

Epsilon
Data Transparency Report

Data Transparency Standard Validation

Company Reviewed: Epsilon
Conducted by: Neutronian
For the period of: 6/6/24 - 6/5/25

COMPANY	
Company Name and Address:	Epsilon Data Management LLC 11030 Circle Point Rd Westminster, CO 88020
URL for Company:	www.epsilon.com
Contact Information:	John Wen Sr. Director, Product john.wen@epsilon.com

STATEMENT OF VERIFICATION FROM NEUTRONIAN
<p>We have reviewed Epsilon’s compliance to the IAB Tech Lab Data Transparency Standards, including the Data Transparency Standards Compliance Guide and Audience Taxonomy.</p> <p>Our examination was performed in accordance with the IAB Tech Lab Data Transparency Compliance Guide. Our examination included reviews of Data Label Technical Specifications, Data Label Dissonance, People and Process Controls, and Technology Controls.</p> <p>Based on our review, we are not aware of any material modifications that should be made to the Epsilon’s processes for IAB Tech Lab Data Transparency Standards compliance.</p> <p>Cory Meyer GM Neutronian, Inc.</p>

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[Data Transparency Standard v1.1](#) [Data Transparency Compliance Guide 1.0](#)

Compliance Key:

Satisfactory:	Meets guideline control, no action required
Recommendation:	Meets guideline control, process improvement recommended
Requirement:	Does not meet guideline control, must be addressed before certification is issued
Not Applicable:	This criteria is not applicable or not in scope

I. Data Label Technical Specs Control Objectives			
Field Name	Field Options	Format Requirements	Compliance
Section: Data Summary			
Provider Name	Free text	Alpha-numeric: 100 characters	Satisfactory
Provider Domain	Valid Domain	Alpha-numeric: 100 characters	Satisfactory
Provider Contact Info	Free text	Alpha-numeric: 100 characters	Satisfactory
Provider's Audience Name	Free text	Alpha-numeric: 100 characters	Satisfactory
Provider's Audience ID	Free Text	Numeric: 15 characters	Satisfactory
Standardized Audience IDs	Select from: IAB Tech Lab Audience Taxonomy 1.1	Alpha-numeric: 100 characters	Satisfactory
Segmentation Criteria	Free text	Alpha-numeric: 500 characters	Satisfactory
Audience Precision Level	Individual; Household Business; Device Id; Browser; Geography	Multi-select: Dropdown	Satisfactory
Audience Scope	Single domain / App; Cross- domain within O&O; Cross- domain outside O&O; N/A (Offline)	Alpha-numeric: 1000 characters	Satisfactory
Originating Domain	Valid top level domain / app store URL; N/A (Undeclared); N/A (Cross-domain, Offline)	Alpha-numeric: 100 characters	Satisfactory
Audience Size	Free text	Numeric: 15 characters	Satisfactory
ID Type(s)	Cookie ID; Mobile ID; Platform ID; User- enabled ID	Multi-select: Dropdown	Satisfactory
Geography	Select from: ISO-3166-1-alpha-3	Multi-select: Dropdown	Satisfactory
Privacy Compliance Mechanisms Used	TCF (Europe); USPrivacy; LSPA; NAI Opt Out; DAA; EDAA; DAAC; GPC; Other (Not Listed); None	Multi-select: Dropdown	Satisfactory
Privacy Policy	Free text	Alpha-numeric: 100 characters	Satisfactory
IAB Tech Lab Compliant	Yes; No	Single-select: Dropdown	Satisfactory

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I. Data Label Technical Specs Control Objectives			
Field Name	Field Options	Format Requirements	Compliance
Section: Audience Details			
Data Source(s)	App Behavior; App Usage; Web Usage; Geo-Location; Email; TV OTT or STB Device; Online Ecommerce Credit Data; Loyalty Card Transaction; Online Survey; Offline Survey; Public Record: Census; Public Record: Voter File; Public Record: Other; Offline Transaction	Multi-select: Dropdown	Satisfactory
Data Inclusion Methodology	Observed/ Known; Declared; Inferred; Derived; Modeled	Multi-select: Dropdown	Satisfactory
Audience Expansion	Yes; No	Single-select: Dropdown	Satisfactory
Cross-device Expansion	Yes; No	Single-select: Dropdown	Satisfactory
Audience Refresh Cadence	Intra-day; Daily; Weekly; Monthly; Bi-Monthly; Quarterly; Bi-Annually; Annually	Single-select: Dropdown	Satisfactory
Source Lookback Window	Intra-day; Daily; Weekly; Monthly; Bi-Monthly; Quarterly; Bi-Annually; Annually	Single-select: Dropdown	Satisfactory
Section: Onboarder Details			
Input ID / Match Key	Name; Address; Email; Postal / Geographic Code; Lat / Long; Mobile ID; Cookie ID; IP Address; Customer ID; Phone Number; N/A	Multi-select: Dropdown	Satisfactory
Pre- onboarding Audience Expansion	Yes; No; N/A	Single-select: Dropdown	Satisfactory
Pre- onboarding Cross Device Expansion	Yes; No; N/A	Single-select: Dropdown	Satisfactory
Pre- onboarding Audience Precision Level	Individual; Household; Business; Geography; N/A	Multi-select: Dropdown	Satisfactory

II. Data Label Dissonance Control Objectives			
Test Number	Control Area	Test Details	Compliance
Section: Data Summary			
	Label Testing	Select random labels to test compliance to the Data Transparency Compliance Guide.	Satisfactory
1.1	Provider Name	Data provider organization is incorporated / functioning in market as a data seller	Satisfactory

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II. Data Label Dissonance Control Objectives			
Test Number	Control Area	Test Details	Compliance
1.2	Provider Name	Data provider has the right to use the name / trademark	Satisfactory
2.1	Provider Contact Info	Email address provided is a real / functioning email	Satisfactory
3.1	Provider's Audience Name	Cross-check content in following fields: A. Segmentation Criteria B. Standard Segment name C. ID Type D. Audience Precision Level E. Geography	Satisfactory
4.1	Standardized Audience IDs	Ensure legitimate entry from IAB Audience Taxonomy 1.1	Satisfactory
5.1	Segmentation Criteria	<p>Check that the criteria described addresses business rules for ID inclusion, and is not overly reliant on peripheral segment description.</p> <p>This description should address: A. Data provenance, B. frequency at which attribute needs to be observed to be associated with ID, C. and how long ago the attribute was observed.</p> <p>If business rules for inclusion are proprietary / algorithmically driven, describe algorithm behavior as it relates to the above items.</p>	Satisfactory
5.2	Segmentation Criteria	Cross-check content in following fields: A. Audience Refresh Cadence B. Source Look Back window C. Data Sources	Satisfactory
6.1	Audience Precision Level	Cross-check content in following fields: A. Segmentation Criteria B. Standard Segment name C. Segment name D. ID Type	Satisfactory
7.1	Audience Size	The count is disclosed (Figure is variable depending on seasonality, activation platform match rates, and other factors)	Satisfactory

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II. Data Label Dissonance Control Objectives			
Test Number	Control Area	Test Details	Compliance
8.1	ID Type(s)	Cross-check content in following fields: A. Data Sources B. Segmentation Criteria	Satisfactory
9.1	Geography Standard country list is used.	Cross-check content to the Segmentation Criteria	Satisfactory
10.1	Privacy Policy	Link is functional and leads to indicated privacy content	Satisfactory
Section: Audience Details			
11.1	Data Source(s)	Cross-check content in following fields: A. ID Type B. Segmentation Criteria If "Offline Survey", "Public Record", or "Offline Transaction" is stated, the "Onboarder Details" section must be completed and properly formatted.	Satisfactory
12.1	Data Inclusion Methodology Selection of "Modeling": Requires selection of "Yes" within "Audience Expansion" field.	Cross-check content in the Segmentation Criteria Ensure that "Audience Expansion" is completed and accurately formatted	Satisfactory
13.1	Audience Expansion	Cross-check content in following fields: A. Data Inclusion Methodology B. Segmentation Criteria	Satisfactory
14.1	Cross-device Expansion	Cross-check content in Segmentation Criteria	Satisfactory
15.1	Audience Refresh Cadence	Cross-check against content in following fields: A. Segmentation Criteria B. Data Sources - if any "Offline" source is selected, "Continuous" or "Daily" are not acceptable options	Satisfactory
16.1	Source Look Back Window	Cross-check against content in following fields: A. Segmentation Criteria B. Audience Refresh Cadence	Satisfactory
Section: Onboarder Details			
17.1	Input ID/ Match Key	Cross-check content in Data Sources field - if any offline data sources are inputted, "Input ID/Match Key" field must be completed.	Satisfactory

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II. Data Label Dissonance Control Objectives			
Test Number	Control Area	Test Details	Compliance
18.1	Pre- onboarding Audience Expansion	Cross-check content in Data Sources field - if any offline data sources are inputted, "Pre-onboarding Audience Expansion" field must be completed.	Satisfactory
19.1	Pre- onboarding Cross Device Expansion	Cross-check content in Data Sources field - if any offline data sources are inputted, "Pre-onboarding Cross Device Expansion" field must be completed.	Satisfactory
20.1	Pre- onboarding Audience Precision Level	Cross-check content in Data Sources field - if any offline data sources are inputted, "Pre-onboarding Audience Precision Level" field must be completed.	Satisfactory

III. People and Process Control Objectives			
Test Number	Control Area	Test Details	Compliance
Section: General			
	General	Examine documentation to support the online and offline data partner's acquisition, data transfer and quality control processes.	Satisfactory
		Walk through workflow of data collection, aggregation and QA processes.	Satisfactory
		Review system control documentation within the data loading process to prevent loss or corruption of data.	Satisfactory
		<p>Organization Structure and Personnel Functions:</p> <p>Org Chart of team directly involved in collecting, analyzing, onboarding, or otherwise preparing the data for sale to buyers.</p> <p>Process by which relevant stakeholders interact to collect and process data.</p> <p>Process by which relevant stakeholders interact to populate the IAB Tech Lab data transparency standard, and description</p>	Satisfactory

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III. People and Process Control Objectives			
Test Number	Control Area	Test Details	Compliance
		of responsible, accountable, consulted, informed parties (RACI) for each label field	
Section: Data Summary			
2.2	Provider Contact Info	Confirm the email address is of the Provider.	Satisfactory
6.2	Audience Precision Level	Provide documentation re how identity is resolved: via in house tech, via a partner, or some combination of both in house and partner. If in house: methodology description (DOM) - documentation to be provided outlining systems for data flow, and for resolving identity.	Satisfactory
9.2	Geography Standard Country list is used.	Provide documentation for the process used to assign geographic attribute to the ID level record	Satisfactory
11.2	Data Source(s)	Examine documentation to support the online and offline data source identification, qualification, acquisition, data transfer and quality control processes.	Satisfactory
Section: Audience Details			
12.2	Data Inclusion Methodology	Review the identification and disclosure of Data Inclusion Methodologies.	Satisfactory
12.3 13.2	Data Inclusion Methodology Audience Expansion	If "Modeled" is selected - documentation shall be provided for model input, output, and scores associated with behavior.	Satisfactory
14.2	Cross Device Expansion	Confirm the details and methods used for cross device expansion.	Satisfactory
15.2	Audience Refresh Cadence	Review the audience refresh cadence.	Satisfactory
16.2	Source Lookback Window	Review the source lookback window.	Satisfactory
Section: Onboarder Detail			
17.2 18.2 19.2 20.2	Input ID/Match Key Pre- onboarding Audience Expansion Pre- onboarding Cross Device Expansion	Review the onboarding process and documentation.	Satisfactory

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III. People and Process Control Objectives			
Test Number	Control Area	Test Details	Compliance
	Pre- onboarding Audience Precision Level		

IV. Technology Control Objectives			
Test No.	Control Area	Tests	Compliance
Section: General			
	General	Review architecture of the Data Solution Provider. Review the flow of data through the system, data retention protocols and system controls.	Satisfactory
Section: Audience Details			
13.3	Audience Expansion	Analyze modeling code / script / routine that is used to process input, create and validate model, and select look-a-like data	Satisfactory
Section: Onboarder Details			
18.3 19.3	Pre- onboarding Audience Expansion Pre- onboarding Cross-device Expansion	Analyze routine that is used execute and validate onboarding process	Satisfactory