

Sift Service Privacy Notice

Updated: December 14, 2022

Previous Service Privacy Notice available [here](#)

OUR COMMITMENT TO PRIVACY

Sift Science, Inc. (“**Sift**”, “**we**” or “**us**”) respects your privacy and wants you to be informed about what we do. Sift provides a suite of digital trust and safety products (the “**Sift Services**”) designed to help online businesses (our “**Customers**”) detect and prevent fraud, security threats, and other illegal or malicious behavior on their digital properties, such as their websites and mobile applications (“**Customer Sites**”).

This Service Privacy Notice (this “**Notice**”) explains who we are and how we collect, share, and use personal information about you when: (i) you use the Sift Services as an authorized end user under our Customer’s (your employer’s) account (“**Authorized User**”); or (ii) you interact with any of the Customer Sites that use the Sift Services as a digital end user or we otherwise process your information on behalf of our Customers for fraud detection and prevention and/or other related purposes (“**End User**”). We also include information about how you can exercise your privacy rights. “**You**” or “**your**” may be an End User and/or Authorized User depending on the context.

Please note that this Notice does not describe our collection and use of personal information when visitors access our website. For information about how we collect and use information via our website (www.sift.com and its subdomains), please see our [Website Privacy Notice](#).

Additionally, if you are an Authorized User and a resident of California or Virginia, please also review our [Supplemental U.S. State Law Privacy Notice](#).

Quick links

We recommend that you read this Notice in full to ensure that you are fully informed. However, if you would like to access a particular section of this Notice, then you can click on the relevant link below to jump to that section.

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PART I. GENERAL INFORMATION AND KEY TERMS

Who we are

Sift is a Software-as-a-Service (SaaS) company based in San Francisco, California. We help our Customers detect and address fraud and other illegal or malicious behavior on their Customer Sites and in other contexts using our proprietary real-time machine learning technology.

In doing so, we need to collect and process information about our Customers' End Users. Our cloud-based machine learning platform uses this information to predict and prevent fraudulent and other illegal or malicious activity in real time.

We have four core product offerings for our Customers: [Payment Protection](#) (reduces fraudulent

payments), [Account Defense](#) (reduces fake account creation and prevents bad actors from accessing trust-worthy accounts), [Content Integrity](#) (protects Customer Sites from malicious content) and [Dispute Management](#) (helps Customers manage chargebacks). You can find out more about these offerings [here](#).

How the Sift Services work

Customers provide us with data and information about End Users and their interactions with the applicable Customer Sites through our Application Programming Interfaces (APIs), and other integrations. We may receive this information directly from our Customers or from their service providers and partners. In addition, we collect data directly from End Users through standard tracking technologies (like our JavaScript code or SDK), which our Customers can embed on their Customer Sites. We refer to all of this data as **"Customer Data"** - as described in [Part II](#) below.

We then process the Customer Data through our cloud-based machine learning platform to return a relative fraud score which is a numerical indicator of the likelihood of fraud or illegal activity for a particular event on the Customer Site (e.g., a purchase transaction, the posting of content, creation of a profile) and supporting information about potential illegal acts or security threats. For our Dispute Management product, we process the Customer Data to create a win rate which (similar to the fraud score) is a numerical indicator of the likelihood of winning a particular chargeback. In addition to the score and win rate, we provide our Customers with supporting evidence, aggregated reporting, insights and records.

The data we provide to Customers, including supporting fraud scores and supporting evidence and insights, are used by Customers to assist them in identifying and preventing fraudulent activity on their Customer Sites and managing chargeback disputes. Any of this information may also be used by certain Customers to support their legal or regulatory reporting obligations and risk management procedures (e.g., in relation to their anti-money laundering or know your customer (KYC) requirements). It is up to our Customers to decide what action to take or not to take using the information we provide. For example, depending on the rules set by our Customers, transactions with certain scores may be presented with further authentication challenges, flagged for the Customer's review, or blocked. Typically, however, the transaction or activity will proceed with no issues. More information about what to do if a transaction is blocked is provided in the ["Automated Decision-Making"](#) section below. Customers also provide us with ongoing feedback on the accuracy of the scores by reviewing the activity on their Customer Sites, which in turn improves our proprietary modeling and algorithms.

We also may provide security notification and verification features (including two-factor authentication) as part of our Account Defense product. To provide these features, we use certain Customer Data provided by our Customers to notify End Users of login attempts and account activity, and to send verification codes to End Users (such as via text messages or emails), which they can enter on the Customer Sites to confirm their identity when they login to use a Customer Site or create a new account.

PART II. WHAT WE COLLECT AND HOW WE USE IT

(A) END USERS

Information We Collect About End Users

Information provided by our Customers: Our Customers decide the type of Customer Data they wish to send to Sift for analysis within the Sift Services. Our solutions and support teams work closely with Customers to assess the utility of the specific Customer Data they send to us. For example, Sift guides Customers as to whether a particular data type (e.g., billing method) may be relevant in assessing the particular activity (e.g., likelihood of stolen payment credentials). While it will depend on the specific product offering and Customer relationship, the Customer Data that Customers typically send to us through our integrations include:

- **Contact details** (such as your email address, postal address, phone number, and user login);
- **Information about your device** (such as your IP address, session ID, mobile/desktop device properties, and metadata);
- **Account activity information** (such as account login attempts and failures, when you've reset your password, and other information about your behavior on a Customer Site);
- **Transaction information** (such as information about items you've purchased, currency codes, billing method, invoice details, and partial credit card information);
- **Customer Site communication information** (such as feedback, messaging, Customer support communications, reviews or images you may have provided on or within Customer Sites);
- **KYC-related information** (such as information about whether a KYC check was initiated by the Customer and the result of the check); and
- **Dispute-related information** (such as dispute case number, dispute ID, dispute stage and status, merchant ID, and whether a chargeback was issued or an order was cancelled)

Information we automatically collect when you visit Customer Sites: As further explained below, we use certain standard tracking technologies to automatically collect certain information about your device when you interact with and use Customer Sites. Some of this information (including, for example, your IP address and certain unique identifiers), may identify a particular computer or device and may be "personal data" in some jurisdictions, including the EU. Depending on whether you visit a Customer Site via an app or a webpage, the information we collect includes:

- **Browser and device information**, such as the device type and model, manufacturer, operating system type and version (e.g. iOS or Android), web browser type and version (e.g., Chrome or Safari), user-agent, carrier name/code and country code, time zone, the network connection type, IP address, hardware-based identifiers (e.g. MAC address), host name, device identifiers (such as iOS Identifier for Advertisers (IDFA), Android/Google Advertising ID (AAID or GAID)), canvas fingerprint, characteristics related to emulation or rooted (such as if your device is "jailbroken"), and app name and version. We also collect character set, host name, language, page title and URL, referrer URL, number of fonts, fonts hash, number of plugins, plugins hash, screen height and width, color depth, platform, cookie footprint,

maximum touch points, JavaEnabled, session storage, local storage, whether the resolution has been tampered, language or OS, whether ad blocking is enabled, whether do not track is enabled, flash socket IP and flash identifier. The SDK will also collect phone-related metadata (battery level, device properties, carrier name); and

- **Information about an End User's behavior on Customer's Sites**, such as information about the activities on those Customer Sites, session ID, session start/stop time, timezone offset, and location information which may be general location information inferred from your IP address or, in some circumstances, more precise geolocation information based on latitude and longitude coordinates. You may be able to control the collection of location information through particular Customer Sites by changing the preferences on your mobile device.

Information we collect from third party sources: We may receive some of the information above from our Customer's service providers or partners (such as, their payment processors, customer support providers or KYC providers), as directed by our Customer. We also combine or enhance the information we collect about you with limited information we receive from third parties. For example, we receive information such as whether an IP address is commercial or private, whether a phone number is a landline, whether an email domain is free, or the issuing bank associated with a transaction. We also work with a small number of providers that match information from social media with End Users' email addresses provided to us, or provide us with a human-readable, mapped location based on a physical address or latitude/longitude.

How We Use End Users Information and the Legal Bases

Sift only uses Customer Data to provide, maintain, improve, and develop the Sift Services and to comply with its legal obligations.

For example, we process Customer Data through our cloud-based machine learning platform to return fraud scores to our Customers for particular events or activities on the Customer Site and/or to return win rates for particular chargeback disputes. We may also use Customer Data to optimize and improve the Sift Services (for example, to train our proprietary models and algorithms so that we can more effectively detect fraudulent behaviors) and to validate the identity of End Users seeking to exercise their privacy rights. In addition, when our Customers use the Sift security notification and two-factor authentication features, we process Customer Data, such as their End Users' telephone number or email address, to notify End Users of login attempts and account activity and send a verification code to End Users via text message or email. This allows our Customers who use these features to identify suspicious logins and validate their End Users' identities when they log into the Customer Sites or create a new account.

We base our processing of your personal information on: (i) our legitimate interests in operating the Sift Services, including to better detecting and preventing fraud, security threats, and other illegal or malicious behavior on Customer Sites; and (ii) our (and our Customers) legitimate interest in combating fraud, maintaining safe online experiences for our Customers and their End Users and reducing the costs associated with invalid or fraudulent chargebacks. In some cases, we may also need to process Customer Data to comply with our legal obligations.

If you have questions about or need further information concerning the legal basis on which we

collect and use your personal information, including any legitimate interests relied upon, please contact us as provided under the [How to contact us](#) section at the end of this Notice.

How We Use Tracking Technologies to Collect Information about End Users

We use standard tracking technologies to automatically collect certain information (as described in the [Information We Collect About End Users](#) section) from your device and/or browser when you visit or interact with Customer Sites.

We use the following tracking technologies:

- **JS Snippet:** A JavaScript code (“**JS Snippet**”), also called a tag or pixel, is a tiny snippet of code inserted into the content of the Customer Site. You can disable JavaScript by changing the settings on your browser. Information about the procedure to follow to change the settings can usually be found on your internet browser provider’s website via your help screen. Because Sift does not control these settings, we encourage you to check the information provided about them on a regular basis to ensure you are aware of any relevant changes.
- **Mobile "SDKs" or "Software Development Kits":** These are blocks of code that are embedded into a Customer Site that allow Sift to collect certain information as further described above. You can control the use of certain information Sift collects through the SDK by following the instructions applicable to your mobile device operating system, which are usually available in your mobile device settings. This typically means that you will no longer be associated with your old device ID or the information collected about you when the old device ID was assigned to you. However, if the Customer Site you visit requires you to login (e.g., via an email address), Sift will associate a new device ID with your login and your new and old device IDs will be associated. You may also be able to control the collection of location information by particular Customer Sites by changing the preferences on your mobile device. Because Sift does not control these settings, we encourage you to check the information provided about them on a regular basis to ensure you are aware of any relevant changes.
- **Canvas Fingerprinting:** We use canvas fingerprinting, which is a tracking technique that allows us to render graphic images from built-in features of HTML5 Canvas in your browser. The canvas image is often rendered differently on different devices because of a number of factors (such as, your web browser version, operating system and its settings, and installed graphics hardware), and this will allow us to distinguish you from other End Users. If you would like to disable canvas fingerprinting, you may choose to disable JavaScript or download a browser extension that blocks canvas fingerprinting techniques; however doing so may impair the functionality of the Sift Services. Because Sift does not control these settings or extensions, we encourage you to check the information provided about them on a regular basis to ensure you are aware of any relevant changes.

When an End User views or uses a Customer Site, Sift servers are notified, and we are able to collect information from the browser or application as described above.

Automated Decision-Making

Automated decision-making means that a decision is made automatically on the basis of a computer

determination (using software algorithms), without human review or intervention. The services we provide to our Customers may result in an automated decision being made by our Customers about an action you have made on a Customer Site. For example, in certain limited circumstances, the Customer may use the analysis we provide them to automatically pause the completion of an activity or transaction based on rules the Customer has set. Similarly, the Customer may use the analysis we provide them to challenge a particular chargeback. In such instances, you may be required to take further steps (e.g., two factor authentication), you may potentially be unable to complete a transaction, or your chargeback may be disputed by the Customer. Please contact the relevant Customer directly for more information.

(B) AUTHORIZED USERS

Information We Collect About Authorized Users

Information you provide to us when you use the Sift Services: You (or your organization's administrator) may provide certain personal information to us through the Sift Services – for example, when you register for the Sift Services, when you consult with our customer support, send us an email or communicate with us in any way in connection with the Sift Services.

The personal information we collect may include:

- **Business contact information**(such as your name, job title, organization, address, and email address);
- **Account log-in credentials** (such as your username and password);
- **Troubleshooting and support data** (which is data you provide when you contact Sift for help, such as the products you use, and other details that help us provide support); and
- **Payment information** (if you pay for the Sift Services, our payment processor will collect certain information required to process your payment, such as your credit card number and associated identifiers, billing address and background information. Sift does not store full credit card data).

If you ever communicate directly with us, we will maintain a record of those communications and responses.

Information we collect automatically when you use the Sift Services: In connection with your organization's deployment of the Sift Services, we may automatically collect certain device and usage data about Authorized Users when they interact with and use the Sift Services (we call this information "Usage Data"). We (or our third party service providers) use cookies, web beacons, and other tracking technologies to collect some of this information. Please review the [Sift Website Cookie Notice](#) for further information.

Usage Data may include:

- **Usage data** (such as the dates and times you access the Sift Services, page views, which activities and features you use, the links you click on, and how you interact with the Sift Services);

- **Device data** (such as IP address, device type, operating system and Internet browser type, screen resolution, operating system name and version, device manufacturer, and model);
- **Device event information** (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings); and
- **Log files** automatically generated during the use of the Sift Services (such as access times, hardware, and software information).

How We Use Authorized Users Information and the Legal Bases

We collect and process personal information for the purposes and on the legal bases identified below. For these purposes, we combine data we collect from different contexts (for example, from your use of two products within the Sift Services). We use this information to:

- **Provide the Sift Services:** We base our processing of your personal information on our legitimate interests to operate and administer the Sift Services. For example, to process transactions with you, authenticate you when you log in, provide customer support, and operate and maintain the Sift Services;
- **Promote the security of the Sift Services:** We process your personal information by tracking use of the Sift Services, creating aggregated, non-personal information, verifying accounts and activity, monitoring suspicious or fraudulent activity, and enforcing our terms and policies, to the extent this is necessary for our legitimate interest in promoting the safety and security of the Sift Services, systems, and applications and in protecting our rights and the rights of others;
- **To improve and develop the Sift Services:** We use your personal information (including Usage Data as described in the [Information We Collect About Authorized Users](#) section) to identify trends, usage, activity patterns, and areas for integration and improvement of the Sift Services so that we continually improve the Sift Services, including adding new features or capabilities that make the Sift Services smarter, faster, secure, integrated, and more useful to our Customers and their Authorized Users to the extent it is necessary for our legitimate interests in developing and improving the Sift Services, or where we seek your consent;
- **To communicate with you about the Sift Services:** We may send you service, technical, and other administrative or transactional emails, messages, and other types of notifications to in reliance on our legitimate interests in administering the Sift Services. These communications are considered part of the Sift Services and in most cases you cannot opt-out of them. If an opt-out is available, you will find that option within the communication itself or in your account settings;
- **Send you marketing communications:** We will process your personal information to send you marketing information, product recommendations, events, promotions, contests, and other non-transactional communications (e.g., emails, telemarketing calls, SMS or push notifications) about us in accordance with your marketing preferences as necessary for our legitimate interests in conducting direct marketing or to the extent you have provided your prior consent (please see the [Unsubscribe from our mailing list](#) section below);
- **To protect our legitimate business interests and legal rights:** Where required by law or where we believe it is necessary to protect our legal rights, interests, and the interests of others, we use information about you in connection with legal claims, compliance, regulatory,

and audit functions, and disclosures in connection with the acquisition, merger, or sale of a business; and

- **With your consent:** We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Sift Services with your permission.

(C) SHARING INFORMATION WITH THIRD PARTIES

We may share and disclose information about End Users and Authorized Users in the following circumstances:

- **Vendors, consultants and other service providers**

We may share your information with third party vendors, contractors, consultants, and other service providers who provide data processing services to us and with whom the sharing of such information is necessary to undertake that work. If you are an Authorized User, examples of the type of service providers include: processing billing, providing customer support, identity verification, or hosting our infrastructure. We may use providers who assist us in delivering online and offline marketing optimizations. If you are an End User, examples of these types of service providers include: hosting our infrastructure, security notification and verification services (including two factor authentication services), assisting with manual review and for data enrichment purposes (described below).

- **Our Customers' vendors, service providers and other intermediaries**

We may share your information with our Customers' third party vendors, service providers and other third parties under their direction, where such sharing is necessary to provide the Sift Services and fulfill the Customer's request. For example, if you are an End User we may share your information with our Customers' payment processors or the issuing or acquiring bank involved in a chargeback.

- **Service Providers for Data Enrichment**

We may share minimal Customer Data (e.g., email addresses) with select third-party service providers (e.g., location data providers or identity verification providers) for data enrichment purposes. Enriching data allows us to make more informed fraud risk assessments. For example, we may work with providers that match information from social media with End Users' email addresses provided to us, that provide us with a human-readable, mapped location based on a physical address or latitude/longitude. Sift requires that any information disclosed to a provider is used only to perform their service and not for any incompatible purpose, and only as allowed by applicable law.

- **Professional advisors**

We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services they render to us.

- **Compliance with laws**

We may disclose your information to any competent law enforcement body, regulator, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or

(iii) to protect your vital interests or those of any other person (see below).

- **Vital interests and legal rights**

We may disclose information about you if we believe it necessary to protect the vital interests or legal rights of Sift, you or any other person.

- **Corporate Affiliates and Transactions**

We may provide your information to our affiliates (meaning any subsidiary, parent company or company under common control with Sift). Our affiliates will use your information only for the purposes described in this Notice. Additionally, if Sift is involved in a merger, acquisition or sale of all or a portion of its assets, your information may be shared or transferred as part of that transaction, as permitted by law.

PART III. INTERNATIONAL TRANSFERS, SECURITY AND DATA RETENTION

Processing of personal information in the US and other territories

Your personal information may be transferred to, and processed by Sift in, countries other than the country in which you are resident, including the United States, Ukraine and other countries around the world where Sift, its affiliates, service providers or partners operate facilities. These countries may have data protection laws that are different to the laws of your country and may not provide for the same level of protection as your jurisdiction. However, regardless of where your data is processed, we take steps to ensure that your personal information will be processed in accordance with this Notice and the requirements of applicable law.

European Data Transfers

If you are resident in the EEA, UK or Switzerland, we will protect your personal information when it is transferred outside of your jurisdiction by: (i) processing it in a territory that provides an adequate level of protection for personal information based on the receiving country's data protection laws; and/or (ii) implementing appropriate safeguards to protect your personal information, such as requiring the recipient to comply with the Standard Contractual Clauses, or another lawful and approved transfer mechanism.

PART IV. YOUR PRIVACY RIGHTS

Depending on your location and subject to applicable law, you may have the following rights with regard to personal information we control about you:

Access, review, change, update or delete your information (EEA, UK, and Swiss residents)

If you are a resident of the European Economic Area ("EEA"), United Kingdom, and Switzerland, you may access, review, modify, and request deletion of any personal information that we process about you, as required by law. You can send an email to privacy@sift.com to exercise these rights.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws, and treat each according to the requirements of the applicable jurisdiction. To protect your privacy and security, we may need to take reasonable steps to verify your identity before responding to your request. Specifically, we (or our third party service provider acting on our behalf) may need to collect a copy of your photo ID and any other information necessary to confirm your identity. Such information will be securely processed in accordance with this Notice and only used for the purpose of verifying your identity.

Objection to processing of, or requesting restriction or portability of personal information (EEA, UK, and Swiss residents)

In addition, if you are a resident of the European Economic Area EEA, United Kingdom, and Switzerland, and we can properly verify your identity, you can object to the processing of your personal information, ask us to restrict the processing of your personal information or request portability of your personal information. To exercise these rights, email privacy@sift.com.

Withdrawal of consent (EEA, UK, and Swiss residents)

If you are a resident of the EEA, United Kingdom, or Switzerland, and we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. To withdraw your consent to any processing, email privacy@sift.com.

Right to complain to a data protection authority (EEA, UK, and Swiss residents)

If you are an End User located in the EEA, UK or Switzerland, you have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA and UK are available [here](#) and Switzerland are [here](#).

U.S. State Law Rights: For Residents of California and Virginia

When we handle personal information (as defined under the California Consumer Privacy Act (“CCPA”), or personal data as defined under the Virginia Consumer Data Protection Act (“VCDPA”) in providing the Sift Services to our Customers, we do so as a service provider under the CCPA and a processor under the VCDPA to and/or on behalf of our Customers (who are “businesses” under the CCPA and “controllers” under the VCDPA), to assist them in protecting against security threats or detecting illegal, criminal, malicious or fraudulent activity. When requested, we reasonably assist our Customers in responding to consumer requests under these U.S. state privacy laws. Please direct any requests regarding your U.S. state privacy law rights to the businesses you believe may have collected (or transferred to Sift) your information, so that those businesses can properly instruct us whether and how to assist them in responding.

Unsubscribe from our mailing list

You may at any time ask us to stop sending marketing communications to you, including by clicking "Unsubscribe" in any e-mail communications we send you. If you have any questions in relation to the "Unsubscribe" process, please feel free to get in touch via the contact details set out below. If you choose to no longer receive marketing information, we may still communicate with you regarding such things as your security updates, product functionality, responses to service requests, or other transactional, non-marketing/administrative related purposes.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. To protect your privacy and security, we may need to take reasonable steps to verify your identity before responding to your request.

PART V. OTHER IMPORTANT INFORMATION

Security safeguards

We use technical and organizational security measures designed to protect personal information processed as part of the Sift Services against unauthorized access, disclosure, alteration, and destruction.

Data retention

We retain your personal information where we have an ongoing legitimate business need to do so and for a period of time consistent with the original purpose as described in this Notice. We determine the appropriate retention period for personal information on the basis of the amount, nature and sensitivity of your personal information processed, the potential risk of harm from unauthorized use or disclosure of your personal information and whether we can achieve the purposes of the processing through other means, as well as on the basis of applicable legal requirements (such as applicable statutes of limitation).

After expiration of the applicable retention periods, we will either delete or anonymize your personal information or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Changes to this Notice

We may revise this Notice from time to time in response to changing legal, technical or business developments, and the revised version will be effective when it is posted. If we make any material changes to the ways in which we use or share personal information previously collected from you, we will prominently post the updated version here and in our discretion notify you and/or the Customer by email or by other reasonable means. You can see when this Notice was last updated by checking the "last updated" or "effective" date displayed at the top of this Notice.

PART VI. HOW TO CONTACT US

Contact Details

Please contact Sift with any questions or comments about this Notice or our privacy practices at:

Sift Science, Inc.
Attn: Privacy Officer
525 Market Street, Sixth Floor
San Francisco, CA 94105
Email: privacy@sift.com

Controller Status, Data Protection Officer and EU Representative

If you are a resident in the EEA, UK, or Switzerland, Sift Science, Inc. is the controller of the personal information (i.e., personal data under European data protection legislation) collected through the Sift Services.

You may contact our Data Protection Officer by emailing dpo@sift.com or using the mailing address listed in the Contact Details section above. Our EU representative (for EEA, UK or Swiss data subjects) is:

Sift Science Ireland Limited
by email: privacy@sift.com
by mail: Sift Science Ireland Limited c/o Sift Science, Inc. 525 Market Street, Sixth Floor, San Francisco, CA 94105

Further Privacy Resources

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[Supplemental U.S. State Law Privacy Notice](#)

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