your device may have sensors that can be used to better understand your location and movement. For example, an accelerometer can be used to determine your speed and a gyroscope to figure out your direction of travel.

## servers around the world

For example, we operate data centers located [around the world](#) to help keep our products continuously available for users.

## services to make and receive calls or send and receive messages

Examples of these services include:

- Google Hangouts, for making domestic and international calls
- Google Voice, for making calls, sending text messages, and managing voicemail
- Google Fi, for a phone plan

## show trends

When lots of people start searching for something, it can provide useful information about particular trends at that time. Google Trends samples Google web searches to estimate the popularity of searches over a certain period of time and shares those results publicly in aggregated terms. [Learn more](#)

## specific Google services

For example, you can delete [your blog](#) from Blogger or [a Google Site you own](#) from Google Sites. You can also delete [reviews](#) you've left on apps, games, and other content in the Play Store.

## specific partners

For example, we allow YouTube creators and advertisers to work with measurement companies to learn about the audience of their YouTube videos or ads, using cookies or similar technologies. Another example is merchants on our shopping pages, who use cookies to understand how many different people see their product listings. [Learn more](#) about these partners and how they use your information.

## synced with your Google Account

Your Chrome browsing history is only saved to your account if you've enabled Chrome synchronization with your Google Account. [Learn more](#)

## the people who matter most to you online

For example, when you type an address in the To, Cc, or Bcc field of an email you're composing, Gmail will suggest addresses based on the people you [contact most frequently](#).

## third parties

For example, we process your information to report use statistics to rights holders about how their content was used in our services. We may also process your information if people search for your name and we display search results for sites containing publicly available information about you.

## Views and interactions with content and ads

For example, we collect information about views and interactions with ads so we can provide aggregated reports to advertisers, like telling them whether we served their ad on a page and whether the ad was likely seen by a viewer. We may also measure other interactions, such as how you move your mouse over an ad or if you interact with the page on which the ad appears.

## your activity on other sites and apps

This activity might come from your use of Google services, like from syncing your account with Chrome or your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics), or it might embed other content (such as videos from YouTube). These services may share information about your activity with Google and, depending on your [account settings](#) and the products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information.

[Learn more](#) about how Google uses data when you use our partners' sites or apps.



# **EXHIBIT 20**

## GOOGLE PRIVACY POLICY

**When you use our services, you're trusting us with your information. We understand this is a big responsibility and work hard to protect your information and put you in control.**

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

**Privacy Checkup**

Looking to change your privacy settings?

[Take the Privacy Checkup](#)

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Effective February 4, 2021

[Archived versions](#)

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We build a range of services that help millions of people daily to explore and interact with the world in new ways. Our services include:

- Google apps, sites, and devices, like Search, YouTube, and Google Home
- Platforms like the Chrome browser and Android operating system
- Products that are integrated into third-party apps and sites, like ads and embedded Google Maps

You can use our services in a variety of ways to manage your privacy. For example, you can sign up for a Google Account if you want to create and manage content like emails and photos, or see more relevant search results. And you can use many Google services when you're signed out or without creating an account at all, like searching on Google or watching YouTube videos. You can also choose to browse the web privately using Chrome in Incognito mode. And across our services, you can adjust your privacy settings to control what we collect and how your information is used.

To help explain things as clearly as possible, we've added examples, explanatory videos, and definitions for [key terms](#). And if you have any questions about this Privacy Policy, you can [contact us](#).

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## INFORMATION GOOGLE COLLECTS

# We want you to understand the types of information we collect as you use our services

We collect information to provide better services to all our users — from figuring out basic stuff like which language you speak, to more complex things like [which ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like. The information Google collects, and how that information is used, depends on how you use our services and how you manage your privacy controls.

When you're not signed in to a Google Account, we store the information we collect with [unique identifiers](#) tied to the browser, application, or [device](#) you're using. This helps us do things like maintain your language preferences across browsing sessions.

When you're signed in, we also collect information that we store with your Google Account, which we treat as [personal information](#).

## Things you create or provide to us

When you create a Google Account, you provide us with [personal information](#) that includes your name and a password. You can also choose to add a [phone number](#) or [payment information](#) to your account. Even if you aren't signed in to a Google Account, you might choose to provide us with information — like an email address to receive updates about our services.

We also collect the content you create, upload, or receive from others when using our services. This includes things like email you write and receive, photos and videos you save, docs and spreadsheets you create, and comments you make on YouTube videos.

# Information we collect as you use our services

## Your apps, browsers & devices

We collect information about the apps, browsers, and devices you use to access Google services, which helps us provide features like automatic product updates and dimming your screen if your battery runs low.

The information we collect includes unique identifiers, browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application version number. We also collect information about the interaction of your apps, browsers, and devices with our services, including IP address, crash reports, system activity, and the date, time, and referrer URL of your request.

We collect this information when a Google service on your device contacts our servers — for example, when you install an app from the Play Store or when a service checks for automatic updates. If you're using an Android device with Google apps, your device periodically contacts Google servers to provide information about your device and connection to our services. This information includes things like your device type, carrier name, crash reports, and which apps you've installed.

## Your activity

We collect information about your activity in our services, which we use to do things like recommend a YouTube video you might like. The activity information we collect may include:

- Terms you search for
- Videos you watch
- Views and interactions with content and ads
- Voice and audio information when you use audio features
- Purchase activity
- People with whom you communicate or share content

- Activity on third-party sites and apps that use our services
- Chrome browsing history you've [synced with your Google Account](#)

If you use our [services to make and receive calls or send and receive messages](#), we may collect call and message log information like your phone number, calling-party number, receiving-party number, forwarding numbers, sender and recipient email address, time and date of calls and messages, duration of calls, routing information, and types and volumes of calls and messages.

You can visit your Google Account to find and manage activity information that's saved in your account.



[Go to Google Account](#)

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## Your location information

We collect information about your location when you use our services, which helps us offer features like driving directions for your weekend getaway or showtimes for movies playing near you.

Your location can be determined with varying degrees of accuracy by:

- GPS
- [IP address](#)
- [Sensor data from your device](#)
- [Information about things near your device](#), such as Wi-Fi access points, cell towers, and Bluetooth-enabled devices

The types of location data we collect depend in part on your device and account settings. For example, you can [turn your Android device's location on or off](#) using the device's settings app. You can also turn on [Location History](#) if you want to create a private map of where you go with your signed-in devices.

---

In some circumstances, Google also collects information about you from publicly accessible sources. For example, if your name appears in your local newspaper, Google's Search engine may index that article and display it to other people if they search for your name. We may also collect information about you from trusted partners, including marketing partners who provide us with information about potential customers of our business services, and security partners who provide us with information to protect against abuse. We also receive information from advertisers to provide advertising and research services on their behalf.

We use various technologies to collect and store information, including cookies, pixel tags, local storage, such as browser web storage or application data caches, databases, and server logs.

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## WHY GOOGLE COLLECTS DATA

# We use data to build better services

We use the information we collect from all our services for the following purposes:

## Provide our services

We use your information to deliver our services, like processing the terms you search for in order to return results or helping you share content by suggesting recipients from your contacts.

## Maintain & improve our services

We also use your information to ensure our services are working as intended, such as tracking outages or troubleshooting issues that you report to us. And we use your information to make improvements to our services – for example, understanding which search terms are most frequently misspelled helps us improve spell-check features used across our services.

## Develop new services

We use the information we collect in existing services to help us develop new ones. For example, understanding how people organized their photos in Picasa, Google's first photos app, helped us design and launch Google Photos.

## Provide personalized services, including content and ads

We use the information we collect to customize our services for you, including providing recommendations, personalized content, and [customized search results](#). For example, [Security Checkup](#) provides security tips adapted to how you use Google products. And Google Play uses information like apps you've already installed and videos you've watched on YouTube to suggest new apps you might like.

Depending on your settings, we may also show you [personalized ads](#) based on your interests. For example, if you search for "mountain bikes," you may see an ad for sports equipment when you're browsing a site that shows ads served by Google. You can control what information we use to show you ads by visiting your ad settings.

- We don't show you personalized ads based on [sensitive categories](#), such as race, religion, sexual orientation, or health.
- We don't share information that personally identifies you with advertisers, such as your name or email, unless you ask us to. For example, if you see an ad for a nearby flower shop and select the "tap to call" button, we'll connect your call and may share your phone number with the flower shop.



[Go to Ad Settings](#)

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## Measure performance

We use data for analytics and measurement to understand how our services are used. For example, we analyze data about your visits to our sites to do things like optimize product design. And we also use data about the ads you interact with to help advertisers understand the performance of their ad campaigns. We use a variety of tools to do this, including Google Analytics. When you visit sites that use Google Analytics, a Google Analytics customer may choose to enable Google to [link information](#) about your activity from that site with activity from other sites that use our ad services.

## Communicate with you

We use information we collect, like your email address, to interact with you directly. For example, we may send you a notification if we detect suspicious activity, like an attempt to sign in to your Google Account from an unusual location. Or we may let you know about upcoming changes or improvements to our services. And if you contact Google, we'll keep a record of your request in order to help solve any issues you might be facing.

## Protect Google, our users, and the public

We use information to help improve the safety and reliability of our services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm Google, our users, or the public.

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We use different technologies to process your information for these purposes. We use automated systems that analyze your content to provide you with things like customized search results, personalized ads, or other features tailored to how you use our services. And we analyze your content to help us detect abuse such as spam, malware, and illegal content. We also use algorithms to recognize patterns in data. For example, Google Translate helps people communicate across languages by detecting common language patterns in phrases you ask it to translate.

We may combine the information we collect among our services and across your devices for the purposes described above. For example, if you watch videos of guitar players on YouTube, you might see an ad for guitar lessons on a site that uses our ad products. Depending on your account settings, your activity on other sites and apps may be associated with your personal information in order to improve Google's services and the ads delivered by Google.

If other users already have your email address or other information that identifies you, we may show them your publicly visible Google Account information, such as your name and photo. This helps people identify an email coming from you, for example.

We'll ask for your consent before using your information for a purpose that isn't covered in this Privacy Policy.

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## YOUR PRIVACY CONTROLS

# You have choices regarding the information we collect and how it's used

This section describes key controls for managing your privacy across our services. You can also visit the [Privacy Checkup](#), which provides an opportunity to review and adjust important privacy settings. In addition to these tools, we also offer specific privacy settings in our products — you can learn more in our [Product Privacy Guide](#).



[Go to Privacy Checkup](#)

## Managing, reviewing, and updating your information

When you're signed in, you can always review and update information by visiting the services you use. For example, Photos and Drive are both designed to help you manage specific types of content you've saved with Google.

We also built a place for you to review and control information saved in your Google Account. Your [Google Account](#) includes:

### Privacy controls



#### Activity Controls

Decide what types of activity you'd like saved in your account. For example, you can turn on Location History if you want traffic predictions for your daily commute, or you can save your YouTube Watch History to get better video suggestions.

[Go to Activity Controls](#)

### Ad settings



Manage your preferences about the ads shown to you on Google and on sites and apps that partner with [Google](#) to show ads. You can modify your interests, choose whether your personal information is used to make ads more relevant to you, and turn on or off certain advertising services.

[Go to Ad Settings](#)

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### About you

Control what others see about you across Google services.

[Go to About You](#)

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### Shared endorsements

Choose whether your name and photo appear next to your activity, like reviews and recommendations, that appear in ads.

[Go to Shared Endorsements](#)

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## Ways to review & update your information



### My Activity

My Activity allows you to review and control data that's created when you use Google services, like searches you've done or your visits to Google Play. You can browse by date and by topic, and delete part or all of your activity.

[Go to My Activity](#)

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### Google Dashboard

Google Dashboard allows you to manage information associated with specific products.

[Go to Dashboard](#)

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### Your personal information

Manage your contact information, such as your name, email, and phone number.

[Go to Personal Info](#)

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When you're signed out, you can manage information associated with your browser or device, including:

- Signed-out search personalization: [Choose](#) whether your search activity is used to offer you more relevant results and recommendations.
- YouTube settings: Pause and delete your [YouTube Search History](#) and your [YouTube Watch History](#).
- Ad Settings: [Manage](#) your preferences about the ads shown to you on Google and on sites and apps that partner with Google to show ads.

## Exporting, removing & deleting your information

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.



[Export your data](#)

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You can also [request to remove content](#) from specific Google services based on applicable law.

To delete your information, you can:

- Delete your content from [specific Google services](#)
- Search for and then delete specific items from your account using [My Activity](#)
- [Delete specific Google products](#), including your information associated with those products
- [Delete your entire Google Account](#)



[Delete your information](#)

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And finally, [Inactive Account Manager](#) allows you to give someone else access to parts of your Google Account in case you're unexpectedly unable to use your account.

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There are other ways to control the information Google collects whether or not you're signed in to a Google Account, including:

- **Browser settings:** For example, you can configure your browser to indicate when Google has set a [cookie](#) in your browser. You can also configure your browser to block all cookies from a specific domain or all domains. But remember that our services [rely on cookies to function properly](#), for things like remembering your language preferences.
  - **Device-level settings:** Your device may have controls that determine what information we collect. For example, you can [modify location settings](#) on your Android device.
- 

## SHARING YOUR INFORMATION

### When you share your information

Many of our services let you share information with other people, and you have control over how you share. For example, you can share videos on YouTube publicly or you can decide to keep your videos private. Remember, when you share information publicly, your content may become accessible through search engines, including Google Search.

When you're signed in and interact with some Google services, like leaving comments on a YouTube video or reviewing an app in Play, your name and photo appear next to your activity. We may also display this information in [ads depending on your Shared endorsements setting](#).

### When Google shares your information

We do not share your personal information with companies, organizations, or individuals outside of Google except in the following cases:

## With your consent

We'll share personal information outside of Google when we have your consent. For example, if you [use Google Home to make a reservation](#) through a booking service, we'll get your permission before sharing your name or phone number with the restaurant. We'll ask for your explicit consent to share any [sensitive personal information](#).

## With domain administrators

If you're a student or work for an organization that uses Google services, your [domain administrator](#) and resellers who manage your account will have access to your Google Account. They may be able to:

- Access and retain information stored in your account, like your email
- View statistics regarding your account, like how many apps you install
- Change your account password
- Suspend or terminate your account access
- Receive your account information in order to satisfy applicable law, regulation, legal process, or enforceable governmental request
- Restrict your ability to delete or edit your information or your privacy settings

## For external processing

We provide personal information to our [affiliates](#) and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with customer support.

## For legal reasons

We will share personal information outside of Google if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, [legal process](#), or enforceable governmental request. We share information about the number and type of requests we receive from governments in our [Transparency Report](#).
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security, or technical issues.
- Protect against harm to the rights, property or safety of Google, our users, or the public as required or permitted by law.

We may share [non-personally identifiable information](#) publicly and with our partners — like publishers, advertisers, developers, or rights holders. For example, we share information publicly to [show trends](#) about the general use of our services. We also allow [specific partners](#) to collect information from your browser or device for advertising and measurement purposes using their own cookies or similar technologies.

If Google is involved in a merger, acquisition, or sale of assets, we'll continue to ensure the confidentiality of your personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

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## KEEPING YOUR INFORMATION SECURE

# We build security into our services to protect your information

All Google products are built with strong security features that continuously protect your information. The insights we gain from maintaining our services help us detect and automatically block security threats from ever reaching you. And if we do detect something risky that we think you should know about, we'll notify you and help guide you through steps to stay better protected.

We work hard to protect you and Google from unauthorized access, alteration, disclosure, or destruction of information we hold, including:

- We use encryption to keep your data private while in transit

- We offer a range of security features, like [Safe Browsing](#), Security Checkup, and [2 Step Verification](#) to help you protect your account
  - We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems
  - We restrict access to personal information to Google employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- 

## EXPORTING & DELETING YOUR INFORMATION

# You can export a copy of your information or delete it from your Google Account at any time

You can export a copy of content in your Google Account if you want to back it up or use it with a service outside of Google.



[Export your data](#)

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To delete your information, you can:

- Delete your content from [specific Google services](#)
  - Search for and then delete specific items from your account using [My Activity](#)
  - [Delete specific Google products](#), including your information associated with those products
  - [Delete your entire Google Account](#)
- 



[Delete your information](#)

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## RETAINING YOUR INFORMATION

We retain the data we collect for different periods of time depending on what it is, how we use it, and how you configure your settings:

- Some data you can delete whenever you like, such as the content you create or upload. You can also delete [activity information](#) saved in your account, or [choose to have it deleted automatically](#) after a set period of time.
- Other data is deleted or anonymized automatically after a set period of time, such as [advertising data](#) in server logs.
- We keep some data until you delete your Google Account, such as information about how often you use our services.
- And some data we retain for longer periods of time when necessary for legitimate business or legal purposes, such as security, fraud and abuse prevention, or financial record-keeping.

When you delete data, we follow a deletion process to make sure that your data is safely and completely removed from our servers or retained only in anonymized form. We try to ensure that our services protect information from accidental or malicious deletion. Because of this, there may be delays between when you delete something and when copies are deleted from our active and backup systems.

You can read more about Google's [data retention periods](#), including how long it takes us to delete your information.

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## COMPLIANCE & COOPERATION WITH REGULATORS

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

## Data transfers

We maintain [servers around the world](#) and your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than



others. Regardless of where your information is processed, we apply the same protections described in this policy. We also comply with certain [legal frameworks](#) relating to the transfer of data.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

## California requirements

The California Consumer Privacy Act (CCPA) requires specific disclosures for California residents.

This Privacy Policy is designed to help you understand how Google handles your information:

- We explain the categories of information Google collects and the sources of that information in [Information Google collects](#).
- We explain how Google uses information in [Why Google collects data](#).
- We explain when Google may share information in [Sharing your information](#). Google does not sell your personal information.

The CCPA also provides the right to request information about how Google collects, uses, and discloses your personal information. And it gives you the right to access your information and request that Google delete that information. Finally, the CCPA provides the right to not be discriminated against for exercising your privacy rights.

We describe the choices you have to manage your privacy and data across Google's services in [Your privacy controls](#). You can exercise your rights by using these controls, which allow you to access, review, update and delete your information, as well as [export and download](#) a copy of it. When you use them, we'll validate your request by verifying that you're signed in to your Google Account. If you have questions or requests related to your rights under the CCPA, you (or your authorized agent) can also [contact Google](#).

The CCPA requires a description of data practices using specific categories. This table uses these categories to organize the information in this Privacy Policy.

## Categories of personal information we collect

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**Identifiers** such as your [name](#), [phone number](#), and address, as well as [unique identifiers](#) tied to the browser, application, or device you're using.

**Demographic information**, such as your [age](#), [gender](#) and [language](#).

**Commercial information** such as your [payment information](#) and a history of [purchases](#) you make on Google's services.

**Biometric information** if you choose to provide it, such as fingerprints in Google's product development studies.

**Internet, network, and other activity information** such as your search terms; views and interactions with content and ads; Chrome browsing history you've synced with your Google Account; information about the interaction of your apps, browsers, and devices with our services (like IP address, crash reports, and system activity); and activity on third-party sites and apps that use our services. You can review and control activity data stored in your Google Account in [My Activity](#).

**Geolocation data**, such as may be determined by GPS, IP address, and other data from sensors on or around your device, depending in part on your device and account settings. Learn more about [Google's use of location information](#).

**Audio, electronic, visual and similar information**, such as [voice and audio information](#) when you use audio features.

**Professional, employment, and education information**, such as information [you provide](#) or that is maintained through an organization using Google services at which you study or work.

**Other information you create or provide**, such as the content you create, upload, or receive (like photos and videos or emails, docs and spreadsheets). [Google Dashboard](#) allows you to manage information associated with specific products.

**Inferences** drawn from the above, like your [ads interest categories](#).

## Business purposes for which information may be used or disclosed

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**Protecting against security threats, abuse, and illegal activity:** Google uses and may disclose information to detect, prevent and respond to security incidents, and for protecting against other malicious, deceptive, fraudulent, or illegal activity. For example, to protect our services, Google may receive or disclose information about IP addresses that malicious actors have compromised.

**Auditing and measurement:** Google uses information for analytics and measurement to understand how our services are used, as well as to fulfill obligations to our partners like publishers, advertisers, developers, or rights holders. We may disclose non-personally identifiable information publicly and with these partners, including for auditing purposes.

**Maintaining our services:** Google uses information to ensure our services are working as intended, such as tracking outages or troubleshooting bugs and other issues that you report to us.

**Research and development:** Google uses information to improve our services and to develop new products, features and technologies that benefit our users and the public. For example, we use publicly available information to help train Google's language models and build features like Google Translate.

**Use of service providers:** Google shares information with service providers to perform services on our behalf, in compliance with our Privacy Policy and other appropriate confidentiality and security measures. For example, we may rely on service providers to help provide customer support.

**Advertising:** Google processes information, including online identifiers and information about your interactions with advertisements, to provide advertising. This keeps Google's services and many of the websites and services you use free of charge. You can control what information we use to show you ads by visiting your [ad settings](#).

**Legal reasons:** Google also uses information to satisfy applicable laws or regulations, and discloses information in response to legal process or enforceable government requests, including to law enforcement. We provide information about the number and type of requests we receive from governments in our [Transparency Report](#).

## Parties with whom information may be shared

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**Other people with whom you choose to share your information**, like docs or photos, and videos or comments on YouTube.

**Third parties to whom you consent to sharing your information**, such as services that integrate with Google's services. You can [review and manage third party apps and sites](#) with access to data in your Google Account.

**Service providers**, trusted businesses or persons that process information on Google's behalf, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

**Domain administrators**, if you work or study at an organization that uses Google services.

**Law enforcement or other third parties**, for the legal reasons described in [Sharing your information](#).

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## ABOUT THIS POLICY

### When this policy applies

This Privacy Policy applies to all of the services offered by Google LLC and its [affiliates](#), including YouTube, Android, and services offered on third-party sites, such as advertising services. This Privacy Policy doesn't apply to services that have separate privacy policies that do not incorporate this Privacy Policy.

This Privacy Policy doesn't apply to:

- The information practices of other companies and organizations that advertise our services
- Services offered by other companies or individuals, including products or sites that may include Google services, be displayed to you in search results, or be linked from our services

### Changes to this policy

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date the last changes were published and we offer access to

[archived versions](#) for your review. If changes are significant, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

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## RELATED PRIVACY PRACTICES

# Specific Google services

The following privacy notices provide additional information about some Google services:

- [Chrome & the Chrome Operating System](#)
- [Payments](#)
- [Fiber](#)
- [Google Fi](#)
- [G Suite for Education](#)
- [Read Along](#)
- [YouTube Kids](#)
- [Google Accounts Managed with Family Link, for Children under 13 \(or applicable age in your country\)](#)
- [Voice and Audio Collection from Children's Features on the Google Assistant](#)

If you're a member of an organization that uses Google Workspace or Google Cloud Platform, learn how these services collect and use your personal information in the [Google Cloud Privacy Notice](#).

## Other useful resources

The following links highlight useful resources for you to learn more about our practices and privacy settings.

- [Your Google Account](#) is home to many of the settings you can use to manage your account

- [Privacy Checkup](#) guides you through key privacy settings for your Google Account
  - [Google's safety center](#) helps you learn more about our built-in security, privacy controls, and tools to help set digital ground rules for your family online
  - [Privacy & Terms](#) provides more context regarding this Privacy Policy and our Terms of Service
  - [Technologies](#) includes more information about:
    - [How Google uses cookies](#)
    - Technologies used for [Advertising](#)
    - [How Google uses pattern recognition](#) to recognize things like faces in photos
    - [How Google uses information from sites or apps that use our services](#)
- 

## Key terms

### Affiliates

An affiliate is an entity that belongs to the Google group of companies, including the following companies that provide consumer services in the EU: Google Ireland Limited, Google Commerce Ltd, Google Payment Corp, and Google Dialer Inc. Learn more about the [companies providing business services in the EU](#).

### Algorithm

A process or set of rules followed by a computer in performing problem-solving operations.

### Application data cache

An application data cache is a data repository on a device. It can, for example, enable a web application to run without an internet connection and improve the performance of the application by enabling faster loading of content.

## Browser web storage

Browser web storage enables websites to store data in a browser on a device. When used in "local storage" mode, it enables data to be stored across sessions. This makes data retrievable even after a browser has been closed and reopened. One technology that facilitates web storage is HTML 5.

## Cookies

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. Learn more about [how Google uses cookies](#) and how Google uses data, including cookies, [when you use our partners' sites or apps](#).

## Device

A device is a computer that can be used to access Google services. For example, desktop computers, tablets, smart speakers, and smartphones are all considered devices.

## Google Account

You may access some of our services by signing up for a [Google Account](#) and providing us with some personal information (typically your name, email address, and a password). This account information is used to authenticate you when you access Google services and protect your account from unauthorized access by others. You can edit or delete your account at any time through your Google Account settings.

## IP address

Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.

## Non-personally identifiable information

This is information that is recorded about users so that it no longer reflects or references an individually-identifiable user.

## Personal information

This is information that you provide to us which personally identifies you, such as your name, email address, or billing information, or other data that can be reasonably linked to such information by Google, such as information we associate with your Google Account.

## Pixel tag

A pixel tag is a type of technology placed on a website or within the body of an email for the purpose of tracking certain activity, such as views of a website or when an email is opened. Pixel tags are often used in combination with cookies.

## Referrer URL

A Referrer URL (Uniform Resource Locator) is information transmitted to a destination webpage by a web browser, typically when you click a link to that page. The Referrer URL contains the URL of the last webpage the browser visited.

## Sensitive personal information

This is a particular category of personal information relating to topics such as confidential medical facts, racial or ethnic origins, political or religious beliefs, or sexuality.

## Server logs



Like most websites, our servers automatically record the page requests made when you visit our sites. These “server logs” typically include your web request, Internet Protocol address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser.

A typical log entry for a search for “cars” looks like this:

```
123.45.67.89 - 25/Mar/2003 10:15:32 -  
http://www.google.com/search?q=cars -  
Firefox 1.0.7; Windows NT 5.1 -  
740674ce2123e969
```

- `123.45.67.89` is the Internet Protocol address assigned to the user by the user’s ISP. Depending on the user’s service, a different address may be assigned to the user by their service provider each time they connect to the Internet.
- `25/Mar/2003 10:15:32` is the date and time of the query.
- `http://www.google.com/search?q=cars` is the requested URL, including the search query.
- `Firefox 1.0.7; Windows NT 5.1` is the browser and operating system being used.
- `740674ce2123a969` is the unique cookie ID assigned to this particular computer the first time it visited Google. (Cookies can be deleted by users. If the user has deleted the cookie from the computer since the last time they’ve visited Google, then it will be the unique cookie ID assigned to their device the next time they visit Google from that particular device).

## Unique identifiers

A unique identifier is a string of characters that can be used to uniquely identify a browser, app, or device.

Different identifiers vary in how permanent they are, whether they can be reset by users, and how they can be accessed.

Unique identifiers can be used for various purposes, including security and fraud detection, syncing services such as your email inbox, remembering your preferences, and providing personalized advertising. For example, unique identifiers stored in cookies help sites display content in your browser in your preferred language. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. Learn more about [how Google uses cookies](#).

On other platforms besides browsers, unique identifiers are used to recognize a specific device or app on that device. For example, a unique identifier such as the Advertising ID is used to provide relevant advertising on Android devices, and can be [managed](#) in your device's settings. Unique identifiers may also be incorporated into a device by its manufacturer (sometimes called a universally unique ID or UUID), such as the IMEI-number of a mobile phone. For example, a device's unique identifier can be used to customize our service to your device or analyze device issues related to our services.

## Additional Context

### ads you'll find most useful

For example, if you watch videos about baking on YouTube, you may see more ads that relate to baking as you browse the web. We also may use your IP address to determine your approximate location, so that we can serve you ads for a nearby pizza delivery service if you search for "pizza." Learn more [about Google ads](#) and [why you may see particular ads](#).

### advertising and research services on their behalf

For example, advertisers may upload data from their loyalty-card programs so that they can better understand the performance of their ad campaigns. We only provide aggregated reports to advertisers that don't reveal information about individual people.

### Android device with Google apps

Android devices with Google apps include devices sold by Google or one of our partners and include phones, cameras, vehicles, wearables, and televisions. These devices use Google Play Services and other pre-installed apps that include services like Gmail, Maps, your phone's camera and phone dialer, text-to-speech conversion, keyboard input, and security features.

### combine the information we collect

Some examples of how we combine the information we collect include:

- When you're signed in to your Google Account and search on Google, you can see search results from the public web, along with relevant information from the content you have in other Google products, like Gmail or Google Calendar. This can include things like the status of your upcoming flights, restaurant, and hotel reservations, or your photos. [Learn more](#)
- If you have communicated with someone via Gmail and want to add them to a Google Doc or an event in Google Calendar, Google makes it easy to do so by autocompleting their email address when you start to type in their name. This feature makes it easier to share things with people you know. [Learn more](#)
- The Google app can use data that you have stored in other Google products to show you personalized content, depending on your settings. For example, if you have searches stored in your Web & App Activity, the Google app can show you news articles and other information about your interests, like sports scores, based your activity. [Learn more](#)
- If you link your Google Account to your Google Home, you can manage your information and get things done through the Google Assistant. For example, you can add events to your Google Calendar or get your schedule for the day, ask for status updates on your upcoming flight, or send information like driving directions to your phone. [Learn more](#)

## customized search results

For example, when you're signed in to your Google Account and have the Web & App Activity control enabled, you can get more relevant search results that are based on your previous searches and activity from other Google services. You can [learn more here](#). You may also get customized search results even when you're signed out. If you don't want this level of search customization, you can [search and browse privately](#) or turn off [signed-out search personalization](#).

## deliver our services

Examples of how we use your information to deliver our services include:

- We use the IP address assigned to your device to send you the data you requested, such as loading a YouTube video
- We use unique identifiers stored in cookies on your device to help us authenticate you as the person who should have access to your Google Account

- Photos and videos you upload to Google Photos are used to help you create albums, animations, and other creations that you can share. [Learn more](#)
- A flight confirmation email you receive may be used to create a “check-in” button that appears in your Gmail
- When you purchase services or physical goods from us, you may provide us information like your shipping address or delivery instructions. We use this information for things like processing, fulfilling, and delivering your order, and to provide support in connection with the product or service you purchase.

## detect abuse

When we detect spam, malware, illegal content, and other forms of abuse on our systems in violation of our policies, we may disable your account or take other appropriate action. In certain circumstances, we may also report the violation to appropriate authorities.

## devices

For example, we can use information from your devices to help you decide which device you’d like to use to install an app or view a movie you buy from Google Play. We also use this information to help protect your account.

## ensure and improve

For example, we analyze how people interact with advertising to improve the performance of our ads.

## ensure our services are working as intended

For example, we continuously monitor our systems to look for problems. And if we find something wrong with a specific feature, reviewing activity information collected before the problem started allows us to fix things more quickly.

## Information about things near your device

If you use Google's Location services on Android, we can improve the performance of apps that rely on your location, like Google Maps. If you use Google's Location services, your device sends information to Google about its location, sensors (like accelerometer), and nearby cell towers and Wi-Fi access points (like MAC address and signal strength). All these things help to determine your location. You can use your device settings to enable Google Location services. [Learn more](#)

## legal process, or enforceable governmental request

Like other technology and communications companies, Google regularly receives requests from governments and courts around the world to disclose user data. Respect for the privacy and security of data you store with Google underpins our approach to complying with these legal requests. Our legal team reviews each and every request, regardless of type, and we frequently push back when a request appears to be overly broad or doesn't follow the correct process. Learn more in our [Transparency Report](#).

## make improvements

For example, we use cookies to analyze how people interact with our services. And that analysis can help us build better products. For example, it may help us discover that it's taking people too long to complete a certain task or that they have trouble finishing steps at all. We can then redesign that feature and improve the product for everyone.

## may link information

Google Analytics relies on first-party cookies, which means the cookies are set by the Google Analytics customer. Using our systems, data generated through Google Analytics can be linked by the Google Analytics customer and by Google to third-party cookies that are related to visits to other websites. For example, an advertiser may want to use its Google Analytics data to create more relevant ads, or to further analyze its traffic. [Learn more](#)

## partner with Google

There are over 2 million non-Google websites and apps that partner with Google to show ads. [Learn more](#)

## payment information

For example, if you add a credit card or other payment method to your Google Account, you can use it to buy things across our services, like apps in the Play Store. We may also ask for other information, like a business tax ID, to help process your payment. In some cases, we may also need to verify your identity and may ask you for information to do this.

We may also use payment information to verify that you meet age requirements, if, for example, you enter an incorrect birthday indicating you're not old enough to have a Google Account. [Learn more](#)

## personalized ads

You may also see personalized ads based on information from the advertiser. If you shopped on an advertiser's website, for example, they can use that visit information to show you ads. [Learn more](#)

## phone number

If you add your phone number to your account, it can be used for different purposes across Google services, depending on your settings. For example, your phone number can be used to help you access your account if you forget your password, help people find and connect with you, and make the ads you see more relevant to you. [Learn more](#)

## protect against abuse

For example, information about security threats can help us notify you if we think your account has been compromised (at which point we can help you take steps to protect your account).

## publicly accessible sources

For example, we may collect information that's publicly available online or from other public sources to help train Google's language models and build features like Google Translate.

## rely on cookies to function properly

For example, we use a cookie called 'lbc's' that makes it possible for you to open many Google Docs in one browser. Blocking this cookie would prevent Google Docs from working as expected. [Learn more](#)

## safety and reliability

Some examples of how we use your information to help keep our services safe and reliable include:

- Collecting and analyzing IP addresses and cookie data to protect against automated abuse. This abuse takes many forms, such as sending spam to Gmail users, stealing money from advertisers by fraudulently clicking on ads, or censoring content by launching a Distributed Denial of Service (DDoS) attack.
- The "last account activity" feature in Gmail can help you find out if and when someone accessed your email without your knowledge. This feature shows you information about recent activity in Gmail, such as the IP addresses that accessed your mail, the associated location, and the date and time of access. [Learn more](#)

## sensitive categories

When showing you personalized ads, we use topics that we think might be of interest to you based on your activity. For example, you may see ads for things like "Cooking and Recipes" or "Air Travel." **We don't use topics or show personalized ads based on sensitive categories like race, religion, sexual orientation, or health. And we require the same from advertisers that use our services.**

## Sensor data from your device

Your device may have sensors that can be used to better understand your location and movement. For example, an accelerometer can be used to determine your speed and a gyroscope to figure out your direction of travel.

## servers around the world

For example, we operate data centers located [around the world](#) to help keep our products continuously available for users.

## services to make and receive calls or send and receive messages

Examples of these services include:

- Google Voice, for making and receiving calls, sending text messages, and managing voicemail
- Google Meet, for making and receiving video calls
- Gmail, for sending and receiving emails
- Google Chat, for sending and receiving messages
- Google Duo, for making and receiving video calls and sending and receiving messages
- Google Fi, for a phone plan

## show trends

When lots of people start searching for something, it can provide useful information about particular trends at that time. Google Trends samples Google web searches to estimate the popularity of searches over a certain period of time and shares those results publicly in aggregated terms. [Learn more](#)

## specific Google services

For example, you can delete [your blog](#) from Blogger or [a Google Site you own](#) from Google Sites. You can also delete [reviews](#) you've left on apps, games, and other content in the Play Store.

## specific partners

For example, we allow YouTube creators and advertisers to work with measurement companies to learn about the audience of their YouTube videos or ads, using cookies or similar technologies. Another example is



merchants on our shopping pages, who use cookies to understand how many different people see their product listings. [Learn more](#) about these partners and how they use your information.

## synced with your Google Account

Your Chrome browsing history is only saved to your account if you've enabled Chrome synchronization with your Google Account. [Learn more](#)

## the people who matter most to you online

For example, when you type an address in the To, Cc, or Bcc field of an email you're composing, Gmail will suggest addresses based on the people you [contact most frequently](#).

## third parties

For example, we process your information to report use statistics to rights holders about how their content was used in our services. We may also process your information if people search for your name and we display search results for sites containing publicly available information about you.

## Views and interactions with content and ads

For example, we collect information about views and interactions with ads so we can provide aggregated reports to advertisers, like telling them whether we served their ad on a page and whether the ad was likely seen by a viewer. We may also measure other interactions, such as how you move your mouse over an ad or if you interact with the page on which the ad appears.

## your activity on other sites and apps

This activity might come from your use of Google services, like from syncing your account with Chrome or your visits to sites and apps that partner with Google. Many websites and apps partner with Google to improve their content and services. For example, a website might use our advertising services (like AdSense) or analytics tools (like Google Analytics), or it might embed other content (such as videos from YouTube). These services may share information about your activity with Google and, depending on your [account settings](#) and the

products in use (for instance, when a partner uses Google Analytics in conjunction with our advertising services), this data may be associated with your personal information.

[Learn more](#) about how Google uses data when you use our partners' sites or apps.

# **EXHIBIT 21**

## WHO ARE GOOGLE'S PARTNERS?

Google works with businesses and organizations in a variety of ways. We refer to these businesses and organizations as “partners”. For example, over 2 million non-Google websites and apps [partner with Google to show ads](#). Millions of developer partners publish their apps on Google Play. Other partners help Google with securing our services; information about security threats can help us notify you if we think your account has been compromised (at which point we can help you take steps to protect your account).

Note we also work with trusted businesses as “data processors” rather than partners, meaning they process information on our behalf, to support our services, based on our instructions and in compliance with our Privacy Policy and other appropriate confidentiality and security measures. The Google [Privacy Policy](#) has more information about how we use data processors.

## Information collected or received by Google’s advertising partners

Specific partners, listed below, can collect or receive non-personally identifiable information about your browser or device when you use Google sites and apps. These partners collect this information for advertising and ad measurement purposes, using their own cookies or similar technologies.

For example, we allow YouTube creators and advertisers to work with measurement companies to learn about the audience of their YouTube videos or ads, using cookies or similar technologies.

You can learn more about how these specific partners collect and use your information:

- [Nielsen](#)
- [comScore](#)
- [Integral Ad Science](#)
- [DoubleVerify](#)
- [Oracle Data Cloud](#)
- [Kantar](#)

- [RN SSI Group](#)

YouTube also allows advertisers and creators to serve advertisements directly, using their own ad serving technologies, outside of EEA countries.

Another example is merchants on our shopping pages who use cookies to understand how many different people see their product listings.

We don't share information that personally identifies you with our advertising partners, such as your name or email, unless you ask us to share it. For example, if you see an ad for a nearby flower shop and select the "tap to call" button, we'll connect your call and may share your phone number with the flower shop.

You can read more about the information Google collects, including from partners, in the [Privacy Policy](#).

# **EXHIBIT 22**

## Personalized advertising

Personalized advertising (formerly known as interest-based advertising) is a powerful tool that improves advertising relevance for users and increases ROI for advertisers. Because it works by employing online user data to target users with more relevant advertising content, it can provide an improved experience for users and advertisers alike.

We understand that when employing user behavior or interest data to provide more relevant ad content it's important to handle that information appropriately and to consider how targeting users with certain content categories impacts their overall experience.

Based on the nature of personalized ads and the sensitivities associated with user ad targeting, we've identified policy standards for all Google features using personalized advertising functionality. These standards do not replace our other advertising policies (for example, for [Google Ads](#) or [Shopping](#) ) and advertisers are still responsible for complying with all applicable advertising policies, in addition to Personalized advertising policies. Advertisers are also required to comply with our policies for [European Union user consent](#) , where applicable. Learn about [what happens if you violate our policies](#).

Our Personalized advertising policies represent a commitment to uphold the highest policy standards for both users and advertisers.

## Data collection and use in personalized advertising

These policies define how advertisers are allowed to collect user data and use it for personalized advertising. We take user privacy very seriously, and we also expect advertisers to respect user privacy. These policies apply in addition to the standard [Google Ads policies for data collection and use](#).

These data collection and use policies apply to advertisers using targeting features, including remarketing, affinity audiences, custom affinity audiences, in-market audiences, similar audiences, demographic and location targeting, and custom intent.

When using certain personalized advertising features, [additional requirements apply](#) . Google won't allow another advertiser to use your remarketing lists or similar audiences lists without your consent.

Additionally, you aren't allowed to do the following:

- ✘ Run ads that collect or contain personally identifiable information (PII), unless using an ad format provided by Google and designed for that purpose
  - **Examples:** Collecting email addresses, telephone numbers, or credit card numbers within the ad itself
- ✘ Imply knowledge of personally identifiable or sensitive information within the ad
- ✘ Use or associate PII with remarketing lists, cookies, data feeds, or other anonymous identifiers
- ✘ Share PII with Google through remarketing tags or any product data feeds that might be associated with ads
- ✘ Send Google precise location information without first obtaining users' consent
- ✘ Use a remarketing list that targets an overly narrow or specific audience. This includes the case where combining a remarketing list with other targeting criteria (such as geographic limitations or other user segmentation) results in an ad targeted to a relatively small number of users. Learn more about [remarketing list size requirements](#) .
- ✘ Use a remarketing list created via DoubleClick's remarketing feature (formerly known as Boomerang) or other remarketing list service for the purposes of Google Ads remarketing campaigns, unless the websites and apps from which those lists were compiled meet the requirements of this policy

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[Troubleshooter: Data collection and use in personalized advertising](#)

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### In-ad notices

Google may include in-ad notice labels to disclose personalized advertising to our users, and we may display to users which remarketing lists they're on, along with the corresponding domain name. You must not modify or obscure these notices. If you want to implement your own in-ad notice, it must only be done in compliance with relevant industry standards.

### Re-marketing

You can choose to disable the collection of personalized advertising data for users who do not wish to view personalized ads or for your own compliance reasons. You can modify the global site tag and [disable the collection of personalized advertising data](#) for particular users on your site, or choose to exclude all users from California in the Audience Manager section of your Google Ads account.

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## Personalized advertising policy principles

Advertisers can't use sensitive interest categories to target ads to users or to promote advertisers' products or services.

We define sensitive interest categories in terms of the following policy principles:

**Personal hardships:** Because we don't want ads to exploit the difficulties or struggles of users, we don't allow categories related to personal hardships.

**Identity and belief:** Because we want ads to reflect a user's interests rather than more personal interpretations of their fundamental identity, we don't allow categories related to identity and belief, some of which could also be used to stigmatize an individual.

**Sexual interests:** Because we understand that sexual experiences and interests are inherently private, we don't allow categories related to sexual interests.

**Access to opportunities:** Because we recognize that users impacted by societal biases may see fewer or different opportunities in ads, we don't allow some categories of products or services to be targeted to specific audiences.

The Personalized advertising policy principles apply to advertisers using one or more of the following features:

- remarketing
- affinity audiences
- custom affinity audiences
- custom intent audiences
- in-market audiences
- similar audiences
- demographic and location targeting
- Gmail ads: Personalized advertising policies apply to all Gmail ads, including Gmail ads that aren't targeted to users using keywords. See our [Gmail ad-specific policies](#).

## Prohibited categories

The following Personalized advertising policies cover categories that are legally or culturally sensitive and are not supported in personalized ads. [The following sensitive interest categories can't be used by advertisers to target ads to users or promote advertisers' products or services.](#)

### Alcohol in personalized advertising

- ✘ Alcoholic beverages and drinks that resemble alcoholic beverages

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[Troubleshooter: Alcohol in personalized advertising](#)

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### Gambling in personalized advertising

- ✘ Gambling, including online and offline gambling; online gambling-related information; online non-casino games played for money or prizes; and online casino-based games, regardless of whether money is exchanged

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[Troubleshooter: Gambling in personalized advertising](#)

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### Location-based gambling in personalized advertising

- ✘ Physical casinos that explicitly promote gambling

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[Troubleshooter: Location-based gambling in personalized advertising](#)

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## Clinical trial recruitment in personalized advertising

- ✘ Promotion of clinical trial recruitment

[Troubleshooter: Clinical trial recruitment in personalized advertising](#)

## Restricted drug terms in personalized advertising

- ✘ Prescription medications and information about prescription medications, unless the medication and any listed ingredients are only intended for animal use and are not prone to human abuse or other misuse. [Learn more](#)

[Troubleshooter: Restricted drug terms in personalized advertising](#)

## Users under 13 in personalized advertising

- ✘ Collecting personal information from children under 13 or targeting interest content to children under the age of 13

[Troubleshooter: Users under 13 in personalized advertising](#)

In addition, Google's [privacy policy](#) applies to all Google features and dictates how Google collects, uses, and protects user data.

## Personal hardships

We understand that users don't want to see ads that exploit their personal struggles, difficulties, and hardships, so we don't allow personalized advertising based on these hardships. Such personal hardships include health conditions, treatments, procedures, personal failings, struggles, or traumatic personal experiences. You also can't impose negativity on the user.

Advertisers can't use personal hardship categories to target ads to users or to promote advertisers' products or services. See below for specific examples of what we don't allow.

## Health in personalized advertising

- ✘ Personal health content, which includes:
  - Physical or mental health conditions, including diseases, sexual health, and chronic health conditions, which are health conditions that require long-term care or management.
  - Products, services, or procedures to treat or manage chronic health conditions, which includes over-the-counter medications and medical devices.
  - Any health issues associated with intimate body parts or functions, which includes genital, bowel, or urinary health.
  - Invasive medical procedures, which includes cosmetic surgery.
  - Disabilities, even when content is oriented toward the user's primary caretaker.

**Examples:** Treatments for chronic health conditions like diabetes or arthritis, treatments for sexually transmitted diseases, counseling services for mental health issues like depression or anxiety, medical devices for sleep apnea like CPAP machines, over-the-counter medications for yeast infections, information about how to support your autistic child

[Troubleshooter: Health in personalized advertising](#)

## Negative financial status in personalized advertising

- ✘ Personal financial distress, difficulties, or deprivation

- **Examples:** bankruptcy services, welfare services, homeless shelters, unemployment resources, predatory lending products and services

[Troubleshooter: Negative financial status in personalized advertising](#)

### Relationships in personalized advertising

- ✘ **Personal hardships with family, friends, or other interpersonal relationships**
  - **Examples:** divorce services, books about coping with divorce, bereavement products or services, family counseling services

[Troubleshooter: Relationships in personalized advertising](#)

### Commission of a crime in personalized advertising

- ✘ **Personal criminal record, crimes committed, criminal allegations, or criminal charges**
  - **Examples:** bail bonds services, criminal defense lawyers

[Troubleshooter: Commission of a crime in personalized advertising](#)

### Abuse and trauma in personalized advertising

- ✘ **Personal status as a victim of abuse, crime, or other traumatic event**
  - **Examples:** domestic abuse shelters, victim advocate services

[Troubleshooter: Abuse and trauma in personalized advertising](#)

### Imposing negativity in personalized advertising

- ✘ **Imposing negativity on the user or using a negative perspective or bias to promote any content category**
  - **Examples:** body shaming, negativity related to physical attributes or social interactions, suggesting negative outcomes for users if they don't take specific actions

[Troubleshooter: Imposing negativity in personalized advertising](#)

## Identity and belief

We consider identity and belief systems to be deeply personal and complex. They're highly dependent on diversity of cultural norms, geography, history, and personal life experiences. We also understand that how one identifies or what one believes can be used to segment users based on judgments or stigmas.

We want ads to provide a positive experience and to be informed by users' interests rather than by who they're perceived to be as a person, so we don't allow personalized advertising based on a user's fundamental or intrinsic self-identity or their belief systems. Such identities and beliefs can include inherently private classifications of one's self; classifications susceptible to stigmas, discrimination, or harassment; membership within groups that are susceptible to stigmas, discrimination, or prejudices; and personally held belief systems.

Advertisers can't use identity and belief categories to target ads to users or to promote advertisers' products or services. See below for specific examples of what we don't allow.

### Sexual orientation in personalized advertising

- ✘ **Sexual orientation, including lesbian, gay, bisexual, questioning, or heterosexual orientation**

- **Examples:** information about revealing your homosexuality, gay dating, gay travel, information about bisexuality

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[Troubleshooter: Sexual orientation in personalized advertising](#)

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## Political affiliation in personalized advertising

This Personalized advertising policy does not apply to Gmail ads. See the policy below for political content in Gmail ads.

### ✘ Political affiliation

- **Examples:** political ideologies, political opinions, political parties, political organizations, political campaigns, engagement in political discourse

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[Troubleshooter: Political affiliation in personalized advertising](#)

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## Political content in personalized advertising

This Personalized advertising policy applies only to Gmail ads.

### ✘ Politics, including political figures, political campaigns, and political issue advocacy

- **Examples:** local political ballot measures, political opinion blogs, political party information, political engagement

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[Troubleshooter: Political content in personalized advertising](#)

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## Trade union membership in personalized advertising

### ✘ Trade unions and ads that imply knowledge of a user's trade union membership

- **Examples:** trade union sites, information oriented toward members of trade unions, trade union blogs, and trade union support for work disputes

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[Troubleshooter: Trade union membership in personalized advertising](#)

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## Race and ethnicity in personalized advertising

### ✘ Personal race or ethnicity

- **Examples:** racially or ethnically oriented publications, racially or ethnically oriented universities, racial or ethnic dating

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[Troubleshooter: Race and ethnicity in personalized advertising](#)

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## Religious belief in personalized advertising

### ✘ Personal religious beliefs

- **Examples:** places of worship, religious guidance, religious education or universities, religious products

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[Troubleshooter: Religious belief in personalized advertising](#)

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## Marginalized groups in personalized advertising

### ✘ Membership in a marginalized or vulnerable social group, such as social castes, immigrants or refugees

- **Examples:** products oriented toward users based on social caste, services for immigrants, legal services for refugees

[Troubleshooter: Marginalized groups in personalized advertising](#)

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## Transgender identification in personalized advertising

✘ Personal identification with a gender different from the gender assigned at birth, or a gender which does not conform to singular male or female identification

- **Examples:** information about gender transitioning, transgender discrimination lawyers

[Troubleshooter: Transgender identification in personalized advertising](#)

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## Sexual interests

We understand that sexual interests are inherently private and, depending on cultural norms, not often candidly discussed. We believe in maintaining the privacy of a user's sexual interests, so we don't allow personalized advertising that targets users based on their personal sexual interests, experiences, activities, or preferences. Such interests include sexual behaviors, activities, or products used when having sex. Additionally, we don't allow categories that are sexually suggestive or intended to sexually arouse.

Advertisers can't use sexual interest categories to target ads to users or to promote advertisers' products or services. See below for specific examples of what we don't allow.

## Partial nudity in personalized advertising

✘ Images or representations of people that display partially exposed sexual body parts such as breasts, genitals, or buttocks

- **Examples:** images of thongs worn by live models, images of pasties worn by live models

[Troubleshooter: Partial nudity in personalized advertising](#)

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## Birth control in personalized advertising

✘ Devices intended to prevent pregnancy or sexually transmitted diseases

- **Examples:** condoms, oral contraceptive pill, contraceptive sponge

[Troubleshooter: Birth control in personalized advertising](#)

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## Non-family safe and Adult content

We don't allow advertisers to use [Non-family safe](#) or [Adult](#) content to create personalized ads.

If the Adult content policy and the Personalized advertising sexual interests policy differ on how each treats a category, the Personalized advertising sexual interests policy takes precedence over the Adult content policy with respect to how the category can be used for targeting and ad content.

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## Access to opportunities

We believe access to social and economic opportunities is fundamental for individual well-being, social status and quality of life. We also recognize that historic discrimination and societal biases have resulted in some segments of society having unequal access to these opportunities.

Therefore, in an effort to improve inclusivity for users disproportionately affected by society's biases, we don't allow some categories of products or services to be targeted to specific audiences. This is in addition

to existing ads policies that prohibit discrimination and personalized ads policies that prohibit use of Identity and Belief categories. See below for specific examples of what we don't allow.

## Countries: United States, Canada

In the United States and Canada, the following categories of products or services cannot be targeted to audiences based on gender, age, parental status, marital status, or ZIP code.

### Housing in personalized ads

✘ Homes for sale or rental, where a home is defined as a place a person would reside. This includes products or services enabling the sale or rental of homes.

- **Examples:** housing listing sites, individual houses for sale or rental, real estate services

### Employment in personalized ads

✘ Employment opportunities or hiring a person for a job.\*

- **Examples:** ads for jobs, job recruitment sites, job listing sites

\*A subset of predetermined U.S. government advertisers promoting employment in personalized ads are permitted to target restricted audiences under specific conditions. If the targeting is based on a bona fide occupational qualification for a government job, which is defined under U.S. law as a qualification that is reasonably necessary for normal function of the job, these identified U.S. government advertisers may target restricted audiences.

### Credit in personalized ads

✘ Offers of credit or products or services related to credit lending.

- **Examples:** credit cards, loans including home loans, car loans, appliance loans, short-term loans

## Need help?

If you have questions about our policies, let us know: [Contact Google Ads Support](#)

# **EXHIBIT 23**

## We do not sell your personal information to anyone.

[safety.google/intl/en\\_ca/privacy/ads-and-data](https://safety.google/intl/en_ca/privacy/ads-and-data)



We use data to serve you relevant ads in Google products, on partner websites and in mobile apps. While these ads help fund our services and make them free for everyone, your personal information is not for sale. And we also provide you powerful ad settings so that you can better control what ads you see.

### Understanding how Google ads work

We use data to make our services more useful and to show relevant advertising, which helps make our services free for everyone. Without identifying you personally to advertisers or other third parties, we might use data that includes your searches and location, websites and apps that you've used, videos and ads that you've seen, and basic information that you've given us, such as your age range and gender.

Depending on your Ad Settings and if you're signed in, this data informs the ads that you see across your devices and across sites that partner with us to show ads. So if you visit a travel website on your computer at work, you might see other ads served by Google about airfares to Paris on your phone later that night.

We want to be transparent about how we make money with advertising, both on our services and on sites and apps that partner with us. For some types of ads, advertisers pay us only for the placement of those ads, and for other types, they pay us for how those ads actually perform. That could include each time someone views or taps an ad or takes an action such as downloading an app or filling in a request form.

We give advertisers data about their ads' performance, but we do so without revealing any of your personal information. At every point in the process of showing you ads, we keep your personal information protected and private.

### Giving you control over your Google ad experience

In Ad Settings, we make it easy to control what data we use to personalise ads to you. This includes information that you've added to your Google account, what we've guessed about your interests thanks to your activity, and interactions with other advertisers that partner with us to show ads.

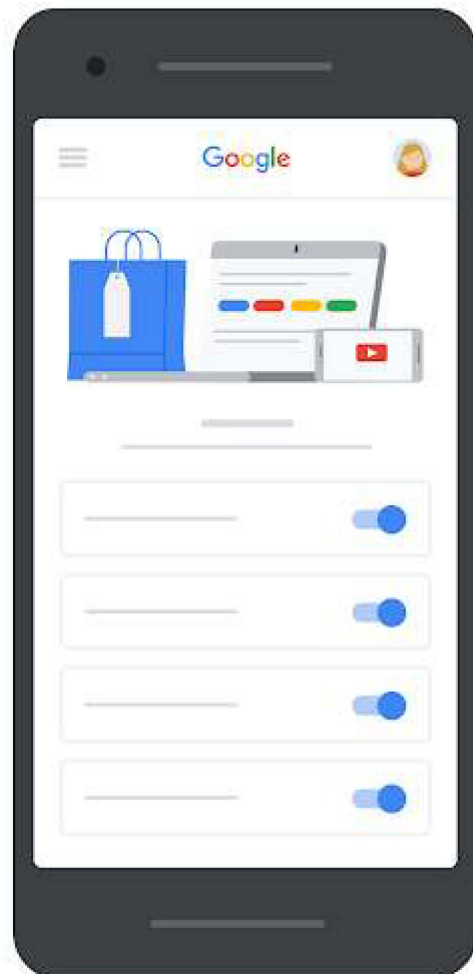
Your activity influences what we show you, but you're always in control. For example, we may think that you're a football fan because you watched highlights from a recent match on YouTube, or looked up 'football fields near me' on Google Search. And if you've spent time on a partner advertiser's site, we may suggest ads based on that visit.

When ad personalisation is on, you can choose any info – age and gender, an inferred interest or a previous interaction with an advertiser – find out more about why it's being used, turn it off or deactivate personalised ads altogether. You'll still see ads, but they'll most likely be less relevant.

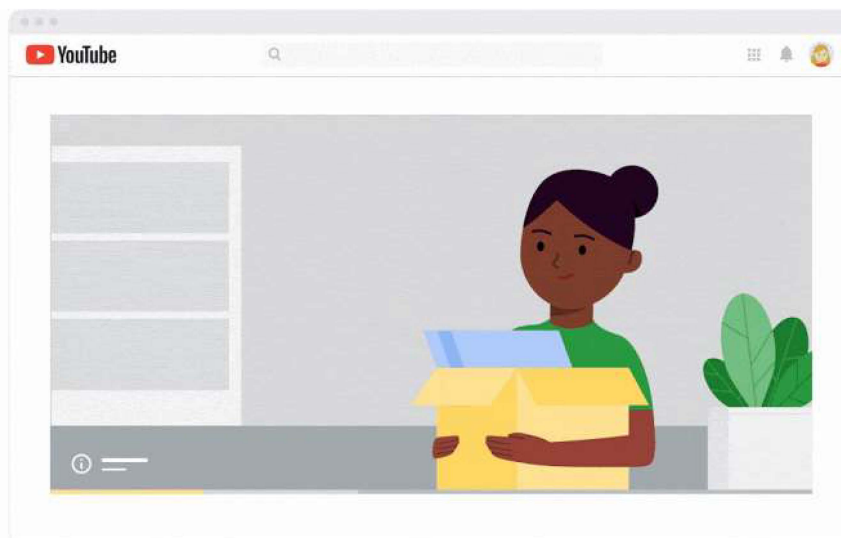
### Go to Ad Settings

We want to help you better understand the data that we use to show you ads. 'Why this ad' is a feature that helps you find out why you are seeing a given ad. For example, you might be seeing that ad for a camera because you've searched for cameras, visited photography websites or clicked on ads for cameras before. Or if you see an ad for a restaurant, you may discover that it's because of your location or your mobile app activity. This type of data helps us show you ads about things that you might find useful. But remember, we never share any of this personal information with advertisers.

You can access this feature through an information icon on our services, such as Search, YouTube, Gmail, Play and Shopping. For most ads that you see on partner sites or in apps that use our services, you can access 'Why this ad' through a similar icon.





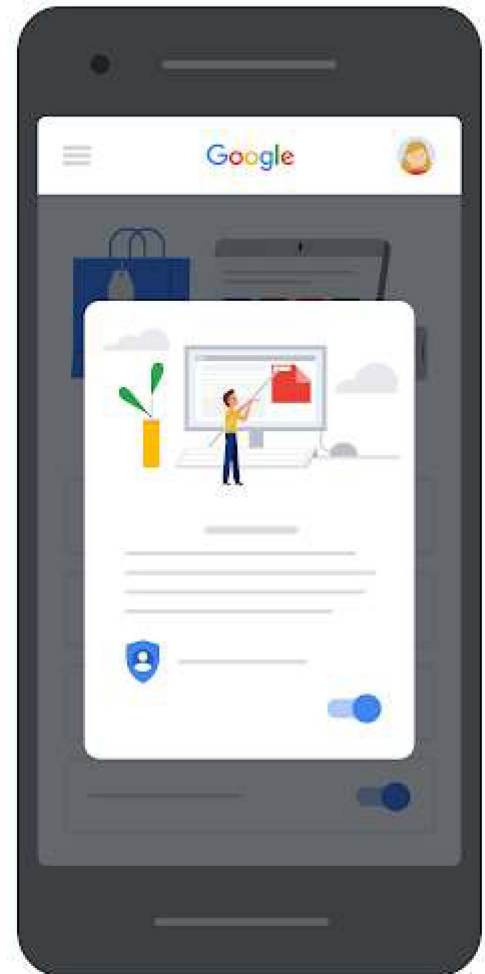


You can remove many of the ads that we show through our partner websites and apps when you see them. By selecting the X in the corner of the ad, you can remove ads that you no longer find relevant. For example, car ads might have been helpful while you were interested in buying a new car, but once you are happily cruising in your new vehicle, you probably don't want to see more ads from Google for that car that you just bought.

If you are signed in and depending on your Ad Settings, this control will take effect across your signed-in devices on websites and apps that partner with us. You also have the option to turn off pop-up ads in Chrome and most other browsers.

You have control over your ads experience, both on Google products and across the Internet. Sometimes, advertisers show you ads when you've visited their sites and they are encouraging you to come back – like when you see an ad for the shoes that you were shopping for earlier. If you no longer want to see them for any reason, you can turn off those ads from a certain advertiser that follow you across our Google properties from Search, YouTube and Gmail. This setting also applies to ads that you see across the Internet on sites and apps that partner with us to show ads.

While signed in and in your Ad Settings, you can also turn off ads from specific advertisers on Google services that show ads.



## Using data to make ads more useful to you

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When you use Google Search, ads may appear along with relevant search results. Most of the time, these ads are prompted by the search that you just did and your location. For example, if you search for 'bikes', you might see ads for bicycles on sale near you.

In other cases, we use additional data like your past searches or sites that you have visited to help deliver more useful ads. Since you have already searched for 'bikes', if you now search for 'holidays' you might see Search ads for places to go cycling while on holiday.

The ads that you see in Gmail are based on data associated with your Google account. For example, your activity in other Google services such as YouTube or Search could affect the types of ads that you see in Gmail. Google does not use keywords or messages in your inbox to show you ads. Nobody reads your email in order to show you ads.



You can find millions of apps from Google and other developers in our Google Play Store. When you browse on an Android device, ads may appear based on your search terms, apps that you've installed or used, or an app's similarity to the app that you're using. For example, if you search for 'travel apps', you might see an ad for a trip planning app.



When you watch videos on YouTube, you may see ads playing beforehand on the video page or as related videos on the homepage. Ads may be based on data such as the videos that you've watched, things or places that you've searched for or apps that you use.



For example, if you search for 'home decor' or watch do-it-yourself videos, you might see an ad for a home improvement series. These ads help support the creators of the videos that you watch.

You can skip many of the YouTube ads if you don't want to watch them or you can subscribe to YouTube Premium to enjoy ad-free YouTube.

When you look for a product on Google Search, sometimes we show Shopping ads along with relevant search results. Businesses that sell products use Shopping ads to make it easy for you to quickly find what you're looking for and buy it online or in a nearby shop. These ads are based on the product that you just searched for, your location and online retailers that you've browsed in the past.



For example, if you search for 'leather sofa', you may see ads with pictures, prices and shop locations for leather sofas on sale at furniture shops near you.

Many websites and mobile apps partner with us to show ads.

When we show ads on these partners' sites and apps, they are based on what you're reading or watching, audience 'types' based on personal information that our users have shared with us, and data that we collect about your online activities, for instance, '35- to 44-year-old females who are interested in travel'.



We might also show you ads based on sites that you've visited or your Chrome browsing activity when logged into your Google account. For example, you might see an ad for those hiking shoes that you added to your online shopping basket but decided not to buy. However, we do this without revealing any personal information, such as your name, email address or billing information.



# **EXHIBIT 24**

[safety.google](https://safety.google)

# Data Practices & Transparency - Google Safety Center

6-8 minutes

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**Your privacy is protected by  
responsible data practices.**

Data plays an important role in making the products and services you use every day more helpful. We are committed to treating that data responsibly and protecting your privacy with strict protocols and innovative privacy technologies.

## **DATA MINIMIZATION**

**Limiting the personal information that is used**

## and saved

We believe that products should keep your information for only as long as it's useful and helpful to you – whether that's being able to find your favorite destinations in Maps or getting recommendations for what to watch on YouTube.

The first time you turn on Location History – which is off by default – your auto-delete option will be set to 18 months by default. Web & App Activity auto-delete will also default to 18 months for new accounts. This means your activity data will be automatically and continuously deleted after 18 months, rather than kept until you choose to delete it. You can always turn these settings off or change your auto-delete setting at any time.

[Learn more](#)

## BLOCKING ACCESS

**We never sell your personal information, and give you controls over who has access**

We are committed to protecting your data from third parties. That's why it's our strict policy to never sell your personal information to anyone.

We don't share information that personally identifies you with advertisers, such as your name

or email, unless you ask us to. For example, if you see an ad for a nearby flower shop and select the “tap to call” button, we’ll connect your call and may share your phone number with the flower shop. If you’re using an Android device, we require third-party apps to ask for your permission to access certain types of data – like your photos, contacts, or location.

[Learn more in our Privacy Policy](#)

## PRIVACY INNOVATION

**Advanced privacy technologies help keep your personal information private**

We are continuously innovating new technologies that protect your private information without impacting your experiences on our products.

Federated learning is a data minimization technology pioneered at Google that trains the machine learning models powering many of our helpful features, like word predictions, right on your device. This new approach helps preserve your privacy by delivering helpful experiences across our products while keeping your personal information on your devices.

We use leading anonymization techniques to



protect your data while making our services work better for you. For example, we aggregate and anonymize data from millions of users to suggest alternate routes that can get you home faster.

To offer features like place busyness in Maps, we apply an advanced anonymization technology called differential privacy that adds noise to your information so it can't be used to personally identify you.

Strict privacy protocols are followed throughout every product's development

Privacy is core to how we build our products, with rigorous privacy standards guiding every stage of product development. Each product and feature adheres to these privacy standards, which are implemented through comprehensive privacy reviews. Learn more in our [Privacy Policy](#).

## **DATA TRANSPARENCY**

### **Making it easy to view and delete your data**

How you use our products and services is a personal choice that's up to you. To help you make informed decisions about what data to save, share or delete, we make it easy to understand what data is being collected and why.

For example, with Dashboard, you can see an overview of the Google products you use and the things you store like your emails and photos. And with My Activity, it's easy to see or delete data collected from your activity across Google services, including things you've searched, viewed, and watched.

[Go to your Google Account](#)

## **DATA PORTABILITY**

### **Empowering you to take your data with you**

Every user should have access to the content they've shared with us – anytime and for any reason. That's why we created Download Your Data – so you can download your photos, emails, contacts, and bookmarks. It's your choice to make a copy of your data, back it up, or even move it to another service.

You are always in control of the data saved to your Google Account. Learn more [here](#).

[Go to Download Your Data](#)

We are committed to complying with applicable data protection laws

We are always working to stay compliant with

applicable privacy regulations. Over the years, we have worked closely with data protection authorities around the world and have implemented strong privacy protections that reflect their guidance. And we continue to invest significantly to upgrade our systems and policies as privacy laws are enacted around the world.

[Learn more](#)



Explore more ways we keep you safe online.



[Built-in security](#)

[Learn more about our automatic security protections.](#)



[Privacy controls](#)

[Choose the privacy settings that are right for you.](#)



[Security tips](#)

[Discover quick tips and best practices to stay safe online.](#)



[Ads and data](#)

[Learn more about the ads you see on our platforms.](#)

# **EXHIBIT 25**

# Google's Sundar Pichai: Privacy Should Not Be a Luxury Good

Yes, we use data to make products more helpful for everyone. But we also protect your information.

By Sundar Pichai

Mr. Pichai is the chief executive of Google.

May 7, 2019

MOUNTAIN VIEW, Calif. — Google products are designed to be helpful. They take the friction out of daily life (for example, by showing you the fastest route home at the end of a long day) and give you back time to spend on things you actually want to do. We feel privileged that billions of people trust products like Search, Chrome, Maps and Android to help them every day.

It's a trust we match with a profound commitment to responsibility and a healthy dose of humility. Many words have been written about privacy over the past year, including in these pages. I believe it's one of the most important topics of our time.

People today are rightly concerned about how their information is used and shared, yet they all define privacy in their own ways. I've seen this firsthand as I talk to people in different parts of the world. To the families using the internet through a shared device, privacy might mean privacy from one another. To the small-business owner who wants to start accepting credit card payments, privacy means keeping customer data secure. To the teenager sharing selfies, privacy could mean the ability to delete that data in the future.

Privacy is personal, which makes it even more vital for companies to give people clear, individual choices around how their data is used. Over the past 20 years, billions of people have trusted Google with questions they wouldn't have asked their closest friends: How do you know if you're in love? Why isn't my baby sleeping? What is this weird rash on my arm? We've worked hard to continually earn that trust by providing accurate answers and keeping your questions private. We've stayed focused on the products and features that make privacy a reality — for everyone.

“For everyone” is a core philosophy for Google; it's built into our mission to create products that are universally accessible and useful. That's why Search works the same for everyone, whether you're a professor at Harvard or a student in rural Indonesia. And it's why we care just as much about the experience on low-cost phones in countries starting to come online as we do about the experience on high-end phones.

Our mission compels us to take the same approach to privacy. For us, that means privacy cannot be a luxury good offered only to people who can afford to buy premium products and services. Privacy must be equally available to everyone in the world.

Even in cases where we offer a paid product like YouTube Premium, which includes an ads-free experience, the regular version of YouTube has plenty of privacy controls built in. For example, we recently brought Incognito mode, the popular feature in Chrome that lets you browse the web without linking any activity to you, to YouTube. You can view YouTube as a logged-in user or in Incognito mode.

To make privacy real, we give you clear, meaningful choices around your data. All while staying true to two unequivocal policies: that Google will never sell any personal information to third parties; and that you get to decide how your information is used. Here's how it works:

First, data makes the products and services you use more helpful to you. It's what enables the Google Assistant to book a rental car for your trip, Maps to tell you how to navigate home and Photos to share vacation pictures with a click of a button.

Second, products use anonymous data in aggregate to be more helpful to everyone. Traffic data in Google Maps reduces gridlock by offering people alternate routes. Queries in Google Translate make translations more accurate for billions of people. Anonymized searches over time help Search understand your questions, even if you misspell them.

Third, a small subset of data helps serve ads that are relevant and that provide the revenue that keeps Google products free and accessible. That revenue also sustains a broad community of content creators, which in turn helps keep content on the web free for everyone. The data used in ads could be based on, for example, something you searched for or an online store you browsed in the past. It does not include the personal data in apps such as Docs or Gmail. Still, if receiving a customized ads experience isn't helpful, you can turn it off. The choice is yours and we try to make it simple.

Eight years ago, we introduced an easy way to export all your data from Google services — and even take it elsewhere. A few years later, we created the Google Account page as a place to review and adjust all of your privacy controls. Nearly 20 million people now visit it every day. But we know our work here is never done, and we want to do more to stay ahead of user expectations.

Last week, we announced significant new privacy features, including one-click access to privacy settings from all our major products and auto-delete controls that allow you to choose how long you want data to be saved. And to protect your data from security threats, we just introduced a security key built into Android phones that can provide two-factor authentication.

*[Technology has made our lives easier. But it also means that your data is no longer your own. We'll examine who is hoarding your information — and give you a guide for what you can do about it. Sign up for our limited-run newsletter.]*

We're also working hard to challenge the assumption that products need more data to be more helpful. Data minimization is an important privacy principle for us, and we're encouraged by advances developed by Google A.I. researchers called "federated learning." It allows Google's products to work better for everyone without collecting raw data from your device. Federated learning is how Google's Keyboard can recognize and suggest new words like "YOLO" and "BTS" after thousands of people begin typing them — without Google ever seeing anything you type. In the future, A.I. will provide even more ways to make products more helpful with less data.

Even as we make privacy and security advances in our own products, we know the kind of privacy we all want as individuals relies on the collaboration and support of many institutions, like legislative bodies and consumer organizations.

Europe raised the bar for privacy laws around the world when it enacted the General Data Protection Regulation. We think the United States would benefit from adopting its own comprehensive privacy legislation and have urged Congress to pass a federal law. Ideally, privacy legislation would require all businesses to accept responsibility for the impact of their data processing in a way that creates consistent and universal protections for individuals and society as a whole.

Legislation will help us work toward ensuring that privacy protections are available to more people around the world. But we're not waiting for it. We have a responsibility to lead. And we'll do so in the same spirit we always have, by offering products that make privacy a reality for everyone.

Sundar Pichai is the chief executive of Google.

*Follow @privacyproject on Twitter and The New York Times Opinion Section on Facebook and Instagram.*

# **EXHIBIT 26**



## Google AdWords API: VERTICALS

<https://developers.google.com/adwords/api/docs/appendix/verticals> (last visited Mar. 24, 2021)

"This page lists verticals for targeting or excluding categories of placements."

(Highlights added by counsel.)

Criterion ID	Parent ID	Category
3	0	/Arts & Entertainment
184	3	/Arts & Entertainment/Celebrities & Entertainment News
316	3	/Arts & Entertainment/Comics & Animation
317	316	/Arts & Entertainment/Comics & Animation/Anime & Manga
319	316	/Arts & Entertainment/Comics & Animation/Cartoons
318	316	/Arts & Entertainment/Comics & Animation/Comics
612	3	/Arts & Entertainment/Entertainment Industry
1116	612	/Arts & Entertainment/Entertainment Industry/Film & TV Industry
1108	1116	/Arts & Entertainment/Entertainment Industry/Film & TV Industry/Film & TV Awards
1117	1116	/Arts & Entertainment/Entertainment Industry/Film & TV Industry/Film & TV Production
1115	612	/Arts & Entertainment/Entertainment Industry/Recording Industry
1113	1115	/Arts & Entertainment/Entertainment Industry/Recording Industry/Music Awards
1114	1115	/Arts & Entertainment/Entertainment Industry/Recording Industry/Record Labels
569	3	/Arts & Entertainment/Events & Listings
188	569	/Arts & Entertainment/Events & Listings/Bars, Clubs & Nightlife
891	569	/Arts & Entertainment/Events & Listings/Concerts & Music Festivals
614	569	/Arts & Entertainment/Events & Listings/Event Ticket Sales
1531	569	/Arts & Entertainment/Events & Listings/Expos & Conventions
1086	569	/Arts & Entertainment/Events & Listings/Film Festivals
1530	569	/Arts & Entertainment/Events & Listings/Food & Beverage Events
1273	569	/Arts & Entertainment/Events & Listings/Live Sporting Events
1085	569	/Arts & Entertainment/Events & Listings/Movie Listings & Theater Showtimes
539	3	/Arts & Entertainment/Fun & Trivia
447	539	/Arts & Entertainment/Fun & Trivia/Flash-Based Entertainment
1174	539	/Arts & Entertainment/Fun & Trivia/Fun Tests & Silly Surveys
182	3	/Arts & Entertainment/Humor
1779	182	/Arts & Entertainment/Humor/Funny Pictures & Videos
895	182	/Arts & Entertainment/Humor/Live Comedy
1180	182	/Arts & Entertainment/Humor/Political Humor
1244	182	/Arts & Entertainment/Humor/Spoofs & Satire
34	3	/Arts & Entertainment/Movies
1097	34	/Arts & Entertainment/Movies/Action & Adventure Films
1101	1097	/Arts & Entertainment/Movies/Action & Adventure Films/Martial Arts Films
1100	1097	/Arts & Entertainment/Movies/Action & Adventure Films/Superhero Films
1099	1097	/Arts & Entertainment/Movies/Action & Adventure Films/Western Films
1104	34	/Arts & Entertainment/Movies/Animated Films
360	34	/Arts & Entertainment/Movies/Bollywood & South Asian Film
1102	34	/Arts & Entertainment/Movies/Classic Films
1098	1102	/Arts & Entertainment/Movies/Classic Films/Silent Films
1095	34	/Arts & Entertainment/Movies/Comedy Films
1103	34	/Arts & Entertainment/Movies/Cult & Indie Films
210	34	/Arts & Entertainment/Movies/DVD & Video Shopping
1145	210	/Arts & Entertainment/Movies/DVD & Video Shopping/DVD & Video Rentals
1072	34	/Arts & Entertainment/Movies/Documentary Films
1094	34	/Arts & Entertainment/Movies/Drama Films
1291	34	/Arts & Entertainment/Movies/Family Films
615	34	/Arts & Entertainment/Movies/Horror Films
213	34	/Arts & Entertainment/Movies/Movie Memorabilia
1106	34	/Arts & Entertainment/Movies/Movie Reference
1107	1106	/Arts & Entertainment/Movies/Movie Reference/Movie Reviews & Previews
1105	34	/Arts & Entertainment/Movies/Musical Films
1310	34	/Arts & Entertainment/Movies/Romance Films
616	34	/Arts & Entertainment/Movies/Science Fiction & Fantasy Films

1096	34	/Arts & Entertainment/Movies/Thriller, Crime & Mystery Films
35	3	/Arts & Entertainment/Music & Audio
217	35	/Arts & Entertainment/Music & Audio/CD & Audio Shopping
586	35	/Arts & Entertainment/Music & Audio/Classical Music
587	35	/Arts & Entertainment/Music & Audio/Country Music
588	35	/Arts & Entertainment/Music & Audio/Dance & Electronic Music
1022	35	/Arts & Entertainment/Music & Audio/Experimental & Industrial Music
1023	35	/Arts & Entertainment/Music & Audio/Folk & Traditional Music
589	35	/Arts & Entertainment/Music & Audio/Jazz & Blues
1040	589	/Arts & Entertainment/Music & Audio/Jazz & Blues/Blues
42	589	/Arts & Entertainment/Music & Audio/Jazz & Blues/Jazz
218	35	/Arts & Entertainment/Music & Audio/Music Art & Memorabilia
1087	35	/Arts & Entertainment/Music & Audio/Music Education & Instruction
1024	35	/Arts & Entertainment/Music & Audio/Music Equipment & Technology
1025	1024	/Arts & Entertainment/Music & Audio/Music Equipment & Technology/DJ Resources & Equipment
1026	1024	/Arts & Entertainment/Music & Audio/Music Equipment & Technology/Music Recording Technology
216	1024	/Arts & Entertainment/Music & Audio/Music Equipment & Technology/Musical Instruments
1327	216	/Arts & Entertainment/Music & Audio/Music Equipment & Technology/Musical Instruments/Drums & Percussion
1325	216	/Arts & Entertainment/Music & Audio/Music Equipment & Technology/Musical Instruments/Guitars
1326	216	/Arts & Entertainment/Music & Audio/Music Equipment & Technology/Musical Instruments/Pianos & Keyboards
1091	1024	/Arts & Entertainment/Music & Audio/Music Equipment & Technology/Samples & Sound Libraries
1027	35	/Arts & Entertainment/Music & Audio/Music Reference
1028	1027	/Arts & Entertainment/Music & Audio/Music Reference/Music Composition & Theory
892	1027	/Arts & Entertainment/Music & Audio/Music Reference/Sheet Music
617	1027	/Arts & Entertainment/Music & Audio/Music Reference/Song Lyrics & Tabs
220	35	/Arts & Entertainment/Music & Audio/Music Streams & Downloads
1408	35	/Arts & Entertainment/Music & Audio/Music Videos
809	35	/Arts & Entertainment/Music & Audio/Podcasts
1021	35	/Arts & Entertainment/Music & Audio/Pop Music
215	35	/Arts & Entertainment/Music & Audio/Radio
1186	215	/Arts & Entertainment/Music & Audio/Radio/Talk Radio
1020	35	/Arts & Entertainment/Music & Audio/Religious Music
585	1020	/Arts & Entertainment/Music & Audio/Religious Music/Christian & Gospel Music
590	35	/Arts & Entertainment/Music & Audio/Rock Music
1037	590	/Arts & Entertainment/Music & Audio/Rock Music/Classic Rock & Oldies
1035	590	/Arts & Entertainment/Music & Audio/Rock Music/Hard Rock & Progressive
1038	590	/Arts & Entertainment/Music & Audio/Rock Music/Indie & Alternative Music
1036	590	/Arts & Entertainment/Music & Audio/Rock Music/Metal (Music)
1041	590	/Arts & Entertainment/Music & Audio/Rock Music/Punk (Music)
893	35	/Arts & Entertainment/Music & Audio/Soundtracks
592	35	/Arts & Entertainment/Music & Audio/Urban & Hip-Hop
1030	592	/Arts & Entertainment/Music & Audio/Urban & Hip-Hop/Rap & Hip-Hop
1242	592	/Arts & Entertainment/Music & Audio/Urban & Hip-Hop/Reggaeton
1039	592	/Arts & Entertainment/Music & Audio/Urban & Hip-Hop/Soul & R&B
618	35	/Arts & Entertainment/Music & Audio/Vocals & Show Tunes
593	35	/Arts & Entertainment/Music & Audio/World Music
1208	593	/Arts & Entertainment/Music & Audio/World Music/African Music
1034	593	/Arts & Entertainment/Music & Audio/World Music/Arab & Middle Eastern Music
1033	593	/Arts & Entertainment/Music & Audio/World Music/East Asian Music
591	593	/Arts & Entertainment/Music & Audio/World Music/Latin American Music
1287	591	/Arts & Entertainment/Music & Audio/World Music/Latin American Music/Brazilian Music
1285	591	/Arts & Entertainment/Music & Audio/World Music/Latin American Music/Latin Pop
1286	591	/Arts & Entertainment/Music & Audio/World Music/Latin American Music/Salsa & Tropical Music
1031	593	/Arts & Entertainment/Music & Audio/World Music/Reggae & Caribbean Music
1032	593	/Arts & Entertainment/Music & Audio/World Music/South Asian Music
1806	593	/Arts & Entertainment/Music & Audio/World Music/Southeast Asian Music
33	3	/Arts & Entertainment/Offbeat
538	33	/Arts & Entertainment/Offbeat/Edgy & Bizarre
449	33	/Arts & Entertainment/Offbeat/Occult & Paranormal

613	3	/Arts & Entertainment/Online Media
1222	613	/Arts & Entertainment/Online Media/Online Image Galleries
575	613	/Arts & Entertainment/Online Media/Virtual Tours
23	3	/Arts & Entertainment/Performing Arts
894	23	/Arts & Entertainment/Performing Arts/Acting & Theater
1243	23	/Arts & Entertainment/Performing Arts/Broadway & Musical Theater
1591	23	/Arts & Entertainment/Performing Arts/Circus
581	23	/Arts & Entertainment/Performing Arts/Dance
1592	23	/Arts & Entertainment/Performing Arts/Magic
1185	23	/Arts & Entertainment/Performing Arts/Opera
36	3	/Arts & Entertainment/TV & Video
211	36	/Arts & Entertainment/TV & Video/Online Video
1780	211	/Arts & Entertainment/TV & Video/Online Video/Live Video Streaming
1781	211	/Arts & Entertainment/TV & Video/Online Video/Movie & TV Streaming
1782	211	/Arts & Entertainment/TV & Video/Online Video/Video Blogs
1409	211	/Arts & Entertainment/TV & Video/Online Video/Web Series
1055	36	/Arts & Entertainment/TV & Video/TV Commercials
1187	36	/Arts & Entertainment/TV & Video/TV Guides & Reference
359	36	/Arts & Entertainment/TV & Video/TV Networks & Stations
358	36	/Arts & Entertainment/TV & Video/TV Shows & Programs
1047	358	/Arts & Entertainment/TV & Video/TV Shows & Programs/TV Comedies
1411	358	/Arts & Entertainment/TV & Video/TV Shows & Programs/TV Documentary & Nonfiction
1193	358	/Arts & Entertainment/TV & Video/TV Shows & Programs/TV Dramas
1111	1193	/Arts & Entertainment/TV & Video/TV Shows & Programs/TV Dramas/TV Crime & Legal Shows
1194	1193	/Arts & Entertainment/TV & Video/TV Shows & Programs/TV Dramas/TV Medical Shows
357	1193	/Arts & Entertainment/TV & Video/TV Shows & Programs/TV Dramas/TV Soap Operas
1110	358	/Arts & Entertainment/TV & Video/TV Shows & Programs/TV Family-Oriented Shows
1050	358	/Arts & Entertainment/TV & Video/TV Shows & Programs/TV Game Shows
1049	358	/Arts & Entertainment/TV & Video/TV Shows & Programs/TV Reality Shows
1112	358	/Arts & Entertainment/TV & Video/TV Shows & Programs/TV Sci-Fi & Fantasy Shows
1410	358	/Arts & Entertainment/TV & Video/TV Shows & Programs/TV Talent & Variety Shows
1048	358	/Arts & Entertainment/TV & Video/TV Shows & Programs/TV Talk Shows
24	3	/Arts & Entertainment/Visual Art & Design
477	24	/Arts & Entertainment/Visual Art & Design/Architecture
1521	24	/Arts & Entertainment/Visual Art & Design/Art Museums & Galleries
653	24	/Arts & Entertainment/Visual Art & Design/Design
654	653	/Arts & Entertainment/Visual Art & Design/Design/Graphic Design
655	653	/Arts & Entertainment/Visual Art & Design/Design/Industrial & Product Design
656	653	/Arts & Entertainment/Visual Art & Design/Design/Interior Design
1167	24	/Arts & Entertainment/Visual Art & Design/Painting
439	24	/Arts & Entertainment/Visual Art & Design/Photographic & Digital Arts
1412	24	/Arts & Entertainment/Visual Art & Design/Sculpture
1195	24	/Arts & Entertainment/Visual Art & Design/Visual Arts & Design Education
47	0	/Autos & Vehicles
1191	47	/Autos & Vehicles/Bicycles & Accessories
1402	1191	/Autos & Vehicles/Bicycles & Accessories/BMX Bikes
1398	1191	/Autos & Vehicles/Bicycles & Accessories/Bike Accessories
1399	1191	/Autos & Vehicles/Bicycles & Accessories/Bike Frames
1400	1191	/Autos & Vehicles/Bicycles & Accessories/Bike Helmets & Protective Gear
1401	1191	/Autos & Vehicles/Bicycles & Accessories/Bike Parts & Repair
1403	1191	/Autos & Vehicles/Bicycles & Accessories/Cruiser Bicycles
1404	1191	/Autos & Vehicles/Bicycles & Accessories/Kids' Bikes
1405	1191	/Autos & Vehicles/Bicycles & Accessories/Mountain Bikes
1406	1191	/Autos & Vehicles/Bicycles & Accessories/Road Bikes
1140	47	/Autos & Vehicles/Boats & Watercraft
1213	47	/Autos & Vehicles/Campers & RVs
1013	47	/Autos & Vehicles/Classic Vehicles
1214	47	/Autos & Vehicles/Commercial Vehicles
1215	1214	/Autos & Vehicles/Commercial Vehicles/Cargo Trucks & Trailers

806	47	/Autos & Vehicles/Custom & Performance Vehicles
815	47	/Autos & Vehicles/Motor Vehicles (By Brand)
821	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Audi
822	815	/Autos & Vehicles/Motor Vehicles (By Brand)/BMW
1059	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Bentley
1060	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Buick
823	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Cadillac
826	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Chevrolet
833	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Chrysler
834	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Citroën
896	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Daewoo Motors
836	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Dodge
1061	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Ferrari
838	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Fiat
1413	838	/Autos & Vehicles/Motor Vehicles (By Brand)/Fiat/Alfa Romeo
840	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Ford
842	815	/Autos & Vehicles/Motor Vehicles (By Brand)/GMC
843	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Honda
820	843	/Autos & Vehicles/Motor Vehicles (By Brand)/Honda/Acura
1062	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Hummer
845	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Hyundai
1378	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Isuzu
1063	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Jaguar
846	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Jeep
848	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Kia
1064	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Lamborghini
1065	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Land Rover
850	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Lincoln
1066	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Maserati
851	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Mazda
852	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Mercedes-Benz
853	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Mercury
1067	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Mini
854	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Mitsubishi
855	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Nissan
1377	855	/Autos & Vehicles/Motor Vehicles (By Brand)/Nissan/Infiniti
856	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Peugeot
857	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Pontiac
858	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Porsche
1783	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Ram Trucks
859	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Renault
1068	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Rolls-Royce
1414	815	/Autos & Vehicles/Motor Vehicles (By Brand)/SEAT
897	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Saab
860	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Saturn
1886	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Skoda
861	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Subaru
1070	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Suzuki
1784	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Tesla Motors
863	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Toyota
849	863	/Autos & Vehicles/Motor Vehicles (By Brand)/Toyota/Lexus
1069	863	/Autos & Vehicles/Motor Vehicles (By Brand)/Toyota/Scion
898	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Vauxhall-Opel
865	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Volkswagen
867	815	/Autos & Vehicles/Motor Vehicles (By Brand)/Volvo
1684	47	/Autos & Vehicles/Motor Vehicles (By Type)
1698	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Compact Cars
1689	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Convertibles
1690	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Coupes

1691	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Diesel Vehicles
1692	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Hatchbacks
810	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Hybrid & Alternative Vehicles
1380	810	/Autos & Vehicles/Motor Vehicles (By Type)/Hybrid & Alternative Vehicles/Electric & Plug-In Vehicles
1693	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Luxury Vehicles
1317	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Microcars & Subcompacts
273	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Motorcycles
148	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Off-Road Vehicles
1212	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Scooters & Mopeds
1694	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Sedans
1695	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Sports Cars
1696	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Station Wagons
610	1684	/Autos & Vehicles/Motor Vehicles (By Type)/Trucks, Vans & SUVs
1056	610	/Autos & Vehicles/Motor Vehicles (By Type)/Trucks, Vans & SUVs/Pickup Trucks
1057	610	/Autos & Vehicles/Motor Vehicles (By Type)/Trucks, Vans & SUVs/SUVs & Crossovers
1697	1057	/Autos & Vehicles/Motor Vehicles (By Type)/Trucks, Vans & SUVs/SUVs & Crossovers/Crossovers
1058	610	/Autos & Vehicles/Motor Vehicles (By Type)/Trucks, Vans & SUVs/Vans & Minivans
1147	47	/Autos & Vehicles/Personal Aircraft
1294	47	/Autos & Vehicles/Vehicle Codes & Driving Laws
968	1294	/Autos & Vehicles/Vehicle Codes & Driving Laws/Drunk Driving Law
1416	1294	/Autos & Vehicles/Vehicle Codes & Driving Laws/Vehicle & Traffic Safety
170	1294	/Autos & Vehicles/Vehicle Codes & Driving Laws/Vehicle Licensing & Registration
1415	170	/Autos & Vehicles/Vehicle Codes & Driving Laws/Vehicle Licensing & Registration/Driving Instruction & Driver Education
1685	47	/Autos & Vehicles/Vehicle Parts & Services
1268	1685	/Autos & Vehicles/Vehicle Parts & Services/Gas Prices & Vehicle Fueling
1807	1685	/Autos & Vehicles/Vehicle Parts & Services/Towing & Roadside Assistance
1688	1685	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Modification & Tuning
89	1685	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Parts & Accessories
1751	89	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Parts & Accessories/Auto Batteries
1750	89	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Parts & Accessories/Auto Brakes
1217	89	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Parts & Accessories/Auto Exterior
1218	89	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Parts & Accessories/Auto Interior
1703	89	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Parts & Accessories/Automotive Electronic Components
1216	89	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Parts & Accessories/Engine & Transmission
1749	89	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Parts & Accessories/High Performance & Aftermarket Auto
1269	89	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Parts & Accessories/Vehicle Fuels & Lubricants
438	89	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Parts & Accessories/Vehicle Wheels & Tires
138	1685	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Repair & Maintenance
1702	138	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Repair & Maintenance/Auto Glass Repair & Replacement
1700	138	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Repair & Maintenance/Brake Service & Repair
1701	138	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Repair & Maintenance/Collision & Auto Body Repair
1748	138	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Repair & Maintenance/Oil Changes
1747	138	/Autos & Vehicles/Vehicle Parts & Services/Vehicle Repair & Maintenance/Transmission Repair & Maintenance
473	47	/Autos & Vehicles/Vehicle Shopping
1686	473	/Autos & Vehicles/Vehicle Shopping/Used Vehicles
1687	473	/Autos & Vehicles/Vehicle Shopping/Vehicle Dealers & Retailers
1267	473	/Autos & Vehicles/Vehicle Shopping/Vehicle Specs, Reviews & Comparisons
803	47	/Autos & Vehicles/Vehicle Shows
44	0	/Beauty & Fitness
1219	44	/Beauty & Fitness/Beauty Pageants
145	44	/Beauty & Fitness/Beauty Services & Spas
1220	145	/Beauty & Fitness/Beauty Services & Spas/Cosmetic Procedures
1885	1220	/Beauty & Fitness/Beauty Services & Spas/Cosmetic Procedures/Cosmetic Dentistry
1774	145	/Beauty & Fitness/Beauty Services & Spas/Manicures & Pedicures
557	145	/Beauty & Fitness/Beauty Services & Spas/Massage Therapy
239	44	/Beauty & Fitness/Body Art
147	44	/Beauty & Fitness/Cosmetology & Beauty Professionals
143	44	/Beauty & Fitness/Face & Body Care



244	143	/Beauty & Fitness/Face & Body Care/Hygiene & Toiletries
1808	244	/Beauty & Fitness/Face & Body Care/Hygiene & Toiletries/Antiperspirants, Deodorants & Body Sprays
1809	244	/Beauty & Fitness/Face & Body Care/Hygiene & Toiletries/Feminine Hygiene Products
1810	244	/Beauty & Fitness/Face & Body Care/Hygiene & Toiletries/Hand & Body Soaps
1811	244	/Beauty & Fitness/Face & Body Care/Hygiene & Toiletries/Toothbrushes
1812	244	/Beauty & Fitness/Face & Body Care/Hygiene & Toiletries/Toothpaste
234	143	/Beauty & Fitness/Face & Body Care/Make-Up & Cosmetics
1766	234	/Beauty & Fitness/Face & Body Care/Make-Up & Cosmetics/Eye Makeup
1767	234	/Beauty & Fitness/Face & Body Care/Make-Up & Cosmetics/Face Makeup
1768	234	/Beauty & Fitness/Face & Body Care/Make-Up & Cosmetics/Lip Makeup
242	143	/Beauty & Fitness/Face & Body Care/Perfumes & Fragrances
93	143	/Beauty & Fitness/Face & Body Care/Skin & Nail Care
1765	93	/Beauty & Fitness/Face & Body Care/Skin & Nail Care/Bath & Body Products
1771	93	/Beauty & Fitness/Face & Body Care/Skin & Nail Care/Face Care Products
1813	1771	/Beauty & Fitness/Face & Body Care/Skin & Nail Care/Face Care Products/Acne & Blemish Treatments
1775	1771	/Beauty & Fitness/Face & Body Care/Skin & Nail Care/Face Care Products/Anti-Aging Skin Care Products
1777	1771	/Beauty & Fitness/Face & Body Care/Skin & Nail Care/Face Care Products/Face Cleansers & Makeup Removers
1776	1771	/Beauty & Fitness/Face & Body Care/Skin & Nail Care/Face Care Products/Face Lotions & Moisturizers
1770	93	/Beauty & Fitness/Face & Body Care/Skin & Nail Care/Nail Care Products
1772	143	/Beauty & Fitness/Face & Body Care/Sun Care & Tanning Products
144	143	/Beauty & Fitness/Face & Body Care/Unwanted Body & Facial Hair Removal
1814	144	/Beauty & Fitness/Face & Body Care/Unwanted Body & Facial Hair Removal/Razors & Shavers
185	44	/Beauty & Fitness/Fashion & Style
98	185	/Beauty & Fitness/Fashion & Style/Fashion Designers & Collections
1155	185	/Beauty & Fitness/Fashion & Style/Fashion Modeling
94	44	/Beauty & Fitness/Fitness
241	94	/Beauty & Fitness/Fitness/Bodybuilding
1417	94	/Beauty & Fitness/Fitness/Fitness Equipment & Accessories
1762	1417	/Beauty & Fitness/Fitness/Fitness Equipment & Accessories/Cardio Training Equipment
1763	1417	/Beauty & Fitness/Fitness/Fitness Equipment & Accessories/Fitness Technology Products
1764	1417	/Beauty & Fitness/Fitness/Fitness Equipment & Accessories/Weights & Strength Training Equipment
1418	94	/Beauty & Fitness/Fitness/Fitness Instruction & Personal Training
1419	94	/Beauty & Fitness/Fitness/Gyms & Health Clubs
1815	94	/Beauty & Fitness/Fitness/High Intensity Interval Training
611	94	/Beauty & Fitness/Fitness/Yoga & Pilates
146	44	/Beauty & Fitness/Hair Care
235	146	/Beauty & Fitness/Hair Care/Hair Loss
1816	146	/Beauty & Fitness/Hair Care/Shampoos & Conditioners
236	44	/Beauty & Fitness/Weight Loss
22	0	/Books & Literature
1883	22	/Books & Literature/Audiobooks
355	22	/Books & Literature/Book Retailers
1183	22	/Books & Literature/Children's Literature
608	22	/Books & Literature/E-Books
540	22	/Books & Literature/Fan Fiction
1184	22	/Books & Literature/Literary Classics
412	22	/Books & Literature/Magazines
565	22	/Books & Literature/Poetry
1177	22	/Books & Literature/Writers Resources
12	0	/Business & Industrial
25	12	/Business & Industrial/Advertising & Marketing
1548	25	/Business & Industrial/Advertising & Marketing/Brand Management
83	25	/Business & Industrial/Advertising & Marketing/Marketing
1743	83	/Business & Industrial/Advertising & Marketing/Marketing/Direct Mail Marketing
1744	83	/Business & Industrial/Advertising & Marketing/Marketing/Email Marketing
1420	25	/Business & Industrial/Advertising & Marketing/Promotional Products & Corporate Gifts
327	25	/Business & Industrial/Advertising & Marketing/Public Relations
1547	25	/Business & Industrial/Advertising & Marketing/Sales
328	25	/Business & Industrial/Advertising & Marketing/Telemarketing

356	12	/Business & Industrial/Aerospace & Defense
662	356	/Business & Industrial/Aerospace & Defense/Aviation Industry
669	356	/Business & Industrial/Aerospace & Defense/Defense Industry
668	356	/Business & Industrial/Aerospace & Defense/Space Technology
46	12	/Business & Industrial/Agriculture & Forestry
748	46	/Business & Industrial/Agriculture & Forestry/Agricultural Equipment
747	46	/Business & Industrial/Agriculture & Forestry/Aquaculture
749	46	/Business & Industrial/Agriculture & Forestry/Crops & Seed
1578	46	/Business & Industrial/Agriculture & Forestry/Farms & Ranches
621	46	/Business & Industrial/Agriculture & Forestry/Food Production
750	46	/Business & Industrial/Agriculture & Forestry/Forestry
751	46	/Business & Industrial/Agriculture & Forestry/Horticulture
752	46	/Business & Industrial/Agriculture & Forestry/Livestock
1190	12	/Business & Industrial/Automotive Industry
799	12	/Business & Industrial/Business Education
1138	12	/Business & Industrial/Business Finance
1160	1138	/Business & Industrial/Business Finance/Commercial Lending
1139	1138	/Business & Industrial/Business Finance/Investment Banking
620	1138	/Business & Industrial/Business Finance/Risk Management
905	1138	/Business & Industrial/Business Finance/Venture Capital
1159	12	/Business & Industrial/Business Operations
336	1159	/Business & Industrial/Business Operations/Business Plans & Presentations
157	1159	/Business & Industrial/Business Operations/Human Resources
723	157	/Business & Industrial/Business Operations/Human Resources/Compensation & Benefits
331	157	/Business & Industrial/Business Operations/Human Resources/Corporate Training
724	157	/Business & Industrial/Business Operations/Human Resources/Payroll Services
330	157	/Business & Industrial/Business Operations/Human Resources/Recruitment & Staffing
338	1159	/Business & Industrial/Business Operations/Management
721	338	/Business & Industrial/Business Operations/Management/Business Process
1360	338	/Business & Industrial/Business Operations/Management/Project Management
722	338	/Business & Industrial/Business Operations/Management/Strategic Planning
801	338	/Business & Industrial/Business Operations/Management/Supply Chain Management
329	12	/Business & Industrial/Business Services
664	329	/Business & Industrial/Business Services/Commercial Distribution
1162	329	/Business & Industrial/Business Services/Consulting
334	329	/Business & Industrial/Business Services/Corporate Events
335	334	/Business & Industrial/Business Services/Corporate Events/Trade Fairs & Industry Shows
340	329	/Business & Industrial/Business Services/E-Commerce Services
280	340	/Business & Industrial/Business Services/E-Commerce Services/Merchant Services & Payment Systems
726	329	/Business & Industrial/Business Services/Fire & Security Services
800	329	/Business & Industrial/Business Services/Knowledge Management
28	329	/Business & Industrial/Business Services/Office Services
337	28	/Business & Industrial/Business Services/Office Services/Office & Facilities Management
95	329	/Business & Industrial/Business Services/Office Supplies
333	95	/Business & Industrial/Business Services/Office Supplies/Office Furniture
1866	333	/Business & Industrial/Business Services/Office Supplies/Office Furniture/Office & Computer Desks
1867	333	/Business & Industrial/Business Services/Office Supplies/Office Furniture/Office Chairs
718	329	/Business & Industrial/Business Services/Outsourcing
719	329	/Business & Industrial/Business Services/Physical Asset Management
720	329	/Business & Industrial/Business Services/Quality Control & Tracking
1892	329	/Business & Industrial/Business Services/Shared Workspaces
1076	329	/Business & Industrial/Business Services/Signage
1426	329	/Business & Industrial/Business Services/Warehousing
725	329	/Business & Industrial/Business Services/Writing & Editing Services
288	12	/Business & Industrial/Chemicals Industry
670	288	/Business & Industrial/Chemicals Industry/Agrochemicals
671	288	/Business & Industrial/Chemicals Industry/Cleaning Agents
672	288	/Business & Industrial/Chemicals Industry/Coatings & Adhesives
673	288	/Business & Industrial/Chemicals Industry/Dyes & Pigments

674	288	/Business & Industrial/Chemicals Industry/Plastics & Polymers
48	12	/Business & Industrial/Construction & Maintenance
650	48	/Business & Industrial/Construction & Maintenance/Building Materials & Supplies
829	650	/Business & Industrial/Construction & Maintenance/Building Materials & Supplies/Nails, Screws & Fasteners
830	650	/Business & Industrial/Construction & Maintenance/Building Materials & Supplies/Plumbing Fixtures & Equipment
831	650	/Business & Industrial/Construction & Maintenance/Building Materials & Supplies/Wood & Plastics
651	48	/Business & Industrial/Construction & Maintenance/Civil Engineering
652	48	/Business & Industrial/Construction & Maintenance/Construction Consulting & Contracting
686	48	/Business & Industrial/Construction & Maintenance/Urban & Regional Planning
233	12	/Business & Industrial/Energy & Utilities
658	233	/Business & Industrial/Energy & Utilities/Electricity
954	233	/Business & Industrial/Energy & Utilities/Nuclear Energy
659	233	/Business & Industrial/Energy & Utilities/Oil & Gas
657	233	/Business & Industrial/Energy & Utilities/Renewable & Alternative Energy
1424	657	/Business & Industrial/Energy & Utilities/Renewable & Alternative Energy/Hydropower
1422	657	/Business & Industrial/Energy & Utilities/Renewable & Alternative Energy/Solar Power
1423	657	/Business & Industrial/Energy & Utilities/Renewable & Alternative Energy/Wind Power
660	233	/Business & Industrial/Energy & Utilities/Waste Management
1307	660	/Business & Industrial/Energy & Utilities/Waste Management/Recycling
1349	233	/Business & Industrial/Energy & Utilities/Water Supply & Treatment
955	12	/Business & Industrial/Hospitality Industry
956	955	/Business & Industrial/Hospitality Industry/Event Planning
957	955	/Business & Industrial/Hospitality Industry/Food Service
816	957	/Business & Industrial/Hospitality Industry/Food Service/Restaurant Supply
287	12	/Business & Industrial/Industrial Materials & Equipment
1152	287	/Business & Industrial/Industrial Materials & Equipment/Fluid Handling
839	1152	/Business & Industrial/Industrial Materials & Equipment/Fluid Handling/Valves Hoses & Fittings
835	287	/Business & Industrial/Industrial Materials & Equipment/Generators
837	287	/Business & Industrial/Industrial Materials & Equipment/Heavy Machinery
1869	287	/Business & Industrial/Industrial Materials & Equipment/Industrial Handling & Processing Equipment
1881	287	/Business & Industrial/Industrial Materials & Equipment/Industrial Measurement & Control Equipment
1862	287	/Business & Industrial/Industrial Materials & Equipment/Work Safety Protective Gear
49	12	/Business & Industrial/Manufacturing
661	49	/Business & Industrial/Manufacturing/Factory Automation
606	12	/Business & Industrial/Metals & Mining
1425	606	/Business & Industrial/Metals & Mining/Precious Metals
255	12	/Business & Industrial/Pharmaceuticals & Biotech
1176	12	/Business & Industrial/Printing & Publishing
332	1176	/Business & Industrial/Printing & Publishing/Document & Printing Services
1375	332	/Business & Industrial/Printing & Publishing/Document & Printing Services/Business Cards & Stationery
1199	12	/Business & Industrial/Professional & Trade Associations
841	12	/Business & Industrial/Retail Trade
844	841	/Business & Industrial/Retail Trade/Retail Equipment & Technology
50	12	/Business & Industrial/Shipping & Logistics
289	50	/Business & Industrial/Shipping & Logistics/Freight Transport
1893	289	/Business & Industrial/Shipping & Logistics/Freight Transport/Air Freight
665	289	/Business & Industrial/Shipping & Logistics/Freight Transport/Maritime Transport
666	289	/Business & Industrial/Shipping & Logistics/Freight Transport/Rail Freight
1894	289	/Business & Industrial/Shipping & Logistics/Freight Transport/Trucking
354	50	/Business & Industrial/Shipping & Logistics/Import & Export
1150	50	/Business & Industrial/Shipping & Logistics/Mail & Package Delivery
663	1150	/Business & Industrial/Shipping & Logistics/Mail & Package Delivery/Couriers, Messengers & Home Delivery Services
291	50	/Business & Industrial/Shipping & Logistics/Moving & Relocation
290	50	/Business & Industrial/Shipping & Logistics/Packaging
1347	50	/Business & Industrial/Shipping & Logistics/Self Storage
551	12	/Business & Industrial/Small Business
1200	551	/Business & Industrial/Small Business/Business Formation
727	551	/Business & Industrial/Small Business/Home Office



552	551	/Business & Industrial/Small Business/MLM & Business Opportunities
566	12	/Business & Industrial/Textiles & Nonwovens
5	0	/Computers & Electronics
1300	5	/Computers & Electronics/CAD & CAM
30	5	/Computers & Electronics/Computer Hardware
717	30	/Computers & Electronics/Computer Hardware/Computer Components
741	717	/Computers & Electronics/Computer Hardware/Computer Components/Chips & Processors
226	717	/Computers & Electronics/Computer Hardware/Computer Components/Computer Memory
740	717	/Computers & Electronics/Computer Hardware/Computer Components/Sound & Video Cards
496	30	/Computers & Electronics/Computer Hardware/Computer Drives & Storage
1321	496	/Computers & Electronics/Computer Hardware/Computer Drives & Storage/CD & DVD Drives & Burners
1322	496	/Computers & Electronics/Computer Hardware/Computer Drives & Storage/CD & DVD Storage Media
1323	496	/Computers & Electronics/Computer Hardware/Computer Drives & Storage/Data Backup & Recovery
1318	496	/Computers & Electronics/Computer Hardware/Computer Drives & Storage/Flash Drives & Memory Cards
1320	496	/Computers & Electronics/Computer Hardware/Computer Drives & Storage/Hard Drives
1319	496	/Computers & Electronics/Computer Hardware/Computer Drives & Storage/Memory Card Readers
729	496	/Computers & Electronics/Computer Hardware/Computer Drives & Storage/Network Storage
312	30	/Computers & Electronics/Computer Hardware/Computer Peripherals
487	312	/Computers & Electronics/Computer Hardware/Computer Peripherals/Computer Monitors & Displays
493	312	/Computers & Electronics/Computer Hardware/Computer Peripherals/Input Devices
1330	312	/Computers & Electronics/Computer Hardware/Computer Peripherals/Printers, Copiers & Fax Machines
1785	1330	/Computers & Electronics/Computer Hardware/Computer Peripherals/Printers, Copiers & Fax Machines/3D Printers & Scanners
1331	1330	/Computers & Electronics/Computer Hardware/Computer Peripherals/Printers, Copiers & Fax Machines/Copiers
1332	1330	/Computers & Electronics/Computer Hardware/Computer Peripherals/Printers, Copiers & Fax Machines/Fax Machines
1333	1330	/Computers & Electronics/Computer Hardware/Computer Peripherals/Printers, Copiers & Fax Machines/Ink &
494	1330	/Computers & Electronics/Computer Hardware/Computer Peripherals/Printers, Copiers & Fax Machines/Printers
495	1330	/Computers & Electronics/Computer Hardware/Computer Peripherals/Printers, Copiers & Fax Machines/Scanners
728	30	/Computers & Electronics/Computer Hardware/Computer Servers
309	30	/Computers & Electronics/Computer Hardware/Desktop Computers
739	30	/Computers & Electronics/Computer Hardware/Hardware Modding & Tuning
310	30	/Computers & Electronics/Computer Hardware/Laptops & Notebooks
314	5	/Computers & Electronics/Computer Security
315	314	/Computers & Electronics/Computer Security/Antivirus & Malware
344	314	/Computers & Electronics/Computer Security/Network Security
78	5	/Computers & Electronics/Consumer Electronics
361	78	/Computers & Electronics/Consumer Electronics/Audio Equipment
1396	361	/Computers & Electronics/Consumer Electronics/Audio Equipment/Headphones
1158	361	/Computers & Electronics/Consumer Electronics/Audio Equipment/Speakers
91	361	/Computers & Electronics/Consumer Electronics/Audio Equipment/Stereo Systems & Components
573	78	/Computers & Electronics/Consumer Electronics/Camera & Photo Equipment
1384	573	/Computers & Electronics/Consumer Electronics/Camera & Photo Equipment/Binoculars, Telescopes & Optical Devices
306	573	/Computers & Electronics/Consumer Electronics/Camera & Photo Equipment/Cameras & Camcorders
308	306	/Computers & Electronics/Consumer Electronics/Camera & Photo Equipment/Cameras & Camcorders/Camcorders
1786	308	/Computers & Electronics/Consumer Electronics/Camera & Photo Equipment/Cameras & Camcorders/Camcorders/Body Mounted & Action Cameras
1383	306	/Computers & Electronics/Consumer Electronics/Camera & Photo Equipment/Cameras & Camcorders/Camera Lenses
307	306	/Computers & Electronics/Consumer Electronics/Camera & Photo Equipment/Cameras & Camcorders/Cameras
1718	307	/Computers & Electronics/Consumer Electronics/Camera & Photo Equipment/Cameras & Camcorders/Cameras/Digital SLR Cameras
1188	78	/Computers & Electronics/Consumer Electronics/Car Electronics
230	1188	/Computers & Electronics/Consumer Electronics/Car Electronics/Car Audio
1189	1188	/Computers & Electronics/Consumer Electronics/Car Electronics/Car Video
1787	78	/Computers & Electronics/Consumer Electronics/Drones & RC Aircraft
1192	78	/Computers & Electronics/Consumer Electronics/Electronic Accessories
794	78	/Computers & Electronics/Consumer Electronics/GPS & Navigation



1346	498	/Computers & Electronics/Software/Business & Productivity Software/Presentation Software
1359	498	/Computers & Electronics/Software/Business & Productivity Software/Project Management Software
1344	498	/Computers & Electronics/Software/Business & Productivity Software/Spreadsheet Software
1345	498	/Computers & Electronics/Software/Business & Productivity Software/Word Processing Software
225	32	/Computers & Electronics/Software/Device Drivers
804	32	/Computers & Electronics/Software/Educational Software
901	32	/Computers & Electronics/Software/Freeware & Shareware
1793	32	/Computers & Electronics/Software/Intelligent Personal Assistants
807	32	/Computers & Electronics/Software/Internet Software
808	807	/Computers & Electronics/Software/Internet Software/Content Management
1500	807	/Computers & Electronics/Software/Internet Software/Download Managers
902	807	/Computers & Electronics/Software/Internet Software/Proxying & Filtering
304	807	/Computers & Electronics/Software/Internet Software/Web Browsers
1792	32	/Computers & Electronics/Software/Monitoring Software
497	32	/Computers & Electronics/Software/Multimedia Software
1089	497	/Computers & Electronics/Software/Multimedia Software/Audio & Music Software
1092	1089	/Computers & Electronics/Software/Multimedia Software/Audio & Music Software/Audio File Formats & Codecs
1088	497	/Computers & Electronics/Software/Multimedia Software/Desktop Publishing
805	1088	/Computers & Electronics/Software/Multimedia Software/Desktop Publishing/Fonts
486	497	/Computers & Electronics/Software/Multimedia Software/Graphics & Animation Software
1090	497	/Computers & Electronics/Software/Multimedia Software/Media Players
577	497	/Computers & Electronics/Software/Multimedia Software/Photo & Video Software
1739	577	/Computers & Electronics/Software/Multimedia Software/Photo & Video Software/Photo Software
1740	577	/Computers & Electronics/Software/Multimedia Software/Photo & Video Software/Video Software
1315	1740	/Computers & Electronics/Software/Multimedia Software/Photo & Video Software/Video Software/Video File Formats & Codecs
313	32	/Computers & Electronics/Software/Open Source
303	32	/Computers & Electronics/Software/Operating Systems
736	303	/Computers & Electronics/Software/Operating Systems/Linux & Unix
735	303	/Computers & Electronics/Software/Operating Systems/Mac OS
1382	303	/Computers & Electronics/Software/Operating Systems/Mobile OS
1534	1382	/Computers & Electronics/Software/Operating Systems/Mobile OS/Android OS
1533	1382	/Computers & Electronics/Software/Operating Systems/Mobile OS/Apple iOS
1535	1382	/Computers & Electronics/Software/Operating Systems/Mobile OS/BlackBerry OS
1536	1382	/Computers & Electronics/Software/Operating Systems/Mobile OS/Symbian OS
1537	1382	/Computers & Electronics/Software/Operating Systems/Mobile OS/Windows Mobile OS
737	303	/Computers & Electronics/Software/Operating Systems/Windows OS
224	32	/Computers & Electronics/Software/Software Utilities
7	0	/Finance
278	7	/Finance/Accounting & Auditing
1427	278	/Finance/Accounting & Auditing/Billing & Invoicing
1428	278	/Finance/Accounting & Auditing/Bookkeeping
1283	278	/Finance/Accounting & Auditing/Tax Preparation & Planning
37	7	/Finance/Banking
1429	37	/Finance/Banking/ATMs & Branch Locations
1430	37	/Finance/Banking/Debit & Checking Services
1432	37	/Finance/Banking/Money Transfer & Wire Services
1431	37	/Finance/Banking/Savings Accounts
279	7	/Finance/Credit & Lending
811	279	/Finance/Credit & Lending/Credit Cards
1433	279	/Finance/Credit & Lending/Credit Reporting & Monitoring
1434	279	/Finance/Credit & Lending/Debt Collection & Repossession
812	279	/Finance/Credit & Lending/Debt Management
1435	279	/Finance/Credit & Lending/Loans
466	1435	/Finance/Credit & Lending/Loans/Home Financing
1445	466	/Finance/Credit & Lending/Loans/Home Financing/Home Equity Loans & Lines of Credit
1446	466	/Finance/Credit & Lending/Loans/Home Financing/Home Refinancing
1447	466	/Finance/Credit & Lending/Loans/Home Financing/Mortgages
1436	1435	/Finance/Credit & Lending/Loans/Personal Loans

1437	1436	/Finance/Credit & Lending/Loans/Personal Loans/Short-Term Loans & Cash Advances
813	1435	/Finance/Credit & Lending/Loans/Student Loans & College Financing
1448	1435	/Finance/Credit & Lending/Loans/Vehicle Financing
468	1448	/Finance/Credit & Lending/Loans/Vehicle Financing/Auto Financing
1820	468	/Finance/Credit & Lending/Loans/Vehicle Financing/Auto Financing/Auto Leasing
903	7	/Finance/Financial Planning & Management
1439	903	/Finance/Financial Planning & Management/Asset & Portfolio Management
1438	903	/Finance/Financial Planning & Management/Inheritance & Estate Planning
619	903	/Finance/Financial Planning & Management/Retirement & Pension
1282	7	/Finance/Grants, Scholarships & Financial Aid
1440	1282	/Finance/Grants, Scholarships & Financial Aid/Government Grants
1441	1282	/Finance/Grants, Scholarships & Financial Aid/Study Grants & Scholarships
38	7	/Finance/Insurance
249	38	/Finance/Insurance/Health Insurance
465	38	/Finance/Insurance/Home Insurance
1442	38	/Finance/Insurance/Life Insurance
1443	38	/Finance/Insurance/Travel Insurance
1444	38	/Finance/Insurance/Vehicle Insurance
467	1444	/Finance/Insurance/Vehicle Insurance/Auto Insurance
107	7	/Finance/Investing
1449	107	/Finance/Investing/Brokerages & Day Trading
904	107	/Finance/Investing/Commodities & Futures Trading
814	107	/Finance/Investing/Currencies & Foreign Exchange
1795	814	/Finance/Investing/Currencies & Foreign Exchange/Digital Currencies
1450	107	/Finance/Investing/Derivatives
1451	107	/Finance/Investing/Funds
1452	1451	/Finance/Investing/Funds/Exchange Traded Funds
1453	1451	/Finance/Investing/Funds/Hedge Funds
1454	1451	/Finance/Investing/Funds/Mutual Funds
1455	107	/Finance/Investing/Real Estate Investment Trusts
1456	107	/Finance/Investing/Socially Responsible Investing
1457	107	/Finance/Investing/Stocks & Bonds
1458	1457	/Finance/Investing/Stocks & Bonds/Bonds
1459	1457	/Finance/Investing/Stocks & Bonds/Exchanges
71	0	/Food & Drink
560	71	/Food & Drink/Beverages
1509	560	/Food & Drink/Beverages/Bottled Water
916	560	/Food & Drink/Beverages/Coffee & Tea
1527	916	/Food & Drink/Beverages/Coffee & Tea/Coffee
1528	916	/Food & Drink/Beverages/Coffee & Tea/Tea
1880	560	/Food & Drink/Beverages/Energy Drinks
1510	560	/Food & Drink/Beverages/Juice
1877	560	/Food & Drink/Beverages/Nutrition Drinks & Shakes
1511	560	/Food & Drink/Beverages/Soft Drinks
1879	560	/Food & Drink/Beverages/Sports Drinks
122	71	/Food & Drink/Cooking & Recipes
1525	122	/Food & Drink/Cooking & Recipes/BBQ & Grilling
911	122	/Food & Drink/Cooking & Recipes/Cuisines
912	911	/Food & Drink/Cooking & Recipes/Cuisines/East Asian Cuisine
1551	912	/Food & Drink/Cooking & Recipes/Cuisines/East Asian Cuisine/Chinese Cuisine
1552	912	/Food & Drink/Cooking & Recipes/Cuisines/East Asian Cuisine/Japanese Cuisine
1554	912	/Food & Drink/Cooking & Recipes/Cuisines/East Asian Cuisine/Korean Cuisine
1563	911	/Food & Drink/Cooking & Recipes/Cuisines/Eastern European Cuisine
1556	911	/Food & Drink/Cooking & Recipes/Cuisines/French Cuisine
1564	911	/Food & Drink/Cooking & Recipes/Cuisines/German Cuisine
913	911	/Food & Drink/Cooking & Recipes/Cuisines/Latin American Cuisine
1566	913	/Food & Drink/Cooking & Recipes/Cuisines/Latin American Cuisine/Caribbean Cuisine
1560	913	/Food & Drink/Cooking & Recipes/Cuisines/Latin American Cuisine/Mexican Cuisine
1565	913	/Food & Drink/Cooking & Recipes/Cuisines/Latin American Cuisine/South American Cuisine

914	911	/Food & Drink/Cooking & Recipes/Cuisines/Mediterranean Cuisine
1558	914	/Food & Drink/Cooking & Recipes/Cuisines/Mediterranean Cuisine/Greek Cuisine
1557	914	/Food & Drink/Cooking & Recipes/Cuisines/Mediterranean Cuisine/Italian Cuisine
1559	914	/Food & Drink/Cooking & Recipes/Cuisines/Mediterranean Cuisine/Spanish Cuisine
1532	911	/Food & Drink/Cooking & Recipes/Cuisines/Middle Eastern Cuisine
915	911	/Food & Drink/Cooking & Recipes/Cuisines/North American Cuisine
1567	911	/Food & Drink/Cooking & Recipes/Cuisines/South Asian Cuisine
1553	1567	/Food & Drink/Cooking & Recipes/Cuisines/South Asian Cuisine/Indian Cuisine
1568	911	/Food & Drink/Cooking & Recipes/Cuisines/Southeast Asian Cuisine
1555	1568	/Food & Drink/Cooking & Recipes/Cuisines/Southeast Asian Cuisine/Thai Cuisine
1569	1568	/Food & Drink/Cooking & Recipes/Cuisines/Southeast Asian Cuisine/Vietnamese Cuisine
825	911	/Food & Drink/Cooking & Recipes/Cuisines/Vegetarian Cuisine
1830	825	/Food & Drink/Cooking & Recipes/Cuisines/Vegetarian Cuisine/Vegan Cuisine
297	122	/Food & Drink/Cooking & Recipes/Culinary Training
1526	122	/Food & Drink/Cooking & Recipes/Desserts
1826	1526	/Food & Drink/Cooking & Recipes/Desserts/Ice Cream & Frozen Desserts
1501	122	/Food & Drink/Cooking & Recipes/Healthy Eating
1529	122	/Food & Drink/Cooking & Recipes/Salads
910	122	/Food & Drink/Cooking & Recipes/Soups & Stews
1512	71	/Food & Drink/Food
1523	71	/Food & Drink/Food & Grocery Delivery
1796	1523	/Food & Drink/Food & Grocery Delivery/Grocery Delivery Services
1884	1523	/Food & Drink/Food & Grocery Delivery/Meal Kits
1797	1523	/Food & Drink/Food & Grocery Delivery/Restaurant Delivery Services
121	71	/Food & Drink/Food & Grocery Retailers
1573	121	/Food & Drink/Food & Grocery Retailers/Bakeries
1574	121	/Food & Drink/Food & Grocery Retailers/Butchers
1575	121	/Food & Drink/Food & Grocery Retailers/Convenience Stores
1576	121	/Food & Drink/Food & Grocery Retailers/Delicatessens
1577	121	/Food & Drink/Food & Grocery Retailers/Farmers' Markets
907	1512	/Food & Drink/Food/Baked Goods
1513	1512	/Food & Drink/Food/Breakfast Foods
906	1512	/Food & Drink/Food/Candy & Sweets
1538	1512	/Food & Drink/Food/Condiments & Dressings
1539	1512	/Food & Drink/Food/Cooking Fats & Oils
1514	1512	/Food & Drink/Food/Dairy & Eggs
1540	1514	/Food & Drink/Food/Dairy & Eggs/Cheese
908	1512	/Food & Drink/Food/Fruits & Vegetables
1541	1512	/Food & Drink/Food/Gourmet & Specialty Foods
1515	1512	/Food & Drink/Food/Grains & Pasta
1516	1512	/Food & Drink/Food/Herbs & Spices
1542	1512	/Food & Drink/Food/Jams, Jellies & Preserves
909	1512	/Food & Drink/Food/Meat & Seafood
1543	909	/Food & Drink/Food/Meat & Seafood/Beef
1544	909	/Food & Drink/Food/Meat & Seafood/Fish & Seafood
1545	909	/Food & Drink/Food/Meat & Seafood/Pork
1546	909	/Food & Drink/Food/Meat & Seafood/Poultry
1517	1512	/Food & Drink/Food/Organic & Natural Foods
1518	1512	/Food & Drink/Food/Snack Foods
276	71	/Food & Drink/Restaurants
1524	276	/Food & Drink/Restaurants/Catering
918	276	/Food & Drink/Restaurants/Fast Food
1562	918	/Food & Drink/Restaurants/Fast Food/Burgers
1561	276	/Food & Drink/Restaurants/Fine Dining
1550	276	/Food & Drink/Restaurants/Pizzerias
917	276	/Food & Drink/Restaurants/Restaurant Reviews & Reservations
8	0	/Games
919	8	/Games/Arcade & Coin-Op Games
920	8	/Games/Board Games



921	920	/Games/Board Games/Chess & Abstract Strategy Games
922	920	/Games/Board Games/Miniatures & Wargaming
39	8	/Games/Card Games
923	39	/Games/Card Games/Collectible Card Games
41	8	/Games/Computer & Video Games
1311	41	/Games/Computer & Video Games/Action & Platform Games
925	41	/Games/Computer & Video Games/Adventure Games
105	41	/Games/Computer & Video Games/Browser Games
926	41	/Games/Computer & Video Games/Casual Games
1798	41	/Games/Computer & Video Games/Competitive Video Gaming
927	41	/Games/Computer & Video Games/Driving & Racing Games
928	41	/Games/Computer & Video Games/Fighting Games
1343	41	/Games/Computer & Video Games/Gaming Reference & Reviews
381	1343	/Games/Computer & Video Games/Gaming Reference & Reviews/Video Game Cheats & Hints
1859	1343	/Games/Computer & Video Games/Gaming Reference & Reviews/Video Game Playthroughs
935	41	/Games/Computer & Video Games/Massively Multiplayer Games
929	41	/Games/Computer & Video Games/Music & Dance Games
1799	41	/Games/Computer & Video Games/Sandbox Games
930	41	/Games/Computer & Video Games/Shooter Games
931	41	/Games/Computer & Video Games/Simulation Games
1497	931	/Games/Computer & Video Games/Simulation Games/Business & Tycoon Games
1496	931	/Games/Computer & Video Games/Simulation Games/City Building Games
1498	931	/Games/Computer & Video Games/Simulation Games/Life Simulation Games
1495	931	/Games/Computer & Video Games/Simulation Games/Vehicle Simulators
932	41	/Games/Computer & Video Games/Sports Games
1499	932	/Games/Computer & Video Games/Sports Games/Sports Management Games
933	41	/Games/Computer & Video Games/Strategy Games
1491	41	/Games/Computer & Video Games/Video Game Development
1342	41	/Games/Computer & Video Games/Video Game Emulation
1828	41	/Games/Computer & Video Games/Video Game Mods & Add-Ons
1146	41	/Games/Computer & Video Games/Video Game Retailers
1492	8	/Games/Dice Games
1493	8	/Games/Educational Games
1290	8	/Games/Family-Oriented Games & Activities
1397	1290	/Games/Family-Oriented Games & Activities/Drawing & Coloring
1173	1290	/Games/Family-Oriented Games & Activities/Dress-Up & Fashion Games
936	8	/Games/Party Games
937	8	/Games/Puzzles & Brainteasers
622	8	/Games/Roleplaying Games
938	8	/Games/Table Games
939	938	/Games/Table Games/Billiards
940	938	/Games/Table Games/Table Tennis
1549	8	/Games/Tile Games
1494	8	/Games/Word Games
45	0	/Health
623	45	/Health/Aging & Geriatrics
624	623	/Health/Aging & Geriatrics/Alzheimer's Disease
499	45	/Health/Alternative & Natural Medicine
1239	499	/Health/Alternative & Natural Medicine/Acupuncture & Chinese Medicine
1238	499	/Health/Alternative & Natural Medicine/Cleansing & Detoxification
419	45	/Health/Health Conditions
625	419	/Health/Health Conditions/AIDS & HIV
626	419	/Health/Health Conditions/Allergies
628	419	/Health/Health Conditions/Arthritis
630	419	/Health/Health Conditions/Blood Sugar & Diabetes
429	419	/Health/Health Conditions/Cancer
629	419	/Health/Health Conditions/Cold & Flu
1211	419	/Health/Health Conditions/Ear Nose & Throat
571	419	/Health/Health Conditions/Eating Disorders

1328	419	/Health/Health Conditions/Endocrine Conditions
1329	1328	/Health/Health Conditions/Endocrine Conditions/Thyroid Conditions
638	419	/Health/Health Conditions/GERD & Digestive Disorders
941	419	/Health/Health Conditions/Genetic Disorders
559	419	/Health/Health Conditions/Heart & Hypertension
643	559	/Health/Health Conditions/Heart & Hypertension/Cholesterol Issues
632	419	/Health/Health Conditions/Infectious Diseases
1262	632	/Health/Health Conditions/Infectious Diseases/Parasites & Parasitic Diseases
1263	632	/Health/Health Conditions/Infectious Diseases/Vaccines & Immunizations
817	419	/Health/Health Conditions/Injury
942	419	/Health/Health Conditions/Neurological Conditions
641	942	/Health/Health Conditions/Neurological Conditions/Learning & Developmental Disabilities
642	641	/Health/Health Conditions/Neurological Conditions/Learning & Developmental Disabilities/ADD & ADHD
1856	641	/Health/Health Conditions/Neurological Conditions/Learning & Developmental Disabilities/Autism Spectrum Disorders
818	419	/Health/Health Conditions/Obesity
819	419	/Health/Health Conditions/Pain Management
631	819	/Health/Health Conditions/Pain Management/Headaches & Migraines
824	419	/Health/Health Conditions/Respiratory Conditions
627	824	/Health/Health Conditions/Respiratory Conditions/Asthma
420	419	/Health/Health Conditions/Skin Conditions
633	419	/Health/Health Conditions/Sleep Disorders
254	45	/Health/Health Education & Medical Training
252	45	/Health/Health Foundations & Medical Research
251	45	/Health/Medical Devices & Equipment
1352	251	/Health/Medical Devices & Equipment/Assistive Technology
1353	1352	/Health/Medical Devices & Equipment/Assistive Technology/Mobility Equipment & Accessories
256	45	/Health/Medical Facilities & Services
634	256	/Health/Medical Facilities & Services/Doctors' Offices
250	256	/Health/Medical Facilities & Services/Hospitals & Treatment Centers
635	256	/Health/Medical Facilities & Services/Medical Procedures
943	635	/Health/Medical Facilities & Services/Medical Procedures/Medical Tests & Exams
944	635	/Health/Medical Facilities & Services/Medical Procedures/Surgery
238	944	/Health/Medical Facilities & Services/Medical Procedures/Surgery/Cosmetic Surgery
500	256	/Health/Medical Facilities & Services/Physical Therapy
253	45	/Health/Medical Literature & Resources
945	253	/Health/Medical Literature & Resources/Medical Photos & Illustration
636	45	/Health/Men's Health
437	45	/Health/Mental Health
639	437	/Health/Mental Health/Anxiety & Stress
511	437	/Health/Mental Health/Counseling Services
640	437	/Health/Mental Health/Depression
418	45	/Health/Nursing
649	418	/Health/Nursing/Assisted Living & Long Term Care
456	45	/Health/Nutrition
457	456	/Health/Nutrition/Special & Restricted Diets
1572	457	/Health/Nutrition/Special & Restricted Diets/Kosher Foods
1570	457	/Health/Nutrition/Special & Restricted Diets/Low Carbohydrate Diets
1571	457	/Health/Nutrition/Special & Restricted Diets/Low Fat & Low Cholesterol Diets
237	456	/Health/Nutrition/Vitamins & Supplements
245	45	/Health/Oral & Dental Care
645	45	/Health/Pediatrics
248	45	/Health/Pharmacy
646	248	/Health/Pharmacy/Drugs & Medications
947	45	/Health/Public Health
1256	947	/Health/Public Health/Health Policy
644	947	/Health/Public Health/Occupational Health & Safety
946	947	/Health/Public Health/Toxic Substances & Poisoning
195	45	/Health/Reproductive Health

198	195	/Health/Reproductive Health/Birth Control
647	195	/Health/Reproductive Health/Infertility
202	195	/Health/Reproductive Health/Male Impotence
558	195	/Health/Reproductive Health/OBGYN
536	195	/Health/Reproductive Health/Sex Education & Counseling
1236	195	/Health/Reproductive Health/Sexual Enhancement
421	195	/Health/Reproductive Health/Sexually Transmitted Diseases
257	45	/Health/Substance Abuse
1351	257	/Health/Substance Abuse/Drug & Alcohol Testing
1350	257	/Health/Substance Abuse/Drug & Alcohol Treatment
1237	257	/Health/Substance Abuse/Smoking & Smoking Cessation
1235	257	/Health/Substance Abuse/Steroids & Performance-Enhancing Drugs
246	45	/Health/Vision Care
1502	246	/Health/Vision Care/Eye Exams & Optometry
1224	246	/Health/Vision Care/Eyeglasses & Contacts
1503	246	/Health/Vision Care/Laser Vision Correction
648	45	/Health/Women's Health
65	0	/Hobbies & Leisure
189	65	/Hobbies & Leisure/Clubs & Organizations
1468	189	/Hobbies & Leisure/Clubs & Organizations/Fraternal Orders & Service Clubs
1469	189	/Hobbies & Leisure/Clubs & Organizations/Youth Organizations & Resources
284	65	/Hobbies & Leisure/Crafts
1361	284	/Hobbies & Leisure/Crafts/Art & Craft Supplies
1470	284	/Hobbies & Leisure/Crafts/Ceramics & Pottery
1230	284	/Hobbies & Leisure/Crafts/Fiber & Textile Arts
1276	65	/Hobbies & Leisure/Merit Prizes & Contests
688	65	/Hobbies & Leisure/Outdoors
462	688	/Hobbies & Leisure/Outdoors/Fishing
542	688	/Hobbies & Leisure/Outdoors/Hiking & Camping
461	688	/Hobbies & Leisure/Outdoors/Hunting & Shooting
786	65	/Hobbies & Leisure/Paintball
787	65	/Hobbies & Leisure/Radio Control & Modeling
1590	787	/Hobbies & Leisure/Radio Control & Modeling/Model Trains & Railroads
999	65	/Hobbies & Leisure/Recreational Aviation
977	65	/Hobbies & Leisure/Special Occasions
1717	977	/Hobbies & Leisure/Special Occasions/Anniversaries
678	977	/Hobbies & Leisure/Special Occasions/Holidays & Seasonal Events
1270	678	/Hobbies & Leisure/Special Occasions/Holidays & Seasonal Events/Birthdays & Name Days
1246	678	/Hobbies & Leisure/Special Occasions/Holidays & Seasonal Events/Carnival & Mardi Gras
1274	678	/Hobbies & Leisure/Special Occasions/Holidays & Seasonal Events/Christian Holidays
1078	1274	/Hobbies & Leisure/Special Occasions/Holidays & Seasonal Events/Christian Holidays/Christmas
1123	1274	/Hobbies & Leisure/Special Occasions/Holidays & Seasonal Events/Christian Holidays/Easter
1079	678	/Hobbies & Leisure/Special Occasions/Holidays & Seasonal Events/Halloween & October 31st
1275	678	/Hobbies & Leisure/Special Occasions/Holidays & Seasonal Events/Islamic Holidays
1124	678	/Hobbies & Leisure/Special Occasions/Holidays & Seasonal Events/Jewish Holidays
1271	678	/Hobbies & Leisure/Special Occasions/Holidays & Seasonal Events/New Year
1125	678	/Hobbies & Leisure/Special Occasions/Holidays & Seasonal Events/Thanksgiving
1122	678	/Hobbies & Leisure/Special Occasions/Holidays & Seasonal Events/Valentine's Day
293	977	/Hobbies & Leisure/Special Occasions/Weddings
1002	65	/Hobbies & Leisure/Water Activities
459	1002	/Hobbies & Leisure/Water Activities/Boating
1305	1002	/Hobbies & Leisure/Water Activities/Diving & Underwater Activities
689	1002	/Hobbies & Leisure/Water Activities/Surf & Swim
11	0	/Home & Garden
948	11	/Home & Garden/Bed & Bath
1365	948	/Home & Garden/Bed & Bath/Bathroom
1366	948	/Home & Garden/Bed & Bath/Bedroom
1369	1366	/Home & Garden/Bed & Bath/Bedroom/Bedding & Bed Linens
1367	1366	/Home & Garden/Bed & Bath/Bedroom/Beds & Headboards



1368	1366	/Home & Garden/Bed & Bath/Bedroom/Mattresses
472	11	/Home & Garden/Domestic Services
949	472	/Home & Garden/Domestic Services/Cleaning Services
828	11	/Home & Garden/HVAC & Climate Control
1835	828	/Home & Garden/HVAC & Climate Control/Air Conditioners
1800	828	/Home & Garden/HVAC & Climate Control/Air Filters & Purifiers
1724	828	/Home & Garden/HVAC & Climate Control/Fireplaces & Stoves
1836	828	/Home & Garden/HVAC & Climate Control/Heaters
1864	828	/Home & Garden/HVAC & Climate Control/Household Fans
137	11	/Home & Garden/Home & Interior Decor
271	11	/Home & Garden/Home Appliances
1726	271	/Home & Garden/Home Appliances/Vacuums & Floor Care
1371	271	/Home & Garden/Home Appliances/Water Filters & Purifiers
270	11	/Home & Garden/Home Furnishings
1363	270	/Home & Garden/Home Furnishings/Clocks
1731	270	/Home & Garden/Home Furnishings/Countertops
1723	270	/Home & Garden/Home Furnishings/Curtains & Window Treatments
1721	270	/Home & Garden/Home Furnishings/Kitchen & Dining Furniture
272	270	/Home & Garden/Home Furnishings/Lamps & Lighting
1720	270	/Home & Garden/Home Furnishings/Living Room Furniture
1875	1720	/Home & Garden/Home Furnishings/Living Room Furniture/Coffee Tables & End Tables
1370	1720	/Home & Garden/Home Furnishings/Living Room Furniture/Sofas & Armchairs
1722	270	/Home & Garden/Home Furnishings/Outdoor Furniture
1362	270	/Home & Garden/Home Furnishings/Rugs & Carpets
158	11	/Home & Garden/Home Improvement
950	158	/Home & Garden/Home Improvement/Construction & Power Tools
827	158	/Home & Garden/Home Improvement/Doors & Windows
832	158	/Home & Garden/Home Improvement/Flooring
1232	158	/Home & Garden/Home Improvement/House Painting & Finishing
1421	158	/Home & Garden/Home Improvement/Locks & Locksmiths
1153	158	/Home & Garden/Home Improvement/Plumbing
1175	158	/Home & Garden/Home Improvement/Roofing
1732	11	/Home & Garden/Home Safety & Security
1837	1732	/Home & Garden/Home Safety & Security/Home Alarm & Security Systems
1348	11	/Home & Garden/Home Storage & Shelving
1730	1348	/Home & Garden/Home Storage & Shelving/Cabinetry
952	11	/Home & Garden/Home Swimming Pools, Saunas & Spas
1805	11	/Home & Garden/Household Supplies
1831	1805	/Home & Garden/Household Supplies/Household Batteries
1832	1805	/Home & Garden/Household Supplies/Household Cleaning Supplies
951	11	/Home & Garden/Kitchen & Dining
120	951	/Home & Garden/Kitchen & Dining/Cookware & Diningware
1870	120	/Home & Garden/Kitchen & Dining/Cookware & Diningware/Cookware
1373	1870	/Home & Garden/Kitchen & Dining/Cookware & Diningware/Cookware/Cutlery & Cutting Accessories
1871	1870	/Home & Garden/Kitchen & Dining/Cookware & Diningware/Cookware/Kitchen Utensils & Gadgets
1872	120	/Home & Garden/Kitchen & Dining/Cookware & Diningware/Diningware
1293	951	/Home & Garden/Kitchen & Dining/Major Kitchen Appliances
1600	1293	/Home & Garden/Kitchen & Dining/Major Kitchen Appliances/Dishwashers
1604	1293	/Home & Garden/Kitchen & Dining/Major Kitchen Appliances/Kitchen Hoods & Vents
1601	1293	/Home & Garden/Kitchen & Dining/Major Kitchen Appliances/Microwaves
1602	1293	/Home & Garden/Kitchen & Dining/Major Kitchen Appliances/Ranges, Cooktops & Ovens
1603	1293	/Home & Garden/Kitchen & Dining/Major Kitchen Appliances/Refrigerators & Freezers
1292	951	/Home & Garden/Kitchen & Dining/Small Kitchen Appliances
1605	1292	/Home & Garden/Kitchen & Dining/Small Kitchen Appliances/Blenders & Juicers
1606	1292	/Home & Garden/Kitchen & Dining/Small Kitchen Appliances/Bread Makers
1607	1292	/Home & Garden/Kitchen & Dining/Small Kitchen Appliances/Coffee & Espresso Makers
1729	1292	/Home & Garden/Kitchen & Dining/Small Kitchen Appliances/Food Mixers
1608	1292	/Home & Garden/Kitchen & Dining/Small Kitchen Appliances/Food Processors
1609	1292	/Home & Garden/Kitchen & Dining/Small Kitchen Appliances/Toasters & Toaster Ovens

1364	11	/Home & Garden/Laundry
1725	1364	/Home & Garden/Laundry/Washers & Dryers
1372	11	/Home & Garden/Nursery & Playroom
953	11	/Home & Garden/Patio, Lawn & Garden
1727	953	/Home & Garden/Patio, Lawn & Garden/Barbecues & Grills
1876	953	/Home & Garden/Patio, Lawn & Garden/Garden Structures
269	953	/Home & Garden/Patio, Lawn & Garden/Gardening
1753	953	/Home & Garden/Patio, Lawn & Garden/Landscape Design
1752	953	/Home & Garden/Patio, Lawn & Garden/Yard Maintenance
1728	1752	/Home & Garden/Patio, Lawn & Garden/Yard Maintenance/Lawn Mowers
471	11	/Home & Garden/Pest Control
13	0	/Internet & Telecom
385	13	/Internet & Telecom/Communications Equipment
1182	385	/Internet & Telecom/Communications Equipment/Radio Equipment
394	13	/Internet & Telecom/Email & Messaging
1522	394	/Internet & Telecom/Email & Messaging/Electronic Spam
1838	394	/Internet & Telecom/Email & Messaging/Email
1379	394	/Internet & Telecom/Email & Messaging/Text & Instant Messaging
386	394	/Internet & Telecom/Email & Messaging/Voice & Video Chat
382	13	/Internet & Telecom/Mobile & Wireless
1171	382	/Internet & Telecom/Mobile & Wireless/Mobile & Wireless Accessories
1170	1171	/Internet & Telecom/Mobile & Wireless/Mobile & Wireless Accessories/Bluetooth Accessories
1109	382	/Internet & Telecom/Mobile & Wireless/Mobile Apps & Add-Ons
1461	1109	/Internet & Telecom/Mobile & Wireless/Mobile Apps & Add-Ons/Android Apps
532	1109	/Internet & Telecom/Mobile & Wireless/Mobile Apps & Add-Ons/Ringtones & Mobile Themes
1462	1109	/Internet & Telecom/Mobile & Wireless/Mobile Apps & Add-Ons/iOS Apps
390	382	/Internet & Telecom/Mobile & Wireless/Mobile Phones
1839	390	/Internet & Telecom/Mobile & Wireless/Mobile Phones/Mobile Phone Repair & Services
1071	390	/Internet & Telecom/Mobile & Wireless/Mobile Phones/Smart Phones
485	13	/Internet & Telecom/Search Engines
1234	485	/Internet & Telecom/Search Engines/People Search
383	13	/Internet & Telecom/Service Providers
501	383	/Internet & Telecom/Service Providers/Cable & Satellite Providers
104	383	/Internet & Telecom/Service Providers/ISPs
1463	383	/Internet & Telecom/Service Providers/Internet Cafes
384	383	/Internet & Telecom/Service Providers/Phone Service Providers
389	384	/Internet & Telecom/Service Providers/Phone Service Providers/Calling Cards
392	13	/Internet & Telecom/Teleconferencing
1142	13	/Internet & Telecom/Web Apps & Online Tools
301	13	/Internet & Telecom/Web Portals
302	13	/Internet & Telecom/Web Services
326	302	/Internet & Telecom/Web Services/Affiliate Programs
1464	302	/Internet & Telecom/Web Services/Cloud Storage
84	302	/Internet & Telecom/Web Services/Search Engine Optimization & Marketing
422	302	/Internet & Telecom/Web Services/Web Design & Development
53	302	/Internet & Telecom/Web Services/Web Hosting & Domain Registration
1745	53	/Internet & Telecom/Web Services/Web Hosting & Domain Registration/Domain Registration
1746	53	/Internet & Telecom/Web Services/Web Hosting & Domain Registration/Web Hosting
675	302	/Internet & Telecom/Web Services/Web Stats & Analytics
958	0	/Jobs & Education
74	958	/Jobs & Education/Education
1289	74	/Jobs & Education/Education/Academic Conferences & Publications
1015	74	/Jobs & Education/Education/Alumni & Reunions
372	74	/Jobs & Education/Education/Colleges & Universities
1465	372	/Jobs & Education/Education/Colleges & Universities/Fraternities, Sororities & Student Societies
1229	74	/Jobs & Education/Education/Computer Education
367	74	/Jobs & Education/Education/Distance Learning
1012	74	/Jobs & Education/Education/Early Childhood Education
1579	1012	/Jobs & Education/Education/Early Childhood Education/Preschool

791	74	/Jobs & Education/Education/Homeschooling
1840	74	/Jobs & Education/Education/Open Online Courses
371	74	/Jobs & Education/Education/Primary & Secondary Schooling (K-12)
1801	74	/Jobs & Education/Education/Private Tutoring Services
1118	74	/Jobs & Education/Education/Special Education
373	74	/Jobs & Education/Education/Standardized & Admissions Tests
1308	74	/Jobs & Education/Education/Study Abroad
700	74	/Jobs & Education/Education/Teaching & Classroom Resources
1466	700	/Jobs & Education/Education/Teaching & Classroom Resources/Lesson Plans
1467	700	/Jobs & Education/Education/Teaching & Classroom Resources/School Supplies & Classroom Equipment
1388	74	/Jobs & Education/Education/Training & Certification
369	74	/Jobs & Education/Education/Vocational & Continuing Education
1471	958	/Jobs & Education/Internships
60	958	/Jobs & Education/Jobs
959	60	/Jobs & Education/Jobs/Career Resources & Planning
960	60	/Jobs & Education/Jobs/Job Listings
1472	960	/Jobs & Education/Jobs/Job Listings/Accounting & Finance Jobs
1473	960	/Jobs & Education/Jobs/Job Listings/Clerical & Administrative Jobs
1474	960	/Jobs & Education/Jobs/Job Listings/Education Jobs
1475	960	/Jobs & Education/Jobs/Job Listings/Executive & Management Jobs
1476	960	/Jobs & Education/Jobs/Job Listings/Government & Public Sector Jobs
1477	960	/Jobs & Education/Jobs/Job Listings/Health & Medical Jobs
802	960	/Jobs & Education/Jobs/Job Listings/IT & Technical Jobs
1478	960	/Jobs & Education/Jobs/Job Listings/Legal Jobs
1479	960	/Jobs & Education/Jobs/Job Listings/Retail Jobs
1481	960	/Jobs & Education/Jobs/Job Listings/Sales & Marketing Jobs
1480	960	/Jobs & Education/Jobs/Job Listings/Temporary & Seasonal Jobs
961	60	/Jobs & Education/Jobs/Resumes & Portfolios
19	0	/Law & Government
76	19	/Law & Government/Government
1075	76	/Law & Government/Government/Courts & Judiciary
962	76	/Law & Government/Government/Embassies & Consulates
963	76	/Law & Government/Government/Executive Branch
1387	76	/Law & Government/Government/Government Agencies
1385	76	/Law & Government/Government/Government Contracting & Procurement
1221	76	/Law & Government/Government/Intelligence & Counterterrorism
964	76	/Law & Government/Government/Legislative Branch
1386	76	/Law & Government/Government/Lobbying
965	76	/Law & Government/Government/Multilateral Organizations
1161	76	/Law & Government/Government/Public Finance
1316	76	/Law & Government/Government/Public Policy
702	76	/Law & Government/Government/Royalty
966	76	/Law & Government/Government/State & Local Government
555	76	/Law & Government/Government/Visa & Immigration
75	19	/Law & Government/Legal
427	75	/Law & Government/Legal/Accident & Personal Injury Law
423	75	/Law & Government/Legal/Bankruptcy
1272	75	/Law & Government/Legal/Business & Corporate Law
967	75	/Law & Government/Legal/Constitutional Law & Civil Rights
424	75	/Law & Government/Legal/Criminal Law
522	75	/Law & Government/Legal/Family Law
426	75	/Law & Government/Legal/Intellectual Property
701	75	/Law & Government/Legal/Labor & Employment Law
792	75	/Law & Government/Legal/Legal Education
969	75	/Law & Government/Legal/Legal Services
970	75	/Law & Government/Legal/Product Liability
1705	75	/Law & Government/Legal/Real Estate Law
366	19	/Law & Government/Military
1247	366	/Law & Government/Military/Air Force

1248	366	/Law & Government/Military/Army
1250	366	/Law & Government/Military/Marines
1249	366	/Law & Government/Military/Navy
793	366	/Law & Government/Military/Veterans
166	19	/Law & Government/Public Safety
704	166	/Law & Government/Public Safety/Crime & Justice
1181	704	/Law & Government/Public Safety/Crime & Justice/Corporate & Financial Crime
1312	704	/Law & Government/Public Safety/Crime & Justice/Gangs & Organized Crime
1284	704	/Law & Government/Public Safety/Crime & Justice/Prisons & Corrections
168	166	/Law & Government/Public Safety/Emergency Services
535	166	/Law & Government/Public Safety/Law Enforcement
705	166	/Law & Government/Public Safety/Security Products & Services
508	19	/Law & Government/Social Services
706	508	/Law & Government/Social Services/Welfare & Unemployment
16	0	/News
112	16	/News/Broadcast & Network News
784	16	/News/Business News
1179	784	/News/Business News/Company News
1240	1179	/News/Business News/Company News/Company Earnings
1241	1179	/News/Business News/Company News/Mergers & Acquisitions
1164	784	/News/Business News/Economy News
1163	784	/News/Business News/Financial Markets News
1165	784	/News/Business News/Fiscal Policy News
507	16	/News/Gossip & Tabloid News
1259	507	/News/Gossip & Tabloid News/Scandals & Investigations
1253	16	/News/Health News
1204	16	/News/Journalism & News Industry
572	16	/News/Local News
408	16	/News/Newspapers
396	16	/News/Politics
398	396	/News/Politics/Campaigns & Elections
1203	396	/News/Politics/Media Critics & Watchdogs
1201	396	/News/Politics/Opinion & Commentary
1202	396	/News/Politics/Political Polls & Surveys
410	396	/News/Politics/Politics (Left)
409	396	/News/Politics/Politics (Right)
1077	16	/News/Sports News
785	16	/News/Technology News
63	16	/News/Weather
1209	16	/News/World News
299	0	/Online Communities
504	299	/Online Communities/Blogging Resources & Services
1381	504	/Online Communities/Blogging Resources & Services/Microblogging
55	299	/Online Communities/Dating & Personals
546	55	/Online Communities/Dating & Personals/Matrimonial Services
102	55	/Online Communities/Dating & Personals/Personals
320	55	/Online Communities/Dating & Personals/Photo Rating Sites
1482	299	/Online Communities/Feed Aggregation & Social Bookmarking
321	299	/Online Communities/File Sharing & Hosting
191	299	/Online Communities/Forum & Chat Providers
43	299	/Online Communities/Online Goodies
1223	43	/Online Communities/Online Goodies/Clip Art & Animated GIFs
578	43	/Online Communities/Online Goodies/Skins, Themes & Wallpapers
847	43	/Online Communities/Online Goodies/Social Network Apps & Add-Ons
582	299	/Online Communities/Online Journals & Personal Sites
275	299	/Online Communities/Photo & Video Sharing
978	275	/Online Communities/Photo & Video Sharing/Photo & Image Sharing
979	275	/Online Communities/Photo & Video Sharing/Video Sharing
529	299	/Online Communities/Social Networks

972	299	/Online Communities/Virtual Worlds
14	0	/People & Society
677	14	/People & Society/Disabled & Special Needs
56	14	/People & Society/Ethnic & Identity Groups
579	56	/People & Society/Ethnic & Identity Groups/Africans & Diaspora
547	579	/People & Society/Ethnic & Identity Groups/Africans & Diaspora/African-Americans
556	56	/People & Society/Ethnic & Identity Groups/Arabs & Middle Easterners
1257	56	/People & Society/Ethnic & Identity Groups/Asians & Diaspora
549	1257	/People & Society/Ethnic & Identity Groups/Asians & Diaspora/East Asians & Diaspora
528	1257	/People & Society/Ethnic & Identity Groups/Asians & Diaspora/South Asians & Diaspora
580	1257	/People & Society/Ethnic & Identity Groups/Asians & Diaspora/Southeast Asians & Pacific Islanders
682	56	/People & Society/Ethnic & Identity Groups/Eastern Europeans
973	56	/People & Society/Ethnic & Identity Groups/Expatriate Communities
681	56	/People & Society/Ethnic & Identity Groups/Indigenous Peoples
171	681	/People & Society/Ethnic & Identity Groups/Indigenous Peoples/Native Americans
550	56	/People & Society/Ethnic & Identity Groups/Jewish Culture
548	56	/People & Society/Ethnic & Identity Groups/Latinos & Latin-Americans
113	56	/People & Society/Ethnic & Identity Groups/Lesbian, Gay, Bisexual & Transgender
683	56	/People & Society/Ethnic & Identity Groups/Western Europeans
1131	14	/People & Society/Family & Relationships
1304	1131	/People & Society/Family & Relationships/Etiquette
1132	1131	/People & Society/Family & Relationships/Family
400	1132	/People & Society/Family & Relationships/Family/Ancestry & Genealogy
1231	1132	/People & Society/Family & Relationships/Family/Baby & Pet Names
58	1132	/People & Society/Family & Relationships/Family/Parenting
974	58	/People & Society/Family & Relationships/Family/Parenting/Adoption
1374	58	/People & Society/Family & Relationships/Family/Parenting/Babies & Toddlers
1585	1374	/People & Society/Family & Relationships/Family/Parenting/Babies & Toddlers/Baby & Toddler Toys
115	1374	/People & Society/Family & Relationships/Family/Parenting/Babies & Toddlers/Baby Care & Hygiene
1584	1374	/People & Society/Family & Relationships/Family/Parenting/Babies & Toddlers/Baby Feeding
1738	1374	/People & Society/Family & Relationships/Family/Parenting/Babies & Toddlers/Baby Strollers & Transport
1741	1374	/People & Society/Family & Relationships/Family/Parenting/Babies & Toddlers/Child Car Seats
1735	1374	/People & Society/Family & Relationships/Family/Parenting/Babies & Toddlers/Diapering & Potty Training
403	58	/People & Society/Family & Relationships/Family/Parenting/Child Care
401	58	/People & Society/Family & Relationships/Family/Parenting/Pregnancy & Maternity
402	58	/People & Society/Family & Relationships/Family/Parenting/Youth Camps
1134	1131	/People & Society/Family & Relationships/Friendship
1133	1131	/People & Society/Family & Relationships/Marriage
1135	1131	/People & Society/Family & Relationships/Romance
1260	1131	/People & Society/Family & Relationships/Troubled Relationships
1261	1260	/People & Society/Family & Relationships/Troubled Relationships/Divorce & Separation
594	14	/People & Society/Men's Interests
525	594	/People & Society/Men's Interests/Men's Interests (Mature)
59	14	/People & Society/Religion & Belief
448	59	/People & Society/Religion & Belief/Astrology & Divination
862	59	/People & Society/Religion & Belief/Buddhism
864	59	/People & Society/Religion & Belief/Christianity
866	59	/People & Society/Religion & Belief/Hinduism
868	59	/People & Society/Religion & Belief/Islam
869	59	/People & Society/Religion & Belief/Judaism
1803	59	/People & Society/Religion & Belief/Mindfulness & Meditation
1258	59	/People & Society/Religion & Belief/Pagan & Esoteric Traditions
1296	59	/People & Society/Religion & Belief/Places of Worship
1251	59	/People & Society/Religion & Belief/Scientology
975	59	/People & Society/Religion & Belief/Skeptics & Non-Believers
101	59	/People & Society/Religion & Belief/Spirituality
1340	59	/People & Society/Religion & Belief/Theology & Religious Study
870	14	/People & Society/Self-Help & Motivational
298	14	/People & Society/Seniors & Retirement

54	14	/People & Society/Social Issues & Advocacy
57	54	/People & Society/Social Issues & Advocacy/Charity & Philanthropy
1205	54	/People & Society/Social Issues & Advocacy/Discrimination & Identity Relations
1314	54	/People & Society/Social Issues & Advocacy/Drug Laws & Policy
1483	54	/People & Society/Social Issues & Advocacy/Ethics
82	54	/People & Society/Social Issues & Advocacy/Green Living & Environmental Issues
1166	54	/People & Society/Social Issues & Advocacy/Housing & Development
1280	54	/People & Society/Social Issues & Advocacy/Human Rights & Liberties
1313	54	/People & Society/Social Issues & Advocacy/Immigration Policy & Border Issues
1127	54	/People & Society/Social Issues & Advocacy/Poverty & Hunger
1281	54	/People & Society/Social Issues & Advocacy/Privacy Issues
976	54	/People & Society/Social Issues & Advocacy/Reproductive Rights
1301	54	/People & Society/Social Issues & Advocacy/Same-Sex Marriage
703	54	/People & Society/Social Issues & Advocacy/Work & Labor Issues
1121	703	/People & Society/Social Issues & Advocacy/Work & Labor Issues/Unions & Labor Movement
509	14	/People & Society/Social Sciences
1484	509	/People & Society/Social Sciences/Anthropology
1485	509	/People & Society/Social Sciences/Archaeology
1302	509	/People & Society/Social Sciences/Communications & Media Studies
1303	1302	/People & Society/Social Sciences/Communications & Media Studies/Public Speaking
510	509	/People & Society/Social Sciences/Demographics
520	509	/People & Society/Social Sciences/Economics
1641	509	/People & Society/Social Sciences/Political Science
521	1641	/People & Society/Social Sciences/Political Science/International Relations
543	509	/People & Society/Social Sciences/Psychology
502	14	/People & Society/Subcultures & Niche Interests
503	502	/People & Society/Subcultures & Niche Interests/Goth Subculture
676	502	/People & Society/Subcultures & Niche Interests/Science Fiction & Fantasy
325	14	/People & Society/Women's Interests
66	0	/Pets & Animals
882	66	/Pets & Animals/Animal Products & Services
883	882	/Pets & Animals/Animal Products & Services/Animal Welfare
379	882	/Pets & Animals/Animal Products & Services/Pet Food & Pet Care Supplies
380	882	/Pets & Animals/Animal Products & Services/Veterinarians
563	66	/Pets & Animals/Pets
884	563	/Pets & Animals/Pets/Birds
885	563	/Pets & Animals/Pets/Cats
886	563	/Pets & Animals/Pets/Dogs
607	563	/Pets & Animals/Pets/Exotic Pets
887	563	/Pets & Animals/Pets/Fish & Aquaria
888	563	/Pets & Animals/Pets/Horses
889	563	/Pets & Animals/Pets/Rabbits & Rodents
890	563	/Pets & Animals/Pets/Reptiles & Amphibians
119	66	/Pets & Animals/Wildlife
29	0	/Real Estate
687	29	/Real Estate/Property Development
1080	29	/Real Estate/Real Estate Listings
1460	1080	/Real Estate/Real Estate Listings/Bank-Owned & Foreclosed Properties
1178	1080	/Real Estate/Real Estate Listings/Commercial Properties
1707	1080	/Real Estate/Real Estate Listings/Lots & Land
378	1080	/Real Estate/Real Estate Listings/Residential Rentals
1708	378	/Real Estate/Real Estate Listings/Residential Rentals/Furnished Rentals
1709	378	/Real Estate/Real Estate Listings/Residential Rentals/Roommates & Shares
1710	1080	/Real Estate/Real Estate Listings/Residential Sales
1713	1710	/Real Estate/Real Estate Listings/Residential Sales/Condos & Townhomes
1715	1710	/Real Estate/Real Estate Listings/Residential Sales/New Homes & Custom Homes
1081	1080	/Real Estate/Real Estate Listings/Timeshares & Vacation Properties
1712	29	/Real Estate/Real Estate Services
463	1712	/Real Estate/Real Estate Services/Property Inspections & Appraisals



425	1712	/Real Estate/Real Estate Services/Property Management
96	1712	/Real Estate/Real Estate Services/Real Estate Agencies
1716	1712	/Real Estate/Real Estate Services/Real Estate Title & Escrow
533	0	/Reference
527	533	/Reference/Directories & Listings
377	527	/Reference/Directories & Listings/Business & Personal Listings
980	533	/Reference/General Reference
690	980	/Reference/General Reference/Biographies & Quotations
691	980	/Reference/General Reference/Calculators & Reference Tools
692	980	/Reference/General Reference/Dictionaries & Encyclopedias
374	980	/Reference/General Reference/Educational Resources
693	980	/Reference/General Reference/Forms Guides & Templates
1137	693	/Reference/General Reference/Forms Guides & Templates/Legal Forms
694	980	/Reference/General Reference/How-To, DIY & Expert Content
1136	980	/Reference/General Reference/Public Records
695	980	/Reference/General Reference/Time & Calendars
1084	533	/Reference/Geographic Reference
1014	1084	/Reference/Geographic Reference/City & Local Guides
268	1084	/Reference/Geographic Reference/Maps
474	533	/Reference/Humanities
433	474	/Reference/Humanities/History
1288	433	/Reference/Humanities/History/Military History
609	474	/Reference/Humanities/Myth & Folklore
1093	474	/Reference/Humanities/Philosophy
108	533	/Reference/Language Resources
1264	108	/Reference/Language Resources/Foreign Language Resources
1266	1264	/Reference/Language Resources/Foreign Language Resources/Foreign Language Study
1265	1264	/Reference/Language Resources/Foreign Language Resources/Translation Tools & Resources
375	533	/Reference/Libraries & Museums
1520	375	/Reference/Libraries & Museums/Libraries
1519	375	/Reference/Libraries & Museums/Museums
1233	533	/Reference/Technical Reference
174	0	/Science
435	174	/Science/Astronomy
440	174	/Science/Biological Sciences
788	440	/Science/Biological Sciences/Anatomy
981	440	/Science/Biological Sciences/Flora & Fauna
1278	981	/Science/Biological Sciences/Flora & Fauna/Insects & Entomology
982	440	/Science/Biological Sciences/Genetics
1226	440	/Science/Biological Sciences/Neuroscience
505	174	/Science/Chemistry
1227	174	/Science/Computer Science
1299	1227	/Science/Computer Science/Machine Learning & Artificial Intelligence
1168	174	/Science/Earth Sciences
1254	1168	/Science/Earth Sciences/Atmospheric Science
443	1168	/Science/Earth Sciences/Geology
1169	1168	/Science/Earth Sciences/Paleontology
441	1168	/Science/Earth Sciences/Water & Marine Sciences
442	174	/Science/Ecology & Environment
1255	442	/Science/Ecology & Environment/Climate Change & Global Warming
231	174	/Science/Engineering & Technology
1844	231	/Science/Engineering & Technology/Augmented & Virtual Reality
1141	231	/Science/Engineering & Technology/Robotics
436	174	/Science/Mathematics
1252	436	/Science/Mathematics/Statistics
444	174	/Science/Physics
445	174	/Science/Scientific Equipment
446	174	/Science/Scientific Institutions
18	0	/Shopping

64	18	/Shopping/Antiques & Collectibles
68	18	/Shopping/Apparel
1228	68	/Shopping/Apparel/Apparel Services
983	68	/Shopping/Apparel/Athletic Apparel
1407	983	/Shopping/Apparel/Athletic Apparel/Cycling Apparel
984	68	/Shopping/Apparel/Casual Apparel
1845	984	/Shopping/Apparel/Casual Apparel/Denim Wear
428	984	/Shopping/Apparel/Casual Apparel/T-Shirts
985	68	/Shopping/Apparel/Children's Clothing
124	68	/Shopping/Apparel/Clothing Accessories
350	124	/Shopping/Apparel/Clothing Accessories/Gems & Jewelry
1860	350	/Shopping/Apparel/Clothing Accessories/Gems & Jewelry/Necklaces
1486	350	/Shopping/Apparel/Clothing Accessories/Gems & Jewelry/Rings
986	124	/Shopping/Apparel/Clothing Accessories/Handbags & Purses
1861	124	/Shopping/Apparel/Clothing Accessories/Socks & Hosiery
987	124	/Shopping/Apparel/Clothing Accessories/Watches
988	68	/Shopping/Apparel/Costumes
989	68	/Shopping/Apparel/Eyewear
1487	989	/Shopping/Apparel/Eyewear/Sunglasses
697	68	/Shopping/Apparel/Footwear
1488	697	/Shopping/Apparel/Footwear/Athletic Shoes
1489	697	/Shopping/Apparel/Footwear/Boots
1490	697	/Shopping/Apparel/Footwear/Casual Shoes
990	68	/Shopping/Apparel/Formal Wear
1597	990	/Shopping/Apparel/Formal Wear/Bridal Wear
991	68	/Shopping/Apparel/Headwear
992	68	/Shopping/Apparel/Men's Clothing
993	68	/Shopping/Apparel/Outerwear
1855	68	/Shopping/Apparel/Pants & Shorts
1874	68	/Shopping/Apparel/Shirts & Tops
994	68	/Shopping/Apparel/Sleepwear
1598	68	/Shopping/Apparel/Suits & Business Attire
995	68	/Shopping/Apparel/Swimwear
530	68	/Shopping/Apparel/Undergarments
996	68	/Shopping/Apparel/Uniforms & Workwear
997	68	/Shopping/Apparel/Women's Clothing
1632	997	/Shopping/Apparel/Women's Clothing/Dresses
1631	997	/Shopping/Apparel/Women's Clothing/Skirts
292	18	/Shopping/Auctions
61	18	/Shopping/Classifieds
69	18	/Shopping/Consumer Resources
97	69	/Shopping/Consumer Resources/Consumer Advocacy & Protection
365	69	/Shopping/Consumer Resources/Coupons & Discount Offers
450	69	/Shopping/Consumer Resources/Customer Services
1309	450	/Shopping/Consumer Resources/Customer Services/Loyalty Cards & Programs
567	450	/Shopping/Consumer Resources/Customer Services/Technical Support & Repair
451	450	/Shopping/Consumer Resources/Customer Services/Warranties & Service Contracts
1504	69	/Shopping/Consumer Resources/Identity Theft Protection
353	69	/Shopping/Consumer Resources/Product Reviews & Price Comparisons
352	353	/Shopping/Consumer Resources/Product Reviews & Price Comparisons/Price Comparisons
1505	18	/Shopping/Discount & Outlet Stores
1143	18	/Shopping/Entertainment Media
1144	1143	/Shopping/Entertainment Media/Entertainment Media Rentals
70	18	/Shopping/Gifts & Special Event Items
1506	70	/Shopping/Gifts & Special Event Items/Custom & Personalized Items
323	70	/Shopping/Gifts & Special Event Items/Flowers
99	70	/Shopping/Gifts & Special Event Items/Gifts
1756	99	/Shopping/Gifts & Special Event Items/Gifts/Gift Baskets
100	70	/Shopping/Gifts & Special Event Items/Greeting Cards



324	70	/Shopping/Gifts & Special Event Items/Party & Holiday Supplies
1507	18	/Shopping/Green & Eco-Friendly Shopping
696	18	/Shopping/Luxury Goods
73	18	/Shopping/Mass Merchants & Department Stores
576	18	/Shopping/Photo & Video Services
1757	576	/Shopping/Photo & Video Services/Event & Studio Photography
1758	576	/Shopping/Photo & Video Services/Photo Printing Services
574	576	/Shopping/Photo & Video Services/Stock Photography
531	18	/Shopping/Shopping Portals
1210	18	/Shopping/Swap Meets & Outdoor Markets
432	18	/Shopping/Toys
1580	432	/Shopping/Toys/Action Figures
1581	432	/Shopping/Toys/Building Toys
1587	432	/Shopping/Toys/Die-cast & Toy Vehicles
1582	432	/Shopping/Toys/Dolls & Accessories
1588	432	/Shopping/Toys/Outdoor Toys & Play Equipment
1589	432	/Shopping/Toys/Puppets
1586	432	/Shopping/Toys/Ride-On Toys & Wagons
1583	432	/Shopping/Toys/Stuffed Toys
1225	18	/Shopping/Wholesalers & Liquidators
20	0	/Sports
1666	20	/Sports/Animal Sports
568	1666	/Sports/Animal Sports/Equestrian
1073	20	/Sports/College Sports
514	20	/Sports/Combat Sports
515	514	/Sports/Combat Sports/Boxing
1669	514	/Sports/Combat Sports/Fencing
516	514	/Sports/Combat Sports/Martial Arts
1670	516	/Sports/Combat Sports/Martial Arts/Capoeira
1671	516	/Sports/Combat Sports/Martial Arts/Chinese Martial Arts
1676	1671	/Sports/Combat Sports/Martial Arts/Chinese Martial Arts/Tai Chi & Internal Martial Arts
1672	516	/Sports/Combat Sports/Martial Arts/Japanese Martial Arts
1677	1672	/Sports/Combat Sports/Martial Arts/Japanese Martial Arts/Jujutsu
1678	1672	/Sports/Combat Sports/Martial Arts/Japanese Martial Arts/Karate
1673	516	/Sports/Combat Sports/Martial Arts/Kickboxing
1674	516	/Sports/Combat Sports/Martial Arts/Mixed Martial Arts
1679	1674	/Sports/Combat Sports/Martial Arts/Mixed Martial Arts/Ultimate Fighting Championship (UFC)
1675	516	/Sports/Combat Sports/Martial Arts/Taekwondo
512	514	/Sports/Combat Sports/Wrestling
1680	512	/Sports/Combat Sports/Wrestling/Amateur & Sport Wrestling
1681	512	/Sports/Combat Sports/Wrestling/Professional Wrestling
1682	1681	/Sports/Combat Sports/Wrestling/Professional Wrestling/World Wrestling Entertainment (WWE)
554	20	/Sports/Extreme Sports
1683	554	/Sports/Extreme Sports/Climbing & Mountaineering
998	20	/Sports/Fantasy Sports
1000	20	/Sports/Individual Sports
1016	1000	/Sports/Individual Sports/Bowling
458	1000	/Sports/Individual Sports/Cycling
261	1000	/Sports/Individual Sports/Golf
519	1000	/Sports/Individual Sports/Gymnastics
262	1000	/Sports/Individual Sports/Racquet Sports
1376	262	/Sports/Individual Sports/Racquet Sports/Tennis
541	1000	/Sports/Individual Sports/Running & Walking
1126	1000	/Sports/Individual Sports/Skate Sports
518	1000	/Sports/Individual Sports/Track & Field
1198	20	/Sports/International Sports Competitions
513	1198	/Sports/International Sports Competitions/Olympics
180	20	/Sports/Motor Sports
1595	180	/Sports/Motor Sports/Auto Racing

1596	180	/Sports/Motor Sports/Motorcycle Racing
1599	20	/Sports/Sport Scores & Statistics
263	20	/Sports/Sporting Goods
1611	263	/Sports/Sporting Goods/American Football Equipment
1612	263	/Sports/Sporting Goods/Baseball Equipment
1613	263	/Sports/Sporting Goods/Basketball Equipment
1615	263	/Sports/Sporting Goods/Bowling Equipment
1616	263	/Sports/Sporting Goods/Combat Sports Equipment
1633	1616	/Sports/Sporting Goods/Combat Sports Equipment/Boxing Gloves & Gear
1634	1616	/Sports/Sporting Goods/Combat Sports Equipment/Martial Arts Equipment
1617	263	/Sports/Sporting Goods/Cricket Equipment
1618	263	/Sports/Sporting Goods/Equestrian Equipment & Tack
1619	263	/Sports/Sporting Goods/Golf Equipment
1620	263	/Sports/Sporting Goods/Gymnastics Equipment
1621	263	/Sports/Sporting Goods/Hockey Equipment
1622	263	/Sports/Sporting Goods/Ice Skating Equipment
1623	263	/Sports/Sporting Goods/Roller Skating & Rollerblading Equipment
1624	263	/Sports/Sporting Goods/Skateboarding Equipment
1614	263	/Sports/Sporting Goods/Soccer Equipment
1083	263	/Sports/Sporting Goods/Sports Memorabilia
1625	263	/Sports/Sporting Goods/Squash & Racquetball Equipment
1627	263	/Sports/Sporting Goods/Table Tennis Equipment
1628	263	/Sports/Sporting Goods/Tennis Equipment
1629	263	/Sports/Sporting Goods/Volleyball Equipment
1626	263	/Sports/Sporting Goods/Water Sports Equipment
1630	263	/Sports/Sporting Goods/Winter Sports Equipment
1635	1630	/Sports/Sporting Goods/Winter Sports Equipment/Skiing Equipment
1636	1630	/Sports/Sporting Goods/Winter Sports Equipment/Snowboarding Gear
1082	20	/Sports/Sports Coaching & Training
1804	20	/Sports/Sports Fan Gear & Apparel
1001	20	/Sports/Team Sports
258	1001	/Sports/Team Sports/American Football
1508	1001	/Sports/Team Sports/Australian Football
259	1001	/Sports/Team Sports/Baseball
264	1001	/Sports/Team Sports/Basketball
534	1001	/Sports/Team Sports/Cheerleading
296	1001	/Sports/Team Sports/Cricket
1017	1001	/Sports/Team Sports/Handball
260	1001	/Sports/Team Sports/Hockey
517	1001	/Sports/Team Sports/Rugby
294	1001	/Sports/Team Sports/Soccer
699	1001	/Sports/Team Sports/Volleyball
118	20	/Sports/Water Sports
1593	118	/Sports/Water Sports/Surfing
1594	118	/Sports/Water Sports/Swimming
265	20	/Sports/Winter Sports
1149	265	/Sports/Winter Sports/Ice Skating
1148	265	/Sports/Winter Sports/Skiing & Snowboarding
67	0	/Travel & Transportation
179	67	/Travel & Transportation/Hotels & Accommodations
1711	179	/Travel & Transportation/Hotels & Accommodations/Vacation Rentals & Short-Term Stays
1003	67	/Travel & Transportation/Luggage & Travel Accessories
1873	1003	/Travel & Transportation/Luggage & Travel Accessories/Backpacks & Utility Bags
1004	67	/Travel & Transportation/Specialty Travel
707	1004	/Travel & Transportation/Specialty Travel/Adventure Travel
1389	1004	/Travel & Transportation/Specialty Travel/Agritourism
1005	1004	/Travel & Transportation/Specialty Travel/Ecotourism
1887	1004	/Travel & Transportation/Specialty Travel/Family Travel
1888	1004	/Travel & Transportation/Specialty Travel/Honeymoons & Romantic Getaways

1854	1004	/Travel & Transportation/Specialty Travel/Religious Travel
208	67	/Travel & Transportation/Tourist Destinations
1074	208	/Travel & Transportation/Tourist Destinations/Beaches & Islands
1006	208	/Travel & Transportation/Tourist Destinations/Historical Sites & Buildings
1120	208	/Travel & Transportation/Tourist Destinations/Lakes & Rivers
1119	208	/Travel & Transportation/Tourist Destinations/Mountain & Ski Resorts
1007	208	/Travel & Transportation/Tourist Destinations/Regional Parks & Gardens
1008	208	/Travel & Transportation/Tourist Destinations/Theme Parks
1391	208	/Travel & Transportation/Tourist Destinations/Vineyards & Wine Tourism
1009	208	/Travel & Transportation/Tourist Destinations/Zoos, Aquariums & Preserves
1889	67	/Travel & Transportation/Transportation
203	1889	/Travel & Transportation/Transportation/Air Travel
205	1889	/Travel & Transportation/Transportation/Car Rentals
1339	1889	/Travel & Transportation/Transportation/Carpooling
1699	1889	/Travel & Transportation/Transportation/Chartered Transportation Rentals
206	1889	/Travel & Transportation/Transportation/Cruises & Charters
708	1889	/Travel & Transportation/Transportation/Long Distance Bus & Rail
1306	1889	/Travel & Transportation/Transportation/Parking
1245	1306	/Travel & Transportation/Transportation/Parking/Airport Parking & Transportation
1891	1889	/Travel & Transportation/Transportation/Taxi & Ride Hail Services
685	1889	/Travel & Transportation/Transportation/Traffic & Route Planners
667	1889	/Travel & Transportation/Transportation/Urban Transit
1010	67	/Travel & Transportation/Travel Agencies & Services
1878	1010	/Travel & Transportation/Travel Agencies & Services/Guided Tours & Escorted Vacations
1390	1010	/Travel & Transportation/Travel Agencies & Services/Sightseeing Tours
1392	1010	/Travel & Transportation/Travel Agencies & Services/Tourist Boards & Visitor Centers
1019	1010	/Travel & Transportation/Travel Agencies & Services/Vacation Offers
1011	67	/Travel & Transportation/Travel Guides & Travelogues
5000	0	/World Localities
5001	5000	/World Localities/Africa
5002	5001	/World Localities/Africa/Eastern Africa
5003	5002	/World Localities/Africa/Eastern Africa/Ethiopia
5004	5002	/World Localities/Africa/Eastern Africa/Kenya
5005	5004	/World Localities/Africa/Eastern Africa/Kenya/Nairobi
5621	5002	/World Localities/Africa/Eastern Africa/Madagascar
5714	5002	/World Localities/Africa/Eastern Africa/Malawi
5634	5002	/World Localities/Africa/Eastern Africa/Mozambique
5473	5002	/World Localities/Africa/Eastern Africa/Rwanda
5591	5002	/World Localities/Africa/Eastern Africa/Somalia
5006	5002	/World Localities/Africa/Eastern Africa/Tanzania
5007	5002	/World Localities/Africa/Eastern Africa/Uganda
5671	5002	/World Localities/Africa/Eastern Africa/Zambia
5008	5002	/World Localities/Africa/Eastern Africa/Zimbabwe
5009	5008	/World Localities/Africa/Eastern Africa/Zimbabwe/Harare
5010	5001	/World Localities/Africa/Middle Africa
5636	5010	/World Localities/Africa/Middle Africa/Angola
5635	5010	/World Localities/Africa/Middle Africa/Cameroon
5715	5010	/World Localities/Africa/Middle Africa/Chad
5011	5010	/World Localities/Africa/Middle Africa/Congo (DR)
5012	5011	/World Localities/Africa/Middle Africa/Congo (DR)/Kinshasa
5013	5001	/World Localities/Africa/Northern Africa
5014	5013	/World Localities/Africa/Northern Africa/Algeria
5015	5013	/World Localities/Africa/Northern Africa/Egypt
5016	5015	/World Localities/Africa/Northern Africa/Egypt/Cairo
5633	5013	/World Localities/Africa/Northern Africa/Libya
5017	5013	/World Localities/Africa/Northern Africa/Morocco
5018	5013	/World Localities/Africa/Northern Africa/Sudan
5019	5013	/World Localities/Africa/Northern Africa/Tunisia
5020	5001	/World Localities/Africa/Southern Africa

5713	5020	/World Localities/Africa/Southern Africa/Botswana
5021	5020	/World Localities/Africa/Southern Africa/South Africa
5022	5021	/World Localities/Africa/Southern Africa/South Africa/Cape Town
5023	5021	/World Localities/Africa/Southern Africa/South Africa/Johannesburg
5024	5001	/World Localities/Africa/Western Africa
5712	5024	/World Localities/Africa/Western Africa/Burkina Faso
5637	5024	/World Localities/Africa/Western Africa/Côte d'Ivoire
5025	5024	/World Localities/Africa/Western Africa/Ghana
5711	5024	/World Localities/Africa/Western Africa/Mali
5710	5024	/World Localities/Africa/Western Africa/Niger
5026	5024	/World Localities/Africa/Western Africa/Nigeria
5027	5026	/World Localities/Africa/Western Africa/Nigeria/Lagos
5653	5024	/World Localities/Africa/Western Africa/Senegal
5028	5000	/World Localities/Asia
5029	5028	/World Localities/Asia/Central Asia
5030	5029	/World Localities/Asia/Central Asia/Kazakhstan
5574	5029	/World Localities/Asia/Central Asia/Kyrgyzstan
5579	5029	/World Localities/Asia/Central Asia/Tajikistan
5580	5029	/World Localities/Asia/Central Asia/Turkmenistan
5031	5029	/World Localities/Asia/Central Asia/Uzbekistan
5032	5028	/World Localities/Asia/East Asia
5033	5032	/World Localities/Asia/East Asia/China
5364	5033	/World Localities/Asia/East Asia/China/Eastern China
5392	5364	/World Localities/Asia/East Asia/China/Eastern China/Jiangsu
5666	5392	/World Localities/Asia/East Asia/China/Eastern China/Jiangsu/Nanjing
5040	5364	/World Localities/Asia/East Asia/China/Eastern China/Shanghai
5393	5364	/World Localities/Asia/East Asia/China/Eastern China/Zhejiang
5039	5393	/World Localities/Asia/East Asia/China/Eastern China/Zhejiang/Hangzhou
5367	5033	/World Localities/Asia/East Asia/China/North Central China
5034	5367	/World Localities/Asia/East Asia/China/North Central China/Beijing
5401	5367	/World Localities/Asia/East Asia/China/North Central China/Hebei
5399	5367	/World Localities/Asia/East Asia/China/North Central China/Henan
5664	5367	/World Localities/Asia/East Asia/China/North Central China/Inner Mongolia
5400	5367	/World Localities/Asia/East Asia/China/North Central China/Shandong
5660	5367	/World Localities/Asia/East Asia/China/North Central China/Shanxi
5043	5367	/World Localities/Asia/East Asia/China/North Central China/Tianjin
5363	5033	/World Localities/Asia/East Asia/China/Northeast China
5391	5363	/World Localities/Asia/East Asia/China/Northeast China/Heilongjiang
5667	5391	/World Localities/Asia/East Asia/China/Northeast China/Heilongjiang/Harbin
5643	5363	/World Localities/Asia/East Asia/China/Northeast China/Jilin
5035	5643	/World Localities/Asia/East Asia/China/Northeast China/Jilin/Changchun
5390	5363	/World Localities/Asia/East Asia/China/Northeast China/Liaoning
5041	5390	/World Localities/Asia/East Asia/China/Northeast China/Liaoning/Shenyang
5368	5033	/World Localities/Asia/East Asia/China/Northwest China
5661	5368	/World Localities/Asia/East Asia/China/Northwest China/Gansu
5662	5368	/World Localities/Asia/East Asia/China/Northwest China/Ningxia
5663	5368	/World Localities/Asia/East Asia/China/Northwest China/Qinghai
5402	5368	/World Localities/Asia/East Asia/China/Northwest China/Shaanxi
5046	5402	/World Localities/Asia/East Asia/China/Northwest China/Shaanxi/Xi'an
5403	5368	/World Localities/Asia/East Asia/China/Northwest China/Xinjiang
5366	5033	/World Localities/Asia/East Asia/China/South Central China
5655	5366	/World Localities/Asia/East Asia/China/South Central China/Anhui
5036	5366	/World Localities/Asia/East Asia/China/South Central China/Chongqing
5397	5366	/World Localities/Asia/East Asia/China/South Central China/Hubei
5045	5397	/World Localities/Asia/East Asia/China/South Central China/Hubei/Wuhan
5398	5366	/World Localities/Asia/East Asia/China/South Central China/Hunan
5658	5366	/World Localities/Asia/East Asia/China/South Central China/Jiangxi
5396	5366	/World Localities/Asia/East Asia/China/South Central China/Sichuan
5881	5396	/World Localities/Asia/East Asia/China/South Central China/Sichuan/Chengdu

5365	5033	/World Localities/Asia/East Asia/China/Southeast China
5394	5365	/World Localities/Asia/East Asia/China/Southeast China/Fujian
5395	5365	/World Localities/Asia/East Asia/China/Southeast China/Guangdong
5037	5395	/World Localities/Asia/East Asia/China/Southeast China/Guangdong/Dongguan
5038	5395	/World Localities/Asia/East Asia/China/Southeast China/Guangdong/Guangzhou
5042	5395	/World Localities/Asia/East Asia/China/Southeast China/Guangdong/Shenzhen
5665	5365	/World Localities/Asia/East Asia/China/Southeast China/Hainan
5369	5033	/World Localities/Asia/East Asia/China/Southwest China
5656	5369	/World Localities/Asia/East Asia/China/Southwest China/Guangxi
5659	5369	/World Localities/Asia/East Asia/China/Southwest China/Guizhou
5044	5369	/World Localities/Asia/East Asia/China/Southwest China/Tibet
5657	5369	/World Localities/Asia/East Asia/China/Southwest China/Yunnan
5047	5032	/World Localities/Asia/East Asia/Hong Kong
5048	5032	/World Localities/Asia/East Asia/Japan
5382	5048	/World Localities/Asia/East Asia/Japan/Chubu
5723	5382	/World Localities/Asia/East Asia/Japan/Chubu/Aichi
5049	5723	/World Localities/Asia/East Asia/Japan/Chubu/Aichi/Nagoya
5725	5382	/World Localities/Asia/East Asia/Japan/Chubu/Fukui
5730	5382	/World Localities/Asia/East Asia/Japan/Chubu/Gifu
5729	5382	/World Localities/Asia/East Asia/Japan/Chubu/Ishikawa
5726	5382	/World Localities/Asia/East Asia/Japan/Chubu/Nagano
5727	5382	/World Localities/Asia/East Asia/Japan/Chubu/Niigata
5731	5382	/World Localities/Asia/East Asia/Japan/Chubu/Shizuoka
5724	5382	/World Localities/Asia/East Asia/Japan/Chubu/Toyama
5728	5382	/World Localities/Asia/East Asia/Japan/Chubu/Yamanashi
5385	5048	/World Localities/Asia/East Asia/Japan/Chugoku
5735	5385	/World Localities/Asia/East Asia/Japan/Chugoku/Hiroshima
5736	5385	/World Localities/Asia/East Asia/Japan/Chugoku/Okayama
5734	5385	/World Localities/Asia/East Asia/Japan/Chugoku/Shimane
5732	5385	/World Localities/Asia/East Asia/Japan/Chugoku/Tottori
5733	5385	/World Localities/Asia/East Asia/Japan/Chugoku/Yamaguchi
5381	5048	/World Localities/Asia/East Asia/Japan/Hokkaido
5051	5381	/World Localities/Asia/East Asia/Japan/Hokkaido/Sapporo
5383	5048	/World Localities/Asia/East Asia/Japan/Kansai
5737	5383	/World Localities/Asia/East Asia/Japan/Kansai/Hyogo
5406	5737	/World Localities/Asia/East Asia/Japan/Kansai/Hyogo/Kobe
5407	5383	/World Localities/Asia/East Asia/Japan/Kansai/Kyoto
5741	5383	/World Localities/Asia/East Asia/Japan/Kansai/Mie
5739	5383	/World Localities/Asia/East Asia/Japan/Kansai/Nara
5050	5383	/World Localities/Asia/East Asia/Japan/Kansai/Osaka
5738	5383	/World Localities/Asia/East Asia/Japan/Kansai/Shiga
5740	5383	/World Localities/Asia/East Asia/Japan/Kansai/Wakayama
5377	5048	/World Localities/Asia/East Asia/Japan/Kanto
5742	5377	/World Localities/Asia/East Asia/Japan/Kanto/Chiba
5745	5377	/World Localities/Asia/East Asia/Japan/Kanto/Gunma
5746	5377	/World Localities/Asia/East Asia/Japan/Kanto/Ibaraki
5744	5377	/World Localities/Asia/East Asia/Japan/Kanto/Kanagawa
5764	5744	/World Localities/Asia/East Asia/Japan/Kanto/Kanagawa/Kawasaki
5404	5744	/World Localities/Asia/East Asia/Japan/Kanto/Kanagawa/Yokohama
5743	5377	/World Localities/Asia/East Asia/Japan/Kanto/Saitama
5747	5377	/World Localities/Asia/East Asia/Japan/Kanto/Tochigi
5052	5377	/World Localities/Asia/East Asia/Japan/Kanto/Tokyo
5380	5048	/World Localities/Asia/East Asia/Japan/Kyushu
5405	5380	/World Localities/Asia/East Asia/Japan/Kyushu/Fukuoka
5752	5380	/World Localities/Asia/East Asia/Japan/Kyushu/Kagoshima
5753	5380	/World Localities/Asia/East Asia/Japan/Kyushu/Kumamoto
5751	5380	/World Localities/Asia/East Asia/Japan/Kyushu/Miyazaki
5749	5380	/World Localities/Asia/East Asia/Japan/Kyushu/Nagasaki
5750	5380	/World Localities/Asia/East Asia/Japan/Kyushu/Oita



5748	5380	/World Localities/Asia/East Asia/Japan/Kyushu/Saga
5379	5048	/World Localities/Asia/East Asia/Japan/Okinawa
5384	5048	/World Localities/Asia/East Asia/Japan/Shikoku
5755	5384	/World Localities/Asia/East Asia/Japan/Shikoku/Ehime
5754	5384	/World Localities/Asia/East Asia/Japan/Shikoku/Kagawa
5757	5384	/World Localities/Asia/East Asia/Japan/Shikoku/Kochi
5756	5384	/World Localities/Asia/East Asia/Japan/Shikoku/Tokushima
5378	5048	/World Localities/Asia/East Asia/Japan/Tohoku
5759	5378	/World Localities/Asia/East Asia/Japan/Tohoku/Akita
5758	5378	/World Localities/Asia/East Asia/Japan/Tohoku/Aomori
5763	5378	/World Localities/Asia/East Asia/Japan/Tohoku/Fukushima
5760	5378	/World Localities/Asia/East Asia/Japan/Tohoku/Iwate
5762	5378	/World Localities/Asia/East Asia/Japan/Tohoku/Miyagi
5765	5762	/World Localities/Asia/East Asia/Japan/Tohoku/Miyagi/Sendai
5761	5378	/World Localities/Asia/East Asia/Japan/Tohoku/Yamagata
5355	5032	/World Localities/Asia/East Asia/Macau
5577	5032	/World Localities/Asia/East Asia/Mongolia
5053	5032	/World Localities/Asia/East Asia/North Korea
5054	5032	/World Localities/Asia/East Asia/South Korea
5672	5054	/World Localities/Asia/East Asia/South Korea/Gangwon
5375	5054	/World Localities/Asia/East Asia/South Korea/Gyeonggi
5370	5375	/World Localities/Asia/East Asia/South Korea/Gyeonggi/Incheon
5371	5054	/World Localities/Asia/East Asia/South Korea/Jeju
5678	5054	/World Localities/Asia/East Asia/South Korea/North Chungcheong
5674	5054	/World Localities/Asia/East Asia/South Korea/North Gyeongsang
5055	5674	/World Localities/Asia/East Asia/South Korea/North Gyeongsang/Daegu
5676	5054	/World Localities/Asia/East Asia/South Korea/North Jeolla
5057	5054	/World Localities/Asia/East Asia/South Korea/Seoul
5677	5054	/World Localities/Asia/East Asia/South Korea/South Chungcheong
5374	5677	/World Localities/Asia/East Asia/South Korea/South Chungcheong/Daejeon
5673	5054	/World Localities/Asia/East Asia/South Korea/South Gyeongsang
5372	5673	/World Localities/Asia/East Asia/South Korea/South Gyeongsang/Busan
5376	5673	/World Localities/Asia/East Asia/South Korea/South Gyeongsang/Ulsan
5675	5054	/World Localities/Asia/East Asia/South Korea/South Jeolla
5373	5675	/World Localities/Asia/East Asia/South Korea/South Jeolla/Gwangju
5058	5032	/World Localities/Asia/East Asia/Taiwan
5389	5058	/World Localities/Asia/East Asia/Taiwan/Hsinchu
5386	5058	/World Localities/Asia/East Asia/Taiwan/Kaohsiung
5388	5058	/World Localities/Asia/East Asia/Taiwan/Taichung
5387	5058	/World Localities/Asia/East Asia/Taiwan/Tainan
5059	5058	/World Localities/Asia/East Asia/Taiwan/Taipei
5593	5028	/World Localities/Asia/Russia & CIS
5408	5593	/World Localities/Asia/Russia & CIS/Caucasus
5537	5408	/World Localities/Asia/Russia & CIS/Caucasus/Armenia
5538	5408	/World Localities/Asia/Russia & CIS/Caucasus/Azerbaijan
5539	5408	/World Localities/Asia/Russia & CIS/Caucasus/Georgia
5120	5593	/World Localities/Asia/Russia & CIS/Russian Federation
5606	5120	/World Localities/Asia/Russia & CIS/Russian Federation/Far Eastern Russia
5766	5120	/World Localities/Asia/Russia & CIS/Russian Federation/North Caucasian District
5594	5120	/World Localities/Asia/Russia & CIS/Russian Federation/Northwestern Russia
5122	5594	/World Localities/Asia/Russia & CIS/Russian Federation/Northwestern Russia/Saint Petersburg
5595	5120	/World Localities/Asia/Russia & CIS/Russian Federation/Russian Central District
5121	5595	/World Localities/Asia/Russia & CIS/Russian Federation/Russian Central District/Moscow
5603	5120	/World Localities/Asia/Russia & CIS/Russian Federation/Russian Southern District
5605	5120	/World Localities/Asia/Russia & CIS/Russian Federation/Siberian Federal District
5607	5120	/World Localities/Asia/Russia & CIS/Russian Federation/Urals District
5604	5120	/World Localities/Asia/Russia & CIS/Russian Federation/Volga District
5074	5028	/World Localities/Asia/South Asia
5075	5074	/World Localities/Asia/South Asia/Afghanistan

5076	5074	/World Localities/Asia/South Asia/Bangladesh
5910	5076	/World Localities/Asia/South Asia/Bangladesh/Dhaka
5553	5074	/World Localities/Asia/South Asia/Bhutan
5077	5074	/World Localities/Asia/South Asia/India
5515	5077	/World Localities/Asia/South Asia/India/East India
5650	5515	/World Localities/Asia/South Asia/India/East India/Bihar
5775	5515	/World Localities/Asia/South Asia/India/East India/Chhattisgarh
5654	5515	/World Localities/Asia/South Asia/India/East India/Orissa
5649	5515	/World Localities/Asia/South Asia/India/East India/West Bengal
5082	5649	/World Localities/Asia/South Asia/India/East India/West Bengal/Kolkata
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5080	5519	/World Localities/Asia/South Asia/India/North India/Delhi
5652	5519	/World Localities/Asia/South Asia/India/North India/Madhya Pradesh
5776	5519	/World Localities/Asia/South Asia/India/North India/Punjab (India)
5644	5519	/World Localities/Asia/South Asia/India/North India/Uttar Pradesh
5520	5644	/World Localities/Asia/South Asia/India/North India/Uttar Pradesh/Agra
5514	5077	/World Localities/Asia/South Asia/India/Northeast India
5516	5077	/World Localities/Asia/South Asia/India/South India
5648	5516	/World Localities/Asia/South Asia/India/South India/Andhra Pradesh
5640	5516	/World Localities/Asia/South Asia/India/South India/Karnataka
5078	5640	/World Localities/Asia/South Asia/India/South India/Karnataka/Bangalore
5651	5516	/World Localities/Asia/South Asia/India/South India/Kerala
5885	5651	/World Localities/Asia/South Asia/India/South India/Kerala/Cochin
5639	5516	/World Localities/Asia/South Asia/India/South India/Tamil Nadu
5079	5639	/World Localities/Asia/South Asia/India/South India/Tamil Nadu/Chennai
5873	5516	/World Localities/Asia/South Asia/India/South India/Telangana
5081	5873	/World Localities/Asia/South Asia/India/South India/Telangana/Hyderabad
5517	5077	/World Localities/Asia/South Asia/India/West India
5518	5517	/World Localities/Asia/South Asia/India/West India/Goa
5647	5517	/World Localities/Asia/South Asia/India/West India/Gujarat
5882	5647	/World Localities/Asia/South Asia/India/West India/Gujarat/Ahmedabad
5645	5517	/World Localities/Asia/South Asia/India/West India/Maharashtra
5083	5645	/World Localities/Asia/South Asia/India/West India/Maharashtra/Mumbai
5883	5645	/World Localities/Asia/South Asia/India/West India/Maharashtra/Pune
5646	5517	/World Localities/Asia/South Asia/India/West India/Rajasthan
5521	5646	/World Localities/Asia/South Asia/India/West India/Rajasthan/Jaipur
5620	5074	/World Localities/Asia/South Asia/Indian Ocean Islands
5576	5620	/World Localities/Asia/South Asia/Indian Ocean Islands/Maldives
5702	5620	/World Localities/Asia/South Asia/Indian Ocean Islands/RÅ©union
5085	5074	/World Localities/Asia/South Asia/Nepal
5086	5074	/World Localities/Asia/South Asia/Pakistan
5087	5086	/World Localities/Asia/South Asia/Pakistan/Karachi
5088	5086	/World Localities/Asia/South Asia/Pakistan/Lahore
5089	5074	/World Localities/Asia/South Asia/Sri Lanka
5060	5028	/World Localities/Asia/Southeast Asia
5554	5060	/World Localities/Asia/Southeast Asia/Brunei
5555	5060	/World Localities/Asia/Southeast Asia/Cambodia
5557	5060	/World Localities/Asia/Southeast Asia/East Timor
5061	5060	/World Localities/Asia/Southeast Asia/Indonesia
5703	5061	/World Localities/Asia/Southeast Asia/Indonesia/Java (Indonesia)
5892	5703	/World Localities/Asia/Southeast Asia/Indonesia/Java (Indonesia)/Bandung
5062	5703	/World Localities/Asia/Southeast Asia/Indonesia/Java (Indonesia)/Jakarta
5704	5061	/World Localities/Asia/Southeast Asia/Indonesia/Kalimantan
5705	5061	/World Localities/Asia/Southeast Asia/Indonesia/Maluku Islands
5706	5061	/World Localities/Asia/Southeast Asia/Indonesia/Nusa Tenggara
5361	5706	/World Localities/Asia/Southeast Asia/Indonesia/Nusa Tenggara/Bali
5707	5061	/World Localities/Asia/Southeast Asia/Indonesia/Sulawesi
5708	5061	/World Localities/Asia/Southeast Asia/Indonesia/Sumatra
5709	5061	/World Localities/Asia/Southeast Asia/Indonesia/Western New Guinea

5575	5060	/World Localities/Asia/Southeast Asia/Laos
5063	5060	/World Localities/Asia/Southeast Asia/Malaysia
5064	5063	/World Localities/Asia/Southeast Asia/Malaysia/Kuala Lumpur
5895	5063	/World Localities/Asia/Southeast Asia/Malaysia/Penang
5065	5060	/World Localities/Asia/Southeast Asia/Myanmar
5066	5060	/World Localities/Asia/Southeast Asia/Philippines
5668	5066	/World Localities/Asia/Southeast Asia/Philippines/Cebu
5067	5066	/World Localities/Asia/Southeast Asia/Philippines/Manila
5068	5060	/World Localities/Asia/Southeast Asia/Singapore
5069	5060	/World Localities/Asia/Southeast Asia/Thailand
5070	5069	/World Localities/Asia/Southeast Asia/Thailand/Bangkok
5810	5069	/World Localities/Asia/Southeast Asia/Thailand/Chiang Mai
5812	5069	/World Localities/Asia/Southeast Asia/Thailand/Pattaya
5811	5069	/World Localities/Asia/Southeast Asia/Thailand/Southern Thailand
5362	5811	/World Localities/Asia/Southeast Asia/Thailand/Southern Thailand/Phuket
5071	5060	/World Localities/Asia/Southeast Asia/Viet Nam
5072	5071	/World Localities/Asia/Southeast Asia/Viet Nam/Hanoi
5073	5071	/World Localities/Asia/Southeast Asia/Viet Nam/Ho Chi Minh City
5090	5028	/World Localities/Asia/West Asia
5552	5090	/World Localities/Asia/West Asia/Bahrain
5084	5090	/World Localities/Asia/West Asia/Iran
5902	5084	/World Localities/Asia/West Asia/Iran/Tehran
5092	5090	/World Localities/Asia/West Asia/Iraq
5093	5090	/World Localities/Asia/West Asia/Israel
5094	5093	/World Localities/Asia/West Asia/Israel/Jerusalem
5095	5093	/World Localities/Asia/West Asia/Israel/Tel Aviv
5096	5090	/World Localities/Asia/West Asia/Jordan
5558	5090	/World Localities/Asia/West Asia/Kuwait
5097	5090	/World Localities/Asia/West Asia/Lebanon
5578	5090	/World Localities/Asia/West Asia/Oman
5592	5090	/World Localities/Asia/West Asia/Palestine
5590	5090	/World Localities/Asia/West Asia/Qatar
5898	5590	/World Localities/Asia/West Asia/Qatar/Doha
5098	5090	/World Localities/Asia/West Asia/Saudi Arabia
5899	5098	/World Localities/Asia/West Asia/Saudi Arabia/Jeddah
5901	5098	/World Localities/Asia/West Asia/Saudi Arabia/Riyadh
5099	5090	/World Localities/Asia/West Asia/Syria
5100	5090	/World Localities/Asia/West Asia/Turkey
5834	5100	/World Localities/Asia/West Asia/Turkey/Aegean Turkey
5842	5834	/World Localities/Asia/West Asia/Turkey/Aegean Turkey/Izmir
5845	5834	/World Localities/Asia/West Asia/Turkey/Aegean Turkey/MuÄŸla
5849	5845	/World Localities/Asia/West Asia/Turkey/Aegean Turkey/MuÄŸla/Bodrum
5846	5834	/World Localities/Asia/West Asia/Turkey/Aegean Turkey/Pamukkale
5835	5100	/World Localities/Asia/West Asia/Turkey/Black Sea Turkey
5836	5100	/World Localities/Asia/West Asia/Turkey/Central Anatolia
5101	5836	/World Localities/Asia/West Asia/Turkey/Central Anatolia/Ankara
5844	5836	/World Localities/Asia/West Asia/Turkey/Central Anatolia/Cappadocia
5847	5836	/World Localities/Asia/West Asia/Turkey/Central Anatolia/Konya
5837	5100	/World Localities/Asia/West Asia/Turkey/Eastern Anatolia
5838	5100	/World Localities/Asia/West Asia/Turkey/Marmara Region
5841	5838	/World Localities/Asia/West Asia/Turkey/Marmara Region/Bursa
5102	5838	/World Localities/Asia/West Asia/Turkey/Marmara Region/Istanbul
5839	5100	/World Localities/Asia/West Asia/Turkey/Mediterranean Turkey
5848	5839	/World Localities/Asia/West Asia/Turkey/Mediterranean Turkey/Adana
5843	5839	/World Localities/Asia/West Asia/Turkey/Mediterranean Turkey/Antalya
5850	5839	/World Localities/Asia/West Asia/Turkey/Mediterranean Turkey/Mersin
5840	5100	/World Localities/Asia/West Asia/Turkey/Southeastern Anatolia
5103	5090	/World Localities/Asia/West Asia/United Arab Emirates
5903	5103	/World Localities/Asia/West Asia/United Arab Emirates/Abu Dhabi



5904	5103	/World Localities/Asia/West Asia/United Arab Emirates/Dubai
5581	5090	/World Localities/Asia/West Asia/Yemen
5104	5000	/World Localities/Europe
5565	5104	/World Localities/Europe/Central & Eastern Europe
5178	5565	/World Localities/Europe/Central & Eastern Europe/Austria
5853	5178	/World Localities/Europe/Central & Eastern Europe/Austria/Burgenland
5854	5178	/World Localities/Europe/Central & Eastern Europe/Austria/Carinthia
5855	5178	/World Localities/Europe/Central & Eastern Europe/Austria/Lower Austria
5856	5178	/World Localities/Europe/Central & Eastern Europe/Austria/Salzburg
5857	5178	/World Localities/Europe/Central & Eastern Europe/Austria/Styria
5858	5178	/World Localities/Europe/Central & Eastern Europe/Austria/Tyrol
5859	5178	/World Localities/Europe/Central & Eastern Europe/Austria/Upper Austria
5179	5178	/World Localities/Europe/Central & Eastern Europe/Austria/Vienna
5860	5178	/World Localities/Europe/Central & Eastern Europe/Austria/Vorarlberg
5556	5565	/World Localities/Europe/Central & Eastern Europe/Baltics
5128	5556	/World Localities/Europe/Central & Eastern Europe/Baltics/Estonia
5134	5556	/World Localities/Europe/Central & Eastern Europe/Baltics/Latvia
5135	5556	/World Localities/Europe/Central & Eastern Europe/Baltics/Lithuania
5108	5565	/World Localities/Europe/Central & Eastern Europe/Czech Republic
5109	5108	/World Localities/Europe/Central & Eastern Europe/Czech Republic/Prague
5105	5565	/World Localities/Europe/Central & Eastern Europe/Eastern Europe
5106	5105	/World Localities/Europe/Central & Eastern Europe/Eastern Europe/Belarus
5585	5105	/World Localities/Europe/Central & Eastern Europe/Eastern Europe/Moldova
5124	5105	/World Localities/Europe/Central & Eastern Europe/Eastern Europe/Ukraine
5628	5124	/World Localities/Europe/Central & Eastern Europe/Eastern Europe/Ukraine/Crimea
5619	5124	/World Localities/Europe/Central & Eastern Europe/Eastern Europe/Ukraine/Kiev
5188	5565	/World Localities/Europe/Central & Eastern Europe/Germany
5490	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Baden-Wuerttemberg
5884	5490	/World Localities/Europe/Central & Eastern Europe/Germany/Baden-Wuerttemberg/Stuttgart
5491	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Bavaria
5195	5491	/World Localities/Europe/Central & Eastern Europe/Germany/Bavaria/Munich
5189	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Berlin
5494	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Brandenburg
5495	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Bremen
5194	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Hamburg
5493	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Hesse
5193	5493	/World Localities/Europe/Central & Eastern Europe/Germany/Hesse/Frankfurt
5492	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Lower Saxony
5496	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Mecklenburg-Vorpommern
5489	5188	/World Localities/Europe/Central & Eastern Europe/Germany/North Rhine-Westphalia
5190	5489	/World Localities/Europe/Central & Eastern Europe/Germany/North Rhine-Westphalia/Cologne
5191	5489	/World Localities/Europe/Central & Eastern Europe/Germany/North Rhine-Westphalia/Dusseldorf
5192	5489	/World Localities/Europe/Central & Eastern Europe/Germany/North Rhine-Westphalia/Essen (Ruhr Area)
5497	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Rhineland-Palatinate
5498	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Saarland
5499	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Saxony
5500	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Saxony-Anhalt
5501	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Schleswig-Holstein
5502	5188	/World Localities/Europe/Central & Eastern Europe/Germany/Thuringia
5110	5565	/World Localities/Europe/Central & Eastern Europe/Hungary
5111	5110	/World Localities/Europe/Central & Eastern Europe/Hungary/Budapest
5566	5565	/World Localities/Europe/Central & Eastern Europe/Liechtenstein
5112	5565	/World Localities/Europe/Central & Eastern Europe/Poland
5113	5112	/World Localities/Europe/Central & Eastern Europe/Poland/Katowice (Upper Silesian)
5114	5112	/World Localities/Europe/Central & Eastern Europe/Poland/Krakow
5115	5112	/World Localities/Europe/Central & Eastern Europe/Poland/Warsaw
5116	5112	/World Localities/Europe/Central & Eastern Europe/Poland/Wroclaw
5117	5112	/World Localities/Europe/Central & Eastern Europe/Poland/Å³dÅ
5123	5565	/World Localities/Europe/Central & Eastern Europe/Slovakia

5170	5565	/World Localities/Europe/Central & Eastern Europe/Slovenia
5200	5565	/World Localities/Europe/Central & Eastern Europe/Switzerland
5201	5200	/World Localities/Europe/Central & Eastern Europe/Switzerland/Geneva
5202	5200	/World Localities/Europe/Central & Eastern Europe/Switzerland/Zurich
5150	5104	/World Localities/Europe/Mediterranean Europe
5091	5150	/World Localities/Europe/Mediterranean Europe/Cyprus
5155	5150	/World Localities/Europe/Mediterranean Europe/Italy
5626	5155	/World Localities/Europe/Mediterranean Europe/Italy/Abruzzo
5722	5155	/World Localities/Europe/Mediterranean Europe/Italy/Aosta Valley
5720	5155	/World Localities/Europe/Mediterranean Europe/Italy/Basilicata
5513	5155	/World Localities/Europe/Mediterranean Europe/Italy/Calabria
5504	5155	/World Localities/Europe/Mediterranean Europe/Italy/Campania
5160	5504	/World Localities/Europe/Mediterranean Europe/Italy/Campania/Naples
5771	5504	/World Localities/Europe/Mediterranean Europe/Italy/Campania/Salerno & Amalfi Coast
5508	5155	/World Localities/Europe/Mediterranean Europe/Italy/Emilia-Romagna
5886	5508	/World Localities/Europe/Mediterranean Europe/Italy/Emilia-Romagna/Bologna
5717	5155	/World Localities/Europe/Mediterranean Europe/Italy/Friuli-Venezia Giulia
5505	5155	/World Localities/Europe/Mediterranean Europe/Italy/Lazio
5162	5505	/World Localities/Europe/Mediterranean Europe/Italy/Lazio/Rome
5511	5155	/World Localities/Europe/Mediterranean Europe/Italy/Liguria
5158	5511	/World Localities/Europe/Mediterranean Europe/Italy/Liguria/Genoa
5503	5155	/World Localities/Europe/Mediterranean Europe/Italy/Lombardy
5159	5503	/World Localities/Europe/Mediterranean Europe/Italy/Lombardy/Milan
5716	5155	/World Localities/Europe/Mediterranean Europe/Italy/Marche
5721	5155	/World Localities/Europe/Mediterranean Europe/Italy/Molise
5507	5155	/World Localities/Europe/Mediterranean Europe/Italy/Piedmont
5164	5507	/World Localities/Europe/Mediterranean Europe/Italy/Piedmont/Turin
5509	5155	/World Localities/Europe/Mediterranean Europe/Italy/Puglia
5156	5509	/World Localities/Europe/Mediterranean Europe/Italy/Puglia/Bari
5512	5155	/World Localities/Europe/Mediterranean Europe/Italy/Sardinia
5163	5155	/World Localities/Europe/Mediterranean Europe/Italy/Sicily
5161	5163	/World Localities/Europe/Mediterranean Europe/Italy/Sicily/Palermo
5718	5155	/World Localities/Europe/Mediterranean Europe/Italy/Trentino-Alto Adige
5510	5155	/World Localities/Europe/Mediterranean Europe/Italy/Tuscany
5157	5510	/World Localities/Europe/Mediterranean Europe/Italy/Tuscany/Florence
5719	5155	/World Localities/Europe/Mediterranean Europe/Italy/Umbria
5506	5155	/World Localities/Europe/Mediterranean Europe/Italy/Veneto
5165	5506	/World Localities/Europe/Mediterranean Europe/Italy/Veneto/Venice
5166	5150	/World Localities/Europe/Mediterranean Europe/Malta
5586	5150	/World Localities/Europe/Mediterranean Europe/Monaco
5167	5150	/World Localities/Europe/Mediterranean Europe/Portugal
5887	5167	/World Localities/Europe/Mediterranean Europe/Portugal/Algarve
5773	5167	/World Localities/Europe/Mediterranean Europe/Portugal/Azores & Madeira
5168	5167	/World Localities/Europe/Mediterranean Europe/Portugal/Lisbon
5772	5167	/World Localities/Europe/Mediterranean Europe/Portugal/Porto
5587	5150	/World Localities/Europe/Mediterranean Europe/San Marino
5171	5150	/World Localities/Europe/Mediterranean Europe/Spain
5476	5171	/World Localities/Europe/Mediterranean Europe/Spain/Andalucia
5891	5476	/World Localities/Europe/Mediterranean Europe/Spain/Andalucia/Cordoba
5616	5476	/World Localities/Europe/Mediterranean Europe/Spain/Andalucia/C�diz
5893	5476	/World Localities/Europe/Mediterranean Europe/Spain/Andalucia/Granada
5174	5476	/World Localities/Europe/Mediterranean Europe/Spain/Andalucia/M�laga
5175	5476	/World Localities/Europe/Mediterranean Europe/Spain/Andalucia/Seville
5485	5171	/World Localities/Europe/Mediterranean Europe/Spain/Aragon
5487	5171	/World Localities/Europe/Mediterranean Europe/Spain/Asturias
5488	5171	/World Localities/Europe/Mediterranean Europe/Spain/Balearic Islands
5481	5171	/World Localities/Europe/Mediterranean Europe/Spain/Basque Country
5890	5481	/World Localities/Europe/Mediterranean Europe/Spain/Basque Country/Bilbao
5482	5171	/World Localities/Europe/Mediterranean Europe/Spain/Canary Islands

5770	5171	/World Localities/Europe/Mediterranean Europe/Spain/Cantabria
5480	5171	/World Localities/Europe/Mediterranean Europe/Spain/Castile and LeÃ³n
5483	5171	/World Localities/Europe/Mediterranean Europe/Spain/Castile-La Mancha
5477	5171	/World Localities/Europe/Mediterranean Europe/Spain/Catalonia
5172	5477	/World Localities/Europe/Mediterranean Europe/Spain/Catalonia/Barcelona
5486	5171	/World Localities/Europe/Mediterranean Europe/Spain/Extremadura
5479	5171	/World Localities/Europe/Mediterranean Europe/Spain/Galicia
5911	5171	/World Localities/Europe/Mediterranean Europe/Spain/La Rioja
5173	5171	/World Localities/Europe/Mediterranean Europe/Spain/Madrid
5484	5171	/World Localities/Europe/Mediterranean Europe/Spain/Murcia
5913	5171	/World Localities/Europe/Mediterranean Europe/Spain/Navarra
5478	5171	/World Localities/Europe/Mediterranean Europe/Spain/Valencian Community
5889	5478	/World Localities/Europe/Mediterranean Europe/Spain/Valencian Community/Alicante
5176	5478	/World Localities/Europe/Mediterranean Europe/Spain/Valencian Community/Valencia
5769	5150	/World Localities/Europe/Mediterranean Europe/Vatican City
5125	5104	/World Localities/Europe/Nordic Countries
5126	5125	/World Localities/Europe/Nordic Countries/Denmark
5127	5126	/World Localities/Europe/Nordic Countries/Denmark/Copenhagen
5129	5125	/World Localities/Europe/Nordic Countries/Finland
5130	5129	/World Localities/Europe/Nordic Countries/Finland/Helsinki
5679	5125	/World Localities/Europe/Nordic Countries/Greenland
5131	5125	/World Localities/Europe/Nordic Countries/Iceland
5136	5125	/World Localities/Europe/Nordic Countries/Norway
5137	5136	/World Localities/Europe/Nordic Countries/Norway/Oslo
5138	5125	/World Localities/Europe/Nordic Countries/Sweden
5139	5138	/World Localities/Europe/Nordic Countries/Sweden/Stockholm
5567	5104	/World Localities/Europe/Southeastern Europe
5582	5567	/World Localities/Europe/Southeastern Europe/Albania
5151	5567	/World Localities/Europe/Southeastern Europe/Bosnia and Herzegovina
5107	5567	/World Localities/Europe/Southeastern Europe/Bulgaria
5888	5107	/World Localities/Europe/Southeastern Europe/Bulgaria/Sofia
5152	5567	/World Localities/Europe/Southeastern Europe/Croatia
5153	5567	/World Localities/Europe/Southeastern Europe/Greece
5831	5153	/World Localities/Europe/Southeastern Europe/Greece/Aegean Islands
5154	5153	/World Localities/Europe/Southeastern Europe/Greece/Athens
5825	5153	/World Localities/Europe/Southeastern Europe/Greece/Crete
5767	5567	/World Localities/Europe/Southeastern Europe/Kosovo
5768	5567	/World Localities/Europe/Southeastern Europe/Montenegro
5584	5567	/World Localities/Europe/Southeastern Europe/North Macedonia
5118	5567	/World Localities/Europe/Southeastern Europe/Romania
5119	5118	/World Localities/Europe/Southeastern Europe/Romania/Bucharest
5169	5567	/World Localities/Europe/Southeastern Europe/Serbia
5177	5104	/World Localities/Europe/Western Europe
5583	5177	/World Localities/Europe/Western Europe/Andorra
5534	5177	/World Localities/Europe/Western Europe/Benelux
5180	5534	/World Localities/Europe/Western Europe/Benelux/Belgium
5181	5180	/World Localities/Europe/Western Europe/Benelux/Belgium/Brussels
5851	5180	/World Localities/Europe/Western Europe/Benelux/Belgium/Flanders
5852	5180	/World Localities/Europe/Western Europe/Benelux/Belgium/Wallonia
5196	5534	/World Localities/Europe/Western Europe/Benelux/Luxembourg
5197	5534	/World Localities/Europe/Western Europe/Benelux/Netherlands
5861	5197	/World Localities/Europe/Western Europe/Benelux/Netherlands/Drenthe
5862	5197	/World Localities/Europe/Western Europe/Benelux/Netherlands/Flevoland
5863	5197	/World Localities/Europe/Western Europe/Benelux/Netherlands/Friesland
5864	5197	/World Localities/Europe/Western Europe/Benelux/Netherlands/Gelderland
5865	5197	/World Localities/Europe/Western Europe/Benelux/Netherlands/Groningen
5866	5197	/World Localities/Europe/Western Europe/Benelux/Netherlands/Limburg
5867	5197	/World Localities/Europe/Western Europe/Benelux/Netherlands/North Brabant
5868	5197	/World Localities/Europe/Western Europe/Benelux/Netherlands/North Holland

5198	5868	/World Localities/Europe/Western Europe/Benelux/Netherlands/North Holland/Amsterdam
5869	5197	/World Localities/Europe/Western Europe/Benelux/Netherlands/Overijssel
5870	5197	/World Localities/Europe/Western Europe/Benelux/Netherlands/South Holland
5199	5870	/World Localities/Europe/Western Europe/Benelux/Netherlands/South Holland/Rotterdam
5871	5197	/World Localities/Europe/Western Europe/Benelux/Netherlands/Utrecht
5872	5197	/World Localities/Europe/Western Europe/Benelux/Netherlands/Zeeland
5182	5177	/World Localities/Europe/Western Europe/France
5533	5182	/World Localities/Europe/Western Europe/France/Central France
5681	5533	/World Localities/Europe/Western Europe/France/Central France/Centre-Val De Loire
5531	5182	/World Localities/Europe/Western Europe/France/East France
5875	5531	/World Localities/Europe/Western Europe/France/East France/Bourgogne-Franche-Comt��
5684	5875	/World Localities/Europe/Western Europe/France/East France/Bourgogne-Franche-Comt��/Burgundy
5686	5875	/World Localities/Europe/Western Europe/France/East France/Bourgogne-Franche-Comt��/Franche-Comt��
5874	5531	/World Localities/Europe/Western Europe/France/East France/Grand-Est
5683	5874	/World Localities/Europe/Western Europe/France/East France/Grand-Est/Alsace
5610	5683	/World Localities/Europe/Western Europe/France/East France/Grand-Est/Alsace/Strasbourg
5685	5874	/World Localities/Europe/Western Europe/France/East France/Grand-Est/Champagne-Ardenne
5687	5874	/World Localities/Europe/Western Europe/France/East France/Grand-Est/Lorraine
5608	5182	/World Localities/Europe/Western Europe/France/French Overseas (DOM-TOM)
5532	5182	/World Localities/Europe/Western Europe/France/North France
5877	5532	/World Localities/Europe/Western Europe/France/North France/Hauts-de-France
5690	5877	/World Localities/Europe/Western Europe/France/North France/Hauts-de-France/Nord-Pas-de-Calais
5611	5690	/World Localities/Europe/Western Europe/France/North France/Hauts-de-France/Nord-Pas-de-Calais/Lille
5691	5877	/World Localities/Europe/Western Europe/France/North France/Hauts-de-France/Picardy
5878	5532	/World Localities/Europe/Western Europe/France/North France/Normandy
5688	5878	/World Localities/Europe/Western Europe/France/North France/Normandy/Lower Normandy
5689	5878	/World Localities/Europe/Western Europe/France/North France/Normandy/Upper Normandy
5528	5182	/World Localities/Europe/Western Europe/France/South East France
5876	5528	/World Localities/Europe/Western Europe/France/South East France/Auvergne-Rh��ne-Alpes
5680	5876	/World Localities/Europe/Western Europe/France/South East France/Auvergne-Rh��ne-Alpes/Auvergne
5693	5876	/World Localities/Europe/Western Europe/France/South East France/Auvergne-Rh��ne-Alpes/Rh��ne-Alpes
5183	5693	/World Localities/Europe/Western Europe/France/South East France/Auvergne-Rh��ne-Alpes/Rh��ne-Alpes/Lyon
5617	5528	/World Localities/Europe/Western Europe/France/South East France/Corsica
5692	5528	/World Localities/Europe/Western Europe/France/South East France/Provence-Alpes-C��te d'Azur
5184	5692	/World Localities/Europe/Western Europe/France/South East France/Provence-Alpes-C��te d'Azur/Marseille
5185	5692	/World Localities/Europe/Western Europe/France/South East France/Provence-Alpes-C��te d'Azur/Nice
5527	5182	/World Localities/Europe/Western Europe/France/South West France
5880	5527	/World Localities/Europe/Western Europe/France/South West France/Nouvelle-Aquitaine
5694	5880	/World Localities/Europe/Western Europe/France/South West France/Nouvelle-Aquitaine/Aquitaine
5613	5694	/World Localities/Europe/Western Europe/France/South West France/Nouvelle-Aquitaine/Aquitaine/Bordeaux
5682	5880	/World Localities/Europe/Western Europe/France/South West France/Nouvelle-Aquitaine/Limousin
5699	5880	/World Localities/Europe/Western Europe/France/South West France/Nouvelle-Aquitaine/Poitou-Charentes
5879	5527	/World Localities/Europe/Western Europe/France/South West France/Occitanie
5695	5879	/World Localities/Europe/Western Europe/France/South West France/Occitanie/Languedoc-Roussillon
5612	5695	/World Localities/Europe/Western Europe/France/South West France/Occitanie/Languedoc-
5696	5879	/World Localities/Europe/Western Europe/France/South West France/Occitanie/Midi-Pyr��n��es
5187	5696	/World Localities/Europe/Western Europe/France/South West France/Occitanie/Midi-Pyr��n��es/Toulouse
5530	5182	/World Localities/Europe/Western Europe/France/West France
5697	5530	/World Localities/Europe/Western Europe/France/West France/Brittany
5614	5697	/World Localities/Europe/Western Europe/France/West France/Brittany/Rennes
5698	5530	/World Localities/Europe/Western Europe/France/West France/Pays de la Loire
5609	5698	/World Localities/Europe/Western Europe/France/West France/Pays de la Loire/Nantes
5529	5182	/World Localities/Europe/Western Europe/France/��le-de-France
5186	5529	/World Localities/Europe/Western Europe/France/��le-de-France/Paris
5132	5177	/World Localities/Europe/Western Europe/Ireland
5133	5132	/World Localities/Europe/Western Europe/Ireland/Dublin
5140	5177	/World Localities/Europe/Western Europe/United Kingdom
5440	5140	/World Localities/Europe/Western Europe/United Kingdom/England
5447	5440	/World Localities/Europe/Western Europe/United Kingdom/England/East Midlands

5446	5440	/World Localities/Europe/Western Europe/United Kingdom/England/East of England
5147	5440	/World Localities/Europe/Western Europe/United Kingdom/England/London (UK)
5451	5440	/World Localities/Europe/Western Europe/United Kingdom/England/North East England
5450	5440	/World Localities/Europe/Western Europe/United Kingdom/England/North West England
5146	5450	/World Localities/Europe/Western Europe/United Kingdom/England/North West England/Liverpool
5148	5450	/World Localities/Europe/Western Europe/United Kingdom/England/North West England/Manchester
5444	5440	/World Localities/Europe/Western Europe/United Kingdom/England/South East England
5445	5440	/World Localities/Europe/Western Europe/United Kingdom/England/South West England
5142	5445	/World Localities/Europe/Western Europe/United Kingdom/England/South West England/Bristol
5448	5440	/World Localities/Europe/Western Europe/United Kingdom/England/West Midlands
5141	5448	/World Localities/Europe/Western Europe/United Kingdom/England/West Midlands/Birmingham (UK)
5449	5440	/World Localities/Europe/Western Europe/United Kingdom/England/Yorkshire
5145	5449	/World Localities/Europe/Western Europe/United Kingdom/England/Yorkshire/Leeds-Bradford
5149	5449	/World Localities/Europe/Western Europe/United Kingdom/England/Yorkshire/Sheffield
5443	5140	/World Localities/Europe/Western Europe/United Kingdom/Northern Ireland
5441	5140	/World Localities/Europe/Western Europe/United Kingdom/Scotland
5143	5441	/World Localities/Europe/Western Europe/United Kingdom/Scotland/Edinburgh
5144	5441	/World Localities/Europe/Western Europe/United Kingdom/Scotland/Glasgow
5442	5140	/World Localities/Europe/Western Europe/United Kingdom/Wales
5203	5000	/World Localities/Latin America
5204	5203	/World Localities/Latin America/Caribbean
5550	5204	/World Localities/Latin America/Caribbean/Antigua & Barbuda
5569	5204	/World Localities/Latin America/Caribbean/Aruba, Bonaire & Curaçao
5360	5204	/World Localities/Latin America/Caribbean/Bahamas
5894	5360	/World Localities/Latin America/Caribbean/Bahamas/Nassau
5559	5204	/World Localities/Latin America/Caribbean/Barbados
5570	5204	/World Localities/Latin America/Caribbean/Cayman Islands
5205	5204	/World Localities/Latin America/Caribbean/Cuba
5560	5204	/World Localities/Latin America/Caribbean/Dominica
5206	5204	/World Localities/Latin America/Caribbean/Dominican Republic
5561	5204	/World Localities/Latin America/Caribbean/Grenada
5700	5204	/World Localities/Latin America/Caribbean/Guadeloupe
5562	5204	/World Localities/Latin America/Caribbean/Haiti
5439	5204	/World Localities/Latin America/Caribbean/Jamaica
5701	5204	/World Localities/Latin America/Caribbean/Martinique
5207	5204	/World Localities/Latin America/Caribbean/Puerto Rico
5563	5204	/World Localities/Latin America/Caribbean/Saint Kitts & Nevis
5564	5204	/World Localities/Latin America/Caribbean/Saint Lucia
5572	5204	/World Localities/Latin America/Caribbean/Saint Vincent & Grenadines
5573	5204	/World Localities/Latin America/Caribbean/Trinidad & Tobago
5571	5204	/World Localities/Latin America/Caribbean/Virgin Islands
5208	5203	/World Localities/Latin America/Central America
5549	5208	/World Localities/Latin America/Central America/Belize
5209	5208	/World Localities/Latin America/Central America/Costa Rica
5548	5208	/World Localities/Latin America/Central America/El Salvador
5547	5208	/World Localities/Latin America/Central America/Guatemala
5546	5208	/World Localities/Latin America/Central America/Honduras
5210	5208	/World Localities/Latin America/Central America/Mexico
5792	5210	/World Localities/Latin America/Central America/Mexico/Baja California
5813	5792	/World Localities/Latin America/Central America/Mexico/Baja California/Los Cabos
5214	5792	/World Localities/Latin America/Central America/Mexico/Baja California/Tijuana
5797	5210	/World Localities/Latin America/Central America/Mexico/Central Mexico
5814	5797	/World Localities/Latin America/Central America/Mexico/Central Mexico/Cuernavaca (Morelos)
5801	5797	/World Localities/Latin America/Central America/Mexico/Central Mexico/Guanajuato
5212	5797	/World Localities/Latin America/Central America/Mexico/Central Mexico/Mexico City
5798	5797	/World Localities/Latin America/Central America/Mexico/Central Mexico/Mexico State
5800	5797	/World Localities/Latin America/Central America/Mexico/Central Mexico/Puebla
5799	5797	/World Localities/Latin America/Central America/Mexico/Central Mexico/Veracruz
5793	5210	/World Localities/Latin America/Central America/Mexico/Northern Mexico



5795	5793	/World Localities/Latin America/Central America/Mexico/Northern Mexico/Chihuahua
5794	5793	/World Localities/Latin America/Central America/Mexico/Northern Mexico/Nuevo LeÃ3n
5213	5794	/World Localities/Latin America/Central America/Mexico/Northern Mexico/Nuevo LeÃ3n/Monterrey
5796	5793	/World Localities/Latin America/Central America/Mexico/Northern Mexico/Tamaulipas
5802	5210	/World Localities/Latin America/Central America/Mexico/Pacific Coast (Mexico)
5806	5802	/World Localities/Latin America/Central America/Mexico/Pacific Coast (Mexico)/Chiapas
5803	5802	/World Localities/Latin America/Central America/Mexico/Pacific Coast (Mexico)/Guerrero
5815	5803	/World Localities/Latin America/Central America/Mexico/Pacific Coast (Mexico)/Guerrero/Acapulco
5805	5802	/World Localities/Latin America/Central America/Mexico/Pacific Coast (Mexico)/Jalisco
5211	5805	/World Localities/Latin America/Central America/Mexico/Pacific Coast (Mexico)/Jalisco/Guadalajara
5816	5805	/World Localities/Latin America/Central America/Mexico/Pacific Coast (Mexico)/Jalisco/Puerto Vallarta
5807	5802	/World Localities/Latin America/Central America/Mexico/Pacific Coast (Mexico)/MichoacÃ3n
5804	5802	/World Localities/Latin America/Central America/Mexico/Pacific Coast (Mexico)/Oaxaca
5808	5802	/World Localities/Latin America/Central America/Mexico/Pacific Coast (Mexico)/Sinaloa
5809	5210	/World Localities/Latin America/Central America/Mexico/YucatÃ3n Peninsula
5817	5809	/World Localities/Latin America/Central America/Mexico/YucatÃ3n Peninsula/Quintana Roo
5819	5817	/World Localities/Latin America/Central America/Mexico/YucatÃ3n Peninsula/Quintana Roo/CancÃ3n & Riviera Maya
5818	5809	/World Localities/Latin America/Central America/Mexico/YucatÃ3n Peninsula/YucatÃ3n
5820	5818	/World Localities/Latin America/Central America/Mexico/YucatÃ3n Peninsula/YucatÃ3n/MÃ3rida
5545	5208	/World Localities/Latin America/Central America/Nicaragua
5215	5208	/World Localities/Latin America/Central America/Panama
5216	5203	/World Localities/Latin America/South America
5217	5216	/World Localities/Latin America/South America/Argentina
5218	5217	/World Localities/Latin America/South America/Argentina/Buenos Aires
5540	5216	/World Localities/Latin America/South America/Bolivia
5219	5216	/World Localities/Latin America/South America/Brazil
5526	5219	/World Localities/Latin America/South America/Brazil/Central West Brazil
5221	5526	/World Localities/Latin America/South America/Brazil/Central West Brazil/Brasilia
5774	5526	/World Localities/Latin America/South America/Brazil/Central West Brazil/GoiÃ3s
5786	5526	/World Localities/Latin America/South America/Brazil/Central West Brazil/Mato Grosso
5787	5526	/World Localities/Latin America/South America/Brazil/Central West Brazil/Mato Grosso do Sul
5522	5219	/World Localities/Latin America/South America/Brazil/North Brazil
5788	5522	/World Localities/Latin America/South America/Brazil/North Brazil/Amazonas
5789	5522	/World Localities/Latin America/South America/Brazil/North Brazil/ParÃ3i
5790	5522	/World Localities/Latin America/South America/Brazil/North Brazil/RondÃ3nia
5791	5522	/World Localities/Latin America/South America/Brazil/North Brazil/Tocantins
5523	5219	/World Localities/Latin America/South America/Brazil/Northeast Brazil
5778	5523	/World Localities/Latin America/South America/Brazil/Northeast Brazil/Alagoas
5631	5523	/World Localities/Latin America/South America/Brazil/Northeast Brazil/Bahia
5226	5631	/World Localities/Latin America/South America/Brazil/Northeast Brazil/Bahia/Salvador
5779	5523	/World Localities/Latin America/South America/Brazil/Northeast Brazil/CearÃ3
5222	5779	/World Localities/Latin America/South America/Brazil/Northeast Brazil/CearÃ3/Fortaleza
5780	5523	/World Localities/Latin America/South America/Brazil/Northeast Brazil/MaranhÃ3o
5781	5523	/World Localities/Latin America/South America/Brazil/Northeast Brazil/ParaÃ3ba
5782	5523	/World Localities/Latin America/South America/Brazil/Northeast Brazil/Pernambuco
5224	5782	/World Localities/Latin America/South America/Brazil/Northeast Brazil/Pernambuco/Recife
5783	5523	/World Localities/Latin America/South America/Brazil/Northeast Brazil/PiauÃ3-
5784	5523	/World Localities/Latin America/South America/Brazil/Northeast Brazil/Rio Grande do Norte
5785	5523	/World Localities/Latin America/South America/Brazil/Northeast Brazil/Sergipe
5524	5219	/World Localities/Latin America/South America/Brazil/South Brazil
5627	5524	/World Localities/Latin America/South America/Brazil/South Brazil/ParanÃ3
5630	5524	/World Localities/Latin America/South America/Brazil/South Brazil/Rio Grande do Sul
5223	5630	/World Localities/Latin America/South America/Brazil/South Brazil/Rio Grande do Sul/Porto Alegre
5629	5524	/World Localities/Latin America/South America/Brazil/South Brazil/Santa Catarina
5525	5219	/World Localities/Latin America/South America/Brazil/Southeast Brazil
5777	5525	/World Localities/Latin America/South America/Brazil/Southeast Brazil/Espirito Santo
5632	5525	/World Localities/Latin America/South America/Brazil/Southeast Brazil/Minas Gerais
5220	5632	/World Localities/Latin America/South America/Brazil/Southeast Brazil/Minas Gerais/Belo Horizonte

5225	5525	/World Localities/Latin America/South America/Brazil/Southeast Brazil/Rio de Janeiro
5227	5525	/World Localities/Latin America/South America/Brazil/Southeast Brazil/SÃ£o Paulo (State)
5912	5227	/World Localities/Latin America/South America/Brazil/Southeast Brazil/SÃ£o Paulo (State)/SÃ£o Paulo
5228	5216	/World Localities/Latin America/South America/Chile
5229	5228	/World Localities/Latin America/South America/Chile/Santiago
5230	5216	/World Localities/Latin America/South America/Colombia
5231	5230	/World Localities/Latin America/South America/Colombia/Bogota
5536	5216	/World Localities/Latin America/South America/Ecuador
5832	5536	/World Localities/Latin America/South America/Ecuador/Galapagos Islands
5833	5536	/World Localities/Latin America/South America/Ecuador/Quito
5544	5216	/World Localities/Latin America/South America/French Guiana
5543	5216	/World Localities/Latin America/South America/Guyana
5541	5216	/World Localities/Latin America/South America/Paraguay
5232	5216	/World Localities/Latin America/South America/Peru
5233	5232	/World Localities/Latin America/South America/Peru/Lima
5542	5216	/World Localities/Latin America/South America/Suriname
5234	5216	/World Localities/Latin America/South America/Uruguay
5235	5216	/World Localities/Latin America/South America/Venezuela
5236	5235	/World Localities/Latin America/South America/Venezuela/Caracas
5588	5000	/World Localities/Middle East
5237	5000	/World Localities/North America
5354	5237	/World Localities/North America/Bermuda
5238	5237	/World Localities/North America/Canada
5239	5238	/World Localities/North America/Canada/Atlantic Provinces
5596	5239	/World Localities/North America/Canada/Atlantic Provinces/New Brunswick
5598	5239	/World Localities/North America/Canada/Atlantic Provinces/Newfoundland & Labrador
5597	5239	/World Localities/North America/Canada/Atlantic Provinces/Nova Scotia
5240	5597	/World Localities/North America/Canada/Atlantic Provinces/Nova Scotia/Halifax
5599	5239	/World Localities/North America/Canada/Atlantic Provinces/Prince Edward Island
5241	5238	/World Localities/North America/Canada/British Columbia
5242	5241	/World Localities/North America/Canada/British Columbia/Vancouver
5243	5241	/World Localities/North America/Canada/British Columbia/Victoria (BC)
5244	5238	/World Localities/North America/Canada/Canadian Prairies
5600	5244	/World Localities/North America/Canada/Canadian Prairies/Alberta
5245	5600	/World Localities/North America/Canada/Canadian Prairies/Alberta/Calgary
5246	5600	/World Localities/North America/Canada/Canadian Prairies/Alberta/Edmonton
5602	5244	/World Localities/North America/Canada/Canadian Prairies/Manitoba
5247	5602	/World Localities/North America/Canada/Canadian Prairies/Manitoba/Winnipeg
5601	5244	/World Localities/North America/Canada/Canadian Prairies/Saskatchewan
5248	5238	/World Localities/North America/Canada/Northern Territories
5249	5238	/World Localities/North America/Canada/Ontario
5253	5249	/World Localities/North America/Canada/Ontario/Greater Toronto
5250	5249	/World Localities/North America/Canada/Ontario/Hamilton-Niagara Peninsula
5252	5249	/World Localities/North America/Canada/Ontario/Ottawa-Gatineau
5251	5249	/World Localities/North America/Canada/Ontario/Southwestern Ontario
5254	5238	/World Localities/North America/Canada/Quebec
5255	5254	/World Localities/North America/Canada/Quebec/Montreal
5256	5254	/World Localities/North America/Canada/Quebec/Quebec City
5257	5237	/World Localities/North America/USA
5258	5257	/World Localities/North America/USA/Alaska
5259	5257	/World Localities/North America/USA/California
5669	5259	/World Localities/North America/USA/California/California Central Coast
5474	5259	/World Localities/North America/USA/California/Lake Tahoe
5263	5259	/World Localities/North America/USA/California/Sacramento Valley
5265	5259	/World Localities/North America/USA/California/San Francisco Bay Area
5260	5259	/World Localities/North America/USA/California/San Joaquin Valley
5266	5259	/World Localities/North America/USA/California/Silicon Valley
5535	5259	/World Localities/North America/USA/California/Southern California
5262	5535	/World Localities/North America/USA/California/Southern California/Inland Empire

5261	5535	/World Localities/North America/USA/California/Southern California/Los Angeles
5475	5535	/World Localities/North America/USA/California/Southern California/Orange County (CA)
5264	5535	/World Localities/North America/USA/California/Southern California/San Diego
5267	5257	/World Localities/North America/USA/Florida
5624	5267	/World Localities/North America/USA/Florida/Central Florida
5642	5624	/World Localities/North America/USA/Florida/Central Florida/Deltona-Daytona Beach
5270	5624	/World Localities/North America/USA/Florida/Central Florida/Greater Orlando
5271	5624	/World Localities/North America/USA/Florida/Central Florida/Tampa Bay Area
5622	5267	/World Localities/North America/USA/Florida/Florida Panhandle
5897	5622	/World Localities/North America/USA/Florida/Florida Panhandle/Pensacola
5824	5622	/World Localities/North America/USA/Florida/Florida Panhandle/Tallahassee
5623	5267	/World Localities/North America/USA/Florida/North Florida
5268	5623	/World Localities/North America/USA/Florida/North Florida/Jacksonville
5638	5267	/World Localities/North America/USA/Florida/Southern Florida
5822	5638	/World Localities/North America/USA/Florida/Southern Florida/Florida Keys
5823	5638	/World Localities/North America/USA/Florida/Southern Florida/Fort Myers-Cape Coral
5625	5638	/World Localities/North America/USA/Florida/Southern Florida/South Florida Metro
5641	5625	/World Localities/North America/USA/Florida/Southern Florida/South Florida Metro/Broward-Fort Lauderdale
5269	5625	/World Localities/North America/USA/Florida/Southern Florida/South Florida Metro/Miami-Dade
5272	5625	/World Localities/North America/USA/Florida/Southern Florida/South Florida Metro/West Palm Beach-Boca Raton
5273	5257	/World Localities/North America/USA/Great Plains (USA)
5462	5273	/World Localities/North America/USA/Great Plains (USA)/Kansas
5470	5273	/World Localities/North America/USA/Great Plains (USA)/Nebraska
5908	5470	/World Localities/North America/USA/Great Plains (USA)/Nebraska/Omaha
5471	5273	/World Localities/North America/USA/Great Plains (USA)/North Dakota
5426	5273	/World Localities/North America/USA/Great Plains (USA)/Oklahoma
5274	5426	/World Localities/North America/USA/Great Plains (USA)/Oklahoma/Oklahoma City
5275	5426	/World Localities/North America/USA/Great Plains (USA)/Oklahoma/Tulsa
5472	5273	/World Localities/North America/USA/Great Plains (USA)/South Dakota
5276	5257	/World Localities/North America/USA/Hawaii
5828	5276	/World Localities/North America/USA/Hawaii/Big Island (Hawaii)
5829	5276	/World Localities/North America/USA/Hawaii/Kauai
5827	5276	/World Localities/North America/USA/Hawaii/Maui
5826	5276	/World Localities/North America/USA/Hawaii/Oahu
5277	5257	/World Localities/North America/USA/Mid-Atlantic (USA)
5463	5277	/World Localities/North America/USA/Mid-Atlantic (USA)/Delaware
5427	5277	/World Localities/North America/USA/Mid-Atlantic (USA)/Maryland
5279	5427	/World Localities/North America/USA/Mid-Atlantic (USA)/Maryland/Baltimore Metro
5909	5427	/World Localities/North America/USA/Mid-Atlantic (USA)/Maryland/Ocean City (MD)
5411	5277	/World Localities/North America/USA/Mid-Atlantic (USA)/New Jersey
5896	5411	/World Localities/North America/USA/Mid-Atlantic (USA)/New Jersey/Atlantic City
5409	5277	/World Localities/North America/USA/Mid-Atlantic (USA)/New York State
5278	5409	/World Localities/North America/USA/Mid-Atlantic (USA)/New York State/Albany-Capital District
5280	5409	/World Localities/North America/USA/Mid-Atlantic (USA)/New York State/Buffalo-Niagara Falls
5282	5409	/World Localities/North America/USA/Mid-Atlantic (USA)/New York State/New York City
5285	5409	/World Localities/North America/USA/Mid-Atlantic (USA)/New York State/Rochester-Finger Lakes
5410	5277	/World Localities/North America/USA/Mid-Atlantic (USA)/Pennsylvania
5281	5410	/World Localities/North America/USA/Mid-Atlantic (USA)/Pennsylvania/Harrisburg-South Central PA
5283	5410	/World Localities/North America/USA/Mid-Atlantic (USA)/Pennsylvania/Philadelphia
5284	5410	/World Localities/North America/USA/Mid-Atlantic (USA)/Pennsylvania/Pittsburgh
5286	5277	/World Localities/North America/USA/Mid-Atlantic (USA)/Washington DC
5287	5257	/World Localities/North America/USA/Midwest (USA)
5428	5287	/World Localities/North America/USA/Midwest (USA)/Illinois
5288	5428	/World Localities/North America/USA/Midwest (USA)/Illinois/Chicago
5429	5287	/World Localities/North America/USA/Midwest (USA)/Indiana
5294	5429	/World Localities/North America/USA/Midwest (USA)/Indiana/Indianapolis
5458	5287	/World Localities/North America/USA/Midwest (USA)/Iowa
5413	5287	/World Localities/North America/USA/Midwest (USA)/Michigan
5292	5413	/World Localities/North America/USA/Midwest (USA)/Michigan/Detroit



5293	5413	/World Localities/North America/USA/Midwest (USA)/Michigan/Grand Rapids-West Michigan
5431	5287	/World Localities/North America/USA/Midwest (USA)/Minnesota
5297	5431	/World Localities/North America/USA/Midwest (USA)/Minnesota/Minneapolis-Saint Paul
5414	5287	/World Localities/North America/USA/Midwest (USA)/Missouri
5298	5414	/World Localities/North America/USA/Midwest (USA)/Missouri/Greater St. Louis
5295	5414	/World Localities/North America/USA/Midwest (USA)/Missouri/Kansas City
5412	5287	/World Localities/North America/USA/Midwest (USA)/Ohio
5289	5412	/World Localities/North America/USA/Midwest (USA)/Ohio/Cincinnati
5291	5412	/World Localities/North America/USA/Midwest (USA)/Ohio/Columbus (OH)
5290	5412	/World Localities/North America/USA/Midwest (USA)/Ohio/Greater Cleveland
5430	5287	/World Localities/North America/USA/Midwest (USA)/Wisconsin
5296	5430	/World Localities/North America/USA/Midwest (USA)/Wisconsin/Milwaukee
5299	5257	/World Localities/North America/USA/New England
5423	5299	/World Localities/North America/USA/New England/Connecticut
5301	5423	/World Localities/North America/USA/New England/Connecticut/Greater Hartford
5670	5423	/World Localities/North America/USA/New England/Connecticut/New Haven
5459	5299	/World Localities/North America/USA/New England/Maine
5424	5299	/World Localities/North America/USA/New England/Massachusetts
5300	5424	/World Localities/North America/USA/New England/Massachusetts/Boston Metro
5461	5299	/World Localities/North America/USA/New England/New Hampshire
5425	5299	/World Localities/North America/USA/New England/Rhode Island
5302	5425	/World Localities/North America/USA/New England/Rhode Island/Providence
5460	5299	/World Localities/North America/USA/New England/Vermont
5303	5257	/World Localities/North America/USA/Pacific Northwest
5433	5303	/World Localities/North America/USA/Pacific Northwest/Oregon
5304	5433	/World Localities/North America/USA/Pacific Northwest/Oregon/Portland (OR)
5432	5303	/World Localities/North America/USA/Pacific Northwest/Washington State
5305	5432	/World Localities/North America/USA/Pacific Northwest/Washington State/Seattle-Tacoma
5306	5257	/World Localities/North America/USA/Rocky Mountains
5434	5306	/World Localities/North America/USA/Rocky Mountains/Colorado
5307	5434	/World Localities/North America/USA/Rocky Mountains/Colorado/Denver
5466	5306	/World Localities/North America/USA/Rocky Mountains/Idaho
5465	5306	/World Localities/North America/USA/Rocky Mountains/Montana
5464	5306	/World Localities/North America/USA/Rocky Mountains/Wyoming
5308	5257	/World Localities/North America/USA/South (USA)
5422	5308	/World Localities/North America/USA/South (USA)/Alabama
5311	5422	/World Localities/North America/USA/South (USA)/Alabama/Birmingham (AL)
5467	5308	/World Localities/North America/USA/South (USA)/Arkansas
5906	5467	/World Localities/North America/USA/South (USA)/Arkansas/Little Rock
5420	5308	/World Localities/North America/USA/South (USA)/Georgia (USA)
5309	5420	/World Localities/North America/USA/South (USA)/Georgia (USA)/Atlanta
5907	5420	/World Localities/North America/USA/South (USA)/Georgia (USA)/Savannah
5421	5308	/World Localities/North America/USA/South (USA)/Kentucky
5315	5421	/World Localities/North America/USA/South (USA)/Kentucky/Louisville
5417	5308	/World Localities/North America/USA/South (USA)/Louisiana
5310	5417	/World Localities/North America/USA/South (USA)/Louisiana/Baton Rouge
5318	5417	/World Localities/North America/USA/South (USA)/Louisiana/New Orleans
5469	5308	/World Localities/North America/USA/South (USA)/Mississippi
5416	5308	/World Localities/North America/USA/South (USA)/North Carolina
5312	5416	/World Localities/North America/USA/South (USA)/North Carolina/Charlotte Metro
5313	5416	/World Localities/North America/USA/South (USA)/North Carolina/Piedmont Triad
5320	5416	/World Localities/North America/USA/South (USA)/North Carolina/Raleigh-Durham
5418	5308	/World Localities/North America/USA/South (USA)/South Carolina
5618	5418	/World Localities/North America/USA/South (USA)/South Carolina/Greater Charleston (SC)
5821	5418	/World Localities/North America/USA/South (USA)/South Carolina/Myrtle Beach & Grand Strand
5314	5418	/World Localities/North America/USA/South (USA)/South Carolina/Upstate South Carolina
5905	5314	/World Localities/North America/USA/South (USA)/South Carolina/Upstate South Carolina/Greenville
5419	5308	/World Localities/North America/USA/South (USA)/Tennessee
5900	5419	/World Localities/North America/USA/South (USA)/Tennessee/Gatlinburg

5316	5419	/World Localities/North America/USA/South (USA)/Tennessee/Memphis
5317	5419	/World Localities/North America/USA/South (USA)/Tennessee/Nashville
5415	5308	/World Localities/North America/USA/South (USA)/Virginia
5321	5415	/World Localities/North America/USA/South (USA)/Virginia/Richmond-Petersburg
5319	5415	/World Localities/North America/USA/South (USA)/Virginia/Virginia Beach-Hampton Roads
5468	5308	/World Localities/North America/USA/South (USA)/West Virginia
5322	5257	/World Localities/North America/USA/Southwest (USA)
5435	5322	/World Localities/North America/USA/Southwest (USA)/Arizona
5325	5435	/World Localities/North America/USA/Southwest (USA)/Arizona/Phoenix
5328	5435	/World Localities/North America/USA/Southwest (USA)/Arizona/Tucson
5436	5322	/World Localities/North America/USA/Southwest (USA)/Nevada
5324	5436	/World Localities/North America/USA/Southwest (USA)/Nevada/Las Vegas
5326	5436	/World Localities/North America/USA/Southwest (USA)/Nevada/Reno-Sparks
5438	5322	/World Localities/North America/USA/Southwest (USA)/New Mexico
5323	5438	/World Localities/North America/USA/Southwest (USA)/New Mexico/Albuquerque-Santa Fe
5437	5322	/World Localities/North America/USA/Southwest (USA)/Utah
5327	5437	/World Localities/North America/USA/Southwest (USA)/Utah/Salt Lake City
5329	5257	/World Localities/North America/USA/Texas
5330	5329	/World Localities/North America/USA/Texas/Austin-Round Rock
5331	5329	/World Localities/North America/USA/Texas/Dallas-Fort Worth
5332	5329	/World Localities/North America/USA/Texas/El Paso
5333	5329	/World Localities/North America/USA/Texas/Houston
5334	5329	/World Localities/North America/USA/Texas/San Antonio
5335	5000	/World Localities/Oceania
5336	5335	/World Localities/Oceania/Australia
5452	5336	/World Localities/Oceania/Australia/New South Wales
5339	5452	/World Localities/Oceania/Australia/New South Wales/Canberra
5342	5452	/World Localities/Oceania/Australia/New South Wales/Newcastle (AU)
5344	5452	/World Localities/Oceania/Australia/New South Wales/Sydney
5457	5336	/World Localities/Oceania/Australia/Northern Territory
5453	5336	/World Localities/Oceania/Australia/Queensland
5338	5453	/World Localities/Oceania/Australia/Queensland/Brisbane
5357	5453	/World Localities/Oceania/Australia/Queensland/Cairns
5340	5453	/World Localities/Oceania/Australia/Queensland/Gold Coast
5456	5336	/World Localities/Oceania/Australia/South Australia
5337	5456	/World Localities/Oceania/Australia/South Australia/Adelaide
5356	5336	/World Localities/Oceania/Australia/Tasmania
5454	5336	/World Localities/Oceania/Australia/Victoria (AU)
5341	5454	/World Localities/Oceania/Australia/Victoria (AU)/Melbourne
5455	5336	/World Localities/Oceania/Australia/Western Australia
5343	5455	/World Localities/Oceania/Australia/Western Australia/Perth
5350	5335	/World Localities/Oceania/New Zealand
5351	5350	/World Localities/Oceania/New Zealand/Auckland
5359	5350	/World Localities/Oceania/New Zealand/Christchurch
5358	5350	/World Localities/Oceania/New Zealand/Wellington
5589	5335	/World Localities/Oceania/Pacific Islands
5345	5589	/World Localities/Oceania/Pacific Islands/Melanesia
5346	5345	/World Localities/Oceania/Pacific Islands/Melanesia/Fiji
5347	5345	/World Localities/Oceania/Pacific Islands/Melanesia/Papua New Guinea
5348	5589	/World Localities/Oceania/Pacific Islands/Micronesia
5349	5348	/World Localities/Oceania/Pacific Islands/Micronesia/Guam
5352	5589	/World Localities/Oceania/Pacific Islands/Polynesia
5568	5352	/World Localities/Oceania/Pacific Islands/Polynesia/Tahiti & Bora Bora
5353	5000	/World Localities/Polar Regions

# **EXHIBIT 27**

**Google Example OpenRTB Protobuf for Web video Real-Time Bidding: Pregnancy and Maternity Vertical, [https://developers.google.com/authorized-buyers/rtb/request-guide#openrtb-protobuf\\_6](https://developers.google.com/authorized-buyers/rtb/request-guide#openrtb-protobuf_6) (last visited January 22, 2021)**  
 (Highlights and italicized description added by counsel)

```

id: "xPFd77195961Y5z082Of0I"
imp {
  id: "1"
  video {
    mimes: "application/javascript"
    mimes: "video/mp4"
    linearity: LINEAR
    maxduration: 16
    w: 361
    h: 203
    startdelay: 0
    playbackmethod: CLICK_TO_PLAY
    pos: ABOVE_THE_FOLD
    companionad {
      w: 0
      h: 0
      mimes: "image/gif"
      mimes: "image/jpeg"
      format {
        w: 0
        h: 0
      }
    }
  }
  api: VPAID_1
  api: VPAID_2
  companiontype: STATIC
  protocols: VAST_2_0
  protocols: VAST_3_0
  skip: true
  placement: IN_STREAM_PLACEMENT
}
displaymanager: "GOOGLE"
tagid: "8003173631"
bidfloor: 0.16
bidfloorcur: "USD"
secure: true
metric {
  type: "click_through_rate"
  value: 0.046027131378650665
  vendor: "EXCHANGE"
}
metric {
  type: "video_completion_rate"
  value: 0.8325581550598145
  vendor: "EXCHANGE"
}
[com.google.doubleclick.imp] {
  billing_id: 85380932591
  dfp_ad_unit_code: "/8586722/google/test"
  ampad: AMP_AD_NOT_ALLOWED

```

```

    open_bidding {
      is_open_bidding: true
    }
  }
}
site {
  page: "https://www.google.com"
  publisher {
    id: "pub-9669716277486105"
    [com.google.doubleclick.publisher] {
      country: "US"
    }
  }
  content {
    contentrating: "DV-PG"
    livestream: false
    language: "es"
  }
  mobile: true
  [com.google.doubleclick.site] {
    amp: DIALECT_HTML
  }
}
device {
  ua: "Mozilla/5.0 (Linux; Android 7.1.1; Moto E (4) Build/NCQS26.69-64-16;
  wv) AppleWebKit/537.36 (KHTML, like Gecko) Version/4.0 Chrome/79.0.3945.116
  Mobile Safari/537.36 [FB_IAB/FB4A;FBAV/252.0.0.22.355;]"
  ip: "192.168.1.0"
  geo {
    country: "USA"
    region: "US-NY"
    metro: "9067609"
    city: "New York"
    utcoffset: -480
  }
  carrier: "70091"
  make: "motorola"
  model: "moto e(4)"
  os: "android"
  osv: "7.1.1"
  devicetype: HIGHEND_PHONE
  w: 720
  h: 1280
  pxratio: 1.0
}
user {
  id: "iE0B3ASr55t81Mf8XnJ34W084h8"p
  buyeruid: "9WYQiC4JG3hQfIM862Eym660G4UdsG4c"
  customdata: "WqJ725BD4feN7831884366n8gmA5Rk77Ud7K61GL85e4i9A6"
  data {
    id: "DetectedVerticals"
    name: "DoubleClick"
    segment {
      id: "184"
      value: "1"
    }
  }
  segment {

```

Per Google documentation, Segment ID "184" corresponds with "Celebrities and Entertainment News"

```
    id: "401"
    value: "0.2"
  }
}
}
at: FIRST_PRICE
tmax: 300
cur: "USD"
[com.google.doubleclick.bid_request] {
  bid_feedback {
    request_id: "51R8rec00v494jF4187mM9"
    creative_status_code: 79
    buyer_creative_id: "test_creative_id_123930"
    minimum_bid_to_win: 0.808421
  }
  bid_feedback {
    request_id: "51R8rec00v494jF4187mM9"
    creative_status_code: 79
    buyer_creative_id: "test_creative_id_123930"
    minimum_bid_to_win: 1.15642
  }
  google_query_id: "ANy-z2Gu2L-
GX054sP4R3F3bdZ20nu41cX94x1yN47w3hg0k7QMuqLA0Qdqr112g4gCt0se9"
}
```

Per Google documentation, Segment ID "401" corresponds with "Pregnancy and Maternity"

# **EXHIBIT 28**

**Google Example OpenRTB Protobuf for “App native” Real-Time Bidding: OBGYN Vertical**, [https://developers.google.com/authorized-buyers/rtb/request-guide#openrtb-protobuf\\_6](https://developers.google.com/authorized-buyers/rtb/request-guide#openrtb-protobuf_6)  
(last visited January 22, 2021)  
(Highlights and italicized descriptions added by counsel)

```
id: "14nX4121o528sg11a5d51S"
```

```
imp {  
  id: "1"  
  displaymanager: "GOOGLE"  
  tagid: "3663182837"  
  bidfloor: 0.12  
  bidfloorcur: "USD"  
  secure: true  
  native {  
    ver: "1.2"  
    api: MRAID_1  
    api: MRAID_2  
    request_native {  
      ver: "1.2"  
      assets {  
        id: 1  
        required: true  
        title {  
          len: 25  
        }  
      }  
    }  
    assets {  
      id: 2  
      required: true  
      data {  
        type: DESC  
        len: 90  
      }  
    }  
    assets {  
      id: 3  
      data {  
        type: CTATEXT  
        len: 15  
      }  
    }  
    assets {  
      id: 4  
      required: true  
      data {  
        type: SPONSORED  
        len: 25  
      }  
    }  
    assets {  
      id: 5  
      required: true  
      img {  
        type: MAIN  
        wmin: 1200  
      }  
    }  
  }  
}
```



```

        hmin: 627
      }
    }
    assets {
      id: 6
      img {
        type: LOGO
        wmin: 128
        hmin: 128
      }
    }
    eventtrackers {
      event: IMPRESSION
      methods: IMG
    }
  }
}
metric {
  type: "click_through_rate"
  value: 0.003636630717664957
  vendor: "EXCHANGE"
}
metric {
  type: "viewability"
  value: 0.7
  vendor: "EXCHANGE"
}
[com.google.doubleclick.imp] {
  billing_id: 29725457068
  billing_id: 29725457068
  publisher_settings_list_id: 7391335554068036165
  publisher_settings_list_id: 7391335554068036165
  allowed_vendor_type: 698
  allowed_vendor_type: 485
  ampad: AMP_AD_NOT_ALLOWED
}
}
app {
  name: "Test App"
  bundle: "com.google.test"
  publisher {
    id: "pub-3381391626698655"
    [com.google.doubleclick.publisher] {
      country: "US"
    }
  }
  content {
    url: "https://www.google.com"
    contentrating: "DV-T"
    userrating: "4.8"
    livestream: false
    language: "en"
  }
  storeurl: "https://www.google.com"
}
device {
  ua: "Mozilla/5.0 (Linux; Android 9; Mi A2 Build/PKQ1.180904.001; wv)

```

```

AppleWebKit/537.36 (KHTML, like Gecko) Version/4.0 Chrome/78.0.3904.108
Mobile Safari/537.36 (Mobile; afma-sdk-a-v19831030.19831030.0) "
ip: "192.168.1.0"
geo {
  lat: 0.0
  lon: 0.0
  country: "USA"
  region: "US-NY"
  utcoffset: 420
}
make: "xiaomi"
model: "mi a2"
os: "android"
osv: "9"
devicetype: HIGHEND PHONE
ifa: "b\ 'c\ \xbc\ \xfbnB<\ \xe9\ \x1em\ \xf9\ \xdc\ \xd1\ \x04\ \xa1\ \xdf\ \x88\ ' "
w: 360
h: 672
pxratio: 3.0
}
user {
  id: "3R2e3G7G0966GuMK118NkE67282"
  data {
    id: "DetectedVerticals"
    name: "DoubleClick"
    segment {
      id: "558"
      value: "0.2"
    }
    segment {
      id: "695"
      value: "0.2"
    }
  }
}
}
at: FIRST_PRICE
tmax: 300
cur: "USD"
bcat: "IAB9-30"
bcat: "IAB23-5"
[com.google.doubleclick.bid_request] {
  google_query_id: "ANy-zZ7G01-
1S65WvAC20fnnI2KA66Ww6RP151C7G0U2F7q3v2N07465EbjUh28FEN6MOF73"

```

Per Google documentation, Segment ID "558" corresponds with "OBGYN"

Per Google documentation, Segment ID "695" corresponds with "Time and Calendars"

CIVIL COVER SHEET

The JS-CAND 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Benjamin Hewitt and Kimberley Woodruff, on behalf of themselves and all others similarly situated

(b) County of Residence of First Listed Plaintiff Los Angeles, California (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Bleichmar Fonti & Auld LLP, 555 12th Street, Suite 1600, Oakland, CA 94601, 415-445-4003

DEFENDANTS

Google LLC

County of Residence of First Listed Defendant Santa Clara (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, HABEAS CORPUS, OTHER, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation-Transfer
8 Multidistrict Litigation-Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): Federal Wiretap Act, 18 U.S.C. § 2511

Brief description of cause: Breach of contract and Invasion of privacy

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, Fed. R. Civ. P. DEMAND \$

CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S), IF ANY (See instructions):

JUDGE Lucy H. Koh

DOCKET NUMBER 5:20-cv-05146

IX. DIVISIONAL ASSIGNMENT (Civil Local Rule 3-2)

(Place an "X" in One Box Only) SAN FRANCISCO/OAKLAND SAN JOSE EUREKA-MCKINLEYVILLE

DATE 03/26/2021

SIGNATURE OF ATTORNEY OF RECORD

/s/ Lesley E. Weaver

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS-CAND 44

**Authority For Civil Cover Sheet.** The JS-CAND 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I. a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the “defendant” is the location of the tract of land involved.)
- c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section “(see attachment).”
- II. Jurisdiction.** The basis of jurisdiction is set forth under Federal Rule of Civil Procedure 8(a), which requires that jurisdictions be shown in pleadings. Place an “X” in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- (1) United States plaintiff. Jurisdiction based on 28 USC §§ 1345 and 1348. Suits by agencies and officers of the United States are included here.
  - (2) United States defendant. When the plaintiff is suing the United States, its officers or agencies, place an “X” in this box.
  - (3) Federal question. This refers to suits under 28 USC § 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
  - (4) Diversity of citizenship. This refers to suits under 28 USC § 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS-CAND 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an “X” in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an “X” in one of the six boxes.
- (1) Original Proceedings. Cases originating in the United States district courts.
  - (2) Removed from State Court. Proceedings initiated in state courts may be removed to the district courts under Title 28 USC § 1441. When the petition for removal is granted, check this box.
  - (3) Remanded from Appellate Court. Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
  - (4) Reinstated or Reopened. Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
  - (5) Transferred from Another District. For cases transferred under Title 28 USC § 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
  - (6) Multidistrict Litigation Transfer. Check this box when a multidistrict case is transferred into the district under authority of Title 28 USC § 1407. When this box is checked, do not check (5) above.
  - (8) Multidistrict Litigation Direct File. Check this box when a multidistrict litigation case is filed in the same district as the Master MDL docket. Please note that there is no Origin Code 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC § 553. Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an “X” in this box if you are filing a class action under Federal Rule of Civil Procedure 23. Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction. Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS-CAND 44 is used to identify related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- IX. Divisional Assignment.** If the Nature of Suit is under Property Rights or Prisoner Petitions or the matter is a Securities Class Action, leave this section blank. For all other cases, identify the divisional venue according to Civil Local Rule 3-2: “the county in which a substantial part of the events or omissions which give rise to the claim occurred or in which a substantial part of the property that is the subject of the action is situated.”
- Date and Attorney Signature.** Date and sign the civil cover sheet.