Pontiac Intelligence Creative Acceptance Policy

Please thoroughly review all Creative Policies before uploading Creative. Pontiac Intelligence reserves the right to reject any creative unit at its discretion, and subsequently suspend the account without advanced warning. If your account is suspended, you will be notified in writing and an investigation will take place within three business days. No refunds will be given for Creative Audit fees incurred on ads that are Rejected or flagged as Sensitive.

All Creative Units go through the Xandr/AppNexus & RiskIQ audit review processes, the result of which will be reflected next to each creative in the platform. In addition, Pontiac Intelligence conducts its own human and technological audit, and reserves the right to override the aforementioned audit decisions, at its sole discretion, even if the reason is not explicitly stated below.

Prohibited Content

- Broken Ads or blank creative
- Creative brand does not match Click URL/landing page brand
- Pornography, Nudity, Obscenities, or other 'Adult' Content
- Hate Speech or Defamatory Language
- Sale of, or instructions for creating, guns, bombs, ammunition, or weapons
- Displaying fake errors to induce user action, or messaging that implies knowledge of a user's computer or operating system
- Discussing or promoting sale of federally illegal drugs, including marijuana, illegal pharmaceuticals, and other schedule 1
- Charging for government forms and services
- **Enabling or Permitting Piracy**
- Misappropriation of Copyright, Trademark, Trade Secret, or Patent
- Executes or Downloads Files without User Interactions
- Causing degradation of site performance (ex: excessive animation, weight)
- Illegal Material or Content

- Inappropriate content (at our discretion)
- Misleading or sensationalized messaging, content or images
- Non-compliance with restricted advertising category guidelines (dating, pharmaceuticals, weight loss, health and beauty, etc.)
- Prohibited advertiser categories (ex: casual dating, illegal gambling, adult, etc.)
- Malware, privacy and security violations
- Global and publisher competitive and lowquality exclusions (CE)
- Non-user-initiated audio (initiated on click and must have integrated audio controls
- Pop ups or any ad or landing pages that spawn them
- Content that intends to, or does, induce user action through misleading appearance or behavior, including, but not limited to, creatives that mimic video players, functional buttons, errors or warnings about viruses, missing codecs, and corrupt disks

Sensitive Categories

Advertisements which exhibit any of the following properties are allowed on the platform but restricted to publishers who have approved this type of content. These ad units will be flagged in the platform as Sensitive and will flag each ad as such next to the creative audit.



If ANY of a Line Item's ad units are flagged as Sensitive, then the Line Item will be restricted to the sensitive publishers.

- CBD or Hemp (No pictures of flower, hemp/marijuana leaves, or the words 'Get High' on the landing page)
- Adult Store (must lead to a landing page without nudity or toys)
- Paraphernalia, Pharmaceuticals and Supplements (usually accepted, but is reviewed on a case-by-case
- Politics See 'Political Advertising' section below for more information
- Social Issues / makes claims
- Weight Loss
- Sexual Health
- Affiliate Offers
- Consumer Loans
- **Tobacco and Smoking Products**
- Online Games
- Gambling & Online Gambling See 'Gambling Advertising' below
- Firearms and Weapons (Sporting Goods stores, education, accessories)
- Tabloid / Advertorial (cannot infringe on copyrights)
- Underwear / Lingerie
- Strip Club / Gentlemen's Club
- Dating

Political Advertising

Pontiac Intelligence permits political advertising (advertising relating to elections, ballot initiatives, or political candidates) in the United States, but requires that such advertising comply with applicable law. We also require that you certify certain information about the ads and the political organization that purchased them for certain political advertising on the state or local level, as legally required.

You are not required to certify political advertising serving outside the United States, but you must still adhere to our general policies and comply with all applicable legal and/or regulatory requirements in the jurisdiction where you are advertising.

Unless specifically authorized by Pontiac Intelligence, buyers are prohibited from serving ads related to any federal elections in Canada.

All necessary information must be entered directly into the Pontiac platform. The platform will guide you through a series of questions. The below exemplifies the nature of the information that must be provided, but is subject to change. Failure to supply all applicable information into the platform could prevent your ads from serving.

1.		in any way running ads related to an election, ballot initiative, or political candidate in the United If yes, please complete a and b below.
	a.	I certify that all such advertising has been paid for, or will be paid for, with funds from financial institutions in the same country and currency where the election, ballot initiative, or campaign for political candidate is being held.
	b.	i. Yes: NO: I am unaware of any portion of the payment being provided by foreign nationals or foreign principals organized under the laws of a foreign country or having their principal place of business in a foreign country.
		i. I am unaware: I can Confirm:



2.	Does your creative include a disclaimer stating who paid for the advertisement and whether it was authorized by the relevant candidate or paid for by an independent expenditure committee? a. Yes: If Yes is checked, continue to question 3. b. No: , If No is checked, stop here. All creatives of political nature require this disclaimer, so
	please go back and adjust the creatives to clearly include this disclaimer
3.	Is your campaign running at the Local/State or Federal Level? a. State/Local: If checked, continue to question 4. b. Federal: If only Federal politics are involved, please move to question 5. c. Both: If Both are involved, move to Question 4.
4.	Is your State/Local campaign running in California, Illinois, Maryland, Nevada, New Jersey, New Jersey, Virginia, or Washington? If Yes, please Fill out Sections a-g below in full. If No, and you are running at the State/Local level OUTSIDE of one of these states, please complete a-g below with as much information as applicable. If the information cannot be completed fill out the field with N/A.
	a) US FEC ID:.
	b) Organization Name:.
	c) Address (Address/City/State/Zip):.
	i) ii)
	ii) iii)
	d) Phone Number: .
	e) <u>Treasurer Name:</u> .
	f) Subject of the Ad:.
	g) Method of Payment: .
5.	If your campaign is running at the Federal Level, provide your ID number issued by Federal Elections Committee. a. <u>US FEC ID</u> :. .
6.	Is your campaign being paid for by an Independent Expenditure Committee, as defined as follows: a political committee that makes only independent expenditures; that is, it spends money on political communications that expressly advocate the election or defeat of a clearly identified candidate and does not coordinate with a candidate, a candidate's authorized committee, or an agent of the candidate? a. Yes: If yes is checked, AND the campaign being run in New Jersey, or New York State, please attach the separate State Registration Form to the email along with this completed document.
	b. No:

Gambling Advertising

A separate Gambling Addendum must be signed prior to the launch of any Gambling advertising. If you are running Gambling Advertising, as defined below, please follow the prompts inside the Pontiac Intelligence platform and follow the steps as instructed. If prompts are not automatically generated, you must reach out to your Account Manager and request the Gambling Addendum via email.

With respect to any campaign executed via the Pontiac Platform, "gambling ad" means the following:



- Any type of advertisement that promotes, directly or indirectly, online (internet and mobile) and offline (land-based or "bricks and mortar" casinos, betting shops, card rooms or other gambling establishments) gambling, gaming, betting or wagering of any kind, whether for cash prizes or other things of value, including but not limited to casino games, poker, sports betting (whether individual or parlay wagering), pari-mutuel wagering or "betting pools" (including horse racing, dog racing, and jai alai), lotteries, raffles, sweepstakes, penny auctions, and fantasy sports.
- Any type of advertisement that otherwise relates in any way to the foregoing activities, including advertisements for promotional products, services or materials, including education, "learn to play," "practice" and other free simulation sites affiliated with online or offline gambling or wagering sites or facilities.

Prohibited Countries

Notwithstanding any other provision in this policy, Pontiac prohibits gambling ads of any kind targeted to serve in the following countries and any other country where gambling or the advertisement of gambling is illegal:

- China
- Egypt
- Hong Kong
- India
- Indonesia
- Russia
- Singapore
- Taiwan
- Thailand
- United Arab Emirates

Restrictions on Gambling Ads

Pontiac generally permits gambling ads to be targeted to serve in jurisdictions other than those above where such ads are not prohibited so long as Pontiac users, on behalf of themselves and the advertisers whose ads they are trafficking, comply with the following requirements:

- The ad complies with all applicable laws, rules and regulations in any jurisdiction where the client's ad targets to serve.
- The buyer and the advertiser currently hold all required licenses, permits, registrations, waivers, consents or
 other governmental approvals (collectively, "licenses") to operate in the jurisdictions in which the ad is
 served and in any other jurisdictions in which you and the advertiser operate.
- The buyer and the advertiser are in compliance and agree to remain in compliance with all applicable laws and the terms of all applicable licenses.
- The buyer and the advertiser agree not to serve gambling ads targeted to serve in any jurisdiction specifically prohibited by this policy, as such may be updated from time to time.
- The buyer is approved by AppNexus/Xandr to serve gambling ads.
- The buyer acknowledges that approval does not guarantee that ads can be served; Pontiac and AppNexus/Xandr reserve the right to conduct appropriate due diligence on the buyer and/or the advertiser and, in each of their sole and absolute discretion, may prohibit any ad from serving for any reason whatever.

Pontiac shall have no liability or responsibility of any kind if AppNexus/Xandr decline to serve gambling ads or any other Ads proposed by a Pontiac user, regardless of whether the ads meet the Pontiac Ad Standards or are approved by Pontiac, and users agree to indemnify and hold



harmless Pontiac from any losses arising from AppNexus/Xandr's decision not to serve a user's gambling ads.

To "target ads to serve in a country" or "jurisdiction", for purposes of this gambling addendum, means to target advertising based on the geographic location of an Internet user (according to the IP address associated with the requesting browser).

Government-Sponsored Lotteries

Advertising for government-sponsored lotteries is permitted, so long as the ads comply with the following requirements:

- The advertiser is a government entity or agency, such as a state, provincial or national lottery commission or authority, or a licensee or agent contractually authorized to operate or advertise lottery games on behalf of a government entity.
- The lottery ads must only target the jurisdiction that controls the lottery commission or authority, or in which the government-sponsored lottery is authorized.
- The lottery ads otherwise comply with all applicable laws, rules, regulations.
- Under no circumstances should gambling ads be targeted to children.

Children's Privacy

Laws in various jurisdictions regulate the collection and use of data from or about children. including based on activity on Child Sites. By Child Site we mean a site or app that is directed to or intended for children under (i) the age of 13 if the user is located in the US, (ii) the age required for parental consent, as determined by the laws of the Member State in which the child resides, if the child is located if the EEA, or (iii) the age defined by the laws or regulations of the given jurisdiction if the child is located outside the US and EEA.

In the US, the Children's Online Privacy Protection Act of 1998 (COPPA) regulates the online collection and use of personal information from or about children. Under US Federal Trade Commission (FTC) rules implementing COPPA, it is prohibited (i) to create or update a user profile based on an activity (such as a click or a visit) on a child-directed site or app and/or (ii) to deliver an ad based on prior online activity to a user on a Child Site.

In the EEA, the General Data Protection Regulation (EU) 2016/679 (GDPR) regulates the processing of personal data from or about children. Under the GDPR, the processing of the personal information of a child is prohibited where the child is younger than 16 (or the age required for parental consent as determined by the laws of the Member State in which the child resides) unless consent is given or authorized by the holder of parental responsibility of the child.

For COPPA or other applicable laws, rules, and regulations, including GDPR, Xandr regulates the collection and use of data on Child Sites:

- Ads served on sites identified as child-directed on the Xandr platform may not be targeted based on prior online activity, i.e. behaviorally targeted or retargeted. Contextual ads may continue to be served on Child Sites. Targeting an ad based on prior online activity to a Child Site is prohibited.
- In connection with your use of the Pontiac Intelligence platform, you may not:



- Associate any behavioral or interest-based information about an impression from a Child Site with a user or unique identifier.
- Target an ad based on prior online activity to a user on a Child Site.
- Create segments specifically targeting children under the age of 13 without parental consent.
- Collect or use personal identifiers or other personal information, e.g. cookie IDs, IP addresses, device IDs, or precise geolocation information, related to impressions on Child Sites.

Identifying Child Sites

- Pontiac Intelligence, in the course of its standard inventory auditing process (i.e., for sites submitted for Pontiac Intelligence audit), will use reasonable procedures designed to identify and categorize Child Sites.
- Pontiac Intelligence provides configuration parameters for sellers to self-identify Child Sites.

Third-Party Seller Policies

In addition to Pontiac Intelligence's content policies, certain sellers have additional policies that apply to buyers of those sellers' inventory and certain data providers have additional policies that apply to buyers of those data providers' data. Pontiac Intelligence clients wishing to purchase such inventory or data are responsible for understanding and adhering to any such additional policies. These links to third-party policy documents are offered below as a convenience. However, these links are not guaranteed by Pontiac Intelligence to be up to date or all inclusive. Other policies and Sellers not listed may apply.

Ad Inventory Seller Policies

Microsoft:

- Creative Acceptance Policy: http://advertising.microsoft.com/creativeacceptance-policy
- For Xandr policies regarding buying ad Inventory from Microsoft (including Windows Apps Inventory), see Additional Microsoft Inventory Policies .

Google (AdX):

- http://www.google.com/support/adxbuyer/bin/topic.py?topic=22149
- http://www.google.com/intl/en/adxbuyer/guidelines.html

Verizon Media (AOL & Yahoo):

https://adspecs.verizonmedia.com/pages/oathsupplypolicies/

