

Bankrate is committed to actively monitoring and tracking all CPC placements to ensure advertisers are responsible for paying only for valid clicks.

Through automatic and human detection, filtering, monitoring and tracking, Bankrate monitors all click activity. You will not incur charges for Clicks that Bankrate automatically determines to be invalid, in its sole discretion. You may incur charges for Clicks 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 were invalid, resulting in an adjustment to your billing statement. Due to invalid click filtering processes, it may take up to three (3) days for a valid Click to post to your account. In accordance with industry standards, Bankrate will not provide cash refunds.

## **Invalid and Fraudulent Click Activity**

If you believe that your account is a victim of invalid click 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 click activity, (ii) make every reasonable attempt to reconcile click activity to ensure you are responsible for paying for only valid clicks and (iii) automatically credit to your account, for future click advertising with Bankrate, clicks 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 click behavior on Bankrate will receive formal notification that Bankrate believes they are engaging in fraudulent behavior. If such advertiser continues to engage in fraudulent activity following the formal notification, such advertiser may be banned from advertising with Bankrate. Any advertiser found to engage in fraudulent click behavior may also be subject to legal prosecution.

## **Unusual Click Activity**

As you monitor your account, please be aware that there may be legitimate explanations for unusual click 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.

There are other circumstances not listed in this policy under which what may seem like unusual click activity could be completely valid click 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 click activity.

Please be advised that Bankrate does not reveal specific IP addresses or other details regarding click 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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