

# Adtelligent Services Privacy Policy

This Privacy Policy will help you understand how Adtelligent Services (also can be referred to as Products) process Customer Personal Data and which actions you can undertake to control information.

This document is renewed due to GDPR & contains all obligatory demands of new Legislation.

Adtelligent undertakes main principles of Data Protection Legislation, such as, fair, lawful and transparent processing; adequate, relevant and limited to what is necessary for which personal data are processed; commit an accurate data processing in a way to ensure security.

## 1. Adtelligent Services List:

### 1. SSP (Supply side platform)

Supply-Side Platform (SSP) is a platform allocating advertising creatives, using automated system. It is a technology platform that enables web publishers to manage their advertising space inventory, fills it with ads, and receives revenue.

### 2. Ad Exchange

Ad Exchange is used to exchange of advertising placements where regular auctions of advertising equipment take place. When the site is put up for sale at the RTB auction, it will be shown to a large number of advertising networks and platforms representing the interests of advertisers. There is sale bidding for the sale of the exposed advertising inventory on the advertising exchange. The advertising exchange works with the RTB ecosystem and is a part of the technological stack of SSP.

### 3. HBMP (Header Bidding Management Platform)

Header Bidding Management Platform is a platform based on script prebid.js. It works for simplify buyer's management work and for convenient cooperation with DSPs (Demand Side Platform).

## 2. Definitions

The terms and expressions set out in this Agreement shall have the following meanings:

**“Adtelligent”** means Adtelligent incorporated company which is located in the United States, 79 Madison Avenue, 7<sup>th</sup> Floor, New York, NY 10016;

**“Controller”, “Processor”, “Processing” and “Data Subject”** shall have the meanings given to them in the Data Protection Legislation;

**“Controller Personal Data”** means the Personal Data processed by Processor on Controller’s behalf pursuant to this Data Processing Agreement.

**“Data Processing Agreement”** means Services, Processing, Personal Data, Data Subjects and Security Measures described in Adtelligent Processing;

**Data Protection Legislation** means the GDPR; and/or (b) the Federal Data Protection Act of 19 June 1992 (Switzerland);

**“Data Subject”** means a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**General Data Protection Regulation (GDPR) (EU) 2016/679** means a regulation in EU law on data protection and privacy for all individuals within the European Union. It also addresses the export of personal data outside the EU. The GDPR aims primarily to give control to citizens and residents over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU.

**“Personal Data”** means all such “personal data” as defined in the Data Protection Legislation as is, or is to be, processed by the Processor on behalf of the Controller;

**‘Personal data breach’** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

**“Processing”** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**“Services”** means Adtelligent applicable services listed above;

**“Sub-processor”** means another processor, which does not include any third parties that receive Personal Data or that are deployed by Processor at the explicit request of Controller;

**“Term”** means the period from the Terms Effective Date until the end of Adtelligent’s provision of the Processor/Controller Services under the Agreement;

**“Third Party”** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

### 3. Process Overview

According to Data Protection Legislation:

**Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

**Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

Due to GDPR adoption Controller instructs the Processor in a written form about selected goals and means for processing Personal Data. The Processor, its Sub-processors, and other persons acting under the authority of the Processor who has access to the Personal Data shall process the Personal Data only on behalf of the Controller and in compliance with its documented instructions and in accordance with the Processing Agreement, unless otherwise stipulated in applicable statutory laws.

Also Processor, its Sub-processors do not have the right to process the Controller's data for their own purposes or for the purposes of Third Party Services, except by instructions.

If Processor consider that the instructions violate the data protection laws, then the Processor shall inform the Controller about it.

### 4. Data Flow

#### Information Adtelligent collect & receive

Adtelligent collects following information by using tags, user agents and cookies in order to optimize and provide the qualitative work of processes.

#### Customer Personal Data

Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### Data Subject have the following list of right:

- Where personal data are transferred to a third country or to an international organisation, the data subject have the right to be informed.
- Regarding to its data Data Subject have right of access, rectification, erasure, restrict.
- Data subject should also be allowed to receive personal data which was provided to a controller in a structured, commonly used, machine-readable and interoperable

format, and to transmit it to another controller. Data controllers should be encouraged to develop interoperable formats that enable data portability.

- The data subject shall have the right to object to processing which is for direct marketing purposes, processing for scientific/historical research/statistical purposes and processing based on two specific purposes:
  1. legitimate interest grounds; or
  2. because it is necessary for a public interest task/official;
  3. Authority.

### **Adtelligent collects:**

#### **1. Personal Data**

- First name, Given name;
- Age;
- Registered office address (according to contract).

#### **2. Other information:**

#### **Information about workspace and account**

Such as email address, telephone number, banking details (this information is given when buying one of Adtelligent Services' Payment Plans).

#### **Information about collected data by Log files**

As many other websites Adtelligent Services automatically collect information when accessing or using the products. This Data is recorded in Log files. It includes:

- Internet Protocol Address (IP),
- Page address used for going on product place;
- Browse setting up: date and time of service use, language preferences and data collected by means of Cookie.

#### **Device Types**

Adtelligent also collects information about devices used for entering Services.

#### **Information about Customer's location**

This information is received both from Customer and from Third party services, who help reach Customer's location. In order to perform this action, Adtelligent can use IP-address received from Customer's Browser or device.

#### **Cookies information**

All Adtelligent's Services use cookie. When Customer uses and accesses the Website, Adtelligent may place a number of cookies files in Customer's web browser. More details can be found in the section «**Cookie**».

## **5. How Adtelligent's Services use information**

All information, collected by Products, including personal data is strictly following this protocol and carefully protected. It is important for high-quality services work as well as for the Customer convenience. Adtelligent strives to ensure that all processes and products were adapted to Customers.

For proper contractual relationship and correct drafting of contracts as well as notifying Customers in case of making changes, new features etc Adtelligent collects Customer Personal Data, for more details review the section "Information we collect & receive".

Adtelligent Company uses information about Customer account and Customer workspace to quickly react to his requests and provide timely support. Also email addresses are an obligatory component for platform authentication. Payment information is provided by the Customer during purchase.

To provide inherent security Adtelligent Services collect Customer IP addresses. This information is necessary to identify real Customer and to secure company system. Also as a matter of convenience to the Customers Adtelligent collects information which will help adapting Customers to their workplace.

In order to develop and provide new functionality and to increase quality of products, Adtelligent collects statistics data by the instrumentality of Third Party Services such as Yandex Metrix, Amplitude and Piwik. Date and duration of Customer visits, regions, type of devices - all this data help Adtelligent to work more effectively with Customers.

## **6. Third Party Services.**

By Third Party Services means outer services which integrate with Adtelligent's Products. Adtelligent use Yandex Metrix, Piwik, and Amplitude. To understand how this Third Party Services collect and use the data, please refer to their respective policies:

- <https://yandex.com/legal/privacy/>
- <https://amplitude.com/privacy>
- <https://matomo.org/privacy-policy/>

## **7. Cookies**

A cookie is a small text file that is stored in a web browser by a website or ad server. By saving information in a cookie, websites and servers remember preferences and recognize web browsers from one visit to another or from one website to another.

There are “persistent” or “session” cookies. Persistent cookies remain on Customer’s personal computer or mobile device when he goes offline, while session cookies are deleted as soon as Customer closes his web browser.

### **How Adtelligent’s products use cookies**

When Customer uses and accesses the Website, Adtelligent may place a number of cookies files in Customer’s web browser.

### **Adtelligent uses cookies for the following purposes:**

- To log in into your account.
- To be in touch with our Support Center.
- To distinguish between unique web browsers, and to store data for advertising purposes, including interest-based advertising.
- To store ad delivery and reporting data for clients, such as, for example, which ad was shown, the number of times a particular ad has been shown, and how recently an ad was shown to a particular web browser.
- The products uses cookies with non-unique values for server load-balancing and similar technical purposes.
- Cookies play a role in cross-device linking where cookies from different browsers or devices might be associated with each other.
- Adtelligent Products use cookies to analyze user behavior when we add new features or some changes.
- Some browsers or other software may be configured to block third party cookies by default.

## **8. Opt Out**

- Blocked cookies.
- Forbiddance of the cookies’ deletion will not work if browser is set up to block third-party cookies.
- Removing / protecting opt outs.

- If Customer needs to opt out again after he deletes his cookies he will use browser plugin.
- Only this browser.
- Managing opt-out cookies works only in the browser that is currently used by Customer. He should set up opt-out cookies in each browser he uses separately.
- When Customer sets up opt-out cookies, he doesn't lead to removing or blocking it. To block or remove cookies Customer should use web browser settings.

### **What are your choices regarding cookies**

- If Customer would like to delete cookies or instruct his web browser to delete or refuse from cookies, he should visit the help pages of his web browser.
- If Customer deletes cookies or refuses to accept them, he might not be able to use all of the features offered by Adtelligent, store his preferences, and some of Adtelligent pages might not display properly.

### **Deletion Recourses:**

- For the Chrome web browser, Customer should visit this page from Google: <https://support.google.com/accounts/answer/32050>
- For the Internet Explorer web browser, Customer should visit this page from Microsoft: <http://support.microsoft.com/kb/278835>
- For the Firefox web browser, Customer should visit this page from Mozilla: <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>
- For the Safari web browser, Customer should visit this page from Apple: [https://support.apple.com/kb/PH21411?locale=en\\_US](https://support.apple.com/kb/PH21411?locale=en_US)
- For the Adtelligent's Products, Customer should visit this page: <https://optout.adtelligent.com/>

Customer can learn more about cookies and the following third-party websites:

- All About Cookies: <http://www.allaboutcookies.org/>
- Network Advertising Initiative: <http://www.networkadvertising.org/>

## **9. Customer's Choices about Private Information**

- Customer can remove Personal Data only by sending a request to our Data Protection Officer or Customer Support.
- Adtelligent will remove Customer Personal Data from its systems as soon as reasonably practicable and within a maximum period of 180 days, unless EU or EU Member State law requires storage.
- If Customer refuse to work with Adtelligent Company the access to his account will be cut down. Customer will be given ability just to control section "Payments" over a period of 90 days. During this period he will have to pay off all his obligations to Adtelligent Company. In the end of this terms the account will be closed and all information will be removed from it.
- When Term is expired, Customer will be given a Notification with the order of re-saving data for safe and convenient further work with the product. Otherwise after 180 days Customer Data will be remove.
- To update Customer Personal Data, Customer will contact Adtelligent. Adtelligent removes Customer's Personal Data if the term, specified of the Adtelligent Data Processing Terms (Data Removal), is expired. If Customer asks to remove his Personal Data, he may contact with our Data Protection Officer.

## **10. Security**

Adtelligent will defend Customer Personal Data from Personal Data breach, loss, wrong use, unauthorized access or divulgation.

Adtelligent cannot guarantee that while being transferred through the internet Customer's Personal Data will be absolutely safe from access by outsiders.

### **Adtelligent's Security Measures**

To successfully counter the threats and attacks of information systems, as well as the choice of methods and means of protection, security policy and risk analysis from possible unauthorized access, Adtelligent carries out a number of works to ensure the safety of information. These measures guarantee the security of all data coming to us to the server.

All the data storing under the supervision of Adtelligent are provided with the following types of protection:

- Firewall system;
- HTTPS encryption (also referred to as SSL or TLS connection) available;
- Limited access to the Personal data.

## **Security inside company**

All staff members who mainstreaming into data performance will make an agreement about confidentiality of Customer Personal Data. According to this fact you can be sure about your Personal Data protection.

## **11. Changes to This Privacy Policy**

Adtelligent may provide some changes to this Privacy Policy time to time in accordance with changes in Law, regulations and industry standards. Customer is advised to review Privacy Policy to stay informed.

If Adtelligent make changes to this page that have prominent influence on Customer's personal Data, Adtelligent will notify Customer about it through email.

## **12. Data Protection Officer**

Adtelligent Company appointed Data Protection Officer in connection with GDPR adoption. Customer can contact him in case he has any questions at [legal@adtelligent.com](mailto:legal@adtelligent.com) or at the address below.