

Tradedoubler

External Privacy Policy

Adopted by the Board

May 18, 2021

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. It also contains requirements on publishers with whom we have contracted to serve 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.

Tradedoubler may at any time and without notice change the Privacy Policy, 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.

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.

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.

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 and if necessary, make a Transfer Impact Assessment prior to any transfer to a country outside EU/EEA.

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 (Google Chrome, Microsoft Edge, 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.

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.
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

Analytics

Cookie name	Description
__ga	Google Analytics: Used to distinguish users..
__gid	Google Analytics: Used to distinguish users..
__ga_<container_id>	Used to persist session state.
__fbp	Facebook unique identifier
__cfduid	CloudFront unique id: used by Cloudflare to detect malicious visitors and minimize blocking legitimate users

Tracking cookies

Cookie Name	Description of how it works (what kind of data is collected, what is the purpose, what kind of activity is allowed due this process)
UI	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

PI	The Post Impression Cookie holds information about ad-views for those organizations that have post impression tracking activated
TD_EH	The Event History Cookie contains information about the three 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

Part 2 - Tradedoubler's processing of digital information about Users

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 services to our Clients. The Policy contains instructions on how you can display and delete information collected by Tradedoubler yourself.. Further, the Policy contains instructions to our publishers on how to notify Users about Tradedoubler's services on their websites.

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.

Privacy

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

Opt-out

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.

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 Tradedoubler's instructions before sending it to Tradedoubler. The consent needs to be in line with GDPR and the ePrivacy directive. As a party to the publisher agreement with Tradedoubler, you agree to provide clear and unambiguous notice about this.

To comply with the regulations governing cookies under the GDPR and the ePrivacy Directive you must:

- ✓ Receive users' consent before you use any cookies except strictly necessary cookies.
- ✓ Provide accurate and specific information about the data each cookie tracks and its purpose in plain language before consent is received.
- ✓ Document and store consent received from users.
- ✓ Allow users to access your service even if they refuse to allow the use of certain cookies.
- ✓ Make it as easy for users to withdraw their consent as it was for them to give their consent in the first place.

For avoidance of doubt, please note that the foregoing requirement of notification and gaining visitors' consent 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 including country you signed up with 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.