

August 28, 2019

David T. Evans
Chief Financial Officer
Cardlytics, Inc.
675 Ponce de Leon Ave. NE
Suite 6000
Atlanta, GA 30308

Re: Cardlytics, Inc.
Form 10-K for the year ended December 31, 2018
Filed March 5, 2019
File No. 001-38386

Dear Mr. Evans:

We have completed our review of your filings. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of

Office of Information

and Services

Corporation Finance

Technologies