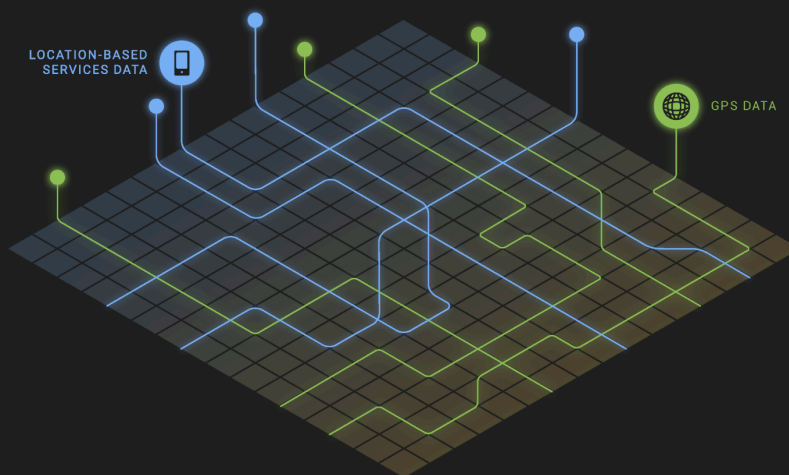


# StreetLight Data Privacy Framework

**Privacy by Design is a core principle at StreetLight Data and has been since our inception in 2011.** Our analytics only describe the movement of groups of people – not the movement of individuals.

- This means that we do not process, use, or distribute personally identifiable information in our products.
- Our services do not enable marketing messages targeted to individual devices like cell phones.
- However, we recognize that there are risks and misconceptions regarding the emerging area of market analytics using location-based information. This document outlines our key privacy procedures.

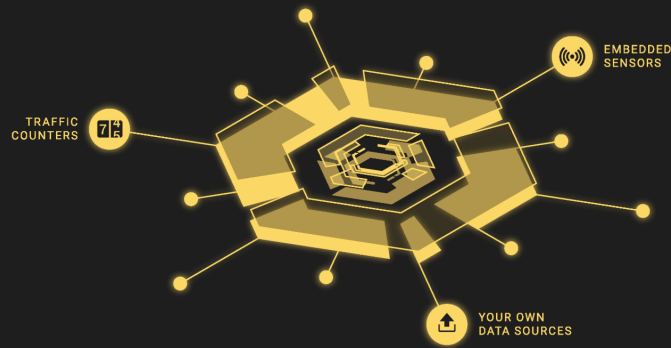
## 1. Data Sources and Supplier Guidelines



- Every month, we ingest, index and process over ~40 billion anonymized location records, whose sources include navigation-GPS and other location-based data from connected cars, trucks, and location apps collected on an “opt-in” basis. StreetLight also uses publicly available Census, traffic counts, and points of interest data.
- We have established guidelines for our data suppliers to promote responsible data practices and ensure the data they provide meets our high standards for privacy protection. Data source material must meet the following requirements:
  1. Data must be archival. No real-time data.
  2. Data files are not to contain personally identifiable information. We expect our suppliers to remove personally identifiable information from all location records and to take reasonable steps to “de-identify” the remaining information using best practices. For example, records may contain encrypted device identifiers for which StreetLight does not have access to the decryption algorithms.
- StreetLight is committed to supporting suppliers who embrace privacy as a core value and adhere to best practices for data protection, including Privacy by Design.



## 2. Data Processing into Metrics and Procedures for Protecting Our Data Sources



- Once in house, the data sources are algorithmically processed into metrics. This process occurs in our secure data repository that sits behind a multilayered network security architecture supported by system audits and controls. Here are some highlights of the steps we take to transform the data into metrics:
  1. Records are decomposed and contribute to the creation of multidimensional probability distribution functions for analysis with other materials through normalization, aggregation and contextualization.
  2. The resulting output is provided as metrics about aggregated composite groups; for example, "half of the group of people who travel to this location live 10 miles away or more."
  3. Every analysis in the StreetLight InSight® platform goes through an automated coverage and privacy check to ensure sufficient source material penetration and aggregation by factors such as time, space, and land use.

## 3. The Result: Multimode metrics for millions of roads and Census Blocks in No. America

- Available on-demand, these are the basic tools to perform powerful analyses for a wide variety of transportation studies:
  - Average Annual Daily Traffic (AADT)
  - Origin, Destination and Route
  - Trip attributes, such as average speed, distance and duration

