



STATEMENT ON PRIVACY

We think that everyone has a fundamental right to privacy. We also believe that respect for privacy rights & consumer choice can coexist within an advertising ecosystem that accounts for consumer's relevant and personalized interests and behavior.

Twine Data is a subsidiary of ID5 Technology SAS ("**ID5**") and makes processing decisions independently from our parent ID5 and its subsidiary, ID5 Technology Ltd. More information on this relationship between Twine Data and ID5 is in Section 17 – ID5 x Twine Data, below.

TWINE DATA PRIVACY POLICY

Effective as of September 30, 2026

You can access the previous version [here](#).

On September 30, 2026, Twine Data Solutions, Inc. changed its legal name to Twine Data Inc.

Twine Data Inc. is the same company and remains responsible for the Personal Information described in this Privacy Policy. Our privacy practices, your privacy choices, and any request you have already submitted to us are not affected by the name change. The "Twine Data" name and the Twine Data.co website have been transferred to an unaffiliated company and are no longer operated by us.

1. TWINE DATA'S SERVICES

Twine Data (formerly TrueData Solutions, Inc.) ("**Twine Data**") is a technology company that provides our Customers with proprietary data solutions, including those that help publishers drive ad revenue and brands find those who might be interested in their products or services. Twine Data works with third-party providers ("**Providers**") such as app publishers, brands, marketers, and data and technology companies that generate information about people and devices, such as app ownership and app usage. Twine Data offers data and technology solutions to publishers, brands, and other companies (our "**Customers**") that use data for Advertising Services (defined below), Data Modeling (defined below), analytics, and other related purposes, as well as for non-advertising research and analysis of consumer behavior. Collectively, these activities are referred to as the "Twine Data Services" or the "Services."

2. TWINE DATA AS A DATA BROKER

As an entity whose principal source of revenue is derived from the receipt, processing, or transferring of personal data that the entity did *not* collect directly from an individual, Twine Data is considered a “Data Broker” and is duly registered under the Texas Data Broker Law.

Twine Data is also a registered Data Broker under the California, Vermont, Texas, and Oregon Data Broker Laws. Our registrations were filed under our former name, TrueData Solutions, Inc., and are being updated to reflect our new name. We implemented appropriate security measures and controls to comply with the requirements of these laws. As required by California law, you may review Twine Data’s opt-out statistics [here](#).

3. SCOPE OF THIS PRIVACY POLICY

This Twine Data Privacy Policy (“**Privacy Policy**”) covers the information that we collect or receive from the following sources:

- Across the internet, offline sources, and through internet-connected devices from Providers;
- Information we collect or receive from visitors to our website at <https://www.twinedata.com> (the “**Site**”);
- Information provided by individuals (many of whom are current or prospective Customers and Partners) who interact with us at events, conferences, and related activities (“**Events**”).

This Privacy Policy also includes Twine Data’s request form and web portals:

[Privacy Rights Request](#)

[Do Not Sell or Share My Personal Information](#)

This Privacy Policy covers the disclosures that are required by “Data Privacy Laws” governing the processing of Personal Information by Twine Data in the U.S. and Canada. Twine Data does not process data of individuals outside the U.S. and Canada.

Please note: third parties have their own privacy policies, and this Privacy Policy does not apply to their chosen policies related to collection, use, storage, destruction, disclosure, and / or processing of any information handled by any third party. We rely on our Providers to adhere to applicable privacy laws, which includes providing privacy notices and/or obtaining consumer consents as required by law before transferring data files to us.

A. DATA LICENSING (CURRENT OPERATIONS):

Twine Data currently operates as a data aggregator. We license data files from Providers via secure, offline server-to-server transfers. Twine Data does not currently deploy pixels, cookies, or software development kits (SDKs) directly on consumer devices for the purpose of collecting data for our Advertising Services.

B. HISTORICAL OPERATIONS:

Prior to January of 2024, Twine Data utilized direct collection technologies using cookies and pixels. Except for a small number of Customers for whom we place pixels which collect data for the exclusive use of that Customer, Twine Data doesn't place pixels or use cookies as part of the Services.

4. HELPFUL TERMINOLOGY

We use some phrases in this Privacy Policy that are unique to our business or the technology underlying our data engine. Here are definitions of some of the key terms that you'll need to know to make it easier to understand this Privacy Policy.

"Advertising Services"

Data services to marketers, brands, and other companies (our "Customers") that use the information obtained by Twine Data for ad targeting, cross-context behavioral advertising, profiling, automated decision-making, audience creation, measurement, analytics, and other purposes associated with advertising (regardless of medium or channel) via online or offline channels including display, mobile, CTV, social, email, direct mail, and video. The Advertising Service typically involves the transfer of Personal Information to our Customers and Providers – which may be deemed as a sell or share of data in certain jurisdictions.

"Personal Information"

"Personal information" is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. Personal Information does not include certain de-identified or aggregated information, information publicly available in government records, or certain other information excluded from the scope of applicable Data Privacy Laws.

"Sensitive Personal Information"

Depending on what is considered as Sensitive Personal Information as provided under the applicable Data Privacy Law, Sensitive Personal Information is that which reveals the following:

- Personal identification numbers, including social security, driver's license, passport, or state ID card numbers
- Account or debit or credit card numbers combined with passwords or codes that would enable access to the accounts
- A consumer's precise geolocation
- A consumer's racial or ethnic origin, religious beliefs, citizenship or immigration status
- A consumer's mail, email, or text message content unless the information was intentionally sent to the business

- A consumer's genetic data or biometric data that may be processed for the purpose of uniquely identifying an individual
- Personal data from a known child (under 18)

"Email Addresses"

We process versions of email addresses that consumers have provided to our Providers.

"Mobile Advertising ID"

A "mobile advertising ID" or "MAID" is a unique identifier of a mobile device used in the mobile advertising ecosystem. This can be Android's Ad ID (AAID) or Apple's Identifier for Advertisers (IDFA).

"Data Modeling"

"Data Modeling" is a process that includes a broad set of probabilistic, inferential, or mathematical techniques used to turn raw data into useful insights, intelligence, scores, or predictions and is sometimes referred to as profiling.

5. TYPES OF DATA WE PROCESS

We don't currently process Sensitive Personal Information as part of the services as of January 2026 but do process Personal Information from the following categories of sources.

A. From Your Internet-Connected Devices:

We receive the following types of information, from websites, mobile apps, data aggregators, public sources, (collectively, our "**Providers**"):

- ***Device Data.*** We process device data, which includes details about the device(s) you use, such as its manufacturer; model; registered country code; mobile carrier; operating system and version; crash data (if applicable); and what settings and permissions you've enabled. Your device and software settings affect what information your device makes available to us such as the language you prefer to use on your mobile device, mobile applications you install on your device, purchases you make in those mobile applications, Bluetooth or wireless preferences, and the like. We may receive this information from Providers via mobile devices, internet-connected televisions, desktop and laptop computers, and / or other internet-connected devices.
- ***Identifiers.*** We process identifiers such as mobile advertising IDs, IP addresses, CTV / Smart TV advertising IDs, and other identifiers from your device, and clear or hashed email addresses, names, phone numbers, or other identifiers that you voluntarily provide when you register, checkout, or otherwise enter data into an online or app form.
- ***App and Site Data.*** We receive information about the specific apps & sites you may use and/or visit on your device(s), such as the names of those apps, sites, and other relevant metadata.

- **Geolocation Data.** We process Coarse Location data (e.g., city, zip code, physical address) from our Providers in connection with the Services.
- **Demographic Data.** We receive information such as your age or gender that you voluntarily provide when you register or make a purchase on an app, website, or other such event.
- **Inferences.** We may draw inferences from any of the above information to create audience segments reflecting consumer preferences and characteristics. We may also infer that two or more devices or browsers (such as tablets, mobile devices or TVs) are likely to be related to the same user or household.

Note that some of the information we process may fall into more than one of the above categories. For example, an IP address is both a unique identifier and device data.

B. From Third Parties and Aggregated Public Sources:

We may receive information from public and private sources as well as aggregated data (e.g. the Apple App Store and the Android Play Store), website crawling, or from other third parties or public sources that we use in providing the Twine Data Services:

- Metadata about mobile apps
- Census data and other publicly available data sources
- Other sources of behavioral, purchase, demographic information, and / or identifiers

C. In Our Corporate Capacity and from our Site:

Twine Data's Site is directed to the representatives of businesses (such as for our Providers and our Customers) that are interested in Twine Data's Services, not individual consumers. However, individual consumers might be interested in better understanding the type of data we process and the privacy choices we make available to them. Accordingly, we try to ensure that this privacy policy and similar pages are written in a way that can be understood by individual consumers.

When individuals visit our Site, they may choose to provide information to us, such as to contact us to request or provide information

We may collect the following categories of information from our Site:

- Full name
- Email address
- Phone number
- Postal Address
- Professional and employment-related information

- Information about your internet connection, including IP address and carrier.

We may also collect information through business channels and Events such as trade shows, or through marketing platforms that help us identify new customers.

6. HOW TWINE DATA USES THE DATA WE OBTAIN

We use the information we obtain under this Privacy Policy for the following purposes:

- To provide the Advertising Services and associated analytics.
- To facilitate research and analysis of consumer habits.
- To make inferences about consumer interests.
- To perform Data Modeling for quality control on our data solutions.
- To establish probable connections among different browsers, devices, and internet identifiers to associate them with the same user or household, and to otherwise create linkages between different data elements (e.g., establishing that a hashed email address is associated with a certain device ID, or that a mailing address is associated with a device ID).
- To use in our internal business purposes such as the development, enhancement, improvement, and release of new products and services. This allows us to create technology products that we license or sell to Customers. These products help our Customers understand their end users better to create enhanced experiences for them.
- To maintain and enhance Twine Data Services, for example, to debug or research technical issues and resolve them.
- To maintain the security of our systems and to prevent fraud.
- When users submit contact information to us in connection with an inquiry or request, to verify and respond to those inquiries or requests.
- For legal or regulatory compliance or to assert or protect our rights.
- To create aggregate data (which is not Personal Information) to run analytics on certain customer segments, advertising campaigns, or other datasets.
- To provide, maintain, and improve the Services (including our website) for Twine Data Customers and prospective customers
- For our own advertising and marketing purposes.
- For individuals who apply for jobs through our website, to evaluate them as candidates for employment with Twine Data.

When we create certain databases (such as, to help companies market to consumers across various devices or methods), we may de-identify or otherwise obfuscate certain Personal Information for privacy or security reasons.

The below chart summarizes the categories of Personal Information we process, where we received the information, how we used it, and who we shared it with. The categories of Personal Information described below are retained and stored for as long as is necessary to effectuate the business and commercial purposes for which they have been obtained, and otherwise as described in the Section 8 (Data Retention). Twine Data doesn't currently process Sensitive Personal Information or geolocation data.

Personal Information					
Categories Of Data Obtained	Example Data Elements	Information Sources	Purposes Behind Our Processing, Use, And Sharing	Sold Or Shared	Categories Of Third Parties We Disclose To
Identifiers	Mobile Advertising Id Ip Address Email Address Name (First And Last) Mailing Address Uidv2.0 Ctv Ids (Ifa, Ifa_Type) Phone Number And Other Similar Online Ids	Our Providers	Advertising Services Analytics Data Modeling Legal Fraud Or Deceit Detection	Yes	Corporate Customers Our Corporate Providers
Demographics	Age Gender Language Education Employment Homeowner Household Income And Size,	Our Providers	Advertising Services Analytics Data Modeling	Yes	Corporate Customers Our Corporate Providers

	Industry Marital Status Timezone				
Commercial Information	Purchase & Transaction Data	Our Providers	Advertising Services Analytics Data Modeling	Yes	Corporate Customers Our Corporate Providers
Device & Site Data	Device Characteristics App Install Data Site Visitation Data Timestamp Privacy Signals Ambient Signals	Our Providers	Advertising Services Analytics Data Modeling	Yes	Corporate Customers Our Corporate Providers
Inferences	Drawn To Create a Profile About a Consumer such as Preferences, Characteristics, Psychological Trends, Predispositions, Behavior, Attitudes, Intelligence, Abilities, and Aptitudes.	Our Providers Based On Underlying Datasets and Combining Datasets	Advertising Services Analytics Data Modeling	Yes	
Cross-Device Linking Data	Mobile Advertising Id Ctv Ids (Ifa, Ifa_Type) Deterministic Shared Identifiers Home Ip	Our Providers	Advertising Services Analytics Data Modeling	Yes	Corporate Customers Our Corporate Providers

7. DATA SHARING

As to the Personal Information that we receive while operating our Services, we may share and disclose such information as follows:

- **With our Customers and with our Providers:** We provide Twine Data Services to our Customers and Providers that include agencies, brands, mobile app publishers, third party marketing companies, advertising technology companies, marketing technology companies, digital advertisers, and other companies and not for profit organizations that use data for Advertising Services such as targeting, profiling, audience creation, measurement, analytics, and other purposes associated with advertising via online or mobile channels including display, mobile, social, email, and video, as well as for purposes of conducting research and analysis of consumer behavior.
- **With our Service Providers:** Service providers are companies that provide Twine Data with business, technical, and operational services and are different from Providers of data who are required by contract to act solely on behalf of Twine Data and are prohibited from making independent processing decisions with the data we provide. We may also share your Personal Information with service providers and / or data processors to help us operate, provide, improve, understand, customize, support, and market our Services. The services provided by these third-party service providers and contractors may include: a) cloud computer, data storage and file storage providers, b) email marketing providers, c) website and b2b sales analytics providers, d) customer relationship management, contact database vendors, data hygiene vendors, survey vendors and project management software providers, e) client billing systems vendors, f) login authentication providers to ensure that the logins to our systems are working efficiently, g) outsourced computer programmers helping ensure our systems are operating properly, h) auditing, debugging and security vendors. We may also use service providers to assist us with providing our Twine Data Services to Customers or Providers (for instance, through the service provider's own platform), or to assist us in marketing to our finding new customers.
- **With your consent:** We may share information about you with third parties at your direction or with your consent.
- **In Connection with a Financing or Sale of Our Business:** If a third party invests in, or acquires, some, or all of our business or assets, we may disclose your information in connection with the sale (including during due diligence in preparation for the transaction).
- **In Connection with Legal Obligations:** We may disclose your Personal Information as required by law, such as to comply with a subpoena, bankruptcy proceedings, or similar legal process when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request. In certain situations, Twine Data may also be required to disclose personal data in response to lawful requests by public authorities.

- **In Our Corporate Capacity:** We may share and disclose the information we process in our corporate capacity in most of the above ways as well: we may share them with our service providers, with consent, in connection with financing or sale, or to exercise our legal obligations.

8. HOW TO EXERCISE YOUR RIGHT TO OPT-OUT OF PROCESSING BY TWINE DATA

There are multiple ways to submit a “request to opt-out” of your Personal Information. You may:

- Submit a request at our [Do Not Sell Or Share My Personal Information Page](#).
- Submit your request through the email at privacy@twinedata.com. In the subject line, include “Privacy Request,” and note in the body of the email that you would like to opt-out.
- Submit your request via our toll-free number: **(888) 868-5427** and follow the instructions to leave a message.
- You may also opt-out of our use, sale and/or share of this information via the Site by clicking on the cookie icon on the lower corner of your computer screen to enable our Site’s consent management platform privacy controls.

By opting out, you are requesting that Twine Data place your Personal Information into a “Suppression File” that tells our systems not to sell, share or use your Personal Information for ad targeting, cross-context behavioral advertising, profiling or automated decision-making as those terms are defined by Data Privacy Laws. In addition, we make this Suppression File available to our Customers on a regular basis. While we contractually require our Customers to ingest this file and honor your privacy rights within the timeframes required by law, Twine Data does not control the systems of third parties, including Customers and Providers.

Twine Data does not recognize or respond to browser-initiated Do Not Track (DNT) signals as a DNT standard has not been adopted. However, we recognize [Global Privacy Control](#) and similar opt-out requests made to the extent that we process Personal Information via a browser (e.g., via our Site) and where required under Data Privacy Laws.

If you use multiple devices or multiple email addresses, make sure you apply the opt out or data control mechanisms provided to each of the web browsers, internet-connected devices, and email addresses you use for a complete opt-out. Opting out using a single browser, device, or email address will not automatically opt out all browsers, devices, or email addresses you use.

Note that when you opt out of Twine Data, you may continue to receive contextual ads which are ads based on the content of the web page or app on which they appear.

9. DATA RETENTION

We may retain data for use with the Twine Data Services for up to 30 months from the most recent date of receipt, or a shorter period where that is required by law. We may archive and store backups for disaster recovery, and they are not accessed for commercial use.

10. SECURITY MEASURES

Twine Data uses security controls designed to protect information from loss, misuse, and unauthorized access. Twine Data has mature incident handling procedures to respond to any breach of our security controls.

11. CHILDREN & MINORS

We do not knowingly receive Personal Information of minors under the age of 18, nor are our Sites or Services developed for, offered to, or directed at children under the age of 18. If you believe that we have obtained information of a child under the age of 18, please contact us at privacy@twinedata.com and we will take appropriate action.

12. YOUR PRIVACY RIGHTS

Certain U.S. States (e.g., California, Colorado, Connecticut, Delaware, Iowa, Maryland, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Texas, Utah, and Virginia) as well as Canada have enacted privacy laws ("**Data Privacy Laws**") specific to data subjects in those states. Those states provide additional privacy protections for data subjects. To the extent that you are a resident of one of these states, this section describes your rights under the Data Privacy Laws and explains how you may exercise these rights. These rights are not absolute and may be subject to exceptions and verification. Twine Data may be required or permitted by law to decline any request.

A. Right to Access

You can make a request to access the categories or specific pieces of Personal Information that Twine Data obtained, used, or shared about you in the past twelve (12) months. Along with your verified request, we will give you any categories of sources from which the Personal Information is obtained; the purpose for processing, selling, or sharing, and any categories of third parties with whom we share such Personal Information.

B. Right to Delete

You can make a request to delete any Personal Information Twine Data has obtained about you. Upon receiving a verified request, Twine Data will notify you once your information has been deleted. We will also communicate your deletion request to our Customers and direct them to delete your information.

C. Right to Opt-Out of Sale, Sharing, Profiling, Ad Targeting & Automated Decisions

Data Privacy Laws provide you with the right to opt out of Twine Data's "sale / sharing" of your Personal Information, as well as our use of such Personal Information for profiling, ad targeting, cross-context behavioral advertising and automated decision-making as those things are defined by Data Privacy Laws.

D. Right to Non-Discrimination

Twine Data values giving consumers control over their privacy and Personal Information. If you choose to exercise any of your rights under the Data Privacy Laws, we will not differentiate our services because of your decision. We also do not offer any financial incentives to opt-in to sell your Personal Information.

E. Right to Correct

You have the right to request the correction of any Personal Information we maintain about you.

F. Your Right to Appeal

If we decline to act regarding a request that you have submitted, we will inform you of our reason for declining to act and provide instructions for how to appeal the decision where required under Data Privacy Laws. You may send your appeal to privacy@twinedata.com and place the word “Appeal” in the subject line. Some U.S. states also provide you with the right to further appeal our determination to a consumer protection agency located in that state. Here is further information on each state’s process:

- **Colorado** – The [Colorado Attorney General’s Office](#).
- **Connecticut** – The [Connecticut Attorney General’s Office](#).
- **Maryland** – Maryland Attorney General [Consumer Protection Division](#).
- **Nebraska** – Nebraska [Attorney General’s Office](#).
- **New Hampshire** – [Data Privacy Unit](#) of the Consumer Protection and Antitrust Bureau of the New Hampshire Attorney General’s Office.
- **New Jersey** – [Division of Consumer Affairs](#) in the Department of Law and Public Safety of New Jersey.
- **Texas** – For denied appeals, visit the Texas Attorney General’s Office, [Consumer Protection Division](#).
- **Virginia** – For denied appeals, visit the Virginia Attorney General’s Office, [Consumer Protection Division](#).

13. HOW TO EXERCISE YOUR PRIVACY RIGHTS

A. How to Exercise your Right to Opt-Out of Twine Data

There are multiple ways to submit a “request to opt-out” of your Personal Information. This information is located about in Section 8 - How to Exercise Your Right to Opt-Out of Processing by Twine Data. One such method is submitting a request at our [Do Not Sell Or Share My Personal Information Page](#).

B. How to Exercise your Access, Deletion, Correction Rights

There are multiple ways to submit a request to access or delete your Personal Information.

- **Web Form:** You may submit a request by clicking this link to the [“Privacy Rights Request”](#) page.
- **Email/Phone:** You can submit your request via email at privacy@twinedata.com or via our toll-free number: **(888) 868-5427**.

We reserve the right to request documentation to verify your identity in response to a correction request.

C. Verifying Your Privacy Request

To protect the privacy and security of your Personal Information, we will attempt to verify your identity before acting on your request. We may also ask for proof of residency, which may include a signed declaration under penalty of perjury that you are the individual whose Personal Information is the subject of the request. Your request must include details sufficient for us to properly understand, evaluate, and respond to the request.

Please also note that as part of the verification process, we're required to consider:

- the difficulty of verifying whether data that we hold and data we have linked to it truly and solely belongs to the data subject making the request; and
- the potential adverse effects on disclosure of personal data to the wrong individual (or a person who is purposefully seeking the information of another) because such improper disclosure would likely adversely affect the privacy rights and freedoms of the relevant data subject/consumer, we limit certain personal data we make available.

D. Use of an Authorized Agent

Some states provide you with the right to legally authorize an agent to act on your behalf to make a verifiable request related to your Personal Information. If you are making a request through an authorized agent, you must provide the authorized agent with written permission to do so that fulfills the requirements of the Data Privacy Laws. Twine Data may request more information from the authorized agent (or from you) if needed to verify the authorized agent's identity or to avoid any breach of security or instances of fraud.

E. Twine Data as a Service Provider

Sometimes we act as a "Service Provider" to other companies outside the scope of the Services. For example, we operate as a "Service Provider" when we help other businesses use their own customers' information for marketing, analytics, or other services. As to Personal Information that we hold and process as a "Service Provider," you generally need to reach out to the business (our Customer) to exercise your rights stated here.

14. CHANGES TO THIS PRIVACY POLICY

Changes to this Privacy Policy will be posted on this page. If we make a material change to our privacy practices, we will provide notice on our Site or by other means as appropriate. If we are required by applicable Data Privacy Laws to obtain your consent to any material changes before they come into effect, then we will do so in accordance with law.

15. CONTACT TWINE DATA

If you have any questions regarding our Privacy Policy or our privacy practices, or about Twine Data generally, you can contact us by any of the following methods:

Via email: privacy@twinedata.com

Via regular mail at the following address:

Twine Data Inc.
c/o Twine Data Privacy Office
1 E Erie St, Suite 525-4083
Chicago, IL 60611

16. DISPUTE RESOLUTION; CLASS ACTION WAIVER

PLEASE READ THIS SECTION CAREFULLY. IT AFFECTS YOUR LEGAL RIGHTS.

- A. BINDING ARBITRATION: ANY DISPUTE OR CLAIM RELATING IN ANY WAY TO YOUR USE OF TWINE DATA'S SERVICES OR THIS PRIVACY POLICY WILL BE RESOLVED BY BINDING ARBITRATION ADMINISTERED BY JAMS, RATHER THAN IN COURT, EXCEPT THAT YOU MAY ASSERT CLAIMS IN SMALL CLAIMS COURT IF YOUR CLAIMS QUALIFY.**
- B. VENUE: THE ARBITRATION WILL BE CONDUCTED IN NEW YORK, NEW YORK.**
- C. CLASS ACTION WAIVER: YOU AND TWINE DATA AGREE THAT ANY DISPUTE RESOLUTION PROCEEDINGS WILL BE CONDUCTED ONLY ON AN INDIVIDUAL BASIS AND NOT IN A CLASS, CONSOLIDATED, OR REPRESENTATIVE ACTION. YOU EXPLICITLY WAIVE ANY RIGHT TO A JURY TRIAL.**

17. ID5 X TWINE DATA

Twine Data (formerly TrueData Solutions, Inc.) is a wholly owned subsidiary of ID5 as of November 2025. ID5 and its other subsidiaries do not process personally identifiable information (e.g., un-hashed email address, name, postal address), profile data used for ad targeting, or demographic data (e.g., age). As described in the [ID5 Privacy Policy](#), ID5 primarily processes machine-generated pseudonymized signals (e.g., IP address, user agent).

To obtain more information on ID5, you may visit www.id5.io or email contact@id5.io.