

Xiam Technologies and Consumer Privacy

Xiam Technologies and its parent company Qualcomm are focused on delivering the best mobile retailing experience to consumers. While the explosion of mobile applications and content is great for consumers, they can sometimes find themselves overwhelmed. Xiam Technologies' products and services deliver a mobile experience that helps consumers find what they want, when they want it. We empower consumers from all walks of life to enjoy a rich and personalized mobile broadband experience wherever they are.

Xiam Technologies' mission is to make it easier for consumers to find content and applications which surprise, delight and entertain them. Simply put, we help people "discover choice" in their digital lives. We believe, however, that helping consumers discover great digital content does not need to come at the sacrifice of their privacy. We therefore develop our products and services on a "privacy by design" basis that delivers consumer value while respecting their privacy. Below we seek to explain what we do, how we do it and how we contribute to an online environment which respects privacy.

What does Xiam Technologies do?

Xiam Technologies licenses the Xiam[®] recommendation engine to owners of websites and application stores in order to improve the usability of their websites or storefronts through the provision of personalized recommendations of applications, content items, or advertisements. The Xiam recommendation engine analyzes consumer data from a website or storefront to create recommendations presented on the website or storefront. This practice is common in e-commerce and is familiar to consumers through its use by many online retailers.

Xiam Technologies does not provide services directly to consumers. The Xiam recommendation engine processes data concerning the consumers' activities within a website or mobile storefront. Owners of websites and storefronts in turn provide the recommendations to consumers. Consumers do not provide information to Xiam Technologies nor does Xiam Technologies collect information directly from consumers.

In addition, the Xiam recommendation engine can optionally analyze other data such as demographics or location information to provide additional consumer value. Location aware recommendations, in particular, can provide tremendous consumer value by recommending events of interest which are taking place near to someone's current location. Xiam Technologies believes that location information should only be used in making recommendations where the consumer has been provided notice and given his or her consent.

Privacy by Design

Xiam Technologies has adopted a privacy by design approach for its Xiam recommendation engine. Privacy by design means building privacy protections into the specifications of the product or service – not as a bolt-on afterthought. Privacy by design is a proactive approach to

addressing privacy concerns that minimizes the privacy issues thereby eliminating the need for compensating measures. Xiam Technologies' privacy by design approach includes:

- **Data Set Selection:** First among the privacy by design attributes of the Xiam recommendation engine is the ability for its customers to select the appropriate data set for the operators' unique circumstances. Xiam Technologies offers its Xiam recommendation engine to mobile operators around the world, each of which is subject to its own country's laws, societal norms, and internal company policies. The Xiam recommendation engine, therefore, is optimized to use a variety of data sets and empowers its customers to select the data set that is appropriate for the operators' unique privacy commitments. For example, a mobile operator that cannot use demographic data for creating recommendations – either because of the laws that regulate the operator or the operator's internal policies – can choose not to input demographic data into the Xiam recommendation engine.
- **Data Minimization:** Privacy by design includes minimizing the collection of data to that which is needed to provide the service. Xiam Technologies has designed its Xiam recommendation engine to only ingest the data that is used to create the recommendations. For example, consumer mailing addresses are not used by the Xiam recommendation engine and therefore cannot be input into our systems.
- **Consumer Choice:** Privacy by design includes recognizing consumer choice. The Xiam recommendation engine includes mechanisms for honoring consumer opt-in or opt-out choices. Xiam Technologies' customers can use these mechanisms to respect their consumer's recommendation choices.
- **Consumer Access:** Privacy by design recognizes that consumers may want access to their data that has been processed by the Xiam recommendation engine. Xiam Technologies's services to its customers include the ability to retrieve individual subscribers' records and provide the records to its customer for provision to the consumer.
- **Security:** Privacy by design recognizes that security is an essential element of privacy. The Xiam recommendation engine can be hosted by Xiam Technologies or by its customer. Where Xiam Technologies hosts the software, we ensure that a variety of rigorous security controls are deployed.
- **Data Deletion:** Finally, privacy by design includes deleting the consumer's data when it is no longer needed for the business purpose. The Xiam recommendation engine contains two data deletion capabilities. The first is a global data retention setting that purges all consumer data after expiration of the operator's pre-selected time period. The second capability allows an operator to delete individual consumers' data records. This second capability can be used, for example, in furtherance of a consumer's opt-out choice.

What does Xiam Technologies NOT do?

- NO Deep Packet Inspection.
Xiam Technologies does not provide technology for deep packet inspection.
- NO Cookies, Adware & Spyware.

Xiam Technologies does not place any cookies, adware, spyware or equivalent technology on consumers' devices.

Questions

For questions regarding privacy and Xiam Technologies' Xiam recommendation engine please send us an email at privacy.xiam@qualcomm.com.