

# Advertising Policy

Effective as of April 13, 2018

## Introduction

Groundhog Technologies ("GT") is a global provider of digital advertising platform. Our proprietary Demand Side Platform (the "Platform") optimizes advertising interactions across addressable media — delivering greater performance, transparency, and control to marketers and a better experience to consumers.

This Advertising Policy ("Policy") sets out Groundhog Technologies' guidelines about advertising contents for advertisers. In this Policy, we use the terms "GT", "our", "us" and "we" to refer to Groundhog Technologies and our affiliates. Groundhog Technologies places a high value on the benefit of our service users, clients and advertisers ("you"), for the operation of advertisement business. In order to protect your rights and interests, please read the following policy carefully:

## Advertising Policy

1. The advertising policies apply to all ads and commercial content served by or purchased through the Platform, including ads purchased under AAAA/IAB Standard Terms and Conditions.
2. You are responsible for understanding and complying with all applicable laws and regulations. Failure to comply with laws and regulations may result in a variety of consequences, including the cancellation of ads you have placed and termination of your account.
3. We do not use sensitive personal information for ad targeting. The topics you choose for targeting your ad don't reflect the personal beliefs, characteristics or values of users.
4. If you are managing ads on behalf of other advertisers, each advertiser or client must be managed through separate ad accounts. You shall set up a new account but not change the advertiser or client associated with an established ad account. You are responsible for ensuring that each advertiser complies with the advertising policies.
5. Every advertisement shall be reviewed to ensure that such advertisement has met our advertising policies before it is shown up in public. Typically the review period is 24 hours after issuing to us, although in some cases it may take longer.
6. We reserve the right to reject, approve or remove any ad for any reason, in our sole discretion, including ads that negatively affect our relationship with our users or partners, or

that promote content, services, or activities, contrary to our position, interests, or advertising philosophy.

7. These policies may be modified or changed by us at any time without notice.

## **Prohibited Content**

8. The advertiser shall ensure that ads shall not constitute, facilitate, or promote any illegal products, services or activities. Ads targeted to minors shall not promote any products, services, or content that are inappropriate, illegal, unsafe, or that exploit, mislead, or exert undue pressure on the age groups targeted.

9. The advertiser shall ensure that ads shall not promote the sale or use of the following:

- i. Illegal, prescription, or recreational drugs;
- ii. Tobacco products and related paraphernalia;
- iii. Unsafe supplements;
- iv. Weapons, ammunition, or explosives;
- v. Adult products or services (except for ads for family planning and contraception);
- vi. Online real money gambling/games of skill, real money lotteries, including online real money casino, sports books, bingo, poker, or any relevant product or services; or
- vii. Except the items indicated in Restricted Content, any products, services or activities which are contrary to the public order or good custom.

10. The advertiser shall ensure that ads shall not contain any of the following:

- i. Content that infringes or violates the rights of any third party, including copyright, trademark, privacy, publicity, or other personal or proprietary rights.
- ii. Adult content: this includes nudity, depictions of people in explicit or suggestive positions, or activities that are overly suggestive or sexually provocative.
- iii. Shocking, sensational, disrespectful, or excessively violent content.
- iv. Content that asserts or implies personal attributes: this includes direct or indirect assertions or implications about a person's race, ethnic origin, religion, beliefs, age, sexual orientation or practices, gender identity, disability, medical condition (including physical or mental health), financial status, membership in a trade union, criminal record, or name.

## **Restricted Content**

11. Alcohol: Ads that promote or reference alcohol must:

- i. Comply with all applicable local laws, required or established industry codes, guidelines, licenses and approvals; and
- ii. Apply age and country targeting criteria consistent with DSP targeting guidelines and applicable local laws. (Note: Ads that promote or reference alcohol are prohibited in the some countries, including but

not limited to: Afghanistan, Brunei, Bangladesh, Egypt, Gambia, Kuwait, Libya, Norway, Pakistan, Russia, Saudi Arabia, Turkey, United Arab Emirates, or Yemen.)

12. Dating: Ads for online dating services are only allowed with prior written permission of users. Ads for adult friend finders or dating sites with a sexual emphasis are not permitted. Ads for other online dating services are only allowed with prior authorization from DSP.

13. Online pharmacies: Subject to the scope permitted by applicable laws, ads for online and offline pharmacies are only permitted with prior written permission of local competent authorities.

14. Supplements: Subject to the scope permitted by applicable laws, ads that promote acceptable dietary and herbal supplements may only target users who are at least 20 years of age.

15. Subscription services: Ads for subscription services, or that promote products or services that include negative options, automatic renewal, free-to-pay conversion billing products, or mobile marketing, must make the subscription terms clearly to the potential subscribers in the ads (ex: "Subscription required").