



April 9, 2018

Irwin Reyes
International Computer Science Institute

via e-mail: ioreyes@icsi.berkeley.edu

Dear Mr. Reyes,

I act as General Counsel for ironSource Ltd. (“**ironSource**”).

We came across an article entitled “*“Won’t Somebody Think of the Children?” Examining COPPA Compliance at Scale*”, which is available on your website at <https://irwinreyes.com/papers/2018-pets-coppa.pdf>, and in which you are named as the Corresponding Author (the “**Article**”).

ironSource is mentioned in the Article several times, together with additional companies. Unfortunately, the Article contains factually wrong statements, which result in misleading of the readers as to the nature of ironSource’s business. While ironSource recognizes the need for free academic research and its contribution, we also strongly believe that the integrity of factual statements should be upheld and, when appropriate, verified in advance, certainly when a company’s reputation may be tarnished as a result of false statements.

In particular, the inclusion of ironSource in Table 2 (on page 71) of the Article, which purports to refer to “[m]ost popular third-party service bundled in apps targeting children under 13, whose terms of service prohibit their service from being used in children’s apps” [*emphasis added*] is inaccurate and misleading. ironSource’s terms of service do not prohibit our SDK from being used in applications targeted at Children. In fact, we specifically state in the ironSource Mobile Privacy Policy (“**Privacy Policy**”) that ironSource “does not knowingly collect or maintain personal information collected online from children under the age of 13, to the extent prohibited by the Children’s Online Privacy Protection Act” [*emphasis added*]. *i.e.* we may collect or maintain such information to the extent permitted under COPPA. Note that our Privacy Policy defines our “Services” as the platforms and services provided to third party websites/apps, *i.e.* the implementation of our SDK and related services. Our terms of service emphasize that that an app developer under the age of 13 is prohibited from signing up through our dashboard, as we do not want such developers to provide the information our dashboard requires. To summarize, our terms of service state that app developer under the age of 13 may not use our Services (as defined), however, app developers who are over the age of 13 may use our Services on their apps even if the end users are Children and we will comply with COPPA. Therefore, the inclusion of ironSource in Table 2 and the accompanying language is mistaken.

We are certain we are aligned in our belief that statements made in any article, and, even more so, in an academic article, should be reliable and truthful. Consequently, we request that the aforementioned reference to ironSource be removed as soon as possible.

Failure to do so jeopardizes the goodwill and reputation of ironSource, and may result in substantial financial damage to ironSource and its shareholders.

Respectfully,



Dalia Litay
General Counsel
ironSource Ltd.
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