UNITED STATES SECURITIES AND EXCHANGE COMMISSION February 8, 2018

ORDER GRANTING CONFIDENTIAL TREATMENT UNDER THE SECURITIES ACT OF 1933

Cardlytics, Inc. File No. 333-222531 - CF#35518

Cardlytics, Inc. submitted an application under Rule 406 requesting confidential treatment for information it excluded from the Exhibits to a Form S-1 filed on January 12, 2018.

Based on representations by Cardlytics, Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibit(s) will not be released to the public for the time period(s) specified:

Exhibit 10.15 through September 15, 2020 Exhibit 10.16 through September 15, 2020

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Brent J. Fields Secretary