

## Commitment to consumer privacy

Our mission is to provide valuable insights to retailers and improve the customer experience while protecting individual privacy. Working with government officials, public policy advocates, and other industry representatives, Euclid helped craft the Mobile Location Analytics (MLA) Code of Conduct. The MLA Code, endorsed by the FTC, is guided by four main principles:



### 1. Limited Data Collection

The data collected is anonymous and works by sensing the presence of smartphones. No personal information is collected.



### Aggregate, Anonymous Analytics

Reports provided do not include any representation of individual behavior.



### 2. Consumer Choice

Individuals can formally opt-out if they don't want their generic device data collected.



### 3. Customer Notification

Euclid provides retailers with standard language and notices that inform consumers about the collection and use of MLA data.

“It's great that industry has recognized consumer concerns about invisible tracking in retail spaces and has taken a positive step forward in developing a self-regulatory code of conduct.”

Jessica Rich  
FTC Director of Consumer Protection

## EUCLID'S ADDITIONAL PRIVACY MEASURES

- Any publicly available device data collected is permanently and irreversibly masked (all MAC Addresses are hashed)
- No credit card or PCI data is ever collected
- Data is encrypted and secured during transmission and storage
- Euclid undergoes regular audits of its privacy policies and practices from third parties such as Techtonica, a privacy consulting firm