



ACXIOM'S APPROACH TO ETHICAL DATA SOURCING

Ethical data sourcing is a key element of our industry-leading Global Data Ethics Program, which establishes ethical practices for all aspects of our business that involve the collection and use of data.

WE ARE DEEPLY COMMITTED TO PROTECTING CONSUMER RIGHTS

Our Global Data Ethics Program goes beyond what is required by law and includes policies and procedures that ensure data uses are fair and just to consumers. This includes detecting and preventing uses of data that could cause harms, such as social embarrassment, reputational damage, bias, or discrimination. It also includes ensuring that permitted uses of data create value for all stakeholders, including consumers and society as a whole.

Acxiom does not collect data directly from consumers — we compile publicly available data, self-reported data, and data from companies that secure permission from consumers to share their data with other businesses.

In order to ensure our data products only contain high quality data that is ethically sourced, we follow strict processes to vet every data supplier and data source.

WE ENSURE OUR SUPPLIERS ARE STABLE, VIABLE, AND REPUTABLE

Every data supplier we work with must complete a thorough **vendor credentialing process** to ensure they are a legitimate, reputable, and ongoing commercial enterprise. Our review process includes:

- Validating articles of incorporation
- Reviewing annual financials, SEC filings, and D&B credit reports
- Researching company principles
- Conducting a legal search to surface any history of claims or disputes

These steps help us maintain a stable supply chain comprised of companies that share our commitment to ethical data sourcing practices.

WE CONDUCT A THOROUGH REVIEW OF EVERY DATA SOURCE

To ensure that the data sources we use in our data products meet our requirements for data quality and ethical data collection, every data source goes through a thorough **data accreditation process** managed by a dedicated team of data sourcing specialists. Our review process includes the following elements:

DATA SOURCE SURVEY Suppliers must complete a disclosure and attestation for each data source that describes their data elements, how the data was collected, what notice and choice was provided to consumers, and what permissions are associated with the data.

PRIVACY NOTICE REVIEW We review consumer-facing privacy notices from the original point of data collection and reject sources that do not demonstrate the required disclosures.

PERMISSIONS REVIEW We ensure data includes permissions for transfer to Acxiom as well as subsequent use, including transfer and use by our clients and partners.

PUBLIC DOMAIN VERIFICATION We take steps to verify that data from publicly available sources and websites are in the public domain and collected in accordance with any applicable legal terms or restrictions.

PUBLIC RECORDS VERIFICATION We determine the applicable laws that govern each type, category, and source of public record data, including the specific permissions, prohibitions, and contractual requirements.

QUALITY REVIEW We analyze a test file provided by the data supplier to verify data contents and complete a rigorous, in-depth quality evaluation.

In addition to completing an initial data accreditation process, data partners are required to complete an annual data certification to ensure that data collection methods have not materially changed and still meet all applicable requirements. We also use contractual controls to provide additional assurances that all data is collected with appropriate consumer consent and in compliance with any applicable laws and regulations.

ADVANCING ETHICAL PRACTICES THROUGHOUT THE DATA INDUSTRY

Acxiom has a long history of advancing consumer protections and ethical practices in the data industry. We were the first company in the world to develop a formal set of practices for ethical data sourcing, and our strict approach to credentialing data suppliers and accrediting data sources has driven many companies in the data industry to change their practices in order to meet our high standards.



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