







officers, employees, agents, and representatives of the foregoing. The terms “parent,” “subsidiary,” “affiliate,” and “joint venture” refer to any person in which there is partial (25 percent or more) or total ownership or control between the Company and any other person.

D3. The terms “each,” “any,” and “all” mean “each and every.”

D4. The term “relating to” means in whole or in part consisting, containing, concerning, discussing, describing, analyzing, identifying, or stating.

D5. “Business Customer” means an individual or entity that purchases or uses the Company’s products or services.

D6. The term “Data Broker” refers to companies that collect personal information about Individual Consumers from a variety of public and non-public sources and resell the information to other companies.

D7. “Targeted Pricing Solution” means any product or service including but not limited to any data set or algorithmic tool that is used, has been used, or has been marketed for use alone or in combination with other products or services to charge or set prices, or determine quantity and availability for Individual Consumers based on location, purchase history, return history, customer service history, browsing behavior, demographic information, or any other variables.

D8. “Use of Data for Targeted Pricing Solution” means the use of data for the purpose of determining the price of a product or service for an individual consumer based on the consumer’s location, purchase history, return history, customer service history, browsing behavior, demographic information, or any other variables.











- vi. Submit redacted documents in TIFF (Group IV) format accompanied by OCR with the metadata and information required by relevant document type in subparts (a)(i) through (a)(v) above. For example, if the redacted file was originally an attachment to an email, provide the metadata and information

- d. provide access to randomized, statistically significant samples of non-privileged documents excluded from review or production by use of keyword search terms Technology Assisted Review software, or any other means;
- e. identify the person(s) able to testify on your behalf about information known or reasonably available to the organization relating to your use of software or technology in responding to this Order.

All documents responsive to this Order:

- D shall be produced in complete form, un-redacted unless privileged, and in the order in which they appear in your files;
- E shall be marked on each page with corporate identification and consecutive document control

