

## **REACHLOCAL CANADA, INC.**

Notice of Marketing Practices  
Last Modified May 27, 2008

Your privacy is important to ReachLocal Canada, Inc. (“ReachLocal” or “we”) and we are committed to respecting it. The following is intended to explain the relationship between ReachLocal and the site of the advertiser that you may have visited and to advise you of the limited ways that we may use information provided as the result of your visit to that site.

### **Who is ReachLocal and What Do We Do?**

It is worth briefly explaining the relationship between us and the advertisers whose sites you may visit. We provide marketing services for small and local businesses. For more information, you can visit our site at [www.reachlocal.ca](http://www.reachlocal.ca). As part of our marketing services, we provide certain campaign assessment tools to the advertiser, so that the advertiser may assess the effectiveness of our or third party marketing services.

It generally starts with you, the consumer, visiting one of our advertiser’s sites. For instance, perhaps, you have run a search on one of the major search engines (such as Google Yahoo or MSN). If you then click on one of the sponsored links (the ads) for one of our clients, one of three things may happen.

1. You may simply be directed right to the advertiser’s site through a web link that we have established. We will refer to that as Web Linking.

2. You might be directed to a landing page hosted by us on behalf of our advertiser (the “Landing Page”). Generally, the phone numbers on the Landing Pages are phone numbers that we have provisioned, but which still connect the consumer directly to the advertiser. Similarly, if the Landing Page has an email form, that email is routed to the advertiser through our servers. You may be thinking, if the phone calls and emails are still going directly to the advertiser, then why are we doing this? The answer is that by doing this, we are able to advise the advertiser as to how many calls, emails, site visits, etc. the advertiser is receiving as a result of our marketing services.

3. You may be visiting a version of the advertiser’s site that is routed through our servers. For purposes of this policy, we will refer to that version of the advertiser’s site as the “Proxy Site.” If you look at the url string in your browser address bar, you may see that it’s not a typical url. That url is our tracking url and with that we are able with the Advertiser’s consent, to replace certain limited information found on the Advertiser’s site. Among the key changes we may make are the following: (1) Where the advertiser’s site would display the advertiser’s phone number, we will display a phone number that we have obtained. If that number is called, it still connects the consumer directly to the advertiser. (2) We generally replace email links, with web based email forms. Again, the emails are still received by the advertiser and, as in the case with the Landing Pages, we do all this to give the Advertiser information about the performance of the marketing campaigns.

### **What are the privacy ramifications?**

**For additional information on what your privacy rights are, please consult our Privacy Policy [MAKE LIVE LINK].**

#### What Information Do We Collect?

Let's separately consider the privacy ramifications for each of these different approaches.

#### Web Linking

In connection with Web Linking, we do not collect any information that allows the user to be identified ("Personal Information"). Personal Information includes any information that may be used to identify an individual, including, but not limited to, a first and last name, a home, business, or other physical address, a phone number, an email address or credit card information. The only information collected, in connection with Web Linking, is anonymous information (including, for instance, an Internet protocol address) that merely enables us to show our advertiser that a consumer visited the advertiser's site as the result of clicking on our sponsored link.

#### Landing Pages/Proxy Sites

With respect to the Landing Pages and/or the Proxy Sites our collection of Personal Information is limited to the following:

E-mails - If you e-mail one of our clients by clicking on the "Send E-mail" link (or a similar link) on a Landing Page or the Proxy Site, ReachLocal may collect Personal Information from that e-mail including, but not limited to, your name, e-mail address and phone number. As explained above, we keep this information to assist the advertiser in assessing the marketing campaigns. For a limited period of time, we will also keep a copy of the complete email, so that we may re-forward it to the advertiser in the event the advertiser claims that the email was never delivered.

Telephone Calls – If you contact one of our clients by calling a telephone number on the Landing Page or the Proxy Site, we may collect Personal Information from you including your name and telephone number through caller identification and reverse call technology. We also may record the telephone conversation. We record the telephone conversation to track the performance of our advertisements and for quality assurance purposes. We do not record the calls for the purpose of collecting your Personal Information. If we record the telephone conversation, we will notify you before the conversation begins. The advertiser, the telephone service provider and ReachLocal are the only parties that have access to the recording.

Registration Information – In certain limited circumstances, if requested by an advertiser we will set up a web page (such as, for instance, an online coupon) that may require certain registration information, including name and email address and such other information as the advertiser may require. We will maintain that information to ensure that it is received by the advertiser.

#### How We May Use Your Personal Information

If you provide us with Personal Information, we may retain the information to assess the performance of our advertisements and services. We also may use Personal Information to

ensure compliance with our policies and applicable law. ReachLocal will not sell or share your Personal Information with any unaffiliated third parties for marketing purposes.

#### With Whom We May Share Your Personal Information

We may sometimes use other businesses to perform certain services for us such as processing inquiries, providing technical assistance, and data analysis. We may provide Personal Information to those businesses when that information is necessary for them to complete a requested transaction or otherwise perform their duties. ReachLocal will take reasonable steps to ensure that these third party service providers will protect Personal Information on ReachLocal's behalf. Except as described in this Notice, we will not share the content of the emails or the phone conversations with anyone other than the advertiser.

We reserve the right to disclose Personal Information in special cases when we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other visitors, or anyone else that could be harmed by such activities. We also reserve the right to disclose visitor information when we believe in good faith that the law requires it.

#### Collection of Personal Information by Advertiser

**You should note that any information that you provide on the Landings Pages or the Proxy Sites, unless specifically discussed here, is kept and maintained by the advertiser and is subject to the advertiser's privacy policy. For instance, if the site provides for e-commerce functionality (such as the online purchase of a product or service) any such data, while it may be routed through our servers, is not reviewed, stored or maintained by us. In addition, the advertiser's site (as opposed to the Proxy Site) may send their own cookies (or other tracking technologies) to visitors, collect data, or solicit Personal Information. Finally, we do not control the manner in which the advertiser uses any information provided to the advertiser through your emails or phone calls. Therefore, any questions regarding the treatment of any such information by the advertiser should be referred directly to the advertiser. We are not responsible for the privacy practices of our advertisers' sites. Please visit the advertiser's site to review the terms of their privacy policy.**

#### **Aggregate Information**

From time to time, we may collect general, non-personal, statistical information in connection with the advertising and marketing services we provide, such as which keywords were used to initiate a search, how many visitors visit a specific page, how long they stay on that page and which hyperlinks, if any, they "click" on. We collect this information through the use of "cookies" and other tracking technologies, which are discussed in greater detail below. We collect this information as part of our ongoing efforts to assess, improve and enhance our advertising and marketing services. We may group this information into aggregate visitor data in order to describe our services to our existing or potential business partners, sponsors, advertisers, or other third parties, or in response to a government request. However, please be assured that this aggregate data will in no way personally identify you nor will it be linked with Personal Information that you have otherwise provided.

#### **Cookies and Other Tracking Technologies**

In connection with its marketing services, ReachLocal utilizes “cookies” and other tracking technologies and it may also permit third parties to do so. A cookie is a small text file a website transfers to an individual’s hard drive for record-keeping purposes. For example, we may use cookies to replace the phone number on an advertiser’s site in order to track the effectiveness of their advertising, and we may use cookies to show you advertisements for the same advertiser’s site that you just visited or to connect you with other local businesses that may be of interest to you. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies, though either of those actions may effect the use of the advertiser’s website. We do not link the information we store in cookies to any Personal Information you submit.

Tracking technologies may record information such as Internet domain and host names; Internet protocol (IP) addresses; browser software and operating system types; clickstream patterns; keyword search strings; and dates and times that the web sites are accessed. It is not our practice to link the information we record using tracking technologies to any Personal Information you submit while on our Client’s site.

### **Changes to Our Notice of Marketing Practices**

These Marketing Practices may change from time to time. We will notify you of any material changes to these Marketing Practices by changing the “Last Modified” date at the top of this Notice of Marketing Practices.

### **ReachLocal’s Corporate Privacy Policy**

ReachLocal has established a Privacy Policy for its corporate site at [www.reachlocal.ca](http://www.reachlocal.ca) to let you know what information we may collect from you on the publicly available portion of Reachlocal.com and how we may use or share that information. If you share information with ReachLocal through that site, the Corporate Privacy Policy will apply to that information. To see ReachLocal’s Privacy Policy, please click here [ADD LIVE LINK].

### **Contacting Us**

If you have any comments or questions regarding our Marketing Practices, please contact us at [privacy@reachlocal.ca](mailto:privacy@reachlocal.ca), or at our contact information below.

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