

PRIVACY POLICY

Effective Date: December 9, 2025

1. Introduction.

Marathon Ventures acts as a sales representative and monetization partner for our clients' digital advertising inventory across their digital properties, including websites, mobile apps, streaming platforms, and social media. Our services include digital ad sales, demand generation, partner management, ad stack setup and technical implementation, revenue optimization, analytics, and reporting, as well as management of relationships and integrations with third-party advertising platforms, technology vendors, and data partners. This Privacy Policy describes Marathon Ventures' practices regarding information we collect and the choices available regarding such information. For purposes of this Privacy Policy, unless otherwise stated, **"information"** or **"personal information"** means information relating to an identified or identifiable individual.

This Privacy Policy applies to information we collect where we control the purposes and means of processing, including information collected through our website at <https://www.marathonventures.com/>, any of our other online services that link to this Privacy Policy, and in connection with our role as a sales representative and monetization partner for digital advertising inventory across client digital properties (such as websites, mobile applications, streaming platforms, and social media channels), to the extent we act as a controller. The "Service" covered by this Privacy Policy includes, collectively:

- our website at <https://www.marathonventures.com/>,
- any other online services that link to this Privacy Policy, and
- our activities as a sales representative and monetization partner for digital advertising inventory across client digital properties, including but not limited to client websites, mobile applications, streaming platforms, and social media channels, to the extent we act as a controller of personal information in connection with such activities.

For clarity, we act as a controller only with respect to information we collect through our own website and business operations. We do not engage in marketing of our own products or services. When processing information on client digital properties, we generally act as a service provider or processor under our agreements with clients, unless expressly permitted by contract to process such information for our own purposes. This Privacy Policy does not apply to the processing of personal information on behalf of a client, which is subject to the client's privacy policy. For further details about our processing of client data, please see the "Processing on behalf of our Clients" section below.

Please note that your use of the Service is subject to our Terms of Use.

See additional disclosures if you live in the following regions:

- [California](#)
- [Colorado, Connecticut, Delaware, Iowa, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia](#)

- [Nevada](#)

For our contact details, see the Contact Us section below.

2. Processing on behalf of Our Clients.

In connection with providing services to our business clients, we collect and use information on their behalf and at their direction (“**client data**”). For example, we collect and process information to help our clients market and advertise to you, including through campaign strategy and media buy services. Client data includes contact identifiers, characteristics or demographics, commercial or transactions information, device identifiers, device information internet or other electronic network activity (such as ad requests, ad impressions, clicks, and video ad metrics—including start, quartiles, and completion), non-precise location data, and inferences generated, among other information. We also process campaign performance data and information used for audience matching and modeling, as part of the digital advertising ecosystem. Further details about what these categories mean is set out below in the Privacy Policy.

Our processing of client data on behalf of our clients is governed by the terms of our service agreements with our clients, and not this Privacy Policy. If you wish to exercise any rights relating to such client data, please contact the applicable client directly. We are not responsible for how our clients treat the information we collect on their behalf, and we recommend you review their privacy policies and terms.

In the event we are permitted to process client data for our own purposes, we will process the client data in accordance with the practices described below in this Privacy Policy.

In our role as sales representative, we work with an extensive ecosystem of third parties on behalf of our clients, including demand-side platforms (DSPs), supply-side platforms (SSPs), ad exchanges, ad networks, data management platforms, technology providers, and direct advertisers. These parties may independently control the processing of your information for their own purposes.

3. Collection.

This section describes the information we collect on our own behalf and how we collect it.

Information You Provide through the Service.

When you use the Service, you may be asked to provide information to us, such as when you contact us. The categories of information we collect in this context include:

- **Contact Identifiers**, including your name, email address, postal address, and phone number.
- **Characteristics or demographics**, including your age and country.

- **Content**, including content within any messages you send to us.

Please do not provide any information that we do not request.

Information from Your Browser or Device.

When you use the Service, we and third parties we work with automatically collect information from your browser or device. The categories of information we automatically collect in this context include:

- **Device identifiers**, including your device's IP address and Ad ID.
- **Device information**, including your device's operating software and browser (e.g., type, version, and configuration), internet service provider, and regional and language settings.
- **Internet activity**, including information about your browsing history and interactions, such as the features you use, pages you visit, content you view, time of day you browse, and referring and exiting pages.
- **Non-precise location data**, such as location derived from an IP address or data that indicates a city or postal code level.

This information is automatically collected through cookies and other tracking technologies incorporated into our Service, as described below:

- **Cookies.** Cookies are browser-based text files which are dropped on your browser when you visit a website, open or click on an email, or interact with an advertisement. There are various types of cookies, including session cookies (which are cookies that expire when you close your browser) and persistent cookies (which are cookies that do not expire until a set expiration date or you manually delete them). Cookies may be first party (which are cookies served directly by us) or third party (which are cookies served by third parties we work with).
- **Pixels.** Pixels (also known as web beacons) are code embedded in a service. There are various types of pixels, including image pixels (which are one-pixel transparent images) and JavaScript pixels (which contain JavaScript code). Pixels are often used in conjunction with cookies. When you access a service that contains a pixel, the pixel may permit us or a third party to collect information from your browser or device, or to drop or read cookies on your browser.

We use these tracking technologies for a variety of purposes, including to help make our Service work, personalize your browsing experience, prevent fraud and assist with security, and perform measurement and analytics, and provide advertising (including targeted advertising).

To exercise choice around tracking technologies, see Your Privacy Choices below.

In connection with our digital advertising services, we and our partners implement technical advertising infrastructure on client digital properties, including ad integration code, ad tags, scripts, and configuration files (such as ads.txt and app-ads.txt). These technologies enable the delivery, measurement, and optimization of digital ads, and facilitate participation in programmatic auctions, header bidding, and real-time bidding environments. As part of these processes, information such as device identifiers, ad requests, impressions, clicks, and other interaction data may be transmitted to and from multiple advertising platforms and technology vendors for the purpose of serving and optimizing ads, measuring performance, and preventing fraud.

Information You Provide During Our Business Relationships.

Through our business relationships with you as a business client, we collect your contact identifiers and other information relating to you and your business. This information is not subject to this Privacy Policy except as required by applicable law.

Information from Other Sources.

We also collect information from other sources. The categories of other sources from which we collect information include:

- **Third party vendors and related parties** we work with in connection with receiving analytics, advertising, security, and fraud prevention services. In the course of providing digital advertising services, we disclose information through technical means such as ad integration code, ad tags, header bidding scripts, and programmatic auction protocols. We also maintain disclosure files (such as ads.txt and app-ads.txt) on client and partner properties to identify authorized sellers of advertising inventory. These technical integrations and disclosures enable the transmission of personal information (such as device identifiers, ad requests, and interaction data) to advertising platforms, exchanges, demand-side platforms, supply-side platforms, and other technology vendors for the purposes of real-time bidding, ad delivery, measurement, and fraud prevention.
- **Public sources**, such as information in the public domain.

Information We Infer.

We infer new information from other information we collect, including to generate information about your likely preferences or other characteristics.

Sensitive Information.

Some of the information we collect may be considered sensitive under applicable law. See additional disclosures in your region for details.

4. Purposes for Collection and Use.

Our purposes for collecting and using information include:

- **Providing services.** We collect and use information to provide and operate the Service.
- **Analytics.** We collect and use information to understand trends, usage, and activities, for example through surveys you respond to and tracking technologies that we incorporate into the Service (such as Google Analytics).
- **Advertising.** Some of the advertising we facilitate for our clients may be “**targeted advertising**,” which is the practice of showing you more relevant or personalized ads based on your activity collected over time and across non-affiliated services. Targeted advertising often involves us incorporating third party tracking technology into our Service or providing (often hashed) contact or device identifiers to a third party, which then matches common factor between our data and their data (or a partner’s data) to serve ads to you or individuals like you. When providing advertising services to clients, we act as a service provider processing data on their behalf under our service agreements.

We facilitate audience modeling services for our clients, where client data and partner data are provided to a technology provider. The technology provider then matches common factors between the client’s data and the partner’s data to allow insights into audience overlap and campaign performance.

- **Security and enforcement.** We collect and use information to prevent, detect, investigate, and address fraud, breach of policies or terms, or threats or harm.
- **At your direction or with your consent.** We collect and use information for additional purposes where you direct us to use it in a certain way or with notice to you and your consent.
- **Non-personal information.** Sometimes we anonymize or deidentify information so it is no longer considered personal information under applicable law. Where we deidentify information, we commit to maintain and use the deidentified information in deidentified form and not attempt to reidentify it. We may use non-personal information for any purpose to the extent permitted by applicable law.

To exercise choice around our collection and use, see Your Privacy Choices below.

5. **Disclosure.**

We disclose the information we collect for the purposes described in this Privacy Policy. The categories of persons to whom we disclose information include:

- **Service providers and independent vendors.** We disclose information to a range of third parties. Some of these third parties act as our service providers, processing information solely on our behalf and subject to contractual restrictions that limit their use of your information to providing services for us (such as payment processing, analytics, marketing, website hosting, and technical support). Other third parties—particularly those involved in digital advertising, such as ad networks, demand-side platforms, supply-side platforms, data management platforms, and analytics providers—may act as independent controllers or vendors. These vendors process your information for their own purposes, often at the

direction or for the benefit of our clients, and are responsible for their own privacy practices. We encourage you to review their privacy policies for more information about their data practices.

- **Affiliates.** We disclose information to our affiliates and related entities, including where they act as our service providers subject to this Privacy Policy or use the information in accordance with their own privacy policies.
- **Clients.** We disclose your information to our clients in connection with us processing your information on their behalf. For example, we disclose your information to clients to provide them with strategic guidance, execute and optimize media buys on their behalf, and otherwise comply with applicable law.
- **Recipients in a merger or acquisition.** We disclose information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business.
- **Recipients for security and enforcement.** We disclose information to comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We also disclose information to protect the rights, property, life, health, security and safety of us, the Service or anyone else.
- **Recipients at your direction or with your consent.** We disclose information where you direct us to or with notice to you and your consent.
- **Non-personal information.** We may disclose non-personal information for any purpose to the extent permitted by applicable law.

To exercise choice around our disclosures, see Your Privacy Choices below.

6. **Third Parties.**

Our Service may link to, or be incorporated into, websites and online services controlled by third parties. In addition, we may integrate technologies into our Service, including those disclosed in the Collection section above, controlled by third parties. Except where third parties act as our service providers, they, and not us, control the purposes and means of processing any information they collect from you, and you should contact them directly to address any concerns you have about their processing. Third party data practices are subject to their own policies and disclosures, including what information they collect, your choices, and whether they store information in the U.S. or elsewhere. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

7. **Your Privacy Choices.**

This section describes the choices available to you regarding your information.

Client Data.

Please contact our clients directly to exercise any rights you have relating to client data we process on their behalf.

Emails.

If you receive any marketing emails from us in error, please contact us at the address in the Contact Us section below.

Browser and Device Controls.

- **Cookies and pixels.** You may be able to manage cookies through your browser settings. When you manage cookies, pixels associated with such cookies may also be impacted. Please note that cookie management only applies to our website. If you use multiple browsers, you will need to instruct each browser separately. If you delete or reset your cookies, you will need to reconfigure your settings. Your ability to limit cookies is subject to your browser settings and limitations.
- **Preference signals.** Your browser or extension may allow you to automatically transmit [Do Not Track](#) and other preference signals. Except as required by law, we do not respond to preference signals.
- **Third party opt-out tools.** Some third parties we work with offer their own opt-out tools related to information collected through cookies and pixels. To opt out of your information being used by Google Analytics, please visit <https://tools.google.com/dlpage/gaoptout>. We are not responsible for the effectiveness of their tools.
- **Connected TV and Industry-Specific Opt-Outs.** If you interact with advertising or services we facilitate for our clients on Connected TV (CTV) platforms, streaming devices, or smart TVs, traditional browser-based privacy controls (such as cookie settings or browser extensions) may not apply. For CTV environments, you may be able to exercise privacy choices or limit targeted advertising using the privacy settings provided by your device manufacturer or streaming service.

Region-Specific Choice.

See additional disclosures regarding your rights to exercise choice if you live in the following regions:

- California
- Colorado, Connecticut, Delaware, Iowa, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia

- Nevada

8. Children.

The Service is not directed toward children under 16 years old. If you are a parent or guardian and believe we have collected information from children in violation of applicable law, contact us as set out in the Contact Us section below.

9. Security.

We implement and maintain reasonable administrative, physical, and technical security safeguards to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Please note that transmission via the internet is not completely secure and we cannot guarantee the security of information about you.

10. Retention.

We retain information for the length of time that is reasonably necessary for the purpose for which it was collected, and as necessary to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

11. International Transfer.

We are based in the U.S. If you are located outside the U.S., please be aware that your information may be transferred to and processed in the U.S. or another country where we operate. Where required by applicable law, we will provide appropriate safeguards for data transfers.

12. Changes to this Privacy Policy.

We reserve the right to revise and reissue this Privacy Policy at any time. Any changes will be effective immediately upon posting of the revised Privacy Policy. Your continued use of our Service indicates your consent to the Privacy Policy then posted. If the changes are material, we may provide additional notice to you, such as through email or prominent notice on the Service.

13. Contact Us.

The controller under this Privacy Policy is:

Marathon Ventures (“**Marathon Ventures**,” “**we**,” “**our**,” or “**us**”)
3050 Broadway, Suite 206
Boulder, CO 80304
privacy@marathonventures.com

If you have questions about our practices regarding your information or have trouble accessing this Privacy Policy, please contact us at the postal address or email address above. To exercise choice available to you, please use the designated methods listed in this Privacy Policy.

14. Region-Specific Disclosures.

California.

Notice at Collection

For residents of California, at or before the time of collection of your personal information, you have the right to receive notice of our data practices. Our data practices are as follows:

- **Collection.** The categories of personal information we have collected in the past 12 months and the categories sources from which the personal information is collected are set out in the [Collection](#) section above.
- For the categories of sources from which personal information is collected, see the [How We Collect Information](#) section above.
- For the specific business and commercial purposes for collecting and using personal information, see the [How We Use Information](#) section above.
- For the categories of third parties to whom information is disclosed, see the [How We Disclose Information](#) section above.
- For the criteria used to determine the period of time information will be retained, see the [Retention](#) section above.
- **Purpose.** The specific business and commercial purposes for collecting and using personal information are set out in the [Purposes for Collection and Use](#) section above.
- **Disclosure.** The categories of persons to whom personal information is disclosed, including service providers for business purposes, are set out in the [Disclosure](#) section above. We disclose the categories of personal information listed in the [Collection](#) section above to service providers for business purposes.
- **Sales and Shares.**

For client campaign data: Some of our disclosures of personal information for the benefit or at the direction of our clients may be considered a “sale” or “share” as those terms are defined under California law. A “sale” is broadly defined to include a disclosure for something of value, and a “share” is broadly defined to include a disclosure for cross-context behavioral advertising. In the course of providing digital advertising services—often on behalf of our clients—we may sell or share your personal information as part of:

- Real-time bidding transactions in programmatic advertising auctions,
- Audience matching and modeling services (including “Match Services” with third-party data partners),
- Cross-context behavioral advertising through demand partners and advertising technology vendors,
- Data provided to and through the Google Open Bidding Program and similar unified auction platforms.

For these activities, consumers should contact the applicable client directly for opt-out requests, as the client is the responsible controller.

For Marathon controller data: We do not sell or share personal information where Marathon Ventures acts as a controller. Marathon Ventures does not sell or share personal information collected through its website or business communications for cross-context behavioral advertising.

- **Sensitive Data.** Some of the personal information we collect may be considered sensitive personal information under California law. We collect, use, and disclose sensitive personal information only for the permissible business purposes for sensitive personal information under the CPRA or without the purpose of inferring characteristics about consumers. We do not sell or share sensitive personal information.
- **Retention.** The criteria used to determine the period of time we retain your personal information is set out in the [Retention](#) section above.

Requests

You have the right to exercise choice over your personal information as follows:

IMPORTANT: The rights described below apply only to personal information for which Marathon Ventures acts as a controller (primarily business contact information collected through our website). For personal information processed on behalf of our clients in connection with advertising campaigns, please contact the applicable client directly, as they are the responsible controller for such data.

- **Verifiable Requests:** You have the right to:

Know what personal information we have collected about you where Marathon Ventures acts as a controller, specifically have the right to know the categories of sources from which personal information was collected, the business or commercial purposes for collecting, selling, or sharing personal information, the categories of personal information that we sold, shared, or disclosed for a business purpose, the categories of third parties to whom we disclosed personal information, and the specific pieces of personal information we have collected about you;

Correct inaccurate personal information we maintain about you where Marathon Ventures acts as a controller; and

Delete personal information that we have collected from you where Marathon Ventures acts as a controller.

These rights are verifiable rights, meaning that we need to verify your identity before fulfilling them. To exercise any of these rights relating to personal information where Marathon Ventures acts as a controller, email us at privacy@marathonventures.com or call our toll-free number at (833) 548-0335. For client campaign data, contact the

applicable client directly. We will confirm receipt of and respond to your request consistent with applicable law. To verify your identity, we may require you to confirm receipt of an email sent to an email address that matches our records, provide us with details relating to your history with us, or provide additional information. If we cannot verify your identity, we may deny your request in accordance with applicable law.

- **Sales and Shares for client campaign data:** Our sales and shares of personal information occur as part of providing services to our clients, where we act as a service provider. For these activities, please contact the applicable client directly to exercise opt-out rights, as they are the responsible controller.
- **Shine the Light:** If you are a customer and Marathon Ventures acts as a controller with respect to your personal information, you may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties' own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To make a request relating to personal information where Marathon Ventures acts as a controller, please write us at the email or postal address set out in the Contact Us section above and specify that you are making a "California Shine the Light Request."

For client campaign data: Most of our disclosures occur as part of providing services to our clients, where we act as a service provider. For these activities, please contact the applicable client directly for Shine the Light requests, as they are the responsible controller.

Your rights are subject to exceptions and our retention practices. You have the right not to be discriminated against for exercising any of your rights. To the extent permitted by law, rights requests must be exercised through the applicable designated method listed above. You may make a rights request using an authorized agent. Except for rights requests made by opt-out preference signal, we will require written and signed proof of the agent's permission to do so and we may verify your identity directly with you.

Colorado, Connecticut, Delaware, Iowa, Maryland, Minnesota, Montana, Nebraska, New Jersey, New Hampshire, Oregon, Tennessee, Texas, Utah, and Virginia.

Data Practices

For residents of Colorado, Connecticut, Delaware, Iowa, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia, our practices regarding the collection, use, disclosure, and retention of your personal data are set out in the main Privacy Policy above.

Some of our disclosures (conducted at the direction of our clients) of personal data may be considered a "sale" under applicable law, which is often defined to include a disclosure for something of value. We also may process your personal data for purposes of targeted advertising

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as part of the services we provide to our clients. We do not process personal data for purposes of profiling in furtherance of decisions that produce legal or similarly significant effects concerning consumers.

Some of the personal data we collect may be considered sensitive personal data under applicable law. We collect sensitive personal data with your consent.

Requests

You have the right to exercise choice over your personal data as follows:

- **Verifiable Requests:** You have the right to:
 - Confirm whether or not we are processing your personal data, and in some regions, confirm the categories of personal data we have processed;
 - Access your personal data;
 - Correct inaccuracies in your personal data;
 - Delete your personal data;
 - Obtain a copy of your personal data that you previously provided to us in a portable and readily usable format

If you are a Minnesota or Oregon resident, you also have the right to receive a list of the specific third parties to which we have disclosed personal data

If you are a Delaware or Maryland resident, you also have the right to obtain a list of categories of third parties to which we have disclosed your personal data

For Connecticut residents, you also have the right to obtain a list of the specific third parties to which we have sold personal information.

These rights are verifiable rights, meaning that we need to verify your identity before fulfilling them. To exercise any of these rights relating to personal information where Marathon Ventures acts as a controller, email us at privacy@marathonventures.com or call our toll-free number at (833) 548-0335. For client campaign data, contact the applicable client directly. We will confirm receipt of and respond to your request consistent with applicable law. To verify your identity, we may require you to confirm receipt of an email sent to an email address that matches our records, provide us with details relating to your history with us, or provide additional information. If we cannot verify your identity, we may deny your request in accordance with applicable law.

- **Sales and Targeted Advertising:**

For client campaign data: Some of our disclosures of personal information for the benefit or at the direction of our clients may be considered a “sale” or “share” as those terms are defined under California law. A “sale” is broadly defined to include a disclosure for something of value, and a “share” is broadly defined to include a disclosure for cross-

context behavioral advertising. In the course of providing digital advertising services—often on behalf of our clients—we may sell or share your personal information as part of:

- Real-time bidding transactions in programmatic advertising auctions,
- Audience matching and modeling services (including “Match Services” with third-party data partners),
- Cross-context behavioral advertising through demand partners and advertising technology vendors,
- Data provided to and through the Google Open Bidding Program and similar unified auction platforms. Our sales and shares of personal information occur as part of providing services to our clients, where we act as a service provider.

For these activities, please contact the applicable client directly to exercise opt-out rights, as they are the responsible controller.

For Marathon controller data: We do not sell or share personal information where Marathon Ventures acts as a controller.

Marathon Ventures does not sell or share personal information collected through its website or business communications for cross-context behavioral advertising.

Consent: You have the right to revoke consent previously given to us for the processing of your personal data. To revoke consent, write us at the email or postal address set out in the Contact Us section above (specifying the consent you wish to withdraw). If you withdraw consent, you may not be able to receive certain services related to that consent.

Your rights are subject to exceptions and our retention practices. You have the right not to be discriminated against for exercising any of your rights. To the extent permitted by law, rights requests must be exercised through the applicable designated method listed above. You may make a rights request using an authorized agent. Except for rights requests made by opt-out preference signal, we will require written and signed proof of the agent’s permission to do so and we may verify your identity directly with you.

You have the right to appeal our decision in response to your request. To appeal, please write us at the email or postal address set out in the Contact Us section above and specify what you wish to appeal. We will review and respond to your appeal in accordance with applicable law. If we deny your appeal, you may submit a complaint to your Attorney General as follows: [Colorado](#), [Connecticut](#), [Delaware](#), [Iowa](#), [Maryland](#), [Minnesota](#), [Montana](#), [Nebraska](#), [New Hampshire](#), [New Jersey](#), [Oregon](#), [Tennessee](#), [Texas](#), [Utah](#), [Virginia](#).

Nevada

Nevada residents have the right to opt-out of sale of their information where Marathon Ventures acts as a controller. For client campaign data, please contact the applicable client directly, as they are the responsible controller. To make a request relating to personal information where Marathon Ventures acts as a controller, please write us at the email or postal address set out in the Contact Us section above and specify that you are making a 'Nevada Opt-Out of Sale Request.