

Bankrate is committed to actively monitoring and tracking all Hyperlink Advertisements (*sometimes referred to as Rate Table Advertisements*) to ensure advertisers are responsible for paying only for valid Clicks and Calls. A “Click” means when a website visitor clicks on an Advertisement and is forwarded to the Advertisement’s destination, as determined by Bankrate, in Bankrate’s sole discretion. A “Call” means when a website visitor initiates a telephone call using the Bankrate provided telephone number included in an Advertisement and is automatically forwarded to the Advertiser’s customer care center.

Through automatic and human detection, filtering, monitoring and tracking, Bankrate and/or its third party service providers monitor all Click and Call (collectively sometimes referred to as “CPC Charges”) activity. You will not incur charges for Clicks or Calls that Bankrate automatically determines to be invalid, in its sole discretion. You may incur charges for Clicks or Calls that Bankrate manually determines to be invalid, in its sole discretion; provided that Bankrate shall credit such charges to your account upon Bankrate’s determination that such Clicks or Calls, as applicable, were invalid, resulting in an adjustment to your billing statement. Due to invalid filtering processes, it may take up to three (3) days for a valid CPC Charge to post to your account. In accordance with industry standards, Bankrate will not provide cash refunds.

### **Invalid and Fraudulent Activity**

If you believe that your account is a recipient of invalid Click or Call activity, please call your sales representative or email [CPCProgram@Bankrate.com](mailto:CPCProgram@Bankrate.com) to report the activity. Once you contact Bankrate, Bankrate will (i) review your account’s activity, (ii) make every reasonable attempt to reconcile activity to ensure you are responsible for paying for only valid CPC Charges and (iii) automatically credit to your account, for future CPC Charge advertising with Bankrate, CPC Charges that are determined by Bankrate, in its sole discretion, to be invalid, resulting in an adjustment to your billing statement.

Any advertiser found to be engaging in fraudulent and/or malicious Click or Call behavior on Bankrate will receive formal notification that Bankrate believes they are engaging in fraudulent behavior. If such advertiser continues to engage in fraudulent and/or malicious activity following the formal notification, such advertiser may be banned from advertising with Bankrate. Any advertiser found to engage in fraudulent and/or malicious behavior may also be subject to legal prosecution.

### **Unusual Activity**

As you monitor your account, please be aware that there may be legitimate explanations for unusual activity, including the following:

- Identical IP addresses in some cases are assigned to more than one user by Internet Service Providers.
- There may be some industry trends or seasonality to your business. For example: (1) if your offering is especially compelling, (2) the rate environment changes significantly, (3) certain geographic locations have more defined mortgage seasons, etc.
- Consumers often return to click on links when actively comparing advertiser offerings. This could result in multiple Clicks from a single IP address within a period of time. As Bankrate’s users tend to be active in-market consumers this could be a valid source of unusual Click activity.
- Consumers often choose to make multiple follow-up telephone calls when actively comparing advertiser offerings. This could result in multiple Calls from a single

telephone number within a period of time. As Bankrate's users tend to be active in-market consumers this could be a valid source of unusual Call activity.

There are other circumstances not listed in this policy under which what may seem like unusual activity could be completely valid CPC Charge activity. Again, Bankrate utilizes automatic and human detection, filtering, monitoring and tracking and, at your reasonable request, Bankrate will conduct a review of your account for invalid CPC Charge activity.

Please be advised that Bankrate does not reveal specific IP addresses, telephone numbers or other details regarding Click or Call data. A few of the reasons we do not provide the information are as follows:

1. Some of the information is personally identifiable in select cases, providing it to third parties could violate our privacy policies.
2. Details regarding Click traffic is useful to parties attempting to circumvent the functioning of our invalid/fraudulent Click filtering.
3. Since for the two reasons above we cannot generally provide this information to advertisers or third parties, our policy is to be fair and not release the information.

For additional questions or concerns please contact your sales representative or [CPCProgram@Bankrate.com](mailto:CPCProgram@Bankrate.com).

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