

Policy on the Use of Health-Related Information in Online Behavioral Advertising

Use of Sensitive Consumer Information. Akamai is a member of the Network Advertising Initiative (NAI). Akamai does not collect or use “sensitive consumer information” (as defined in the NAI’s Self-Regulatory Code of Conduct) in its online behavioral advertising activities and does not offer or sell to its clients segments based on sensitive consumer information. “Sensitive consumer information” includes social security numbers or other government-issued identifiers, insurance plan numbers, financial account numbers, information that describes the precise real-time geographic location of an individual derived through location-based services such as through GPS-enabled devices, and precise information about past, present, or potential future health or medical conditions or treatments, including genetic, genomic and family medical history. Akamai maintains internal policies and procedures designed to safeguard against the collection or use of such information.

Use of General Health-Related Information. General health-related information that is not based on precise medical conditions or treatment is not considered “sensitive consumer information.” Akamai does not offer or sell to its clients, on a routine or ordinary basis, standard segments (i.e., broad classifications of consumers used for advertising) based on general health-related information Akamai may, however, from time to time collect or use anonymous general health-related user information in connection with customized advertising campaigns and/or remarketing activities for particular advertiser clients. Remarketing (or retargeting) is when an advertiser tries to deliver advertisements to consumers that have previously visited its website. Examples of these sorts of customized data uses include:

- Retargeting users who have visited a health-related Web site, such as a health information/research site or a site providing information on a particular type of over-the-counter medication such as a particular brand of aspirin. However, in each of these instances the level of data collected would include only the fact that the site was visited and would not include any detail on a particular type of health condition or other information being viewed.
- Advertising campaigns targeted at users who may have an interest in general health and/or wellness matters, such as users interested in fitness. Anonymous information collected for such general campaigns is typically gathered from user visits to Web sites that provide information regarding general health and fitness, or from purchases of goods and services, such as exercise equipment, that may indicate the user has an interest in fitness.
- Advertising campaigns targeted at users who may have an interest in a health condition that is widespread and not generally considered to be unusual, embarrassing or otherwise “sensitive”, such as allergy sufferers. Such campaigns typically rely on information inferred from other common

and “non-sensitive” activities, such as purchases of an air purification device in the case of potential allergy sufferers.

The above examples are intended to be illustrative and are not an exhaustive list of the general health-related advertising campaigns that Akamai might conduct. In considering which campaigns to support, Akamai attempts to take into account both the source of the data being collected and used as well as the audience that an advertiser is attempting to target. If either the data source or the intended audience would involve particular health conditions or treatments that are generally considered unusual, embarrassing or otherwise “sensitive” Akamai will not conduct the campaign.