

**Epsilon**  
**Data Transparency Report**

**Data Transparency Standard Validation**

**Company Reviewed: Epsilon**  
**Conducted by: Neutronian**  
**For the period of: 6/6/23 - 6/5/24**

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

| <b>STATEMENT OF VERIFICATION FROM NEUTRONIAN</b>  |
|---|
| <p>We have reviewed Epsilon’s compliance to the IAB Tech Lab <a href="#">Data Transparency Standards</a>, including the <a href="#">Data Transparency Standards Compliance Guide</a> 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>Lisa Abousaleh<br/>CEO and Co-Founder<br/>Neutronian, Inc.</p> |

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## Data Transparency Report

### [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   |
| <b>Section: Data Summary</b>                     |  |                                |              |
| 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   |
| <b>Section: Audience Details</b>                 |   |                         |              |
| 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 |
| <b>Section: Onboarder Details</b>                |   |                         |              |
| 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   |
| <b>Section: Data Summary</b>                 |               |   |              |
|  | 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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| <b>II. Data Label Dissonance Control Objectives</b> |                           |   |                   |
|---|---------------------------|---|-------------------|
| <b>Test Number</b>                                  | <b>Control Area</b>       | <b>Test Details</b>   | <b>Compliance</b> |
| 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:<br>A. Segmentation Criteria<br>B. Standard Segment name<br>C. ID Type<br>D. Audience Precision Level<br>E. Geography   | Satisfactory      |
| 4.1   | Standardized Audience IDs | Ensure legitimate entry from IAB Audience Taxonomy 1.1  | Satisfactory      |
| 5.1   | Segmentation Criteria     | Check that the criteria described addresses business rules for ID inclusion, and is not overly reliant on peripheral segment description.<br><br>This description should address:<br>A. Data provenance,<br>B. frequency at which attribute needs to be observed to be associated with ID, C. and how long ago the attribute was observed.<br><br>If business rules for inclusion are proprietary / algorithmically driven, describe algorithm behavior as it relates to the above items. | Satisfactory      |
| 5.2   | Segmentation Criteria     | Cross-check content in following fields:<br>A. Audience Refresh Cadence<br>B. Source Look Back window<br>C. Data Sources  | Satisfactory      |
| 6.1   | Audience Precision Level  | Cross-check content in following fields:<br>A. Segmentation Criteria<br>B. Standard Segment name<br>C. Segment name<br>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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| <b>II. Data Label Dissonance Control Objectives</b> |   |   |                   |
|---|---|---|-------------------|
| <b>Test Number</b>                                  | <b>Control Area</b>   | <b>Test Details</b>   | <b>Compliance</b> |
| 8.1   | ID Type(s)  | Cross-check content in following fields:<br>A. Data Sources<br>B. Segmentation Criteria   | Satisfactory      |
| 9.1   | Geography<br><br>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      |
| <b>Section: Audience Details</b>                    |   |   |                   |
| 11.1  | Data Source(s)  | Cross-check content in following fields:<br>A. ID Type<br>B. Segmentation Criteria<br><br>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<br><br>Selection of "Modeling": Requires selection of "Yes" within "Audience Expansion" field. | Cross-check content in the Segmentation Criteria<br><br>Ensure that "Audience Expansion" is completed and accurately formatted  | Satisfactory      |
| 13.1  | Audience Expansion  | Cross-check content in following fields:<br>A. Data Inclusion Methodology<br>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:<br>A. Segmentation Criteria<br>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:<br>A. Segmentation Criteria<br>B. Audience Refresh Cadence   | Satisfactory      |
| <b>Section: Onboarder Details</b>                   |   |   |                   |
| 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   |
| <b>Section: General</b>                    |              |   |              |
|  | 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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| <b>III. People and Process Control Objectives</b> |  |   |                   |
|---|--|---|-------------------|
| <b>Test Number</b>                                | <b>Control Area</b>  | <b>Test Details</b>   | <b>Compliance</b> |
|   |  | of responsible, accountable, consulted, informed parties (RACI) for each label field  |                   |
| <b>Section: Data Summary</b>                      |  |   |                   |
| 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<br>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      |
| <b>Section: Audience Details</b>                  |  |   |                   |
| 12.2  | Data Inclusion Methodology   | Review the identification and disclosure of Data Inclusion Methodologies.   | Satisfactory      |
| 12.3<br>13.2                                      | Data Inclusion Methodology<br>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      |
| <b>Section: Onboarder Detail</b>                  |  |   |                   |
| 17.2<br>18.2<br>19.2<br>20.2                      | Input ID/Match Key<br>Pre- onboarding Audience Expansion<br>Pre- onboarding Cross Device Expansion | Review the onboarding process and documentation.  | Satisfactory      |

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| <b>III. People and Process Control Objectives</b> |  |                     |                   |
|---|--|---------------------|-------------------|
| <b>Test Number</b>                                | <b>Control Area</b>                      | <b>Test Details</b> | <b>Compliance</b> |
|   | Pre- onboarding Audience Precision Level |                     |                   |

| <b>IV. Technology Control Objectives</b> |  |   |                   |
|--|--|---|-------------------|
| <b>Test No.</b>                          | <b>Control Area</b>  | <b>Tests</b>  | <b>Compliance</b> |
| <b>Section: General</b>                  |  |   |                   |
|  | General  | Review architecture of the Data Solution Provider.<br><br>Review the flow of data through the system, data retention protocols and system controls. | Satisfactory      |
| <b>Section: Audience Details</b>         |  |   |                   |
| 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      |
| <b>Section: Onboarder Details</b>        |  |   |                   |
| 18.3<br>19.3                             | Pre- onboarding Audience Expansion<br><br>Pre- onboarding Cross-device Expansion | Analyze routine that is used execute and validate onboarding process  | Satisfactory      |