

## Executive Summary

DoubleVerify conducted a thorough review of Epic Marketplace's online behavioral advertising (OBA) cookie-based opt-out mechanism. As part of the test, DoubleVerify conducted empirical testing, reviewed user panel data, and tested the opt-out calls through DoubleVerify's automated testing system. Tests were planned, prepared and executed independently by DoubleVerify staff which included implementation managers, product managers and Certified Information Privacy Professionals.

DoubleVerify's tests were conducted on the legacy ad server that Epic Marketplace acquired in 2010 and that was operational during the past year prior to DoubleVerify's engagement, and on Epic's new ad serving platform, of which certain components are provided by Lucid Media. On both platforms, Epic respected consumer choice and did not display any OBA ads after the user opted-out in all of the tests that we conducted.

In addition to these tests, Epic Marketplace and DoubleVerify will continue to work together to ensure compliance, accountability and transparency to advertisers and consumers.

## *Test Plan and Scope*

DoubleVerify's tests consisted of 3 elements:

1. Empirical tests – Conduct empirical testing of ads and cookies to ascertain whether or not OBA is being used after the user opted-out. We created dummy campaigns with OBA and non-OBA placements to determine that the proper placements were being delivered to the user after opt-out and that the cookies reflected the opt-out preferences of the user
2. Panel data tests - Review historical panel data from users on live sites to determine whether or not the opt-out cookie persisted, and that no alternative cookie-bypassing techniques such as LSOs (e.g., flash cookies) were observed
3. Automated testing – Perform an automated test that the opt-out request URL placed the opt-out cookie on the user's machine. This test was run daily during the period to confirm that the opt-out script successfully placed the opt-out cookie when it was called

All three tests were conducted on the legacy ad server. On the new ad server, the panel data tests and automated tests will be conducted on an ongoing basis since there is insufficient historical data at this time.

Testing was conducted independently by DoubleVerify personnel in its offices located in New York, New York during a two week period in August 2011. Testing was conducted across all major browsers and operating systems and included all of Epic's identified opt-out mechanisms (Epic website opt-out, DAA opt-out, NAI opt-out).

## *Test Results*

### **Legacy ad server**

The legacy ad server passed all empirical tests, panel data tests and automated tests that were conducted by DoubleVerify. In 100% of our tests where the user opted out, the opt-out cookie was set and persisted for the duration of the test, and the behavioral targeting cookie was removed. Accordingly, in our test, when a user opted-out, the user was only served non-OBA ads.

## **New ad server**

The new ad server passed all empirical tests in Firefox and Chrome. In IE, while it appears that the opt-out cookie does not persist in some cases in the browser, the opt-out was fully functional. In Firefox and Chrome, when the user opted-out of the cookie, the cookie was set and persisted for the duration of the test and the behavioral targeting cookie was removed. In all three browsers, when the user opted-out they only received non-OBA ads.

## ***On-going monitoring and testing***

In addition to the above tests, Epic Marketplace has retained DoubleVerify to provide ongoing 3<sup>rd</sup> party monitoring and testing of their ad servers for privacy compliance, ad verification and transparency on its network. In particular, the new ad server will be monitored and tested from this time forward during the time of the engagement.

As part of the agreement, DoubleVerify will be performing the following on-going monitoring

- Periodic review of PrivacyChoice panel data for Epic Marketplace and Lucid Media cookies and LSOs (e.g., locally stored objects/flash cookies)
- Periodic testing that the opt-out script places the opt-out cookie on the browser
- Periodic testing of the proper functionality of the opt-out mechanism (done in the controlled DoubleVerify environment)

In addition, Epic Marketplace will be utilizing the AdChoices icon from DoubleVerify for compliance with the new self-regulatory program for online behavioral advertising for all advertisers running on Epic Media's premium display marketplace as well as DoubleVerify's Compass product across its entire premium display marketplace, allowing them to monitor and remediate against inappropriate content, fraud and tag-jacking.