

# BlueKai

## Description

You can use Oracle BlueKai DMP tags to extract user attributes from your containers (also known as sites, mobile sites, and mobile apps) and to traffic third-party pixels.

This document summarizes and illustrates the BlueKai tags used for the BlueKai's partner interface ([partner.bluekai.com](http://partner.bluekai.com)) and BlueKai's tag management service ([publisher.bluekai.com](http://publisher.bluekai.com)).

You use the tag management service to [schedule the firing of third-party tags](#) from the container. Container tags are not set or visible from the tag management service.

The BlueKai container tag includes JavaScript and HTML code that collects explicitly defined data from a website and then transfers that data to partners by scheduling third-party tags and pixels onto a client's page. It includes settings that determine how the tag is fired and how data collection and transfer is managed. See [creating containers](#) for more information on the different firing methods and options for the various container tag types.

## Privacy Policy

Oracle respects your preferences concerning the collection and use of your Personal Information. The following privacy policies are tailored for the different ways your Personal Information is collected by different Oracle lines of business and offerings.

Oracle Corporation and our subsidiaries and affiliates ("Oracle" or "we") respect your preferences concerning the treatment of Personal Information that we may collect. This Policy ("Policy") lets you know how we collect and use your Personal Information, how you can control its use, and describes our practices regarding information collected from the different Oracle sites that link or refer to this Policy (such as our websites, computer or mobile software applications, social media pages and HTML-formatted e-mail messages), as well as through offline sales and marketing activities (collectively, the "Channels").

The Channels may provide links to or the ability to connect with non-Oracle websites, services, social networks or applications. Clicking on those links or enabling those connections may allow the third party to collect or share information about you. Those third-party websites or services are beyond our control. We encourage you to check the privacy policies and terms of use of any non-Oracle websites or services before providing your Personal Information to them.

### Personal and Other Information We Collect

Through your interaction with and use of the Channels, Oracle may collect **Personal Information**, which is information that identifies an individual or relates to an identifiable individual. Personal Information may include, but is not limited to:

- Your name and physical address, email addresses, and telephone numbers
- Behavioral or demographic attributes, when tied to personal identifiers
- Past transactional behavior on the Channels

- Information obtained from third parties on your interests
- Information about your company such as the name, size and location of your company and your role within the company

Oracle may also collect **Other Information** through your interaction with and use of the Channels and non-Oracle websites, which does not reveal your specific identity or does not directly relate to an individual. Other Information may include, but is not limited to:

- Unique IDs such as a cookie placed on your computer, mobile or device IDs
- Internet Protocol address ("IP address") and information derived from your IP address such as your geographic location
- Information about your devices such as information contained in HTTP Headers (defined below) or other internet transfer protocol signals, browser or device type and version, operating system, user-agent strings and information about or from the presence or use of "apps" on your mobile devices, screen resolution, and your preferred language
- Behavioral data about your usage of the Channels, such as webpages clicked, websites and content areas visited, date and time of activities
- The web search you used to locate and navigate to the Channels

In some instances, we may combine Other Information with Personal Information, such as deriving geographical location from your IP address and combining behavioral data about your usage of the Channels with your name. If we combine Other Information with Personal Information, we will treat the combined information as Personal Information.

## **How We Use and Share Information**

### **Personal Information**

Oracle uses and shares the Personal Information it collects (unless otherwise restricted by applicable law), to:

### **Engage in Transactions.**

Oracle may use Personal Information to engage in transactions with you.

### **Process Transactions.**

Oracle may use Personal Information along with financial, credit card, and payment information, to process your transactions.

### **Provide Support or Other Services.**

Oracle may use your Personal Information to provide you support or other services you have ordered, as well as product updates, product patches and fixes and other similar operational communications.

### **Tailor Marketing to Your Needs.**

Oracle may use your Personal Information and Other Information to notify you about new product releases and service developments, and to advertise Oracle's products and services in accordance with this Policy. Your website visit, marketing experience, and communications may be tailored to your interests based on your Personal Information. Oracle may pass your contact information to the appropriate Oracle distributor or reseller for further follow-up related to your interests. In addition, Oracle may share your Personal Information to specific partners that offer complimentary products and services and may share Other Information with third parties to facilitate interest-based advertising. Other

Information uses specified above are not mandatory and may be controlled by you. Please refer to the "[Registration and Privacy Choices](#)" section below for opt-out options.

#### **Respond to Your Requests.**

Oracle may also use Personal Information in order to respond directly to your information requests (including newsletter registrations or other specific requests) or other inquiries.

#### **Provide Oracle Online Communities.**

Some Channels permit you to: participate in interactive discussions; create a profile; post comments, opportunities or other content; communicate directly with another user; or otherwise engage in networking activities. Some of these services are moderated and all may be accessed for technical reasons. Oracle does not control the content that users post to these forums or social networks. You should carefully consider whether you wish to submit Personal Information to these forums or social networks and whether you wish to make your profile available to other users, and you should tailor any content you submit appropriately. You should also review any additional terms and conditions that may govern your use of these Channels. To manage or remove your Personal Information from our online communities, please fill out a [request form](#). If we are not able to remove your Personal Information, we will let you know.

#### **Interact with You on Third Party Social Networks.**

Oracle may use your Personal Information to interact with you on third party social networks. Oracle's interactions with you on a third party social network would be subject to that network's privacy policies and terms of use.

#### **Post Testimonials.**

We post testimonials on our Channels that may contain Personal Information. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. If you wish to update or delete your testimonial, please fill out a [request form](#), and be sure to include your name, testimonial location, and contact information.

#### **Administer Product Downloads and Licensing Compliance.**

If you download products from our Channels, Oracle uses Personal Information to: confirm certain information about your order (for example, that you did not experience problems in the download process); discuss the downloaded products; or provide marketing or sales information about related products and services. Oracle also may use Personal Information to contact you, confirm compliance with licensing and other terms of use, and may share it with your company.

#### **Select Content, Improve Quality and Facilitate Use of the Channels.**

Oracle may use your Personal Information to help create and personalize content on our Channels, facilitate your use of the Channels (for example, to facilitate navigation and the login process, avoid duplicate data entry, enhance security, keep track of shopping cart additions and preserve order information between sessions), improve quality, track marketing campaign responsiveness (including online advertising and e-mail marketing), and evaluate page response rates.

**Provide various Oracle Communities, such as Partners, with Relevant Product Alerts and Updates.**

If you sign up for an Oracle community or program (e.g., Oracle Partner Network, Oracle Technology Network, Oracle.com), Oracle will provide you information regarding your expressed interests, such as new product releases, alerts, updates, prices, terms, special offers and associated campaigns.

**Power Joint Sales or Product Promotions.**

Oracle and its partners may engage in joint sales or product promotions. Such promotions will always reference the partners involved. Both Oracle and the partner(s) will have access to your Personal Information, and either Oracle or our partners may provide you with the sales or product promotion information. Each party will be responsible for managing their own use of the Personal Information collected for the joint sale or product promotion. We recommend you review the privacy policies of these partners to address any questions you have regarding their handling of your information.

**Improve Products, Services, and Experiences.**

Oracle may use your Personal Information to evaluate and improve our products, services, marketing, and customer relationships.

**Communicate with You about a Conference or Event.**

We or our partners may communicate with you about a conference or event hosted or co-sponsored by Oracle or one of our partners. This may include information about the event's content, logistics, payment, updates, and any additional meetings, special demonstrations or other customer facilitation that we may provide related to your event registration. After the event, Oracle may contact you about the event and related products and services, and may share information about your attendance with your company. Where legally permitted, Oracle will also allow designated partners or conference sponsors to send you up to two communications related to your event attendance. Please note that our partners or conference sponsors may directly request your Personal Information at their conference booths or presentations. You should review their privacy policies to learn how they use Personal Information.

**Obtain Third Party Services.**

We also share Personal Information and Other Information with third parties who provide services to Oracle, such as credit card processing services, order fulfillment, analytics, event / campaign management, website management, information technology and related infrastructure provision, customer service, e-mail delivery, auditing, and other similar services. When Oracle shares Personal Information with third party service providers, we require that they use your Personal Information and Other Information only for the purpose of providing services to us and subject to terms consistent with this Policy.

**Protect our Employees, Sites, Facilities, and Operations.**

Oracle may disclose your Personal Information as we believe to be necessary or appropriate to protect the health and safety of our employees and visitors, our physical and online operations, our property, rights, and privacy, and/or that of our affiliates, you or others. If you visit our offices, you may be photographed or videotaped as part of maintaining the

security of our facilities. Facility security photography will be treated as sensitive information and will only be used for security and investigation purposes.

### **Comply with Legal Requirements and Corporate Transactions.**

Oracle may disclose your Personal Information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes; (d) to enforce our terms and conditions; and (e) to allow us to pursue available remedies or limit the damages that we may sustain.

Additionally, in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), we may transfer the Personal Information we have collected to the relevant third party.

Some of the Personal Information and Other Information uses specified above are not mandatory and may be controlled by you. Please refer to the "[Registration and Privacy Choices](#)" section below or view the summary of your [Privacy Choices](#) for more information.

### **Other Information**

We may use, transfer, and disclose Other Information we collect for any purpose, except where applicable law requires otherwise. If we are required to treat Other Information as Personal Information under applicable law, then we will only use it in the same way that we are permitted to use and disclose Personal Information.

### **How We Collect Information**

Oracle and our third party service providers may collect both Personal Information and Other Information from a variety of sources that generally fall into three categories:

- **Direct Interactions:** From your use of and interaction with us through the Channels and other activities such as account creation, submission of registrations and forms, or sales inquiries and transactions.
- **Publicly Available Data / Data from Third Parties:** Data from Automated Interactions on non-Oracle websites, or other data you may have made publicly available, such as social media posts, or data provided by third party sources, such as marketing opt-in lists, or data aggregators.
- **Automated Interactions:** From the use of technologies such as [electronic communication protocols](#), [cookies](#), [embedded URLs](#) or [pixels](#), or [widgets, buttons and tools](#). Although Oracle's use of Automated Interactions may change over time as technology evolves, the following descriptions are designed to provide you with additional detail about Oracle's current approach to information collected from Automated Interactions.

**Electronic Communications Protocols:** As is true when you visit most websites and apps, Oracle may automatically receive information from you as part of the communication connection itself, which often consists of network routing information (where you came from), equipment information (browser type or device type), your IP address (which may identify your general geographic location or company), and date and time.

Oracle may also automatically receive and record information about your interaction with the Channels, such as clickstream information (when each Oracle webpage was visited and

how much time was spent on the page), how often you access the Channel, performance data, aggregate usage, or general geo-location data.

**Cookies:** Oracle's server will query your browser to see if there are "cookies" previously set by our electronic Channels. A cookie is a small piece of information sent by a Web server to store on a Web browser so it can later be read back from that browser. Cookies may collect information, including a unique identifier, user preferences, profile information, membership information, and general usage and volume statistical information. Cookies may also be used to collect individualized website use data, provide electronic Channel personalization, or conduct and measure the effectiveness of advertising in accordance with this Policy. Some cookies may remain on users' computers after they leave the website. While the majority are set to expire within 1-24 months of your last visit to the website that set the cookie, others may not expire because of their nature, like cookies that remember opt-out preferences.

Your browser may provide you with information and control over cookies. You can set your browser to alert you when a cookie is being used, and accept or reject the cookie. You can also set your browser to refuse all cookies or accept only cookies returned to the originating servers. Users can generally disable the cookie feature on their browser without affecting their ability to use the site, except in some cases where cookies are used as an essential security feature necessary for transaction completion. Cookies, however, are important to the proper functioning of a site, and disabling them may degrade your experience and interfere with website features and customizations.

Oracle has engaged one or more third party service providers to track and analyze both individualized usage and volume statistical information from interactions with electronic Channels. The service provider(s) may set cookies on behalf of Oracle. Oracle also uses other third party cookies to provide advertising and personalization services in accordance with this Policy, and to track the performance of Oracle advertisements on our Channels and Oracle e-mails.

**Managing Cookie Preferences:** You may access or change your [cookie preferences](#) at any time. If you have any problems using this cookie preference mechanism, please fill out an [inquiry form](#).

**Flash Cookies:** We may use Flash cookies, also known as "local shared objects," on our electronic Channels that employ Flash technology. Flash cookies are used to remember the site's settings to personalize the look and feel of the site. Like normal cookies, Flash cookies are represented as small files on your computer. One method of preventing Flash cookies from being placed is to adjust your preferences in the Macromedia Website Privacy Settings Panel at [macromedia.com](http://macromedia.com).

**Embedded URLs:** Oracle may use a tracking technique that employs embedded URLs to allow use of the electronic Channels without cookies. Embedded URLs allow limited information to follow you as you navigate the electronic Channels, but are not associated with Personal Information and are not used beyond the session.

**Embedded Pixels and Similar Technologies:** On the electronic Channels, Oracle and its service providers may use embedded pixel technologies for the purposes of identifying unique user visits (as opposed to aggregate hits) and for advertising purposes. In addition, embedded pixels or other technologies may be used in e-mails and our online display advertising to provide information on when the e-mail or ad was opened to track marketing

campaign responsiveness; information collected using these technologies may be associated with the recipient's e-mail address.

The pixel technology used on our Channels enable the synchronization of internal unique identifiers between Oracle (AddThis) and our third party partners to facilitate interest-based advertising. For a list of those third party partners, please [click here](#). Please see the "Cookies and Do Not Track" section below for opt-out options.

**Widgets, Buttons, and Tools:** Our electronic Channels may include widgets, which are interactive mini-programs that run on our site to provide specific services from another company (e.g., links to bookmarked sites), along with buttons or other tools that link to other companies' services (e.g., a "Like" button or third party map). The widget, button or tool may collect and automatically send Personal Information, such as your e-mail address, or Other Information (such as your browser information, or IP address), to a third party. Cookies may also be set or used by the widgets, buttons or tools to enable them to function properly or for other purposes, which may include advertising. Information collected or used by a widget, button or tool, including cookie settings and preferences, is governed by the privacy policy of the company that created it.

**Physical Location:** We may collect and share the physical location of your device for purposes consistent with this Policy, such as to provide you with personalized location-based services or content. In some instances, you may be permitted to allow or deny such use of your device's location, but if you choose to deny such use, we may not be able to provide you with the applicable personalized services or content.

### **Registration and Privacy Choices**

A list of your current Privacy Choices is listed on the [following tab](#).

### **Registration**

Oracle allows you to establish an online registration profile for marketing communications at Oracle.com. You may use the profile to customize and control your preferences for receiving electronic information, including opting into (or out of) communities, newsletters and general interest areas. You can return to the registration profile at any time to change your elections or modify your profile at <https://profile.oracle.com/>. Please login as usual and follow the prompts to "update my profile."

### **E-mail Marketing.**

Oracle enables you to opt out of marketing communications. You may opt out of e-mail marketing by modifying your online profile as described above or by using our general unsubscribe automated link that is included in Oracle marketing e-mails. You can find details on how to automatically unsubscribe from e-mail communications, as well as how to submit requests to opt-out from phone and postal marketing, on our [Oracle.com Account Help page](#). If you have any problems using any of these opt-out mechanisms, please fill out an [inquiry form](#).

Some non-marketing communications are not subject to general opt-out, such as communications related to product download, sales transactions, software updates and other support related information, patches and fixes, conferences or events for which you

have registered, disclosures to comply with legal requirements, and (where permitted by law) quality assurance surveys. Some additional communications with partners are also not subject to general-opt out, including product alerts, updates, contractual marketing and sales materials, and other notices related to partner status.

### **Cookies and Do Not Track.**

Oracle enables you to opt out of cookies that are not required to enable core site functionality. Oracle uses its cookies preferences tool to process Internet advertising and tracking preferences, but does not respond any other Do Not Track signals. Once you have set your cookie preferences. Oracle will signal participating companies with your choice. The following companies require you to select your interest-based advertising preferences directly on their websites: Facebook and Twitter.

Please remember that if you delete your cookies, or use a different browser or computer, you will need to set your cookies preferences again. You may access or change your cookie preferences at any time. If you have any problems using this cookie preference mechanism, please fill out an inquiry form. Oracle enables you to opt out of personalized (non-anonymized) website analytics. You may access or change your website analytics preferences at any time. If you have any problems using this website analytics preference mechanism, please fill out an inquiry form.

### **Mobile Application.**

Oracle's mobile applications may send push notifications directly to your mobile device for the purposes specified in this Policy. You may opt-out of receiving such push notifications and location-based services on your mobile device at any time by editing the notification and location settings on your mobile device.

### **Third Party Permission-Based Lists.**

On occasion, Oracle may use third-party lists to send communications about Oracle products and services. These lists, which are maintained by third parties, include users eligible under applicable law to receive e-mails from other companies such as Oracle. When we use such lists, the communications will include mechanisms to opt out of receiving Oracle marketing communications. If you have trouble opting out, or if you wish to make us aware of any issues related to a third-party mailing, you may contact us directly through our inquiry form.

### **Information-Sharing Choices.**

There are limitations to opting out of sharing with third parties in the case of: (1) joint sales or joint events; (2) where the customer has requested follow-up which involves Oracle partners; (3) where third parties are required to accomplish the transaction or perform the service; and (4) where required by law.

### **Access, Correction, and Profile Updates**

You may request to review, correct, update, suppress, or otherwise modify any of your Personal Information that you have previously provided to us through the Channels, or object to the use or processing of such Personal Information by us. You have the ability to update your Oracle profile and related Personal Information at any time. To change this information, please login at <https://profile.oracle.com/> and follow the prompts to "update

my profile." If you have questions about your account or are having trouble accessing your account, you can get answers to [Frequently Asked Questions \(FAQs\)](#) and request [help with your account](#). If you have privacy concerns regarding access to or the correction of your Personal Information, please contact us through our [inquiry form](#), or write to us at the following address:

Chief Privacy Officer, Oracle Corporation  
10 Van de Graaff Drive  
Burlington, MA 01803  
USA

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information that you have provided to us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information that you have provided to us.

While the majority of questions and issues related to access can be handled quickly, complex requests may take more research and time. In such cases, issues will be addressed, or you will be contacted regarding the nature of the problem and appropriate next steps, within thirty days.

### **Retention and Deletion**

Oracle will retain your Personal Information for as long as your account is active; as needed to provide you products or services; as needed for the purposes outlined in this Policy or at the time of collection; as necessary to comply with our legal obligations (e.g., to honor opt-outs), resolve disputes, and enforce our agreements; or to the extent permitted by law. At the end of the retention period, Oracle will delete your Personal Information in a manner designed to ensure that it cannot be reconstructed or read.

### **Advertising**

Oracle uses third parties to administer Oracle advertisements on third party electronic channels. Other Information, such as user community or implied or inferred interests, may be used in the selection of advertising to make sure that it has relevance to the user. Some ads may contain embedded pixels that may write and read cookies or return session connection information that allows advertisers to better determine how many individual users have interacted with the ad.

Oracle may also use advertising technologies and participate in advertising technology networks that collect Other Information from Oracle and non-Oracle websites, as well as from other sources, to show you Oracle-related advertisements on Oracle's own and third-party websites. These advertisements may be tailored to your perceived interests using retargeting and behavioral advertising technologies, a set of practices collectively referred to as "Interest Based Advertising" in this Policy. Any retargeted or behavioral advertisements served to your browser will contain information on or near it that informs you about the advertising technology partner and how to opt-out of viewing such advertisements. You also may opt out by visiting the Interest Based Advertising portion of the [Privacy Choices tab of this Policy](#). Opting-out does not mean that you will stop receiving ads from Oracle. It means that you still stop receiving ads from Oracle that have been targeted to you based on your visits and browsing activity across websites over time.

Cookie-based tools that allow you to opt-out of Interest Based Advertising prevent Oracle and other participating advertising technology companies from serving interest-related ads to you on behalf of Oracle. They will only work on the Internet browser on which they are

deposited, and they will only function only if your browser is set to accept third-party cookies. These cookie-based opt-out tools may not be as reliable where (e.g., certain mobile devices and operating systems) cookies are sometimes automatically disabled or removed. If you delete cookies, change browsers, computers or use another operating system, you will need to opt-out again.

Oracle is a member of the Network Advertising Initiative (NAI) and works with industry-leading companies to address important privacy and consumer protection issues in online advertising. The NAI has created a compliance program that incorporates attestation reviews, a consumer complaint process, sanctions and annual reporting to help ensure that member companies keep their promises to you and abide by the NAI's Self-Regulatory Code of Conduct. [Click here](#) to learn more about the NAI.

Oracle also participates in the Direct Marketing Association (DMA), Direct Marketing Association UK (DMA UK), [Digital Advertising Alliance \(DAA\)](#), [Digital Advertising Alliance of Canada \(DAAC\)](#), and [European Digital Advertising Alliance \(EDAA\)](#) self-regulatory programs and adheres to the DAA and EDAA Principles for Online Behavioral Advertising.

For general privacy-related information on Oracle's interest based advertising technology, including how Oracle and other companies may use this technology to tailor their own or other third-party advertisements, [click here](#).

### **Security**

The security of your Personal Information is very important to Oracle. We use physical, electronic, and administrative safeguards that are designed to protect your Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

In addition, Oracle uses standard security protocols and mechanisms to exchange the transmission of sensitive data such as credit card details. When you enter sensitive Personal Information such as your credit card number on our site, we encrypt it using secure socket layer (SSL) technology.

In the event that your Personal Information is acquired, or is reasonably believed to have been acquired, by an unauthorized person and applicable law requires notification, Oracle will notify you by e-mail or mail. Oracle will give you notice promptly, consistent with the reasonable needs of law enforcement and/or Oracle to determine the scope of the breach and to investigate and restore the integrity of the data system.

### **Cross Border Transfers**

Oracle is a global corporation with operations in over 80 countries and has developed global data security practices designed to ensure that your personal information is appropriately protected. Please note that personal information may be transferred, accessed and stored globally as necessary for the uses and disclosures stated above in accordance with this policy. By providing your personal information you consent to Oracle transferring your personal information to its affiliates globally and to third party entities that provide services to Oracle.

Oracle has implemented appropriate safeguards for transfers of personal information originating from the European Economic Area ("EEA") to Oracle affiliates and unaffiliated third parties located outside the EEA.

## **Dispute Resolution**

If you have any complaints regarding our compliance with this policy, you should first [contact us](#). We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of your personal information in accordance with this policy. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

## **Sensitive Information**

We ask that you not send us, and you not share any sensitive Personal Information (e.g., government-issued or financial account numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, genetic, or biometric data, criminal background or trade union membership).

## **Children's Privacy**

As a company focused on serving the needs of businesses, Oracle's Channels are not directed to minors and Oracle does not promote or market its services to minors, except as part of specific educational outreach programs with parental permission. If you believe that we have mistakenly or unintentionally collected Personal Information of a minor through our Channels without appropriate consent, please notify us through our [inquiry form](#) so that we may immediately delete the information from our servers and make any other necessary corrections. Additionally, please use [this same form](#) to request removal of content or information that was posted to our Channels when the registered user was under the age of 18. Please note that such requests may not ensure complete or comprehensive removal of the content or information, as, for example, some of your content may have been reposted by another user.

# **Oracle Services Privacy Policy**

## **Scope**

This policy covers the privacy practices that Oracle Corporation and its subsidiaries and affiliates ("Oracle" or "we") employ when providing support, consulting, Cloud or other services (the "services") to its customers ("you" or "your"). Oracle established this privacy policy in order to clarify that the use of information to which it may be provided access in order to provide services is more limited than the use of information covered by Oracle's general privacy policy.

## **Customer Information and Services Data**

**Customer Information** is information that we may collect from your use of the Oracle Web sites and your interactions with us offline. We deal with customer information according to the terms of our general privacy policy.

**Services Data** is data that resides on Oracle, customer or third-party systems to which Oracle is provided access to perform services (including Cloud environments as well as test, development and production environments that may be accessed to perform Oracle consulting and support services). Oracle treats services data according to the terms of this

policy, and treats services data as confidential in accordance with the terms of your order for services.

To illustrate the difference between customer information and services data, when a customer contracts with Oracle for Cloud services, the customer provides information about itself, including its name, address, billing information, and some employee contact information. Oracle may also collect other information about the customer and some employees, for example through its web sites, as part of that interaction. All of that information is customer information, and is treated according to Oracle's general privacy policy.

In contrast, having contracted with Oracle for Cloud or other services, the customer provides Oracle access to its production, development or test environment, which may include personal information about its employees, customers, partners or suppliers (collectively "end users").

### **How Oracle Collects and Uses Services Data**

Below are the conditions under which Oracle may access, collect and/or use services data.

**To Provide Services and to Fix Issues.** Services data may be accessed and used to perform services under your order for support, consulting, Cloud or other services and to confirm your compliance with the terms of your order. This may include testing and applying new product or system versions, patches, updates and upgrades; monitoring and testing system use and performance; and resolving bugs and other issues you have reported to Oracle. Any copies of services data created for these purposes are only maintained for time periods relevant to those purposes.

**As a Result of Legal Requirements.** Oracle may be required to retain or provide access to services data to comply with legally mandated reporting, disclosure or other legal process requirements.

Oracle may transfer and access services data globally as required for the purposes specified above. If Oracle hires subcontractors to assist in providing services, their access to services data will be consistent with the terms of your order for services and this services privacy policy. Oracle is responsible for its subcontractors' compliance with the terms of this policy and your order.

Oracle does not use services data except as stated above or in your order. Oracle may process services data, but does not control your collection or use practices for services data. If you provide any services data to Oracle, you are responsible for providing any notices and/or obtaining any consents necessary for Oracle to access, use, retain and transfer services data as specified in this policy and your order.

### **Access Controls**

Oracle's access to services data is based on job role/responsibility. Services data residing in Oracle-hosted systems is controlled via an access control list (ACL) mechanism, as well as the use of an account management framework. You control access to services data by your end users; end users should direct any requests related to their personal information to you.

### **Security and Breach Notification**

Oracle is committed to the security of your services data, and has in place physical, administrative and technical measures designed to prevent unauthorized access to that information. Oracle security policies cover the management of security for both its internal operations as well as the services. These policies, which are aligned with the ISO/IEC 27001:2013 standard, govern all areas of security applicable to services and apply to all

Oracle employees. Oracle's Support, Consulting and Cloud lines of business have developed detailed statements of security practices that apply to many of their service offerings, which are available for review at your request.

Oracle's security policies and procedures are reviewed and overseen by Oracle Global Information Security (GIS). GIS is responsible for security oversight, compliance and enforcement, and for conducting information security assessments and leading the development of information security policy and strategy.

Oracle is also committed to reducing risks of human error, theft, fraud, and misuse of Oracle facilities. Oracle's efforts include making personnel aware of security policies and training employees to implement security policies. Oracle employees are required to maintain the confidentiality of services data. Employees' obligations include written confidentiality agreements, regular training on information protection, and compliance with company policies concerning protection of confidential information.

Oracle promptly evaluates and responds to incidents that create suspicions of unauthorized handling of services data. Oracle GIS and Legal are informed of such incidents and, depending on the nature of the activity, define escalation paths and response teams to address the incidents. If Oracle determines that your services data has been misappropriated (including by an Oracle employee) or otherwise wrongly acquired by a third party, Oracle will promptly report such misappropriation or acquisition to you.

### **Cross Border Transfers**

Oracle is a global corporation with operations in over 80 countries and has developed global data security practices designed to ensure that your personal information is appropriately protected. Please note that personal information may be transferred, accessed and stored globally as necessary in accordance with this privacy policy.

Oracle complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention when a customer and Oracle have agreed by contract that transfers of personal information from the European Economic Area ("EEA") or Switzerland will be transferred and processed pursuant to the Privacy Shield for the relevant services. When conducting those activities on behalf of its EEA or Swiss customers, Oracle holds and/or processes personal information provided by the EEA or Swiss customer at the direction of the customer. Oracle will then be responsible for ensuring that third parties acting as an agent on our behalf do the same.

Oracle has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/list>.

The following entities are covered entities under Oracle's Privacy Shield self-certification:

Delphi Asset Management Corporation; MICROS Fidelio Worldwide LLC; Oracle America, Inc.; Oracle Financial Services Software America, Inc.; Oracle Financial Services Software, Inc.; Oracle International Corporation; Oracle Taiwan LLC; Bronto Software, LLC; Monexa, LLC, NetSuite, Inc.; OrderMotion, Inc.; Dynamic Network Services, Inc. With respect to personal information received or transferred pursuant to the Privacy Shield Framework, Oracle is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission and commits to cooperate with EU data protection authorities.

### **Dispute Resolution**

If you have any complaints regarding our compliance with this privacy policy, you should first contact us. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with this privacy policy. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>. Under certain conditions, more fully described on the Privacy Shield website, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

### **Compliance**

Oracle has appointed a Chief Privacy Officer. If you believe your services data has been used in a way that is not consistent with this policy, or if you have further questions related to this policy, please contact the Chief Privacy Officer through our inquiry form. Written inquiries may be addressed to:

Chief Privacy Officer, Oracle Corporation  
10 Van de Graaff Drive  
Burlington, MA 01803  
USA

Last Updated: February 13, 2018

### **Oracle Recruiting Privacy Policy**

This policy lets you know how Oracle Corporation and its affiliates and subsidiaries ("Oracle" or "we") collect and use your personal information in connection with [Oracle Recruiting Cloud](#) and Oracle's recruiting efforts more generally, both online and offline. This policy describes the broadest potential use of personal information; we may make less use of your personal information than is described here.

Your provision of personal information in connection with the recruiting or job application process confirms your consent for Oracle to collect that information and to use, transfer, retain and share it with third parties as specified in this policy.

**Collecting Personal Information.** You may provide personal information to Oracle. Oracle Recruiting Cloud asks for certain data, including educational and employment background, contact information and preferences, job qualifications, and jobs for which you would like to submit an application. You also may choose to provide Oracle additional information, such as your CV, resume, or transcripts; employment references and related information; and compensation requests. In addition, Oracle may collect information from third parties, for example, in connection with a background or employment check and/or an employment reference.

Oracle's web sites, including Oracle Recruiting Cloud, may use cookies and other electronic communication protocols. For further information, please consult the [Oracle Privacy Policy](#).

**Sensitive Personal Information.** Oracle does not request or require sensitive personal information concerning religion, health, sexual orientation, or political affiliation in connection with recruiting. If you have a disability and would like Oracle to consider any accommodation, you may provide that information during the recruiting process. As well, in some countries we ask for information such as race or ethnicity for the purpose of

monitoring equal opportunity; however, we do not require applicants to provide race or ethnicity information, and if you provide this information it will not be viewable in the hiring or selection process.

To the extent information you provide contains details of your racial or ethnic origin; political opinions or beliefs; religious beliefs; membership in a trade union or political party; physical or mental health or condition; sexual orientation; commission or alleged commission of an offense or related proceedings; job evaluations or educational records, you expressly authorize Oracle to handle such details as specified in this policy.

**Voluntary Disclosure.** Your provision of personal information in connection with recruiting is voluntary, and you determine the extent of information you provide to Oracle; please note that if you decide not to provide information, it may affect our ability to consider you for employment.

**Using Personal Information.** The information may be used to communicate with you, to manage Oracle's recruiting and hiring processes, and for compliance with corporate governance and legal and regulatory requirements. If you are hired, the information may be used in connection with employment and corporate management.

**Data Recipients and Sharing with Third Parties.** Oracle may share your personal information internally and with service providers and other third parties as necessary in connection with recruiting, employment, corporate governance, acquisitions and legal or regulatory requirements, to respond to requests from public and government authorities, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes. Oracle requires that its service providers and such other third parties keep your personal information confidential and that they only use the personal information in furtherance of the specific purpose for which it was disclosed. Oracle and its service providers may use your personal information in an anonymized format (in a form in which your identity cannot be determined) for other purposes not specified above, including in the development and testing of products and services.

**Security and Confidentiality.** Except as otherwise stated in this policy or as required for legal or regulatory purposes, Oracle treats your personal information as confidential and will not disclose it to third parties without your consent. Oracle maintains, and requires its services providers to maintain, reasonable administrative, physical, and technical controls designed to protect the confidentiality and security of your personal information. Oracle employees who may have access to personal information are required to keep that information confidential.

Oracle may employ security procedures at its facilities and on its computer systems to monitor and maintain security, including the use of closed circuit television. Any monitoring of Oracle facilities, systems or assets is performed in accordance with applicable law.

**Retention and Access.** Oracle may retain your information to consider you for other job opportunities. To the extent permitted or required by law, Oracle may delete data at any time; accordingly, you should retain your own copy of any information you submit to us. You may access and correct personal information you have submitted online using [Oracle Recruiting Cloud](#). You may submit other requests by filling out an [inquiry form](#) or by mail to 10 Van de Graaff Drive, Burlington, MA 01803, USA, Attn: Chief Privacy Officer.

**Your Responsibilities.** You are responsible for the information you provide or make available to Oracle, and you must ensure it is honest, truthful, accurate and not misleading in any way.

You must ensure that the information provided does not contain material that is obscene, defamatory, or infringing on any rights of any third party; does not contain malicious code; and is not otherwise legally actionable. Further, if you provide any information concerning any other person, such as individuals you provide as references, you are responsible for providing any notices and obtaining any consents necessary for Oracle to collect and use that information as described in this policy.

### **Cross Border Transfers**

Oracle is a global corporation with operations in over 80 countries and has developed global data security practices designed to ensure that your personal information is appropriately protected. Please note that personal information may be transferred, accessed and stored globally as necessary for the uses and disclosures stated above in accordance with this policy.

The Oracle affiliates have entered into and executed an Agreement for the International Transfer of Personal Information within the Oracle Group ("Intra-Company Agreement") which allows for the processing of your personal information and which also incorporates the European Union Model Clauses requirements for transfers of your personal information.

### **Dispute Resolution**

If you have any complaints regarding our compliance with this policy, you should first [contact us](#). We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of your personal information in accordance with this policy. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

**General.** We may update this policy from time to time. In the event we make material changes that reduces your rights or Oracle obligations under this policy, we will post a prominent notice in this section of this policy notifying users when it is updated. If you have any questions or concerns about this policy or its application, or if you believe your personal information has been used in a way that is not consistent with this policy or your specified preferences, please fill out an [inquiry form](#), or contact us by mail:

Chief Privacy Officer, Oracle Corporation

10 Van de Graaff Drive

Burlington, MA 01803

USA

Oracle's corporate headquarters are located at:

500 Oracle Parkway

Redwood Shores, CA

94065, USA

Tel: +1.650.506.7000

Last updated: January 23, 2017

# Oracle Marketing Cloud & Oracle Data Cloud Privacy Policy

## Introduction

It is important to Oracle that consumers have greater knowledge and control over information related to them that Oracle makes available to its Oracle Marketing Cloud and Oracle Data Cloud marketing services customers ("OMC/ODC services"). This privacy policy is designed to provide consumers ("you" or "your") with tools to help understand and control the collection and use of that information.

## Scope

This policy applies to Oracle's handling of third-party information about you to provide OMC/ODC services ("Marketing Information"). "Third-party" information is information that Oracle receives from third parties and uses to provide OMC/ODC services in accordance with this privacy policy. This may include information that does not directly identify you and as well as information that does. The section of this privacy policy entitled "Types of Information Collected" describes the different types of information.

This policy does not apply to an OMC/ODC customer's own collection and use of your information (known as "first party" information) to conduct marketing activities, including when they do so using Oracle products or services. For example, an Oracle customer may use the Oracle Marketing Cloud or other Cloud services to collect and manage only the data they themselves (or their agents) have collected or purchased, otherwise known as "first-party" information. This first-party information is collected, shared and used subject to the individual privacy policy of the Oracle customer that collected it, and therefore is not covered by this policy; please consult that company if you have any questions about its use of your information. Please note however, that if you use the opt-out tool described in this policy, Oracle will opt you out of first-party collection and use of your information facilitated by OMC/ODC services for interest-based advertising, in addition to opting you out of the third party collection described later in this policy.

If you are a visitor to an Oracle website or an Oracle customer, and wish to learn more about how Oracle uses information collected from you as part of your general relationship with Oracle or your visit to Oracle websites, please refer to the [Oracle Privacy Policy](#).

## Types of Information Collected

Marketing Information may include both offline and online information. Offline Marketing Information originates from sources such as brick-and-mortar or online retail stores, grocery stores and their associated loyalty cards, catalog orders and catalog address lists ("Offline Marketing Information").

Offline Marketing Information in the OMC/ODC that directly identifies a particular individual may include:

- Name and physical address, email addresses, and telephone numbers
- Behavioral or demographic attributes, when tied to personal identifiers
- Transactional data based on past purchase behavior, when tied to personal identifiers
- Company data such as the name, size and location of the consumer's company and the consumer's role within the company
- Data from marketing opt-in lists, consumer surveys, or publicly available information

Online Marketing Information is collected based on Internet-based activity and does not directly identify you ("Online Marketing Information"). Online Marketing Information in the OMC/ODC that does not directly identify a particular individual may include:

- Unique IDs such as a cookie placed on a computer, mobile or device IDs
- Internet Protocol address ("IP address") and information derived from IP address such as geographic location
- Information about a device such as information contained in HTTP Headers (defined below) or other internet transfer protocol signals, browser or device type and version, operating system, user-agent strings and information about or from the presence or use of "apps" on mobile devices, screen resolution, and the consumer's preferred language
- De-identified personal information (such as email addresses that are de-identified so as to be non-identifiable to the recipient of such information)
- Demographic information such as a consumer's gender, age, and income range, when not tied to personal identifiers
- Behavioral data of consumers' computer or device usage on websites or apps, such as advertisements clicked, websites and content areas, date and time of activities
- The web search a consumer used to locate and navigate to a website
- Latitude/Longitude data ("Lat/Long data")

#### How Information is Collected

Oracle may receive Marketing Information from third parties, such as our customers, data providers and data partners ("Data Sources"). Oracle allows our OMC/ODC Data Sources to send us Marketing Information that they have collected from both online and offline sources. This may include information from customer lists, website membership, or other information created from a third-party's own technology (such as proprietary modeling or matching technology of other companies).

Online Marketing Information is collected from your interactions on your computer or device including data contained in standard HTTP headers or HTML, collected by Cookies, or specific site interaction like clicks, advertisements viewed, and other online behavior able to be determined through JavaScript and Pixel Tags.

"Cookies" are small text files that contain a string of characters and uniquely identify a browser. They are sent to a computer by website operators or third parties. Most browsers are initially configured to accept cookies by default. You may, however, be able to change your browser settings to cause your browser to refuse third-party cookies or to indicate when a third-party cookie is being sent. Check your browser's "Help" files to learn more about handling cookies.

"HTML" is the language used to write webpages. HTML may include "Pixel Tags" or small strings of code contained in HTML that provide a method for delivering a graphic image on a webpage, email, or other electronic document. Pixel tags allow the operator of the webpage or other document, or a third party who serves the pixel tag, to set, read, and modify cookies on, and to transfer other data to, the browser used to view the webpage or other document. Pixel tags may also be used to obtain information about the computer being used to view that webpage or other document, including the IP address of the computer that the tag is sent to, the time it was sent, the consumer's operating system and browser type, and other similar information.

"HTTP Headers" are information that is transmitted whenever a webpage is viewed, and contain technical information required for communication between a browsing device and a website server. Other electronic communication protocols (such as those used for email) also use headers to transmit information. Our OMC/ODC customers may transmit

information through HTTP (or other electronic communication protocol) headers to Oracle or otherwise direct Oracle to retrieve such information from consumers' interaction with the customer's website. This may include information about the device browser, the requested webpage, server and other information the customer knows about the consumer, its computer or device (such as a carrier or device identifier).

#### How Oracle Uses Marketing Information

OMC/ODC customers and partners use Profiles and Interest Segments (each defined below) for marketing campaigns to try to make the content and ads that consumers receive more relevant. Profiles and Interest Segments are based on offline or online interactions with the consumer that have been collected by Oracle's Data Sources to infer interests. When we receive Offline Marketing Information that identifies a consumer, we remove the direct identifiers, such as name, address, telephone number, and email address, prior to using it for online interest-based advertising.

A "Profile" is a set of attributes about a specific consumer, computer or device, or a set of multiple computers or devices sharing common attributes. An "Interest Segment" is a group of Profiles that share a common behavior or preference. For example, we may create an Interest Segment consisting of Profiles interested in "Travel." We create these Interest Segments based on the information available to us and the preferences and requests of our customers.

We may prepare reports and metrics based on Marketing Information that provide our customers with the number of consumers in an Interest Segment using aggregated data on consumers' activity on the websites where Interest Segments are collected and used. We may also prepare aggregate reports for our customers that measure the effectiveness of their marketing campaigns. The reports and metrics provided to our customers do not include any Marketing Information that directly identifies a consumer.

Offline Marketing Information may be used by our customers for offline direct mail campaigns. Oracle may supplement a customer's marketing list or provide a customer with potential prospective consumers to assist the customer with offline direct marketing. Consumers may opt-out of Oracle's use of Marketing Information as described below in the "Opting Out" section.

We may also use Marketing Information for billing, auditing, research and development purposes, for our internal operational purposes, and to create aggregate statistics for market research or analytics services. Aggregated statistics do not include any information that directly identifies a consumer.

#### How Oracle Creates Cookie IDs and Other Identifiers

Oracle creates Profiles using various methods and technologies. Oracle creates offline Profiles and Interest Segments at the household level and/or individual level by using past purchase behavior, demographic data, and behavioral attributes. Oracle creates online Profiles through the use of cookies, cross-device/cross-context technology (explained below), or other unique identifiers provided to us by our customers (such as mobile advertising IDs).

Oracle associates each Cookie used for interest-based advertising that we set on a consumer's web browser with a unique identifier ("Cookie ID"). When our Data Sources transmit information about that web browser to us, or otherwise direct Oracle to collect information from the interaction between that web browser and a webpage, we use the Cookie ID to store the information into a Profile with the same Cookie ID. For example, a computer with a pre-existing Oracle interest-based advertising Cookie may be used to

browse airline prices to Hawaii on a travel website one day, and the next day used to browse for used cars on an automobile listing website. Oracle will record that the Profile associated with that Cookie ID is interested in both travel to Hawaii and used cars.

**Other Identifiers.** Oracle may create a statistical ID ("Stat ID") for a user or a group of users using the user agent string and IP address. Creating a stat ID involves computing and then assigning a probabilistic identifier to a device or a group of devices based on information contained in the header. Multiple users may share a Stat ID or one user may have multiple Stat IDs. Data Sources may create or collect other unique identifiers and provide those to Oracle. These may include IDs intended for marketing use (such as mobile advertising IDs), hashed email, or proprietary identifiers created by the Data Sources. Oracle may create connections between these and other identifiers.

#### Cross-Device/Cross-Context Technology

Oracle may also link Profiles using cross-device/cross-context technology. This technology is designed to enable Oracle and its customers to connect a consumer's Interest Segments across the various devices or contexts where the consumer is browsing digital content. For example, a single consumer might use multiple browsers on a single device, or use various devices (such as desktops, smartphones, and tablets), which can result in a consumer having multiple Profiles across these various contexts and devices. Cross-device/cross-context technology may be used to connect these various Profiles and the corresponding Interest Data from the different contexts and devices.

Oracle does this through both deterministic and statistical methods. The deterministic method leverages data that does not change, such as a consumer logging into a single account on multiple devices. The statistical method leverages non-fixed data about the device or browsers that help identify devices or contexts, like partial or full IP address and browser version. Oracle analyzes this data to determine if the devices or contexts are likely to be related to a single consumer. When a probable connection is found, Oracle creates links between the Profile IDs from the different devices/contexts using a reference table to link these devices or contexts. Oracle customers can then use linked Interest Data when serving interest-based advertising and other content across the consumer's devices/contexts. For example, a consumer searching for trips to Hawaii on a Chrome browser may switch to a mobile application. When this happens, if Oracle has linked the Cookie ID from the Chrome browser to the mobile advertising IDs, Oracle can then provide the consumer with advertising related to Hawaiian vacations on the consumer's mobile device. Consumers may opt out of Oracle's use of cross-device technology as described below in the "Opting Out" section.

#### Disclosure of Marketing Information

We disclose Marketing Information to our OMC/ODC customers to facilitate our customers' use of the OMC/ODC services for executing offline and online marketing campaigns. Our customers may use third-party service providers, acting on their behalf, to create and display advertising or other content that reflects a Profile's membership in an Interest Segment. When Oracle shares your Marketing Information with OMC/ODC customers, we require them to use Marketing Information consistent with this Policy and to maintain the confidentiality of that information.

We may also share Marketing Information with third-party service providers in order for those service providers to perform business functions for Oracle or on behalf of Oracle customers. When Oracle shares your Marketing Information with third party service providers, we require them to use Marketing Information only for the purpose of providing

services to us and to implement security controls to maintain the confidentiality of that information.

Oracle may also use or disclose Marketing Information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Additionally, in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), we may transfer Marketing Information to the relevant third party.

#### Retention of Marketing Information

Oracle sets Online Marketing Information collected for interest-based advertising to expire within 180 days from the date it is collected. For example, if you last browsed an applicable travel website for airline tickets to Hawaii on January 1, your membership in Oracle's "Travel to Hawaii" Interest Segment would expire from your Profile by July 1. Device identifiers used for cross-device/cross-context technology, as described above, are retained for 365 days. On an occasional basis and in accordance with applicable law, Oracle may permit some OMC/ODC customers to retain Marketing Information for up to 36 months for limited purposes such as seasonal or cyclical interest-based advertising campaigns or internal analytics and model development; such customers are required to delete this Marketing Information at the end of the agreed time period.

Oracle may also retain Offline Marketing Information and other statistical data related to the performance, operation and use of OMC/ODC services for more than 180 days for security and operations management, statistical analyses, service improvement, and research and development.

#### Accessing Marketing Information

Oracle maintains a consumer tool called the [Oracle Data Cloud Registry \("Registry"\)](#), which allows you to view the type of third-party online Interest Segments in the Oracle BlueKai Marketplace that is applicable to the device that views the Registry. Please note that the Interest Segments you see within the Registry are information from the Profile associated with the specific browser, computer or device that you are using to visit the Registry. You may see different segments when viewing the Registry from a different browser, computer or device.

You may request to review, correct, update, suppress, or otherwise modify your Offline Marketing Information, or object to the use or processing of such Offline Marketing Information by us, via written request to the address supplied below. Oracle will provide you with a copy of the Offline Marketing Information in our databases, including a list of the Interest Segments that we have associated with you. You may request to receive this information by sending a written request, along with a copy of government-issued identification to verify your identity, to:

Chief Privacy Officer, Oracle  
10 Van de Graaff Drive

Burlington, MA 01803  
United States of America

While the majority of questions and issues related to access can be handled quickly, complex requests may take more research and time. In such cases, you will be contacted regarding the nature of the request and appropriate next steps within thirty days from the date of receipt of the request. We cannot provide information that is collected and controlled solely by our customers. If you have questions in regards to the privacy practices of our customers, Oracle recommends that you contact that customer directly.

## Opting-Out

As described above, Oracle uses third party Offline and Online Marketing Information to provide OMC/ODC services to our customers. We also provide consumers the ability to opt out of Oracle's use of that information.

**Online Marketing Information Opt-Out.** Oracle offers multiple ways for you to opt out of third-party collection and use of your Marketing Information for online interest-based advertising. Opting out does not mean you will stop seeing online advertisements, but the advertisements you do see will not be influenced by Marketing Information collected using the OMC/ODC. If your browser accepts cookies, you can opt out directly from the OMC/ODC's third-party interest based advertising by downloading Oracle's OMC/ODC opt-out cookie for Datalogix, AddThis, Crosswise, and BlueKai ("Opt-out Cookie"). This Opt-out Cookie, when deposited on your browser, will prevent the OMC/ODC from creating Interest Segments based on information collected from that browser. You can access and learn more about the Opt-out Cookie [here](#). The Opt-out Cookie is configured to opt-out for a minimum of 20 years if left undeleted.

## Opt Out

You may also opt out using tools provided by the following industry groups. (Oracle's participation in these organizations may appear under the "BlueKai" or "Datalogix" names.)

- Digital Advertising Alliance (DAA): <http://www.aboutads.info/choices/>
- Network Advertising Initiative (NAI): <http://www.networkadvertising.org/choices/>
- European Interactive Digital Advertising Alliance (EDAA): <http://www.youronlinechoices.eu/> and <http://www.edaa.eu/>

**Note:** The opt-out tools described above are currently Cookie-based and prevent Oracle from using Marketing Information for interest-based advertising on the browser on which they are installed. As a result, the opt out will only function if your browser is set to accept third-party Cookies and may not function where Cookies are sometimes automatically disabled or removed (e.g., certain mobile devices and operating systems). If you delete Cookies, change your browser settings, switch browsers or computers, or use another operating system, you will need to opt out again. Oracle does not use persistent, unique identifiers to revive a previously opted-out profile or deleted Cookie.

**Also note:** The OMC/ODC may interact with third parties who engage in interest-based advertising in conjunction with certain OMC/ODC services. For example, an Oracle customer may use Oracle Marketing Cloud services to send promotional emails to you, and include tags in those emails that enable a third party to place a Cookie on your web browser. The Oracle customer and the third party may use this Cookie to collect data about you and engage in interest-based advertising at a later time. Because in this limited circumstance, opting out with Oracle's own opt-out Cookie will not currently prevent the third parties from collecting or using Marketing Information for interest-based advertising, Oracle encourages you to use the NAI, DAA, and EDAA opt-out tools described above if you are interested in opting out of this sort of activity.

#### **Cross-Device/Cross-Context Opt-Out.**

When you opt out of interest-based advertising above and Oracle has used cross-device/cross-context technology to link that profile to other devices or contexts, Oracle will break the connections from the opted-out profile to those other devices or contexts. If you wish to opt out of interest-based advertising based on your other devices or contexts, you should exercise one of the opt-out options discussed above using each of the devices/contexts (including each browser) that you use.

#### **Mobile Opt-Out.**

The OMC/ODC allow customers to use Marketing Information collected from mobile devices for interest-based advertising. While the opt-out methods described above often work for mobile web browsing, they are Cookie-based and are therefore less reliable in mobile "app" environments that may not accept Cookies. As an alternative, Oracle suggests you download AppChoices App provided by the Digital Advertising Alliance (DAA). This app allows consumers to exercise opt-out control for specific companies, including Oracle, and provides a more reliable opt-out signal when you are in a mobile app.

#### **Offline Marketing Information Opt-out.**

Oracle honors your choice to opt out of the use of Offline Marketing Information for offline direct mail campaigns or online interest-based advertising. To process your request to opt out, we require your name, address and email address. Your request will take effect within 30 days. You may still receive marketing due to marketing campaigns already underway; however, you will be opted out of all future marketing campaigns. You can access offline opt-out [here](#).

If you would like to opt out of all direct mail marketing to your home address, you may visit the Data & Marketing Association [website](#) for information on how to reduce direct mail marketing to your home address.

#### **Do Not Track.**

Oracle does not uniformly process do-not-track signals from browsers. However, you may prevent Oracle from collecting Interest Segments using Cookies on a browser by blocking third-party Cookies in that browser. If you block third-party Cookies from being set on your browser, you may not be able to enjoy some features or functionality of, and you may see the same content and advertisements repeatedly on, some websites.

Oracle may add additional opt-out tools over time as they become available.

Oracle's Commitment to Privacy Standards

**Industry Involvement.**

Oracle is a member of, and adheres to the self-regulatory principles of, the Data & Marketing Association (DMA), [Direct Marketing Association UK \(DMA UK\)](#), Network Advertising Initiative (NAI), Interactive Advertising Bureau (IAB), Digital Advertising Alliance (DAA), Digital Advertising Alliance of Canada (DAAC), and European Digital Advertising Alliance (EDAA). As a member of these organizations, Oracle works with industry-leading companies to address important privacy and consumer protection issues in offline direct marketing and online advertising.

The NAI has created a compliance program that incorporates attestation reviews, a consumer complaint process, sanctions and annual reporting to help ensure that member companies keep their promises to you and abide by the NAI's Self-Regulatory Code of Conduct. [Click here](#) to learn more about the NAI.

The Digital Advertising Alliance (DAA), Digital Advertising Alliance of Canada (DAAC), and European Digital Advertising Alliance (EDAA) provide self-regulatory Principles for Online Behavioral Advertising. [Click here](#) to learn more about the DAA. [Click here](#) to learn more about the DAAC. [Click here](#) to learn more about the EDAA.

**Data Sources.**

Oracle requires our Data Sources to comply with laws applicable to their collection, use and sharing of Marketing Information, and to maintain their own privacy policies that disclose their practices as required by applicable laws. Oracle permits these companies to link directly to this privacy policy. Oracle also mandates that these companies obtain your consent as required by applicable law, including consents required to collect, use, and share your information.

**Sensitive Data.**

Oracle is aware of the sensitivity of certain types of data. We do not create any online Interest Segments that reflect third-party Marketing Information that we consider sensitive. While the types of Marketing Information considered sensitive may vary among consumers, we presently treat online Marketing Information as sensitive if it includes precise health information (such as a consumer having a certain medical condition like cancer or diabetes); certain aspects of a consumer's personal life or financial situation; or interest in "adult" products or services. If you would like to view the list of third-party health and wellness Interest Segments available in the Oracle BlueKai Marketplace, please [click here](#). We may further restriction segments based on the differing laws in countries outside of the United States. We do not allow our Marketing Information to be used for employment, credit, healthcare, or insurance eligibility purposes. Our customers who collect their own data (first-party data), including those who choose to share their data with other third parties, may have their own standards of what they consider sensitive; however, Oracle requires all such customers to comply with laws applicable to sensitive information.

**Children.**

We do not intentionally collect Marketing Information from, and do not tailor any services to, children under 13 years of age. We prohibit our Data Sources from providing Oracle with information from sites directed to children under the age of 13 or from consumers whose age these companies know to be under the age of 13.

## **Security**

The security of Marketing Information is very important to Oracle. We use physical, technical, and administrative safeguards that are designed to protect Marketing Information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

In the event that Oracle determines that Marketing Information identifying you and stored in the OMC/ODC is acquired, or is reasonably believed to have been acquired, by an unauthorized person and applicable law requires notification, Oracle will, consistent with the reasonable needs of law enforcement and subject to applicable law, notify the applicable Data Source who provided Oracle with the information so that it may notify you.

## **Cross Border Transfer**

Oracle is a global corporation with operations in over 80 countries and has developed global data security practices designed to ensure that your personal information is appropriately protected. Please note that personal information may be transferred, accessed and stored globally as necessary in accordance with this privacy policy.

Oracle complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention when a customer and Oracle have agreed by contract that transfers of personal information from the European Economic Area ("EEA") or Switzerland will be transferred and processed pursuant to the Privacy Shield for the relevant services. When conducting those activities on behalf of its EEA or Swiss customers, Oracle holds and/or processes personal information provided by the EEA or Swiss customer at the direction of the customer. Oracle will then be responsible for ensuring that third parties acting as an agent on our behalf do the same.

Oracle has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/list>.

The following entities are covered entities under Oracle's Privacy Shield self-certification: Delphi Asset Management Corporation; MICROS Fidelio Worldwide LLC; Oracle America, Inc.; Oracle Financial Services Software America, Inc.; Oracle Financial Services Software, Inc.; Oracle International Corporation; Oracle Taiwan LLC; Bronto Software, LLC; Monexa, LLC, NetSuite, Inc.; OrderMotion, Inc.; Dynamic Network Services, Inc. With respect to personal information received or transferred pursuant to the Privacy Shield Framework, Oracle is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission and commits to cooperate with EU data protection authorities.

## **Dispute Resolution**

If you have any complaints regarding our compliance with this privacy policy, you should first [contact us](#). We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with this privacy policy. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>. Under certain conditions,

more fully described on the [Privacy Shield website](#), you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

### **Contact Us**

Oracle has appointed a Chief Privacy Officer. If you believe your personal information has been used in a way that is not consistent with this privacy policy or your specified preferences, or if you have further questions related to this privacy policy, please contact the Chief Privacy Officer by filling out an [inquiry form](#).

Written inquiries may be addressed to:

Chief Privacy Officer, Oracle Corporation

10 Van de Graaff Drive

Burlington, MA 01803

United States of America

### **Corporate Headquarters**

Oracle's corporate headquarters are located at:

500 Oracle Parkway

Redwood Shores, CA

94065, USA

Tel: +1.650.506.7000

Fax: +1.650.506.7200

### **Policy Updates**

Oracle may update this privacy policy from time to time. In the event we make material changes that reduces your rights or Oracle obligations under this privacy policy, we will post a prominent notice in this section of this privacy policy notifying users when it is updated.

**Policy Updated:** February 13, 2018.

## **Privacy Choices**

### **Preference and Opt-Out Mechanisms**

Oracle believes in permission-based marketing and tracking and provides you with the following options to customize and control your preferences. If you have a problem with any of the choice mechanisms listed below, please fill out an [inquiry form](#).

### **Email and Profile Information**

To customize and control your preferences for receiving electronic information, including opting into (or out of) Oracle communities, newsletters and general interest areas through your Oracle profile, login at <https://profile.oracle.com/> and follow the prompts to "update my profile."

You may opt out of Oracle's email marketing by modifying your online profile as described above or by using our general unsubscribe automated link that is included in Oracle marketing emails.

You can also find details on how to automatically unsubscribe from email communications, as well as how to submit requests to opt-out from phone and postal marketing, on our [Oracle.com Account Help](#) page.

### **Cookie Preferences on Oracle websites**

Oracle enables you to opt out of cookies that are not required to enable core site functionality. Oracle uses its cookies preferences tool to process Internet advertising and tracking preferences, but does not process any other Do Not Track signals. Once you have set your cookie preferences, Oracle will follow the specific choices you made there. Please remember that if you delete your cookies, or use a different browser or computer, you will need to set your cookies preferences again. You may access or change your cookie preference for Oracle websites by [clicking here](#), or through the links provided in the Oracle website footers.

### Web Monitoring and Analytics

#### **Oracle Marketing Cloud**

Eloqua and Maxymiser provide website metrics and website personalization services to their customers. Visitors to these websites have control over whether their data is used for these services. If you don't want your data to be included in services provided by Eloqua or Maxymiser, you can simply [opt-out](#). [Click here](#) to view your current [opt-out status](#) and make your choice.

#### **Adobe**

[Click here](#) to opt-out of website analytics and on-site personalization services provided by Adobe.

#### **Interest Based Advertising (IBA) Enabled by Oracle Data Cloud**

The Oracle Data Cloud (ODC) facilitates the collection and use of data by our customers in connection with interest-based advertising. To view more information about these services, the types of data collected and how this data is used, please [click here](#).

**Online Marketing Information Opt-Out.** If your browser accepts cookies, you can opt out directly from the ODC's third-party interest based advertising by downloading Oracle's ODC opt-out cookie for Datalogix, BlueKai, AddThis, and Crosswise ("Opt-out Cookie"). This Opt-out Cookie, when deposited on your browser, will prevent the ODC from creating Interest Segments based on information collected from that browser. You can access and learn more about the Opt-out Cookie [here](#).

You may also opt out using tools provided by the following industry groups. Oracle's participation in these organizations may appear under the "BlueKai" or "Datalogix" names.

- Digital Advertising Alliance (DAA): <http://www.aboutads.info/choices/>
- Network Advertising Initiative (NAI): <http://www.networkadvertising.org/choices/>
- European Interactive Digital Advertising Alliance (EDAA): <http://www.youronlinechoices.eu/> and <http://www.edaa.eu/>

**Offline Marketing Information Opt-out.** The ODC honors your choice to opt out of the use of Offline Marketing Information for offline direct mail campaigns or online interest-based advertising. To process your request to opt out, we require your name, address and email address. You can access offline opt-out [here](#).

**Note:** For more information on ODC opt-out options, please visit the [OMC/ODC privacy policy](#).

**Recent Acquisitions:** Oracle recently acquired companies that engage in online interest-based advertising. These companies will soon transition to the [OMC/ODC privacy policy](#). Please note that the provisions of the privacy policies will remain active until the transition is complete. Please visit the privacy policies for these acquisitions for more information about these services, the types of data collected and how this data is used, and opt-out options.

- AddThis: <http://www.addthis.com/privacy/privacy-policy>

## BlueKai Opt-out

<https://www.oracle.com/legal/privacy/privacy-choices.html#iba>