

June 13, 2022

The Honorable Elizabeth Warren
United States Senator
309 Hart Senate Office Building
Washington, DC 20510

Dear Senator Warren:

I write in response to your letter dated May 17, 2022. I welcome the opportunity to address your questions and clarify Placer.ai's role in the retail ecosystem as a leading physical world data research platform designed with serious protections for personal privacy.

At the outset, I want to clarify that Placer.ai is an *aggregated* data business that delivers extrapolated market research to retail customers and municipalities. Emphatically, Placer.ai is not a data broker, and does not sell or provide data that can be traced back to individual users.

Placer.ai processes location data that is stripped of identifiers, aggregates that data around specific points of interest, then leverages its proprietary technology to extrapolate broader predictions based on this representative sample set, much as a pollster might use a small sample size to generate insights about a much larger set of voters.

The Company takes significant steps to protect individual privacy—because the identities of the individuals constituting Placer.ai's sample data are irrelevant to Placer.ai's business, and because privacy is and has always been a bedrock principle for Placer.ai's architecture.

I would like to take this opportunity to explain what Placer.ai is, and how it helps both commercial and civic clients better understand the needs of consumers and communities.

Background on Placer.ai and Its Customers

Placer.ai provides aggregated and extrapolated market research about brick-and-mortar locations to more than 1,300 institutional customers, including Fortune 500 companies, small and family businesses, commercial real estate firms, investment finance firms, entertainment businesses, hospitality businesses, and consumer-facing businesses, ranging from restaurants to grocery stores, shopping malls to major retail brands. Data from Placer.ai also aids municipalities seeking to drive local economic development, distribute federal grants equitably, increase retail leasing, and provide effective services to underserved communities. This data can provide critical insights to help businesses create more sustainable operations and even rebound from debilitating economic challenges like the COVID-19 pandemic. Our data helps retailers and restaurants understand patterns in foot traffic, gives municipalities a way to measure economic development, and allows hospitality services to plan effectively for local events.

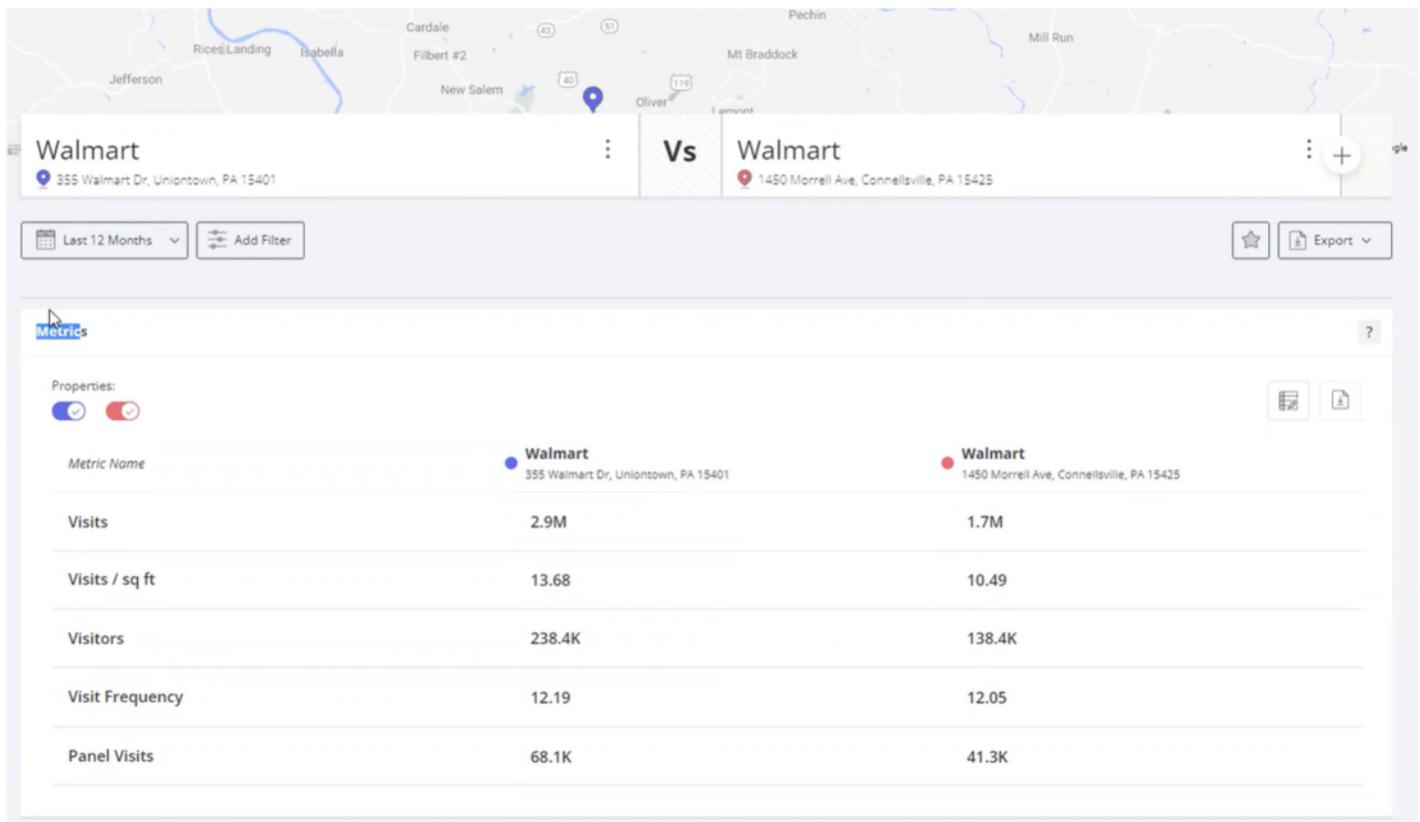
Placer.ai limits access to its most comprehensive data set to certain customers. Customers who seek paid access to Placer.ai are vetted for their affiliation with an incorporated business that has a brick-

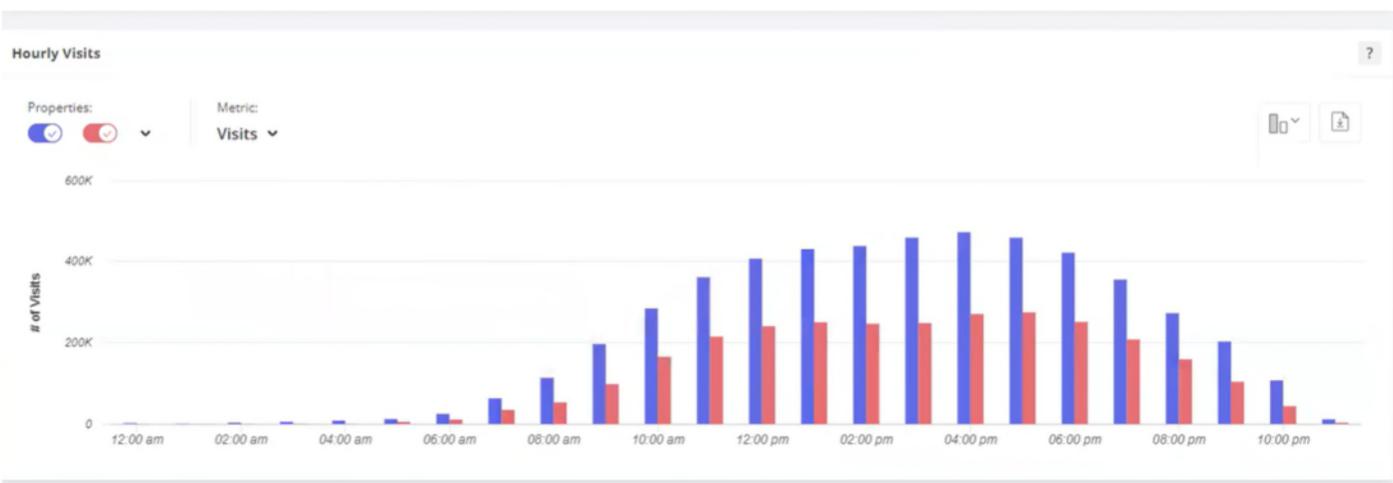
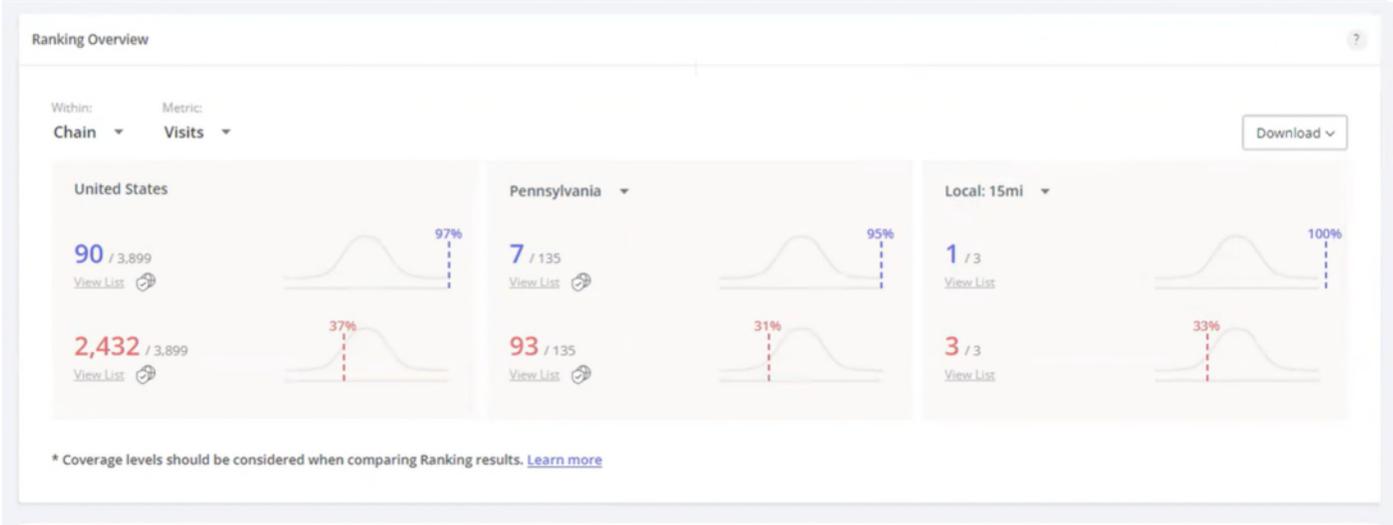
and-mortar commercial interest. They are also required to certify that they will use Placer.ai’s data in compliance with all applicable laws and regulations. Placer.ai does not contract with individuals or organizations that are not incorporated. And it specifically does not provide paid access to any law enforcement agencies or advocacy groups.

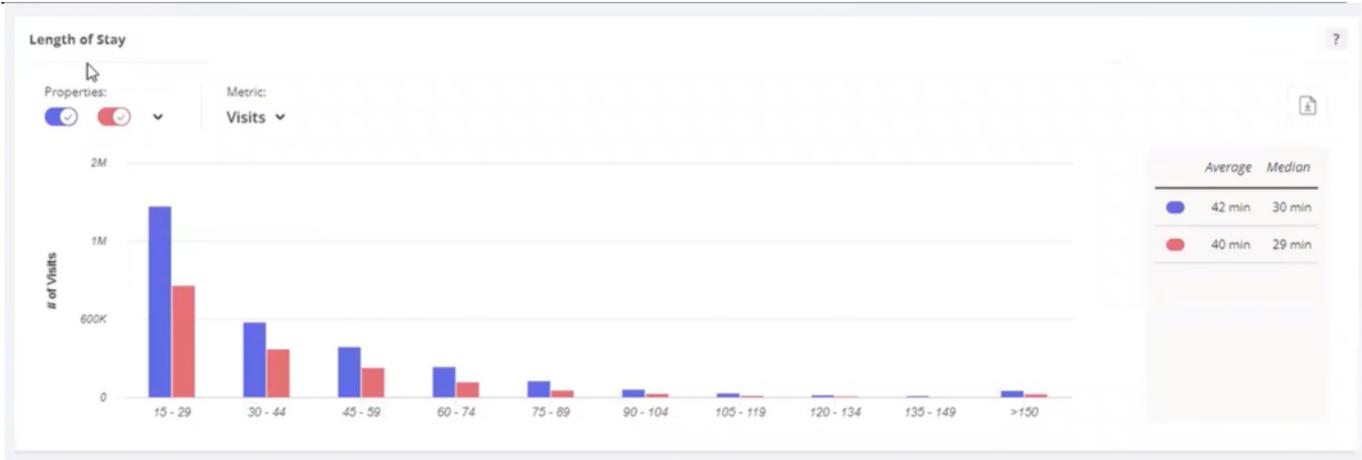
As a marketing and educational tool, Placer.ai does offer a free version for prospective commercial customers and the general public. However, that platform deliberately has limited functionality compared with the comprehensive features that paid users enjoy. The dashboard allows non-paying customers to see some of Placer.ai’s proprietary technology at work on a small subset of all properties for which Placer.ai aggregates data—namely, several large retail chains and major retail properties—and limits them to general overview data from the most recent calendar month. As with the paid version, the free version of Placer.ai provides no data that can be traced back to individual users.

The information Placer.ai provides on its platform centers around locations, not individuals.

Figure 1. Sample of Analytics Provided about Locations in Placer.ai’s Database







Placer.ai’s Commitment to Individual Privacy

From the beginning, Placer.ai has placed a significant emphasis on creating a highly accurate analytics platform about physical locations without compromising individual privacy. Privacy is not only a core requirement for our technical solutions, but the cornerstone of our business. To this end, Placer.ai has structured its business only to provide its customers with aggregated statistical information about brick-and-mortar locations—never any data tied to specific individuals. Specifically:

- Placer.ai is not a data broker and does not share or sell user-level data. The Company has made a deliberate decision not to participate in the ad tech industry, which relies on tracking individual user behavior. The Company has invested heavily in building privacy mechanisms directly into our platform, including a differential privacy service to remove individual identifiers from the data we receive from our partners even before it enters our systems.
- Placer.ai only provides its customers with aggregated statistical information, such that every piece of information presented preserves K-anonymity of 50. That means every dot presented on our platform represents an approximate and randomized location where, according to the U.S. Census, there are at least 50 residents. In addition, our platform only presents approximate locations and never the actual location of any particular users or user devices.
- Placer.ai requires its data partners to comply with all laws, regulations, and industry standards. In an effort to further protect personal privacy, Placer.ai’s data partners then strip user-level data of identifiers, such as mobile advertising identifiers (“MAIDs”), names, other persistent device identifiers, and contact information.
- Placer.ai uses end-to-end encryption to protect data in transit and at rest, using a centralized key management system and rotating keys.

In keeping with these central values, Placer.ai does not knowingly sell any data to law enforcement agencies or advocacy organizations. The Company also has a policy not to knowingly sell or provide any data relating to sensitive places, such as military facilities, schools or facilities for minors, places of worship, rehabilitation centers, or reproductive health facilities.

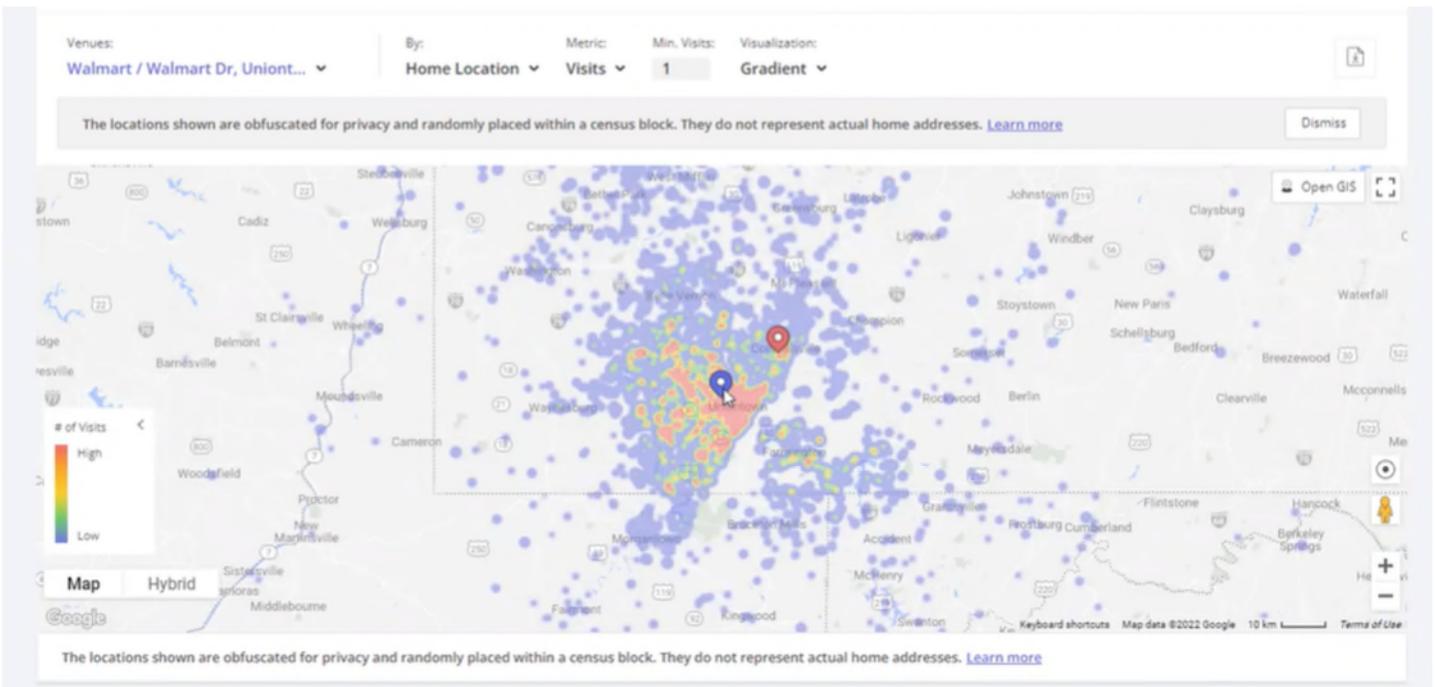
The implementation of this process is necessarily iterative, and the Company remains committed to removing any locations on its platform that are found not to be in compliance with this policy.

Placer.ai’s Response to Reports about Planned Parenthood Data

Consistent with its principles and policies, Placer.ai has never sold individual-level data, including data related to any individuals visiting reproductive health facilities.

As discussed above, each dot on Placer.ai’s maps represents an approximate and randomized location, not the actual location of any particular observed user device. To correct for the misunderstandings of Placer.ai’s product that were reflected in the news reporting, the Company is in the process of adding prominent descriptions to the website and dashboard to make it more clear what each geographic marker represents.

Figure 2. Example of Placer.ai Analytics with Disclaimers Regarding Data Points



It is neither in the Company’s business interests, nor in keeping with its intentional privacy commitments, to provide information about sensitive locations like Planned Parenthood clinics. In response to the press inquiry, in order to prevent any potential misuse of Placer.ai’s platform, the Company immediately undertook an in-depth review to recategorize as sensitive—and disable user access to—aggregated data about Planned Parenthood locations, even though (as explained above) that survey-level data could not be used to track any individual user’s data. The Company commits, on a permanent basis, to disabling user access to data about any additional sensitive locations that raise similar concerns—including other reproductive health providers that may not have been identified in the Company’s prior reviews.

In an effort to be as responsive as possible to your inquiry, Placer.ai recently reviewed all Planned Parenthood locations on its platform that were ever accessed by paying or free customers.

From 2020 to 2022, of the 17 locations accessed, we have assessed that 7 were only accessed by journalists for reporting related to the recent news cycle. Activity to review the other 10 locations—by 11 total users—is summarized in the chart below.

Planned Parenthood Location	Number of Users	Date of First View	Date of Last View¹
Arizona	2	2022-03-08	2022-04-20
Illinois	1	2020-04-03	
Kansas	1	2021-08-18	2021-08-20
Michigan	1	2020-11-09	
Minnesota (I)	1	2021-10-13	
Minnesota (II)	1	2021-11-15	
Minnesota (III)	1	2022-05-04	
Nebraska	1	2022-01-24	
Nevada	1	2022-05-03	
Utah	1	2022-05-02	

Additionally, from August 2021 to May 2022, Placer.ai provided one medical consumer goods company with a weekly data feed about many medical facilities, and the feed included information about Planned Parenthood locations. The feed included high-level metrics like total foot traffic, but no location heatmaps.

Conclusion

Placer.ai was designed to help communities understand their physical locations, and allow businesses to make informed business decisions with accurate consumer movement data, while strictly preserving individual users' privacy and control. The Company appreciates and shares your concerns about the potential misuse of user-level data. Placer.ai provides a best-in-class example of technological innovation that furthers economic growth and civic vitality, while still strictly upholding consumer privacy and security.

We would welcome further discussions about any additional questions or concerns you have. An identical response has been sent to all of the co-signers of your letter.

¹ In cases where the location's data was reviewed on only one date, this column was left empty.

I appreciate the opportunity to address your questions and clarify the record.

Sincerely,



Noam Ben-Zvi
Co-Founder and Chief Executive Officer
Placer.ai