

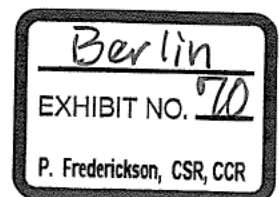
Exhibit 70

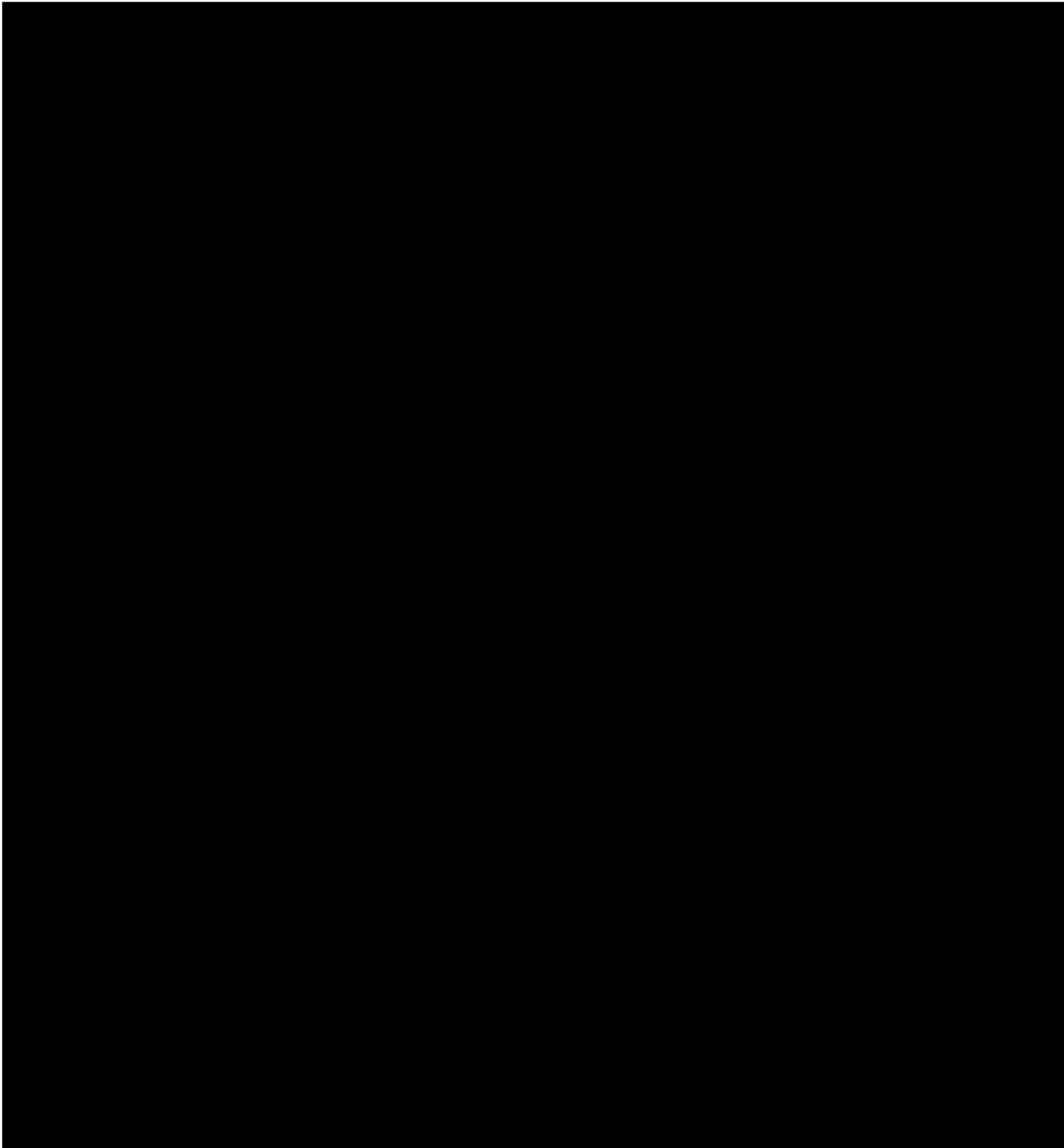
Google

[REDACTED] Service in [REDACTED] privacy deep dive

Thanks to [REDACTED]

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Background

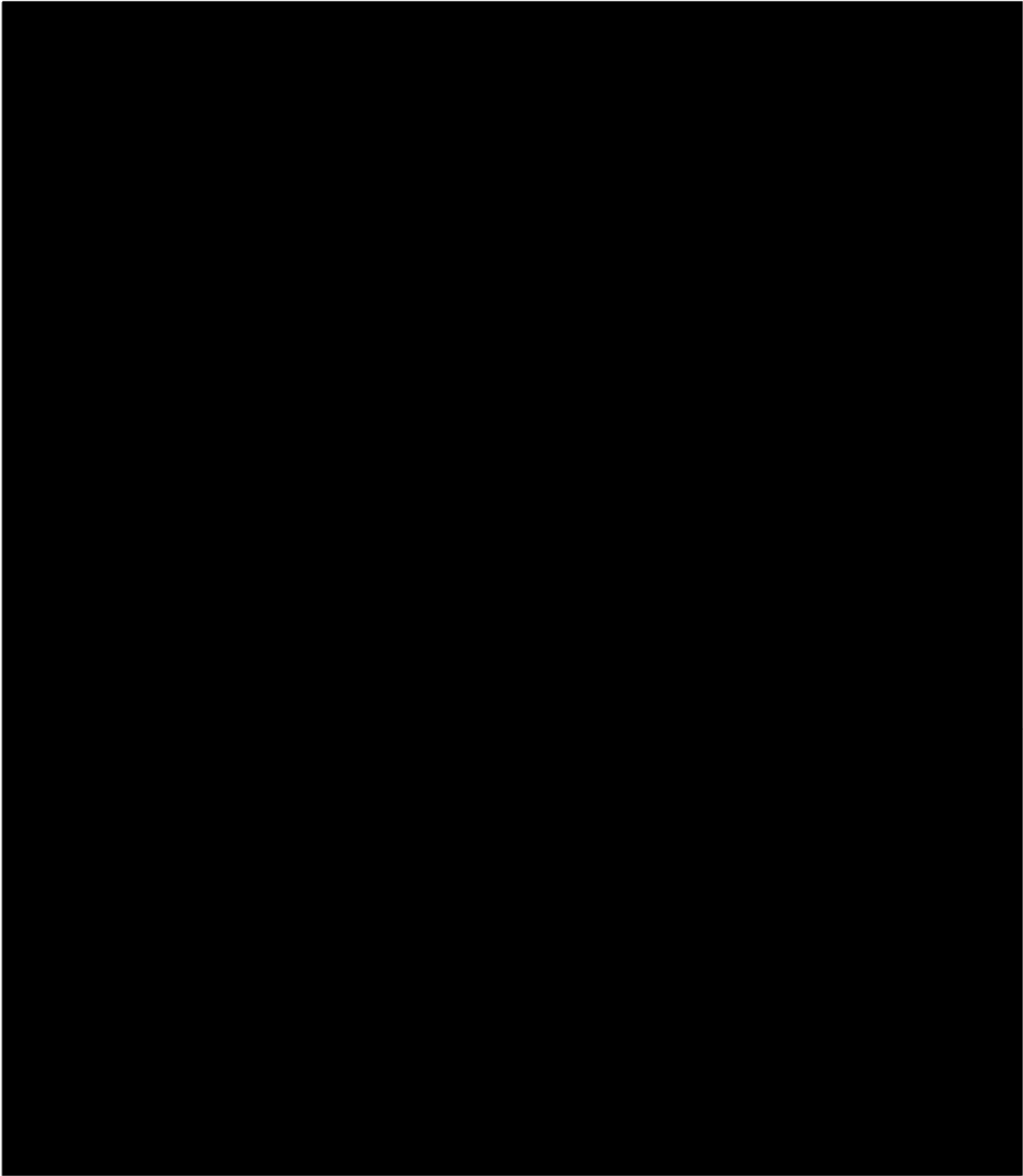
1 Today [REDACTED] uses only [REDACTED] to determine the user's location. There is a proposal to use the [REDACTED] (currently used by gws) to determine the user's location. [REDACTED] adds personalized signals which can improve accuracy.

Scope:

- Per request use of location
 - Including how that location is logged / used after the request
- Initially signed in [REDACTED] but others are coming
 - Could do a similar thing for signed-out [REDACTED] to signed-out Search
 - Display [REDACTED] is also considering using [REDACTED]

Google

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Current Behaviour

██████ calls ██████ which is based only on ██████

This returns a bounding box and political / postal features (e.g. country, region, zip code).

██████ uses this to create **retrieval tokens** "city", "state"

These are then matched against advertisers' targeting.

Google

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Current transparency

For Why This Ad we differentiate by the coarseness of the area that is matched:

- “Your approximate location”
 - CITY, METRO, PROXIMITY_TARGET
- “Your general location (like your country or city)”
 - COUNTRY, REGION

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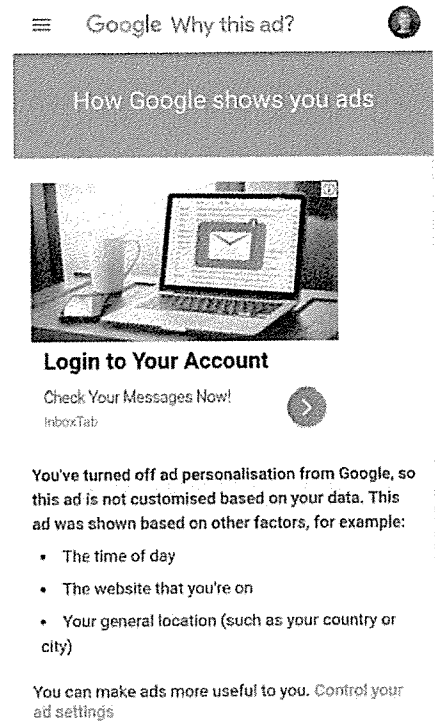
Current Control

None (VPN?) - we use ipgeo for all requests

Even if a user opts out of ads personalization (GAP off) they can still be targeted based on the finer areas (e.g. CITY or METRO). In some ways the current thinking is that location targeting is a **contextual** method of targeting.

We may want to re-think this.

Google



The screenshot shows a mobile interface for a Google advertisement. At the top, there is a hamburger menu icon, the text "Google Why this ad?", and a profile icon. Below this is a grey header with the text "How Google shows you ads". The main content area features an image of a laptop with an email icon on the screen, a white mug, and a smartphone. Below the image is the text "Login to Your Account" in bold, followed by "Check Your Messages Now!" and "InboxTab" with a right-pointing arrow icon. A paragraph of text explains that the ad is not customized based on user data because ad personalization is turned off. It lists three factors: "The time of day", "The website that you're on", and "Your general location (such as your country or city)". At the bottom, it says "You can make ads more useful to you. Control your ad settings".

Google Why this ad?

How Google shows you ads

Login to Your Account

Check Your Messages Now!
InboxTab

You've turned off ad personalisation from Google, so this ad is not customised based on your data. This ad was shown based on other factors, for example:

- The time of day
- The website that you're on
- Your general location (such as your country or city)

You can make ads more useful to you. Control your ad settings

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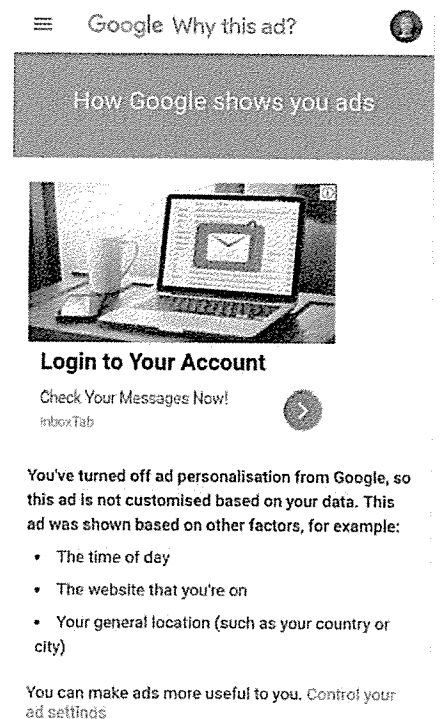
Current Control

²(Out of scope for this integration, but...)

Recommendation 1: Consider preventing using the **finer** location targeting for opted out users

Recommendation 2: ATC to consider whether we want to update Why This Ad explanations for location targeting

Google



Google Why this ad?

How Google shows you ads

Login to Your Account

Check Your Messages Now!
inboxTab

You've turned off ad personalisation from Google, so this ad is not customised based on your data. This ad was shown based on other factors, for example:

- The time of day
- The website that you're on
- Your general location (such as your country or city)

You can make ads more useful to you. Control your ad settings


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Slide 7

2 One thing to keep in mind: we probably don't want it to be seen as
hiding information from the user. As in: we estimate where you are at the
zip code level, but we will not show you very local ads so that you don't
freak out. But since the IP location is estimated and coarse anyway, that
may be fine.

██████████, 3/2/2019

Logging and use of data

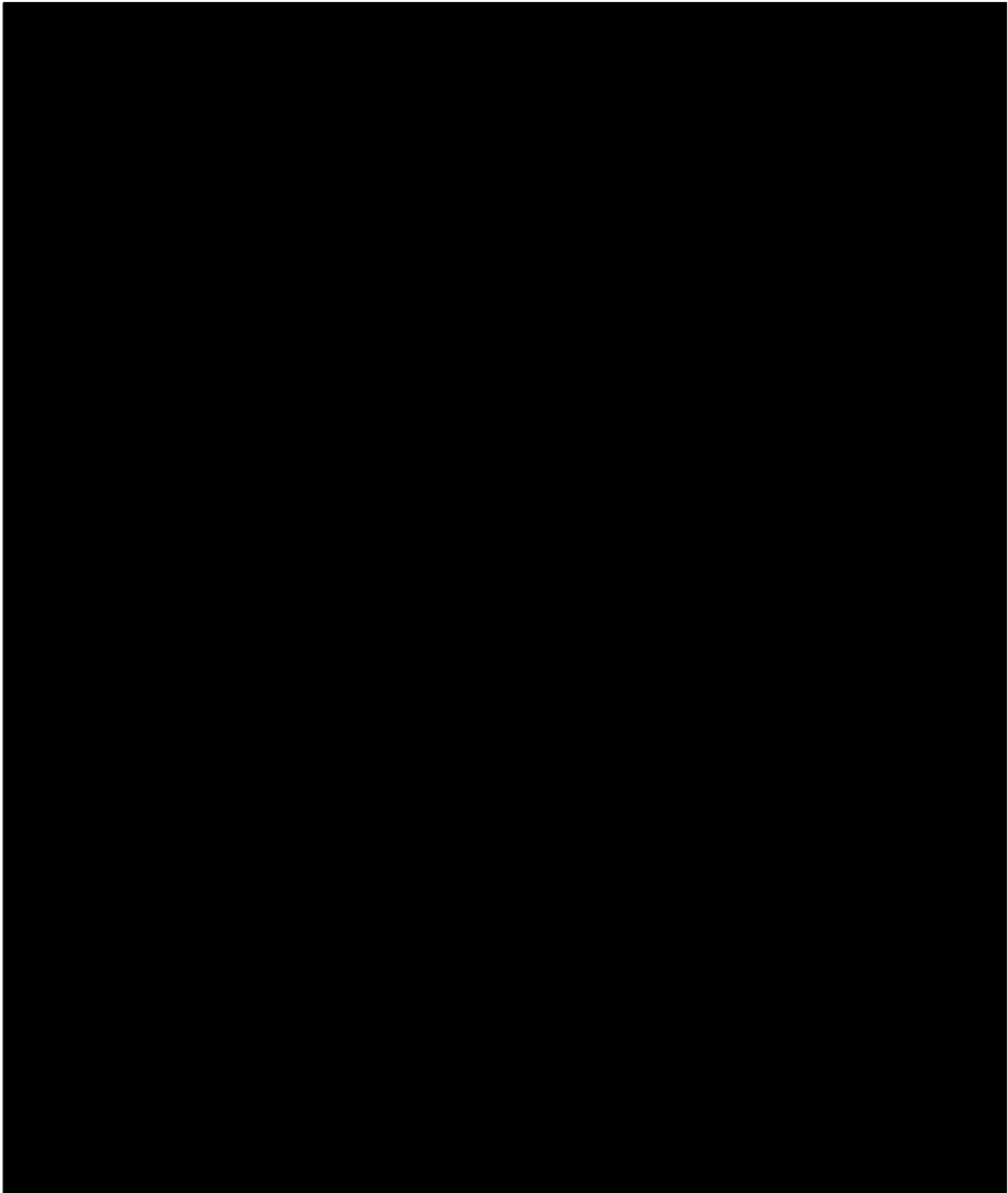
² Currently logged to 

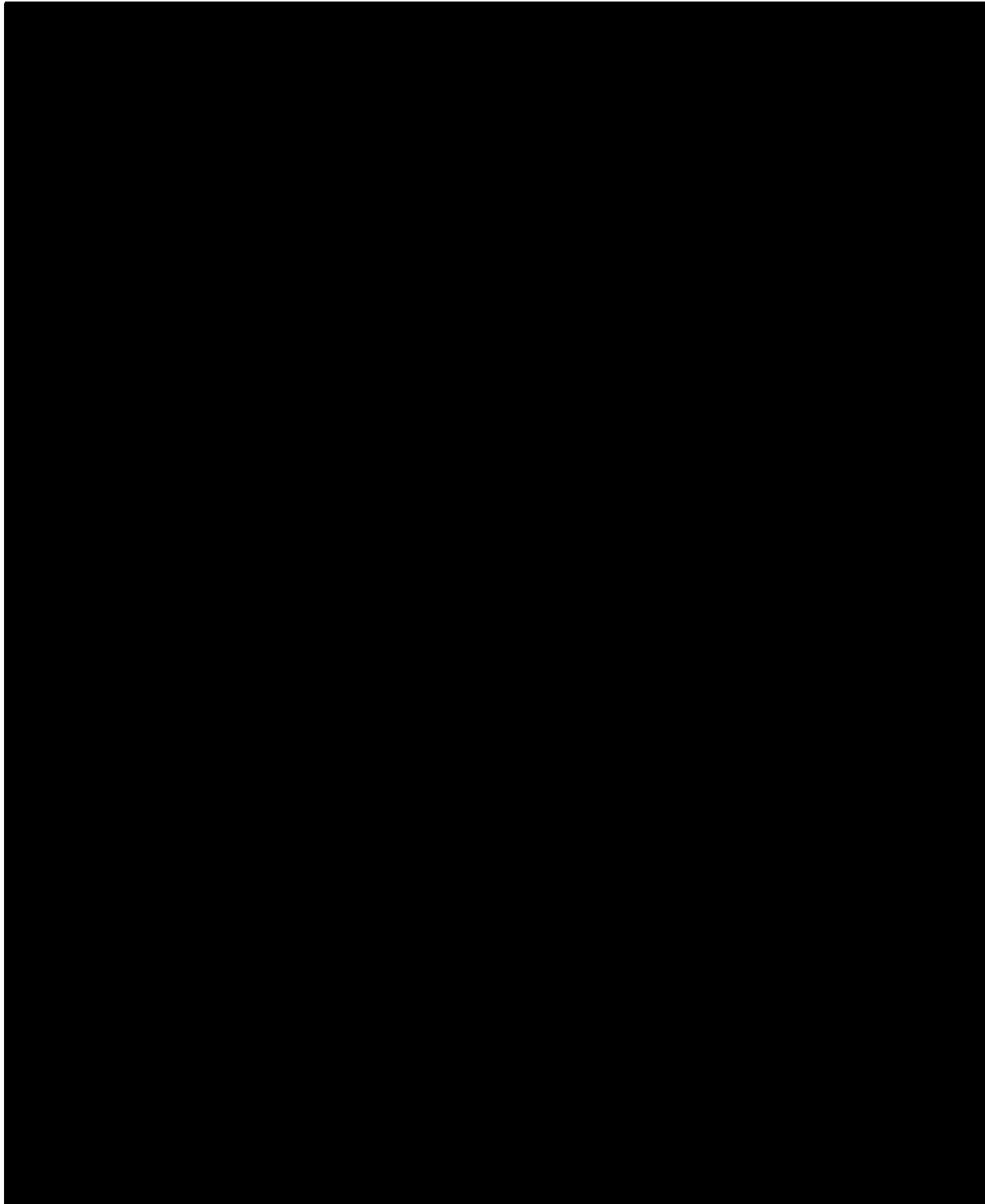
- IP address
- Retrieval tokens (e.g. state, city)
 - Smallest area zip code size

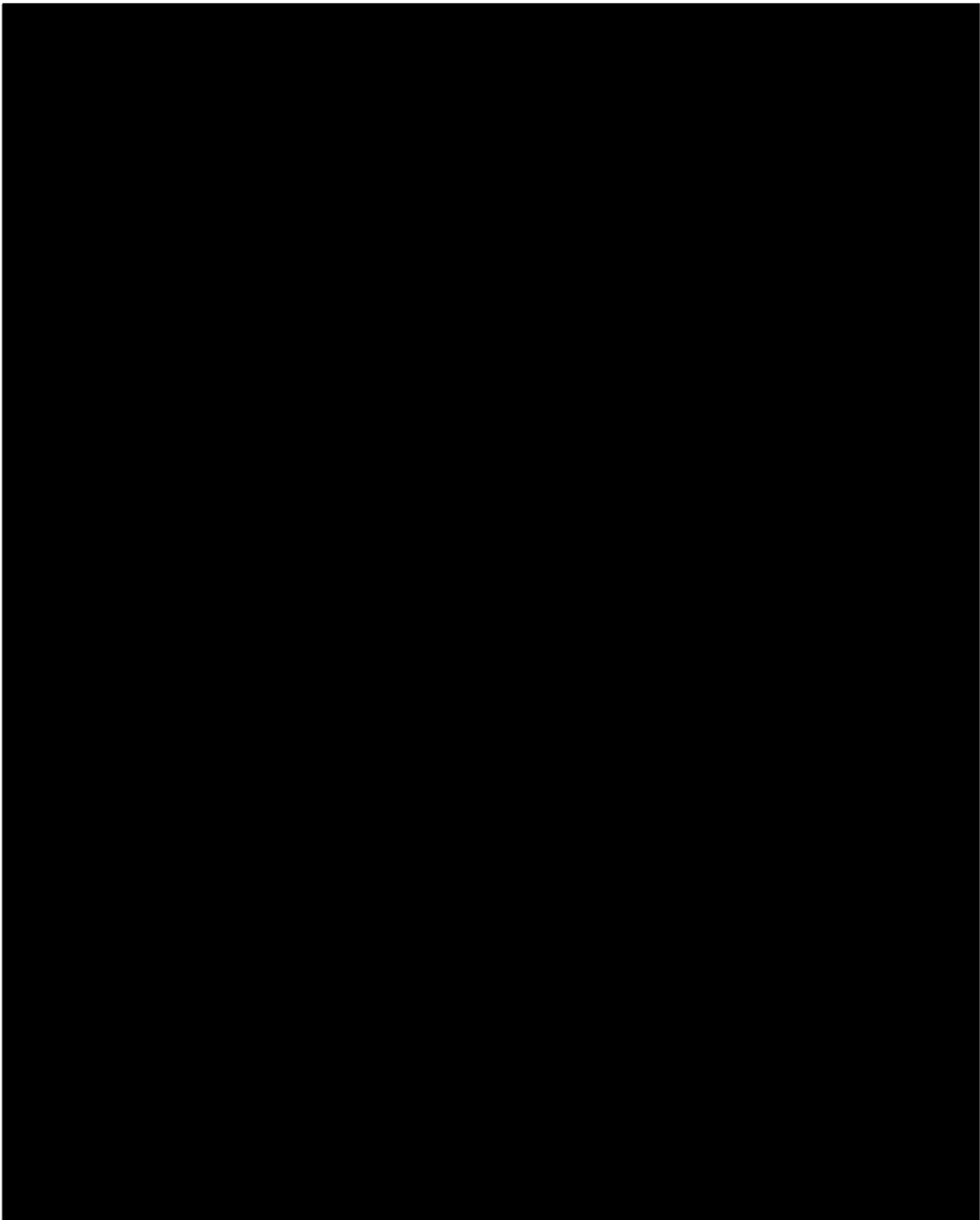
No user profiles are currently created from this

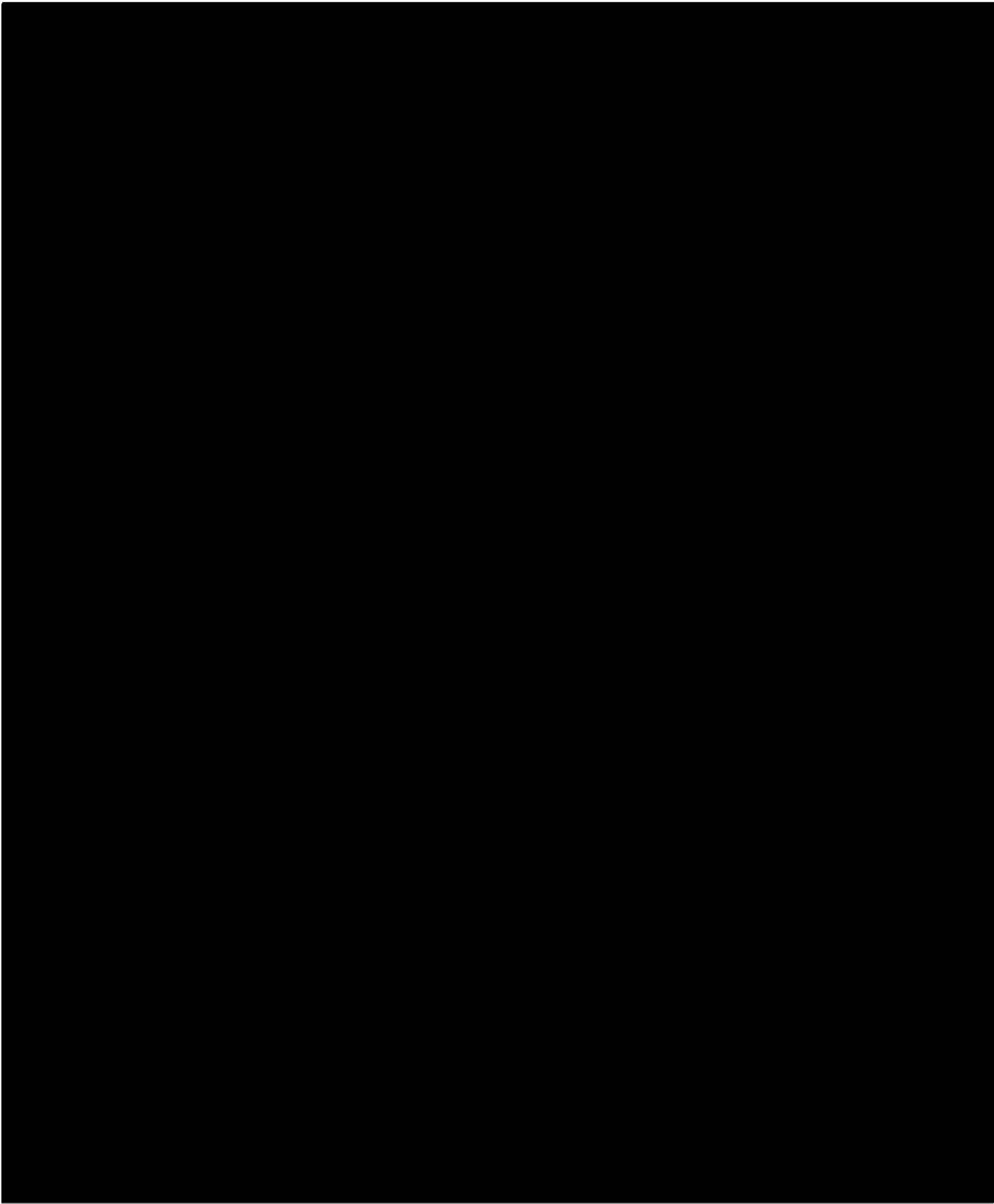
Google

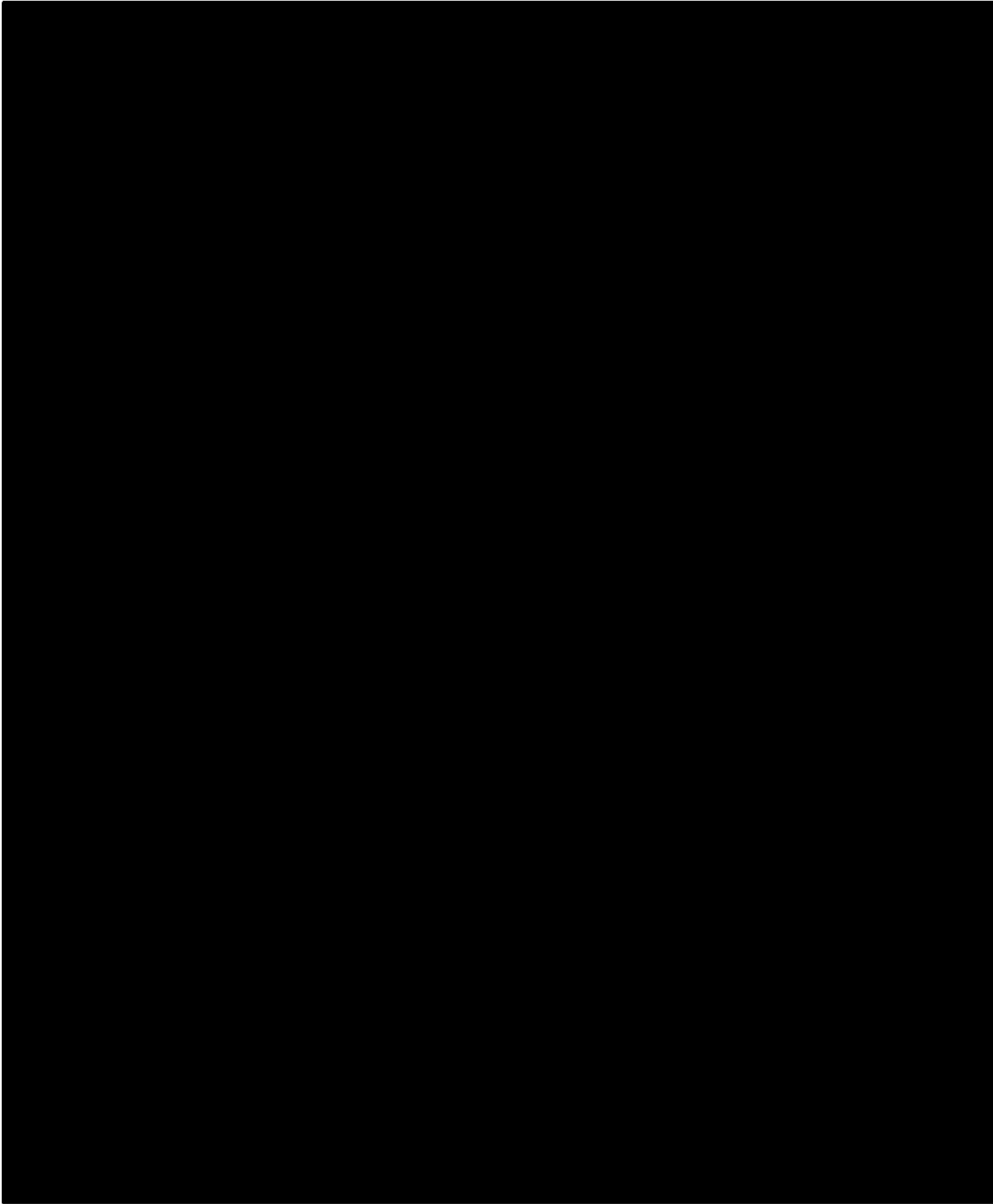
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Transparency

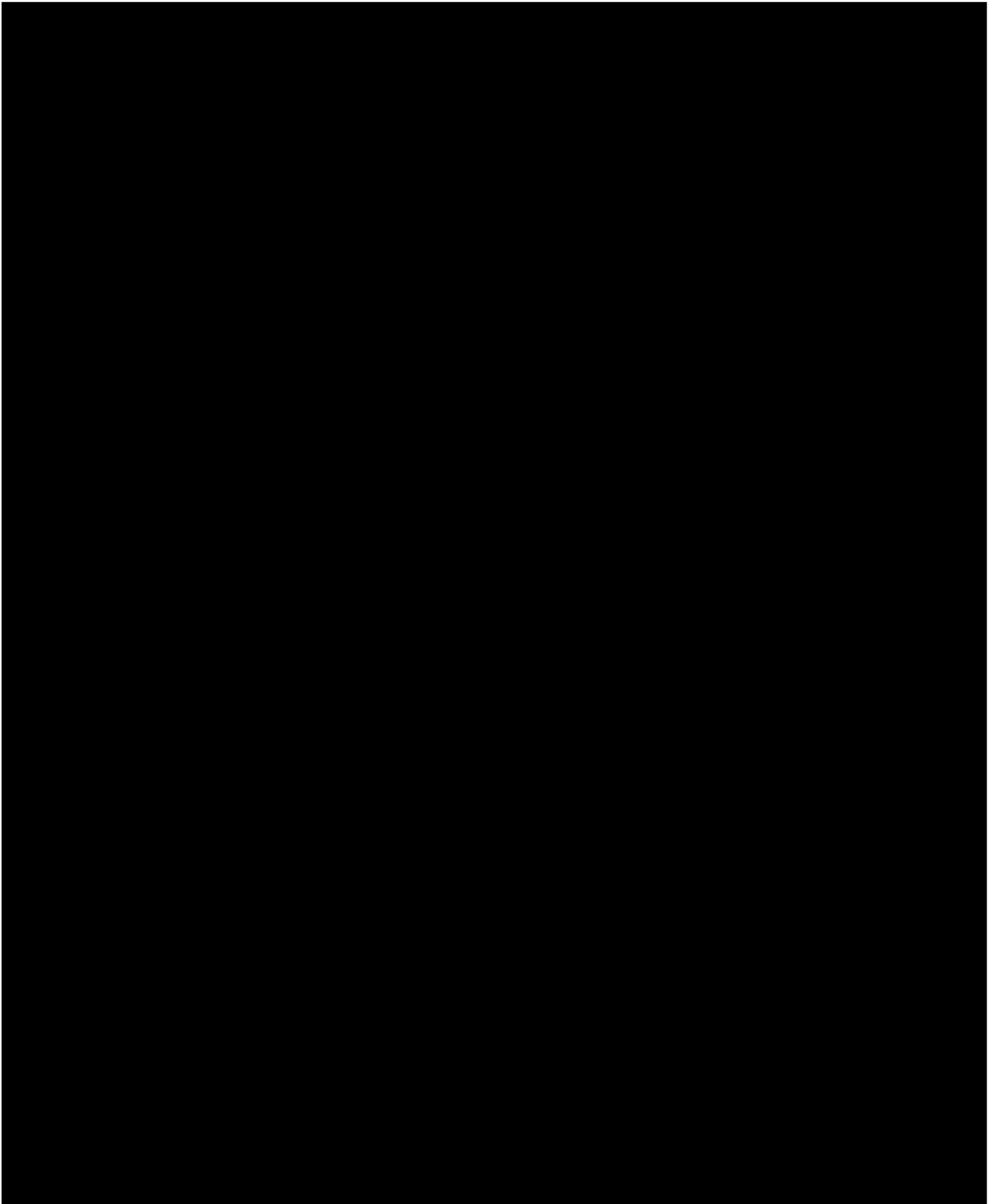
[REDACTED] provides to clients a transparency message based on how the location was determined.



© 94043, Mountain View, CA - From your Internet address - Use precise location - Learn more
Help Send feedback Privacy Terms

Google

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Control

WAA / My Activity - [REDACTED] respects WAA and is wipe-out compliant

Location History -

- if LH is paused [REDACTED] will stop using background device locations in 24hr
- If the data is deleted [REDACTED] will stop seeing and serving it ([REDACTED] does not store LH data)

When a user is opted out of ads personalization (and in other cases?) - [REDACTED] needs to tell [REDACTED] not to use personalized signals. The behaviour will then be as before.

Google

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Logging and use of data

Recommendation: Use [logging utils](#) provided by [REDACTED] to ensure data logged to [REDACTED] is aggregated enough.

Using [REDACTED] utils is likely to be a privacy win over the current state.

