

Annex 5

Response from CleverTap

Hi Eva,

Here are some pointers to help with the article:

- **About CleverTap**

CleverTap is a customer retention platform that helps consumer brands maximize user lifetime value, optimize key conversion metrics, and boost retention rates. CleverTap's industry-first user retention platform combines real-time audience insights, advanced segmentation capabilities, and marketing automation to help growth marketers create differentiated user experiences that drive long-term brand loyalty. We're not an ad platform.

Our customers use our platform to engage with billions of users every day, which is why end-user privacy is vitally important to CleverTap. **Privacy is not an afterthought but a core principle on which we build our offering.** As a result, we were one of the early adopters in the business to become GDPR compliant.

- **Shared responsibility model**

Data privacy is a shared responsibility between the following stakeholders, which can be classified broadly under three categories:

- Data Controller (CleverTap Customers/Publishers)
- Data Subject (End Users)
- Data Processor (CleverTap)

Our platform is designed to ensure that the ownership of all user data always rests with the publisher. This data is then passed on to CleverTap, the data processor. The end user data that we receive from the publisher is bound by the terms of the publisher's privacy policy.

- **Customer retention and engagement service**

Our algorithms leverage aggregated data rather than individual records to generate insights that the customer/publisher may use to run various engagement campaigns. We are a privacy-first organization and that's built into our DNA. CleverTap doesn't share, rent or sell the data to any third party and we are GDPR compliant. CleverTap respects users' right to data privacy. We take utmost care to ensure that our customers have complete peace of mind regarding data controls and privacy so they can focus on growing their business. The very idea of having a partnership with data broking organizations is contrary to the spirit and DNA of CleverTap. CleverTap does not engage in business partnerships with data/broker companies.

CleverTap is also acutely aware of its responsibility to end user privacy, which is why our platform ensures that the end user may at any point in time exercise any of their rights as follows:

Right to Erase:

This right allows end users to delete all information about them from CleverTap servers. The Data Controller/Publisher/Customer may use the Rest API to delete all data related to the appropriate profiles from the CleverTap servers. The entire profile page will be unavailable for use and ALL profile and event information will be removed from our servers within 24 hours of calling this function.

Right to Modify/Rectify:

This right allows users to modify/rectify any profile data stored about them, which means old profile information will be overridden with a new profile for the given user identifier per the user's wish.

Right to Access:

This right allows users to access data which has been captured about them by the Data Processors/Publisher.

Right to Data Suppress (Opt-Out):

This right allows users to opt out of sharing any data with Data Processors. This means that the profile page of the user who has opted out will be stale and will not have the latest events performed by the user. They will also be auto-filtered out from all segment calculations and engagement.

By 360 degree view we mean that the app publisher can view the combined behavior of the user across publishers app and website. For eg: what is a segment of users doing on the platform and what is the combined behavior to help support retention. We do not analyze data to the individual level and only look at it holistically.