

Tradedoubler

External Privacy Policy

Adopted by the Board

May 15, 2019

Tradedoubler Privacy Policy

Introduction

The integrity of individuals is an important factor of Tradedoubler's business success. Tradedoubler's advertisers, publishers, media agencies and other customers (hereafter the "Client/Clients") that from time to time provide Tradedoubler with personal data, as well as web surfers whose digital data is processed by Tradedoubler as part of its provision of services to its Clients (hereafter the "User/Users"), must be able to trust that data is processed by Tradedoubler in accordance with applicable privacy laws and regulations.

This Privacy Policy was created in order for Clients and Users to better understand how information relating to them is processed by Tradedoubler. The Privacy Policy is not exhaustive, but contains certain fundamental privacy principles applied by Tradedoubler which Tradedoubler considers to be of particular importance for Clients and Users to be aware of. If you do not agree to this Privacy Policy and/or other terms and conditions stated in connection with the collection, please do not provide personal data to Tradedoubler. Tradedoubler reserves the rights not to provide you certain products or services should you choose not to provide required personal data.

- Part 1 of the Privacy Policy contains Tradedoubler's general privacy principles with regard to its processing of personal data provided by Clients, Users or other individuals.
- Part 2 of the Privacy Policy contains information regarding Tradedoubler's processing of digital information about Users in relation to Tradedoubler's Interest Based Advertising and Retargeting activities. It also contains requirements on publishers with whom we have contracted to serve Interest Based Advertising, Retargeting and other marketing services, to notify Users about Tradedoubler's services on their websites and obtain User's consent when required by applicable laws.
- Part 3 of the Privacy Policy contains contact information for different kinds of inquiries and requests relating to Tradedoubler's processing of data and this Privacy Policy.

This Privacy Policy was last revised on 5 April 2018. Tradedoubler may at any time and without notice change it, e.g. to keep it compliant with applicable laws. You should therefore read this Privacy Policy each time you intend to provide Tradedoubler with personal data.

Part 1 - General privacy principles

Personal data and controller of personal data

Personal data comprises all information that directly or indirectly can be referred to a natural person who is alive, e.g. name, postal address, e-mail address and phone number. A controller of personal data is the natural or legal person who processes personal data and who decides why and how such data shall be processed.

Tradedoubler AB is the controller of personal data provided by you through the website 'www.Tradedoubler.com'. Tradedoubler AB is the Controller of personal data provided to us by you through sub-sites of www.Tradedoubler.com, that are published and maintained by Tradedoubler AB or its subsidiaries (all Tradedoubler websites hereafter referred to as the "Site") unless otherwise indicated when such data is collected, or personal data that you are asked to provide us with in other situations if not otherwise is indicated.

Collection of personal data

Personal data for which Tradedoubler is controller may be provided by you to us e.g. in the following situations:

- If you are a Client you may be required to provide us with personal and corporate information, such as name, address, email address and other account information, in order to be able to access and use our services;
- As part of our sales efforts, we may collect and store data through online forms for contact purposes;
- If you are a prospect Client, you may provide us with personal data through this Site when applying to join our network;
- You may provide us with personal data when you send us inquiries relating to our services or in relation to this Privacy Policy. The collection of personal data is based on legitimate interest according to the above and for the performance of a contract to which you and Tradedoubler are the parties.
- **The collection of personal data is based on legitimate interest according to the above and for the performance of a contract to which you and TradeDoubler are the parties.**

Use of personal data

Tradedoubler is committed to protect any personal data you provide to us and to process your personal data in accordance with this Privacy Policy and applicable laws.

Personal data provided to Tradedoubler may be used for the following purposes; provide you requested products and services; manage Tradedoubler's agreed obligations and rights towards you; process payments; administration; internal analysis to improve or more effectively tailor Tradedoubler's Site, business or offerings generally; allow you access to agreed products and services; direct marketing; any other purpose you have consented to or which is allowed under applicable law. Your personal data may also be processed for additional purposes stated on any relevant part of the Site or otherwise in connection with the provision to us of your personal data. Your personal data may be combined with other information collected from you or third parties for the above purposes.C

Disclosure and transfer of personal data

Personal data may be transferred to other companies within the Tradedoubler group of companies. Tradedoubler may as a consequence of service agreements with third parties, also transfer personal data to

such third parties who process personal data on behalf of Tradedoubler. Such service agreement shall contain obligations for third parties to process data only in accordance with Tradedoubler's instructions and to take appropriate measures to secure that the processing of the personal data is secure.

For any of the purposes described herein, personal data may be transferred to Tradedoubler's business partners within or outside the EU/EEA. Should any of the recipients reside in a country without adequate legal protection for personal data, Tradedoubler will make reasonable efforts to make the recipient adopt the principles described in this Privacy Policy.

Consent

Where it is required by law or where Tradedoubler otherwise deems it appropriate, Tradedoubler will seek consent from you before Tradedoubler processes your personal data. Such consent may e.g. be obtained by asking you to accept processing of your personal data in accordance with this Privacy Policy. If you do not agree to this Privacy Policy and/or other terms and conditions stated in connection with the collection, please do not provide personal data to Tradedoubler. Tradedoubler reserves the rights not to provide you certain products or services should you choose not to provide required personal data.

Withdrawal of consent

You are at all times entitled to withdraw your consent to process personal data if you have provided consent to Tradedoubler. In such case Tradedoubler will not process your personal data based on consent any more.

You are entitled to request that Tradedoubler shall not process your personal data for direct marketing purposes.

Contact details for withdrawal of consent and/or for request that Tradedoubler shall not process your personal data for direct marketing purposes are set out in Part 3 below.

Right to information and rectification of personal data

Tradedoubler will take reasonable measures to rectify incorrect information, block or erase personal data without undue delay. You also have the right to contact Tradedoubler in order to object the processing or use the right to data portability. Part 3 of this Privacy Policy contains information about who you should contact if you would like us to correct personal data that we hold on you and which you consider incorrect.

To the extent required by law, we will inform you about Tradedoubler's processing of your personal data in connection with the initial collection or registration of your personal data. Such information may e.g. be provided by notifying you about this Privacy Policy.

You may request a copy of the personal data that Tradedoubler holds about you ("Subject Access Request"). This information will include information regarding what personal data Tradedoubler processes about you, where such information has been collected, for which purpose the information is being processed, and to

whom, or to which categories of persons, the information is being disclosed. Contact information for Subject Access Request is set out in Part 3 of this Privacy Policy.

Destruction of personal data

Any personal data that we hold on you is only stored as long as it is required for us to keep them in order to fulfill the purposes for which they were collected. Data may however be necessary to store for a longer period due to legal requirements, e.g. for accountancy purposes.

Security

Tradedoubler is dedicated to maintain the security of personal data and preventing unauthorized access through the implementation of appropriate technical and organizational measures, as far as is reasonably possible. Such security measures also include that personal data may be accessed only by a limited number of persons within Tradedoubler.

Our employees are made aware of and must comply with Tradedoubler's security standards. When we occasionally use third-party contractors to perform tasks that might otherwise be performed by our employees, these contractors are contractually bound to adhere to this Privacy Policy and they are subject to similar restrictions as our employees.

Cookies

The Site contains cookies. This Site sends your browser a cookie - a small piece of data stored on your computer's hard drive. The purpose of the cookie is to improve your reading of and your search possibilities on our Site. If you are a registered Client (e.g. a publisher), the cookie will also manage and control your login and session on those part of our Site that are only available to registered Clients.

If you do not want to accept that your computer receives and stores cookies, you can alter your security settings on your web browser (Internet Explorer, Google Chrome, Safari etc.). However, note that certain parts of our Site may only be used fully if your browser allows cookies. Thus, your reading experience of our Site may be affected negatively by removing and not allowing cookies.

If you wish to alter your cookie settings, by going to your browsers settings, below are short instructions for how to do this in the four most popular browsers:

Microsoft Internet Explorer

Click the 'Tools' icon in the top right hand corner and select 'Internet options'. In the pop up window select the 'Privacy' tab. From here you can adjust your cookie settings.

Google Chrome

Click the spanner in the top right hand corner and select 'Settings'. From here select 'Under the hood' and change the settings under 'Privacy'.

Mozilla Firefox

From the drop down menu in the top left hand corner select 'Options'. In the pop up window select the 'Privacy' tab. From here you can adjust your cookie settings.

Safari

From the settings drop down menu in the top right hand corner select 'Preferences'. Select the 'Security' tab and from here you can adjust your cookie settings.

In addition, Tradedoubler may serve ads on this and other websites using our own ad-serving technology. In doing so, one of our ad servers will place or read a unique ad-serving cookie on your computer and will use non-personal information about your browser and your activity at this site to serve ads on this and other sites. The ad-serving cookie is a persistent cookie. For more information about Tradedoubler ad serving or to opt-out of the Tradedoubler ad-serving cookie read the instructions below in section "Tradedoubler's targeting technologies."

The table below explains the cookies we use and why.

Signup/Login cookies

Cookie name	Description
JSESSIONID	For security reasons when logging in a session cookie is needed. It is a unique id to this session and encrypts this in a cookie. This cookie is set when logging in and will be deleted when logging out.
GlobalSessionId	A session cookie to keep you logged in into the old and the new system at the same time
test	To check if cookies are disabled or not in the browser. To inform the user that cookies has to be enabled for the signup and be able to login

Google analytics

Cookie name	Description
__utmz	Keeps track of where the visitor came from, what search engine they used, what link was clicked on, what keyword they used, and where in the world they are when they accessed the website.

__utmv	Stores information used within Analytics to identify user as part of a custom segmentation.
__utmc	Holds timestamp of the exact moment in time when a visitor leaves the site
__utmb	Holds timestamp of the exact moment in time when a visitor first visits the site
__utma	This cookie keeps track of the number of times a visitor has been to the site, when their first visit was, and when their last visit occurred.

Tracking cookies

Cookie name	Description
TD_UNIQUE_IMP	The Unique Impression Cookie contains programs of viewed ads together with the time of the ad-view. This information is used to be able to identify unique ad-views.
TD_POOL	Ad-pools have the feature of ad-rotation. To support this, pool-based ad-views are stored in a cookie.
TD_PIC	The Post Impression Cookie holds information about ad-views for those organizations that have post impression tracking activated.
TD_ANETC	The Frequency Capping Cookie is used support the frequency capping functionality. This is a feature that makes it possible to limit the number of times a user is exposed to a certain set of ads within a time interval. The set of ads can be specified on three different levels; budget, program, ad-group.
BT	Behavioural targeting is a feature that makes it possible to target ads to users with a specific browsing behaviour or interest. To support this, users are profiled when visiting Tradedoubler publisher sites. A user profile consists of about 20 weighted categories and is stored in a cookie.
TD_EH_<counter>	The Event History Cookie contains information about the tree latest tracks (clicks) and the ten latest closures per program. This information is used to be able to connect clicks with closures.
TradedoublerGUID	The GUID Cookie holds an identifier to support server side storage of the user event history
OPT_OUT	Allows a user to disable cookie based tracking or targeting for the browser that the user is using
RET	Retargeting is a feature that makes it possible to target ads to users that have visited configured targeting points on the advertiser's site. To support this feature the targeting points visited by a user are stored in this cookie.

Part 2 - Interest Based Advertising and Retargeting privacy principles

Introduction

Tradedoubler processes digital information about Users (web surfers) who visit websites belonging to Clients with whom Tradedoubler has contracted to serve advertisements (the "Advertising Network"). This part of the Privacy Policy lets you know what information we collect and process about you as a User on behalf of our Clients, why we collect it and how it is used in relation to our Interest Based Advertising and Retargeting services to our Clients. The Policy contains instructions on how you can display and delete information collected by Tradedoubler yourself and how you can opt-out from further Interest Based Advertising and Retargeting activities of Tradedoubler. Further, the Policy contains instructions to our publishers on how to notify Users about Tradedoubler's services on their websites.

What is Interest Based Advertising and Retargeting?

There exists a range of different kinds of online Interest Based Advertising and Retargeting services; from fairly simple forms to the far-reaching monitoring of web surfer activities carried out by search-engine owners or services carried out in partnerships between technology companies and Internet Service Providers. As a common denomination, you could say that Interest Based Advertising and Retargeting is intended to make online display advertising more relevant to web surfers' likely interests.

Tradedoubler's Interest Based Advertising and Retargeting services use a combination of cookie- and cookieless technologies.. "Cookies" are small simple text files (not programs or spyware) stored on the hard drive of a web surfer's computer. Cookie-less solutions gather data points from the User's device to create a unique ID for the device. The data points collected are non-PII (non-Personally Identifiable Information). Based on the anonymous information stored in the User's cookie, Tradedoubler is able provide more relevant advertising to the User on behalf of our Clients. For example, a User that visits sports sites often will be categorized in the "sports fan" segment, and will primarily be served advertisements that are relevant to the interests of a sports fan, and a User that shows interest in a certain car model or a certain computer model, may be served advertisements or specific offers for such car model or computer model.

Tradedoubler may also link multiple devices used by a single User into an anonymous user profile. This is done with hashed (anonymous, de-identified) User login IDs used across various devices to login to websites belonging to Tradedoubler's Advertising Network by the User. Such linking enables Tradedoubler to offer its IBA and Retargeting services across devices but not to identify the User.

The fundamental integrity principle underlying all Tradedoubler's processing of digital data relating to Users, is that such data shall be anonymous. Therefore, we do not store IP addresses on the cookie of a User, only a unique randomly generated ID that does not allow Tradedoubler to identify the User; we do not have, and will not initiate, any co-operation with Internet Service Providers in order to identify Users. The data stored on the cookie is limited to information collected at the User's visits to websites belonging to Tradedoubler's Advertising Network. With the exception of a marginal proportion of cookie data saved for statistical purposes solely, a User's cookie can only be viewed by Tradedoubler when the User visits a website that belongs to our Advertising Network.

Targeting information

What is interest based advertising?

Interest based advertising is Tradedoubler's solution for optimizing the selection of ads for a certain user. The selection of ads is based on an interest profile built up during visits to websites in the Tradedoubler network.

Interest based advertising step by step:

- 1. A website user browses sites across the Tradedoubler network (affiliate- and ad networks). The category of each website is saved to a cookie in the web browser.*
- 2. When the website user browse sites related to cars the counter for category "Automotive" is updated in the cookie.*
- 3. Ads are selected and shown to the user based on the category count in the cookie. A user with a higher than average count in the "Automotive" category will be shown more ads related to cars.*

Categories and interest profiles

The system is based on 20 categories; for example Sport and Travel. The only information that is saved in the cookie is a counter showing the amount of times a certain category of website has been visited and the time of the latest update of the counter.

Below you can see the information that have been stored in your web browsers cookie.

You are blocked from interest based advertising.

What is retargeting?

Retargeting is Tradedoubler's solution for displaying ads based on which websites or pages the user has visited before.

Retargeting step by step:

- 1. The user browses the website of a Tradedoubler client that runs a retargeting campaign.*
- 2. Information on what pages the user visits on the website is stored in a cookie in the user's web browser.*
- 3. When the user visits sites in the Tradedoubler publisher network ads are shown to the user based on the information in the retargeting cookie.*

Benefits

For the website user targeting means that more relevant ads will be displayed, ads that match the user's interests. For example, a user visiting more travel websites than average will be served more ads related to travel. A user being interested in a certain product will be served ads with offers related to that product.

For the advertiser targeting means enhanced possibilities to reach a certain audience across Tradedoubler's network.

For the publisher targeting means a possibility of higher return from the advertising inventory. As more relevant ads are shown for a user the probability that the user notices the ad and acts upon its message increases. This will in turn affect the value of the inventory and hence the possible return from it.

Privacy

Tradedoubler does not save any personal information in the cookie and cannot identify the information in the cookie to a specific person.

We follow the IAB guidelines for behavioural targeting in our targeting solutions. Please read Tradedoubler's privacy policy for more information.

You can opt out from our targeting solutions by clicking the button "Block targeting" below, when you have opted out you will not be served ads based on your interests and no targeting information will be stored in your web browser. Tradedoubler will also stop linking your various devices together to an anonymous user profile for the purposes of cross-device tracking and targeting. Note that the blocking ends if you clear your browser from cookies.

Also a publisher can choose not to serve ads with Tradedoubler's targeting solutions; this is done in the publisher account settings ("Site information" section).

Delete targeting cookies

Your interest profile can be removed by clicking the button "Empty cookie" below or by deleting your browser's cookies.

Information stored on cookies

The cookie information stored on the User's hard drive for Interest Based Advertising and Retargeting purposes is: (i) User segment hits or information on a specific product, service, brand or model in which the User has shown interest during its visit to a certain website (for example a User that visits a sport site of one of Tradedoubler's Clients, will record a hit in the 'sports' segment and a User that has shown interest in a certain car model will record a hit of that car model) and (ii) time and date stamp of the latest update of the User profile. The User segments used by Tradedoubler for cookie hits are: (1) Animals; (2) Humanities; (3) Automotive (4) Business; (5) Computers & electronics; (6) Entertainment; (7) Finance; (8) Food & drink; (9) Gaming; (10) Health & beauty; (11) Home & garden; (12) Insurance; (13) Lifestyle & society; (14) News & current events; (15) Reference; (16) Shopping & retail; (17) Social; (18) Sports & recreation; and (19) Telecom & utilities

For the sake of clarity, no segments relating to sensitive information have been or will be created, such as segments relating to political opinions, religious beliefs, physical or mental health conditions or sexual life. Further, Tradedoubler is very sensitive to the issue of children's privacy and marketing directed to children. No segments are intended to be established for the profiling of children.

Use of collected digital data

Tradedoubler will use the User data in order to better target advertisements on behalf of our Clients, to provide aggregated non-personal reporting to our Clients, and to improve our advertising systems and products. The data may be combined with other anonymous information collected from other sources so that we may better serve Users with offers that may be of interest to them. We may also share anonymous data between companies within the Tradedoubler group of companies.

Security

Tradedoubler is dedicated to maintain the security of all its data and to prevent unauthorized access through the implementation of appropriate technical and organizational measures, as far as is reasonably possible. Such security measures also include access restrictions, i.e. that data may be accessed only by a limited number of persons within Tradedoubler.

Our employees are made aware of and must comply with Tradedoubler's security measures. When we occasionally use third-party contractors to perform tasks that might otherwise be performed by our employees, these contractors are contractually bound to adhere to this Privacy Policy and they are subject to similar restrictions as our employees.

Opt-out

You may at any time easily block further Interest Based Advertising and Retargeting activities which are based on cookie-, cookieless or Cross-device tracking from Tradedoubler by opting-out. To do so please follow the instructions above in section "Tradedoubler's targeting technologies"..

In addition, note that you are always able to prevent cookies from any website from being installed on your computer by readjusting your browser settings. For more information about cookies and how to disable them, you should consult the help section of your browser.

If the cookie is deleted by the User, all profile data is removed.

Publisher notification

If you are a publisher, please note that you are obligated to notify visitors of your website about third parties who are serving advertisements on your website by way of use of cookies. If using Tradedoubler's cross-device tracking solution, you are required to notify visitors to your website of this fact, gain their consent for passing data to Tradedoubler and to hash the data in accordance with Tradeoubler's instructions before sending it to Tradedoubler. As a party to the publisher agreement with Tradedoubler, you agree to provide clear and unambiguous notice about this. In relation to Tradedoubler's Interest Based Advertising and Retargeting (if you have chosen to be provided with such services), such information shall at least include the following text:

"By using our website you consent to our Privacy policy [Link] including third-party advertising companies serving ads when you visit our website. These companies may use information (not including your name, address, email address or telephone number) about your visits to this and other websites in order to provide advertisements about goods and services of interest to you. In order to do this, our advertising partners may place a cookie (a small text file) on your computer; or collect device ids or other device data and link you various devices to the same anonymous user

profile using hashed (de-identified) user login ids. Please, read our Privacy policy [Link] for detailed information and for instructions to disable third-party advertising.

For avoidance of doubt, please note that the foregoing requirement of notification does not limit any of your obligations according to applicable law. You are yourself as a publisher responsible for providing relevant and accurate information required by law, including applicable privacy laws.

Part 3 - Contact information

Contact details for inquiries and requests:

- For general inquiries concerning this Privacy Policy or Tradedoubler's processing of data, please send an e-mail to the following address: privacy@Tradedoubler.com;
- For: (i) a withdrawal of a consent to process your personal data previously provided by you to Tradedoubler; (ii) a request that Tradedoubler shall not process your personal data for direct marketing purposes; (iii) a requirement that Tradedoubler shall rectify certain personal data held on you, or; (iv) a Subject Access Request, please send an e-mail to the following address: privacy@Tradedoubler.com;

Please provide relevant details in your e-mail in order for Tradedoubler to be able to process your request or inquiry.

You also have the right to lodge a complaint to the Data Protection Authority if you do not think that Tradedoubler has respected your data privacy rights.