



LAST MODIFIED, AUGUST 2021

TUNNL PRIVACY POLICY

California residents please [click here](#) to see more information about Tunnl's compliance with the California Consumer Privacy Act.

At our core, Tunnl is a data analytics firm. What does that mean? We help our clients develop their media advertising strategy by applying proprietary techniques and technologies to data sets. We are thankful to be able to service a wide-range of clients, such as companies, political campaigns, not-for-profits, foundations, and issue advocacy organizations. Our clients use our data products and services to communicate with adult consumers and registered voters in more relevant and meaningful ways on topics and issues they care about. This helps reduce the amount of irrelevant ads consumers and voters see.

Tunnl does not and will not knowingly collect, maintain, process, store, transfer, or analyze highly-sensitive information such as Social Security Numbers, driver's license or other government-issued identification numbers, financial account numbers, payment card numbers, pin numbers, credit history, credit scores, health information, or biometric data. Tunnl does not knowingly collect, maintain, process, store, transfer, or analyze information on individuals younger than the voter registration age.

Most of the data we analyze is from data sets licensed to us by third-parties. That being said, we understand the critical importance of maintaining the privacy and security of any personal information that we receive. Although we do not have a direct relationship with the individuals we receive information about, we have drafted this Privacy Notice so that you know where we receive data from, how we use it, how we share it, and who you can speak with if you have any questions or concerns.

This Privacy Notice covers only Tunnl's policies and practices. This notice may change over time; so we recommend that you re-visit this Privacy Notice any time you have questions about the ways we treat the data in our possession. Your continued use of our website signifies your agreement to the new terms in our Privacy Notice. If you have questions about any of the topics covered in this Privacy Notice, or any changes we may make, please [contact us](#).



THE INFORMATION WE COLLECT

INFORMATION RECEIVED FROM SURVEY RESPONDENTS

Tunni regularly conducts opinion surveys via a third-party survey provider or market research company in which we ask individuals to volunteer their views and opinions on topics ranging from consumer products to politics. When we conduct these surveys, we use the data for aggregate analysis purposes. We use this data, in combination with other third-party data, to make predictions about audiences with similar characteristics as to how likely they are to buy a certain product or service or support a candidate.

INFORMATION RECEIVED FROM THIRD PARTIES

As described above, our customers are companies, political campaigns, and issue advocacy organizations. In order to provide our customers with the most accurate analyses possible, we license data sets from third-party vendors who have lawful access to that information and comply with any and all federal and state laws that apply to these data sets. These data sets contain information, including:

- Television viewership data, such as the programs audiences watch and the devices on which they watch those programs;
- Data about individuals' interests such as travel interests, purchasing interests, and other preferences;
- Information collected by states' election divisions or secretaries of state, such as individual names, birthdates, physical address, ethnicity (in states where available) phone numbers, party registration (in states where available), and the elections individuals voted in, such as general elections or primary elections; and
- Data about predicted views on issues, politics, and purchases.

As noted above, Deep Root uses either its own surveys or survey data from third parties to make predictions about how likely individuals are to take an action, such as support a candidate or cause.

From time to time, we may also collect information from other publicly available third-party sources, including information posted on websites and social media platforms such as YouTube, Reddit, and Twitter. We do not collect information from any non-public or private portions of these platforms, such as Direct Messages and private subreddits. Most social media platforms provide tools and settings that allow you to manage the publicly available content about you.

While Tunni does not control the privacy-related features of these third-party platforms, we strongly encourage you to explore these tools and settings so that you are comfortable with the information disclosed about you.



INFORMATION COLLECTED FROM OUR WEBSITE, SOFTWARE AND PLATFORMS

Like most companies, to use our software and platforms, we require certain information from our clients and users. As one example, we offer a self-service platform for our clients to choose media markets and produce reports. In connection with the use of that platform, we may collect your name; your company name, address, email, phone and billing contact; your political election and advertising entity; and your state, media market, target and tier.

In addition, we also collect information about the way visitors interact with our website or various software and platforms we offer. Although you can visit our website, software or platforms without telling us who you are, when you access our website, software or platforms, our servers are able to optimize your viewing experience by automatically gathering information from your browser, such as the type of browser you are using and the operating system of your computer or mobile device. Our servers may also store additional information, including the pages of our website, software or platforms that you visit, the way you interact with our website, software or platforms and your IP Address. Your IP address is a unique number assigned to your computer or device by your Internet Service Provider. Collecting IP addresses is a standard practice and is generally done automatically. We also collect and maintain log-in information—including username, password, and log-in attempts—related to the Tunnl Client Portal accessible from the website and any other software and platforms we provide.

COOKIES

Like many companies with web pages, we also use other automated collection tools, such as “cookies” and “web beacons”, to gather information from you and your computer while you are visiting our website. A cookie is a small file stored on your computer that lets us know whether you’ve visited our website before and your navigation experience during your visit. We may use cookies to facilitate your access to our services, to enhance your experience, to increase security, and to recognize your computer or device. Cookies allow us to collect statistical information about the usage of our services and website to improve functionality and design. Most browsers automatically accept cookies, but you can usually adjust your browser’s settings to decline cookies, delete past cookies, or otherwise modify your browser’s interactions with cookies. If you choose to disable cookies, it is possible that some of our website’s features may not function or display properly.

DO NOT TRACK

Our website does not respond to your browser’s “do-not-track” requests or comparable mechanisms.

CORRESPONDENCE RECEIVED BY TUNNL

Individuals may correspond directly with us through our “Contact Us” link. Any personal information submitted through such channels will be used only to respond to such communications.



CHILDREN UNDER THE AGE OF THIRTEEN

Tunnl does not knowingly collect information from children under the age of thirteen. From time to time, we may receive third-party data that indicates the fact that children under the age thirteen reside in a given household.

HOW WE USE INFORMATION WE RECEIVE

We use the information we receive to better understand how and why individuals make certain decisions. Specifically, our proprietary modeling techniques allow us to use the data sets described above to understand what people value and the characteristics that drive these values. We then use this understanding to aggregate groups of individuals together based on common interests and values so that our clients can best make use of their media and advertising efforts.

We also use the information in our possession to provide the services you have requested, continue to develop new tools and technologies to better serve our clients and to further protect the privacy and security of the individuals described by this information.

At times, information we collect directly from our website or received from a third party may be subject to certain additional restrictions on the information's use. These restrictions may arise from provisions in our agreements with third parties or because of applicable State and Federal laws. We comply with any such applicable restrictions on our use of information.

HOW WE SHARE INFORMATION

We use the information we receive to build statistical models and other analytical tools so that our clients can better understand how groups of people with common interests may behave. For example, we might conclude that individuals who watched a particular television program are more likely to be interested in a particular topic or support a certain candidate or cause. The results of such analyses are generally shared with our clients at the aggregate level. When requested, however, we may provide our clients with models that analyze information at an individual level. Similarly, some clients may wish to use the datasets we create to provide digital advertising to a group of specific individuals based on the characteristics we identify these individuals may likely share.

We may, from time to time, use a third-party service, such as Google Analytics, to collect and analyze website visitor data. We use this information for a number of purposes, including calculating usage levels, diagnosing server issues, improving our website and services to better accommodate user patterns, and detecting and diminishing security threats.



At times, we may be required to share information about specific individuals with various third parties. Except for the ways otherwise outlined in this notice, we will not disclose individual level data unless we believe that such action is necessary to (a) comply with a court order or other legal process served on us; (b) investigate or prevent suspected illegal activities; (c) enforce contracts or other binding agreements; (d) take precautions against liability, investigate or defend against any third-party claims or allegations; or (e) exercise or protect the rights, property, security, personal safety, or integrity of Tunnl, its employees, customers, or the public.

Tunnl shares information only in the ways described in this Privacy Notice. At times, we may store such information in locations outside our facilities, such as on servers co-located with third-party hosting providers.

As we grow, we may buy or sell assets or business divisions. Generally, the information stored on our systems would be transferred in such a transaction. We may also transfer or assign such information in the course of business combinations, including but not limited to mergers, divestitures, or dissolution. In the event of such a transaction, any successor entity that acquires the information in our possession will continue to be subject to the terms and conditions of this Privacy Notice.

REMOVAL OF NAMES FROM RECORDS MAINTAINED BY TUNNL

If you would like to have your name removed from our records for any reason, please e-mail us a removal request containing your full name and physical address at notice@tunnldata.com. You may also submit a request to remove the name(s) of individuals who reside in your household. Tunnl will not honor removal requests for individuals residing outside of your household or whose submitted address does not match the address in our systems. Because we do not knowingly collect or retain information about individuals under the voter registration age, it is not necessary to submit a removal request for individuals under the age of 17.

We will acknowledge receipt of your removal request. For security reasons, we will not be able to confirm whether a submitted name appears in different forms in our systems, any addresses on file associated with the name, or the sources of any information we may have received related to the name.

Removing your name will disassociate your name from any data that was previously associated with you, but it will not remove this data from our databases. In short, once your name has been removed, neither Tunnl nor our clients will be able to associate your name with any data we have stored on our systems.



Please also note that submitting a request to remove your name from our system does not guarantee that your information—including your name—will not be passed to Tunnl again at some point in the future by one of the third-parties from whom we license data. Because of the way such data is assembled and disclosed, we do not know the identity of individuals within the data sets we license before we receive them. While we will attempt to honor prior removal requests with each new data set we receive, a change in spelling or format of an individual's name or address from one data set to another may leave us unable to match the requesting individual with their corresponding data in a future data set. As we do not have a direct relationship with the individuals we receive information about, we highly recommend that those concerned about the sharing of their personal information also speak directly with any entity who is involved in collecting and disclosing such information.

HOW WE PROTECT INFORMATION

Whether collected directly from our website or received from a third party, protecting the privacy of your information is important to us. We take security measures—physical, electronic, and procedural—to help defend against the unauthorized access to and disclosure of information in our possession. In addition to the restrictions discussed in this Privacy Notice, our employees are required to comply with information security safeguards, and our systems are protected by technological measures to help prevent unauthorized individuals from gaining access. Furthermore, Tunnl's employees are trained to observe and comply with applicable federal and state privacy laws.

Despite these precautions, no system can be completely secure and there remains a risk that unauthorized access or use, hardware or software failure, human error, or a number of other factors may compromise the security of the personal information maintained by Tunnl.

UPDATES TO THIS PRIVACY NOTICE

We may update or modify this Privacy Notice to reflect changes in the way Tunnl maintains, uses, shares, or secures the information we receive. Any changes to this Privacy Notice will become effective when we post the revised Notice to our website.

HOW TO CONTACT US

If you have any questions regarding this Privacy Notice, or about Tunnl practices with regard to information we receive, please send us an email at notice@tunnldata.com.