



DATA ETHICS PROGRAM OVERVIEW

Acxiom and LiveRamp

The Acxiom and LiveRamp Global Data Ethics Program is built on our pioneering work on codes of conduct for ethical data use, consumer privacy, ethical data sourcing, and data governance. Our program goes beyond what the law requires to ensure we operate in ways that are just and fair to individuals. Throughout our history, we have always been leaders in ethical practices, as well as vocal advocates for individual privacy rights and protections.

WE BELIEVE DATA ETHICS AND GOVERNANCE ARE ESSENTIAL

Today, every company is a data company, capturing data to create better customer experiences and fuel smarter business decisions. Data is central to our economy, supporting millions of jobs and enabling access to free services and information online. In addition, third-party data provides a vital role in enabling smaller organizations to compete on a more level playing field in a world increasingly dominated by a handful of companies that control access to consumers through their widely adopted online services.

While consumers experience innumerable benefits from data-driven experiences, they also expect companies to be accountable for keeping data safe and using it in ways that are ethical. Since innovation typically outpaces legislation, an ethical approach to data requires safeguards and policies that go beyond what is required by the law to protect consumer privacy — it also addresses the gap between what companies technically can do with data and what they should do.

ETHICAL DATA PRACTICES RELY ON EFFECTIVE POLICIES AND PROCESSES THAT ADDRESS THREE FUNDAMENTAL CRITERIA:

LEGAL

Does data use comply with laws, regulations, co-regulations, and the promises made in privacy policies?



JUST

Are we detecting and preventing uses of data that could cause harms, such as social embarrassment, reputational damage, bias, or discrimination?



FAIR

Is data being used in ways that create value for all stakeholders, including consumers and society as a whole — and would consumers and regulators agree?

PUTTING ETHICAL POLICIES INTO PRACTICE

Our industry-leading program combines a data ethics methodology with operational data governance to ensure policies are followed. The core pillars of our program are:

CONSUMER TRANSPARENCY, NOTICE, AND CONTROL In addition to providing consumers with meaningful transparency, notice, and control (including the ability to opt-out of our marketing data products and correct data in our fraud prevention products), we have created the world's first consumer portal designed to provide transparent access to third-party data that can be used for marketing purposes.

DATA PROTECTION IMPACT ASSESSMENTS (DPIAS) We operationalize our policies for ethical data use and security by conducting over 800 DPIAs per year on our products, solutions, and data sources, as well as the client workflows we support, and the code we write to process data. Performing this work at the design layer is essential to ensuring that governance and ethics are built in from the start, not bolted on at the end of the development process.

PRIVACY AND SECURITY AUDITS Our auditing practices include conducting formal third-party audits required for our compliance certifications, performing our own internal audits, and conducting approximately 50 audits of our policies and controls each year in partnership with our clients.

INTERNAL AND EXTERNAL RISK ASSESSMENTS We maintain a formal Enterprise Risk Management program with an independent risk leader that reports directly to our Executive Committee and Board of Directors. This structure provides an independent layer of oversight to ensure we implement controls effectively and conduct regular risk assessments to help us determine when new controls need to be added.

PROVIDING GLOBAL EXPERTISE AND OVERSIGHT

We have the largest and most expert global team of data ethics professionals in our industry. This team has three core responsibilities:

OPERATIONALIZING DATA ETHICS Ensuring Acxiom and LiveRamp operate in compliance with jurisdictional laws, co-regulation developed by industry self-regulatory groups, and our own rigorous standards for ethical practices.

EXTERNAL POLICY ENGAGEMENT AND DEVELOPMENT Engaging with more than 30 organizations around the world focused on data policy, law, and enforcement to advocate for industry rules and accountability that benefits both consumers and businesses.

ADVISING CLIENTS AND PARTNERS Providing guidance on how to implement best practices for data ethics and governance that increase brand safety and build consumer trust.

ENABLING A DATA DRIVEN FUTURE

We firmly believe that everyone who collects and uses data needs to put a strong data ethics program in place with robust governance. This is key to building trust between companies and consumers — trust that is essential for our data-driven economy to thrive.

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