

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

- Describe in Detail any contractual or technical restrictions or limitations placed on the collection, retention, use, or disclosure of such information;
- e. how such information is combined with other types of information about consumers and their Devi

Notice and Disclosure:

10. Produce a copy of Each materially different statement (e.g., advertising, privacy policy, terms of service) You have publicly disseminated or caused to be disseminated relating to Your privacy practices.
11. State the total number of consumers, broken down by month, who have visited or otherwise viewed or interacted with the Company's online privacy policy.

Consent and Choice:

12. For Each category of information described in Specification 7, Describe in Detail:
 - a. when and how consumers are offered choice

Access, Correction, and Deletion:

15. Describe in Detail the Company's process for providing consumers with the ability to access, correct, or delete their Personal Information.
16. Describe in Detail the Company's data deletion and retention policies, including any retention periods for Personal Information about consumers and their Devices. Produce any written data deletion and retention policies and procedures and public statements to consumers about retention or deletion policies and procedures.

Other Documents:

17. Produce all Documents Identified in Your response to this Order that were not otherwise specifically requested.

Attachment A

DEFINITIONS & ADDITIONAL INSTRUCTIONS

- A. **“Ad Service”** means any program or service that analyzes, tracks, or otherwise identifies consumers, their households, or their devices for purposes of advertising or improving advertisements to consumers, irrespective of platform (e.g., Internet, cable, or television).
- B. **“Company”** means [company name], its divisions, branches, joint ventures, and operations under assumed names.
- C. **“Device”** means (a) any computing device that operates using an operating system, including smartphone, tablet, wearable, sensor, television, set-top box, cable box, router, or any periphery of any portable computing device; and (b) the software used to access, operate, manage, or configure a device subject to part (a) of this definition, including, but not limited to, the firmware, web or mobile applications, and any related online services.
- D. **“Describe in Detail”** means providing the information requested in narrative form, including an explanation of Each material change, if any, made over the applicable time period rnnnnnDcoMn (x)-1P5,

tapes, disks, computer hard drives, network shares or servers, or other drives, cloud-based platforms, cell phones, PDAs, computer tablets, or other mobile devices, or other storage media.

- H. **“Identify”** shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors, or managers of the business or organization, and contact persons, where applicable.
- I. **“Order”** means the Order, including the attached Resolution, Specifications, and Attachment.
- J. **“Parent”** means any person or entity that owns or controls (directly or indirectly) the Company. For purposes of this paragraph, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10 percent.
- K. **“Personal Information”** means information about a specific consumer or device, including: (a) first and last name; (b) home or other physical address, including street name and name of city or town, or other information about the location of the individual, including but not limited to location from cellular tower information, fine or coarse location, or GPS coordinates; (c) email address or other online contact information, such as an instant messaging user identifier or screen name; (d) telephone number; (e) a persistent identifier, such as a customer number held in a “cookie,” a static Internet Protocol (“IP”) address, a device identifier, a device fingerprint, a hashed identifier, or a processor serial number; (f) nonpublic communications and content, including, but not limited to, e-mail, text messages, photos, videos, audio, or other digital images or audio content; (g) Internet browsing history, search history, or list of URLs visited; (h) video, audio, cable, or TV viewing history; (i) biometric data; or (j) health or medical information.
- L. **“Third Party”** means any person or entity that is not exclusively operated or controlled by the Company, including a Parent, affiliate, or separately incorporated subsidiary of the Company.
- M. **“You”** and **“Your”** means the person or entity to whom this CID is issued and includes the “Company.”
- N. **Meet and Confer:** You are encouraged to contact **Jah-Juin “Jared” Ho** at **(202) 326-3463**, as soon as possible to schedule a meeting (telephonic or in person) in order to confer regarding Your response.
- O. **Modification of Specifications:** If You believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission’s need for Documents or information, You are encouraged to discuss such possible modifications,

including any modifications of definitions and instructions, with the Commission counsel named above.

- P. **Electronic Submission of Documents:** See the attached “Federal Trade Commission, Bureau of Consumer Protection Production Requirements,” which details all requirements