



## Privacy Policy

Adopted by the Board of Directors

13th December 2023

## This Privacy Policy covers the following areas:

1. Tradedoubler
2. Transparency
3. Important concepts and definitions
4. Why, how, and for how long we might process personal data about you:
  - Website visitor
  - Potential advertiser
  - Advertiser
  - Publisher (influencer)
  - Contacting us for other matters
5. Who Tradedoubler may disclose your personal data to
6. How Tradedoubler protects your personal data
7. Your privacy rights
8. Contact details to us and Supervisory Authorities
9. Changelog
10. Cookies
11. Information to visitors of our publishers' and advertiser's websites

### 1. Tradedoubler

**We** are fully committed to protecting your right to privacy, keeping you updated as to how and why we may process data about you, and informing you of corresponding rights. Rights under privacy legislation such as the GDPR and ePrivacy legislation, in addition to our own values and commitments to you.

The following entities, each responsible for controlling how and why personal data may be processed on its domain:

- Tradedoubler AB (reg.no 556575-7423) mother company of the Tradedoubler Group owning 100% of all local Tradedoubler subsidiaries incl IP and all systems for processing on <https://www.tradedoubler.com/>
- Grow by Tradedoubler (Tradedoubler AB, reg.no 556575-7423 for processing on <https://grow.tradedoubler.com/>
- Metapic Sweden AB (reg.no 556965-7868) for processing on <https://metapic.com/>

As a company group we follow the same principles on data processing and share a privacy team. You are welcome to reach out to us should you have any questions, concerns or requests as to your personal data and rights.

You may reach our Privacy team at [privacy@tradedoubler.com](mailto:privacy@tradedoubler.com) and our DPO at [dpo@tradedoubler.com](mailto:dpo@tradedoubler.com).

## 2. Transparency

The purpose of this Privacy Policy is to help you understand why we might need information about you and what rights you have to personal data we process about you when we do. As we value your time and attention, we have limited the information to what we believe is of most interest to you and to describing the activities that may impact you the most.

That said, you have the right to request detailed information on all processing about you (see contact details above and read about your rights below in section 7).

This Privacy Policy describes why and how we process information about **you** as a:

- Website visitor,
- Advertiser,
- Publisher or influencer/creator
- and contact person at our potential advertisers or,
- when you contact us through other means.

## 3. Important concepts and definitions

**Personal data**, in this context, means any information that tells us something about you (what the GDPR calls a data subject). In other words, both information that identifies you (such as your name, personal e-mail-address, or phone number) and information that can be connected to such identifiers (for instance: what settings you prefer on our website). As long as we can reasonably connect information we process to a person, we consider it personal data and apply strict data privacy principles to keep it safe, and to make sure it is used only for specific, informed and lawful purposes.

**Advertisers** use Tradedoubler's services to to advertise through Tradedoubler's Publishers network.

**Publishers** are individuals or companies that are a part of our Publisher Network. Publishers publish the Advertiser's advertisements/banners on their own website.

**Influencers** are individuals or companies that are a part of our Influencer Network. Influencers market Tradedoubler's advertiser's products or services on their own social media accounts.

**Website visitors** are individuals who visit websites belonging to us. This policy covers the websites stated in section 1.

The **Data Controller** of personal data is the natural person or legal entity who determines the purpose and the means of the processing of personal data. For example, the Tradedoubler company, or companies, deciding why and how we use information about you when visiting our websites or contacting us directly. Or the Advertiser acting as a Data Controller, and where we act as Processor (only acting on their instructions) in collecting information on interaction with ads, from Publishers or Influencers – see section 11.

The **Data Processor** of personal data is the natural person or legal entity who processes personal data on the behalf of the Data Controller. A Data Processor may in turn enlist its own Data Processors, referred to as **Sub-Processors**, to carry out some tasks. For example, where we act as Processor for Advertisers in collecting information on interactions on ads at Publishers or Influencers, and where those Publishers and Influencers then act as our Sub-Processors.

As a Data Processor, we do not decide why, or in any material matter how, your personal data is processed.

## 4. Why, how, and for how long we might process personal data about you

- **Visitors to our websites**

When you visit [www.tradedoubler.com](http://www.tradedoubler.com), [www.grow.tradedoubler.com](http://www.grow.tradedoubler.com) or [www.metapic.com](http://www.metapic.com), we may collect and use personal data to:

### **Run the website and provide requested functions**

**Why:** For the website to establish and keep a connection to your device, as well as to maintain settings and functions you have requested (such as language settings).

**How:** We use cookie technology (store and retrieve information from your device). See section 10 on cookies, below, for details on how we collect this information.

**Personal data:** None (just device info, which we do not connect to a person).

**How long:** Limited to provide this functionality, after which it is deleted.

**Lawful basis:** Cookie consent exemption. Since this information is needed to display the website and requested functions (so called necessary cookies) it cannot be turned off through our settings and we cannot connect it to you as an individual, but you can disable cookies in your website browser – which might affect website performance and functionality.

## Analyse the use and function of the website

**Why:** We collect information on the use of our websites to better direct resources to improve its future content and functionality.

**How:** Through unique identifier cookies we measure whether two views of a website belong to the same device (even between different browsing sessions), time of visits (first visit, this visit, and last visit). See the section on cookies, below, for details on how we collect this information.

**Personal data:** We do not identify individual users for analytics purposes.

**How long:** Until revoking consent or up to 730 days.

**Lawful basis:** Consent. The collection of this information is based on your consent, which means that you can, at any time, revoke your consent, after which we will delete the cookie and no longer process your information for this purpose. The easiest way for you to manage your cookies with us is through the functionality of our cookie banner, which you can reach through clicking on the cogwheel at the bottom of our websites.

## Create more relevant ads for you

**Why:** To deliver relevant ads on the Facebook network.

**How:** Through a Facebook Pixel first-party cookie, to track visits across websites.

**Personal data:** Facebook will, depending on your settings on that platform, identify you and show you ads that are relevant based on their data on you.

**How long:** Until consent is revoked or up to 90 days.

**Lawful basis:** Consent

## • Potential advertisers (Advertisers)

### Contact forms

**Why:** To answer your questions through various forms found on our websites (such as "Get in touch") and to inform about our services.

**How:** Our web-forms collect the information you provide us with.

**Personal data:** Depending on form and its purpose: First & Last Name, Phone, Email, Country, Category (your relation to us), and a free text message from you.

**How long:** We will process your personal data for as long as needed to provide you with answers and feedback, or as further communicated to you through our following correspondence.

**Lawful basis:** Legitimate interest.

**Why:** To inform about our services.

**Lawful basis:** Legitimate interest.

### **Marketing activities**

**Why:** To contact potential advertisers, we perform marketing activities.

**How:** Purchase contact lists from vendors and then contact the potential advertisers. We follow-up each contact point and send requested information.

**Personal data:** Name, email, telephone number and company name.

**How long:** Removed when not considered as prospect anymore, reviewed every six months and deleted after that.

**Lawful basis:** Legitimate interest.

## • Advertisers

### **Administration and communication to advertisers**

**Why:** To administer advertiser's account and send important information to advertisers.

**How:** Through various contact channels.

**Personal data:** Name, email, company, telephone number.

**How long:** Reviewed and deleted every 6 months after contract termination if not needed any more.

**Lawful basis:** Contractual relationship/agreement

### **Financial administration**

**Why:** In order to handle invoicing and payments correctly.

**How:** The information is used for communication and used as reference for invoicing and payments.

**Personal data:** Name, email, company, telephone number

**How long:** Up to 5-10 years depending on your resident country's bookkeeping laws. 50 years in Poland according to Polish bookkeeping laws.

**Lawful basis:** Contractual relationship/agreement

## • Publishers (influencers)

### **Payment of commissions and book-keeping**

**Why:** To fulfill the agreement with our publishers and influencers and fulfil the legal obligation of bookkeeping and tax laws.

**How:** To process payments and make sure we calculate the correct commissions as well as report information to tax authorities and document the payments in our bookkeeping.

**Personal data:** Name, address, personal identification number (Sweden), date of birth, bank account details and email address.

**How long:** We store information regarding Publisher's and influencers in accordance with local bookkeeping and tax laws.

**Lawful basis:** Contractual relationship/agreement and legal obligation.

### **Account management**

**Why:** All registered influencers/creators have an account in our portal where they can log in.

**How:** To administer their account.

**Personal data:** Name, address, email address, username, images incl videos

**How long:** Until the Influencer/creator remove their account.

**Lawful basis:** Contractual relationship/agreement

## • Contacting us on other matters

**Why:** To respond to various requests, such as applications to work for us, and questions about our services.

**How:** Through contact forms on our website or by contacting us directly using the direct email addresses found on our websites.

**Personal data:** What you provide us, including your email address.

**How long:** Until we have handled your request.

**Lawful basis:** Legitimate interest.

## 5. Who does Tradedoubler disclose your personal data to?

Your personal data may be transferred to, and processed by:

- Subprocessors and other data controllers

Subprocessors are companies that act only on our specific instructions, and which do not process or in any way use your personal data for their own purposes. We have signed a data processing agreement with all of our processors.

Categories of subprocessors:

- IT-hosting/Cloud hosting providers
  - CRM system provider
  - Email system provider
  - Payment system providers/Banks
  - ERP-provider
  - Voucher code providers
- Other Controllers
    - Facebook and Google - these parties have their own use for your personal data and we will only transfer your data to them after first informing you.
    - Tax Authorities, for compliance with local tax laws and regulations. Only for data subjects in Sweden and Norway.

### **Third country transfers**

For any of the purposes described herein, personal data may be transferred to our processors, business partners and other controllers outside of the EU/EEA ('a third country'). We have strict guidelines to check that those recipients, which are handling your personal data, are doing so in a lawful and secure way in accordance with the data protection legislation.

This means that we ensure that the transfer is only made to countries where the recipients have made sure that there is either an Adequacy Decision in place from the EU Commission, or that another approved transfer mechanism under the GDPR, including standard contractual clauses ((EU) 2021/914), have been put into place.

For example, the UK, which we transfer data to, holds an Adequacy Decision. Should any of the recipients reside in a country without adequate legal protection for personal data, we will make sure the recipient adopts appropriate safeguards and enter contractual arrangements with the recipient of the personal data.

You have a right to know when we transfer personal data to a third country and the appropriate safeguards relating to the transfer.



## 6. How Tradedoubler protects your personal data

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

Our employees must comply with our security standard and they are all bound by confidentiality clauses. GDPR and information security staff trainings are performed annually. When we occasionally use third-party contractors to perform tasks that might otherwise be performed by our employees, these contractors are contractually bound to similar restrictions as our employees.

## 7. Your privacy rights

You have several privacy rights that you can exercise. The following is a summary of these rights. To exercise your rights please contact us by using the contact details below. Please note that all rights are not applicable for all processing of personal data, some are restricted to certain lawful basis (see each processing activity above for which lawful basis is applicable). One of your rights is the right to information which we do our best to meet by this Privacy Policy.

- We will rectify any incorrect information upon request.
- You can request us to erase your personal data. We will then assess which information we can erase, since some information might be necessary for us to keep. For example personal data processed based on your consent can be deleted, but not information we need to fulfil our commitment under the agreement with you or your employer.
- You also have the right to object to the processing of your personal data based on the lawful basis legitimate interest. If we process your personal data for direct marketing purposes, we will cease to do so directly. For other purposes we will assess whether we have compelling legitimate grounds for continued processing or not, in your particular case. You may request a copy of the personal data that we hold about you via a "Data Subject Access Request". A Data Subject Access Request will include a confirmation whether we process your personal data or not, and if that is the case you will receive a copy of what personal data we process about you, together with information on where such information has been collected, for which purpose the information is being processed, and information on any recipients of your personal data.
- You have the right to request that we restrict our processing of your personal data under the following circumstances:
  - The accuracy of the personal data is under examination,
  - The processing is unlawful or no longer necessary, but you oppose erasure of the data,

- We no longer need the personal data, but it is necessary for us to keep the personal data for you to be able to establish, exercise or defend a legal claim,
- You have objected to the processing of your personal data and such objection is under verification.
- If we process your personal data based on consent or contract and we have received the personal data from you, digitally, you have a right to request us to export that data, which is called data portability.
- You also have the right to lodge a complaint to the Data Protection Authority (Supervisory Authority) in the EU Member state you live, if you think that we have not respected your data privacy rights or processed your personal data wrongfully. Here you will find the contact details to the Supervisory Authorities in each EU member state.
  - If you have any comments or questions about our processing, we would like you to contact us first, so that we have a chance to help you and answer your questions.

When you request to exercise your rights, we will first identify you in order to ensure that we give the correct information to you, and only you. How the identification process is performed depends on what personal data we process about you. We will then process your request without undue delay and at latest reply to your request within a month or explain to you if and why it takes longer.

## 8. Contact details to us and Supervisory Authorities

For general inquiries and questions concerning this Privacy Policy or how we process personal data, please send an e-mail to one of the following addresses:

You can contact our Data Protection Officer, which is independent from us, with the mission to monitor, inform and advise on our data processing.

- [dpo@tradedoubler.com](mailto:dpo@tradedoubler.com).

Send an e-mail to [privacy@tradedoubler.com](mailto:privacy@tradedoubler.com) if you want to exercise one of your rights, such as

- Request that Tradedoubler shall not process your personal data for direct marketing purposes,
- Request that Tradedoubler rectify certain personal data held on you,
- Have a Data Subject Access Request (want a record of what specific data is processed about you),
- Want Tradedoubler to delete your personal data where possible.

Please provide relevant details including country you signed up with in your e-mail for us to be able to process your request or inquiry as promptly as possible.

If you have any comments or questions about our processing, we would like you to contact us first, so that we have a chance to help you and answer your questions. You

always have the right to contact the Supervisory Authority if you feel we have processed your personal data wrongly. You will find the EU Supervisory Authorities [Here](#).

## 9. Changelog

We are constantly improving and developing our services and websites, so we may change this Privacy Policy from time to time. If the changes are significant, we will provide you with a notice.

Current version: Adopted by the Board of Directors in December 2023

Previous versions: Adopted by the Board of Directors in May 2023, May 2022, May 2021, May 2020, May 2019, April 2018

## 10. How does Tradedoubler use cookies?

### What are cookies?

Cookies is a term used to sum up different technologies that store or retrieve data on or from your device. A website or app can use different types of cookies to collect information about you, your electronic device (mobile phone, computer, tablet etc.) and your behaviour (e.g. how you browse a website).

Cookies can either be a session cookie or a permanent cookie. A permanent cookie remains on the visitor's computer for a set period of time. A session cookie is temporarily stored while the visitor is on a web page. Session cookies disappear when the visitor closes their browser.

Cookies are used for different purposes, such as to improve the website with better experience and search possibilities on a website. Cookies can also be collected for statistical and analytical purposes. The different purposes are usually described as "categories".

### We use four different categories of cookies:

- **Necessary cookies:** Are types of cookies that are essential for the website to function properly, without which the site would not work as intended. Necessary cookies are also cookies that save certain settings you do, e.g. change language at the website. Necessary cookies do not require consent and will always be placed, unless you disable cookies in your browser.

- **Functional cookies (“preferences”):** Are types of cookies that are used to enhance the performance of a website. Without functional cookies, some features or functions of a website may not be available.
- **Analytics cookies:** Are types of cookies used to track website visitors and their user behaviour. The collected information is used to improve the performance of the website and improve user experience.
- **Marketing cookies:** Marketing cookies are used to track visitors across websites to allow publishers to display relevant and engaging advertisements.

If you are a registered Advertiser or Publisher, the cookie will also manage and control your login and session on those part of our websites that are only available to registered Advertisers or Publishers.

## What type of cookies does Tradedoubler use?

The tables below explain the cookies we use and why we use them their purpose. The tables are divided by the different websites used within the Tradedoubler Group.

More information about the cookies can be found i our cookie notice, at each website.

### [Metapic.com](#)

| Cookie name     | Description  | Storage time | Type of cookie    |
|-----------------|--|--------------|-------------------|
| i18n_redirected | Cookie used for browser language detection to redirect web visitor to preferred language.        | 1 year       | Functional cookie |
| laravel_session | laravel uses laravel_session to identify a session instance for a user.                          | 2 years      | Necessary cookie  |
| _ga_*           | Google Analytics sets this cookie to store and count page views.                                 | 2 years      | Analytics cookie  |
| _ga             | Google Analytics sets this cookie to calculate visitor, session and campaign data and track site | 2 years      | Analytics cookie  |

|                  |  |          |                   |
|------------------|--|----------|-------------------|
|                  | usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.           |          |                   |
| <b>_fbp</b>      | Facebook sets this cookie to display advertisements when either on Facebook or on a digital platform powered by Facebook advertising after visiting the website. | 3 months | Marketing cookie  |
| <b>cookiehub</b> | Store cookie consent preferences.  | 1 year   | Functional cookie |

[Tradedoubler.com](https://www.tradedoubler.com)

| Cookie Name                       | Description   | Storage time   | Type of cookie    |
|-----------------------------------|---|----------------|-------------------|
| <b>wpml_browser_redirect_test</b> | This cookie is set by WPML WordPress plugin and is used to test if cookies are enabled on the browser. This cookie is enabled for all site visitors if you use the Browser language redirect feature. | Session cookie | Functional cookie |
| <b>_icl_visitor_lang_js</b>       | WPML sets this cookie to store the redirected language.   | 1 day          | Functional cookie |

|                  |  |                |                   |
|------------------|--|----------------|-------------------|
| <b>_lcST</b>     | This cookie is used to monitor website performance for statistical purposes.   | Session cookie | Functional cookie |
| <b>elementor</b> | The website's WordPress theme uses this cookie. It allows the website owner to implement or change the website's content in real-time. | Not saved      | Necessary cookie  |

[Grow.tradedoubler.com](https://grow.tradedoubler.com)

| Cookie Name                                     | Description   | Storage time      | Type of cookie    |
|---|---|-------------------|-------------------|
| <b>ip2location_redirection<br/>_first_visit</b> | This cookie is used to direct web visitor to the most relevant webpage, e.g. if a user is browsing from Sweden, the cookie will redirect the user to the Swedish website. | 1 day             | Functional cookie |
| <b>wpml_browser_<br/>redirect_test</b>          | This cookie is set by WPML WordPress plugin and is used to test if cookies are enabled on the browser.  | Session           | Functional cookie |
| <b>_icl_visitor_lang_js</b>                     | WPML sets this cookie to store the redirected language.   | 42 days, 16 hours | Functional cookie |

|                     |  |                  |                   |
|---------------------|--|------------------|-------------------|
| <b>_gcl_au</b>      | Used by Google AdSense to understand user interaction with the website by generating analytical data.  | 90 days          | Functional cookie |
| <b>mp*_mixpanel</b> | Mixpanel sets this cookie to determine how web visitor use the website so that a good user experience can be provided.   | 1 year           | Analytics cookie  |
| <b>_fbp</b>         | Facebook sets this cookie to display advertisements when either on Facebook or on a digital platform powered by Facebook advertising after visiting the website.   | 3 months         | Marketing cookie  |
| <b>__hstc</b>       | Hubspot set this main cookie for tracking visitors. It contains the domain, initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session). | 5 months 27 days | Analytics cookie  |

|                   |  |                  |                   |
|-------------------|--|------------------|-------------------|
| <b>hubspotutk</b> | HubSpot sets this cookie to keep track of the visitors to the website. This cookie is passed to HubSpot on form submission and used when deduplicating contacts.   | 5 months 27 days | Analytics cookie  |
| <b>__hsrc</b>     | This cookie is set by Hubspot whenever it changes the session cookie. The __hsrc cookie set to 1 indicates that the user has restarted the browser, and if the cookie does not exist, it is assumed to be a new session. | Session          | Necessary cookie  |
| <b>__hssc</b>     | HubSpot sets this cookie to keep track of sessions and to determine if HubSpot should increment the session number and timestamps in the __hstc cookie.  | 30 minutes       | Necessary cookie  |
| <b>__cf_bm</b>    | Cloudflare set the cookie to support Cloudflare Bot Management.  | 1 hour           | Necessary cookies |
| <b>cookiehub</b>  | Used by CookieHub to store information about whether visitors have given or declined the use of cookie   | 1 year           | Necessary cookies |



|               |   |         |                  |
|---------------|---|---------|------------------|
|               | categories used on the site.  |         |                  |
| <b>_cfuid</b> | Used by Cloudflare WAF to distinguish individual users who share the same IP address and apply rate limits. | Session | Necessary cookie |

## 11. Information to visitors of our Publishers' and Advertiser's websites

Advertisers provide us with personal data for Tradedoubler to attribute sales and leads to Publishers. Publishers provide us with personal data to track sales.

When you visit one of our Publishers and/or Advertisers and click on one of the links that they have been provided with by us, information such as your IP address, cookie ID and order number will be sent to us to be processed on behalf of our advertisers, the Advertisers. The overall purpose to collect your personal data is to provide our Affiliate marketing services to our Advertisers and to enable them to advertise through our Publisher network.

We are a Processor for the personal data collected by the cookies described below. In accordance with our business agreements for our services, the publishers collect consent from their website visitors. This information is only for informational purposes, and not something Tradedoubler is a controller of.

### Cookies involved in Tradedoubler's tracking for publishers and advertisers

| 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)                                 |
|-------------|--|
| <b>UI</b>   | 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. |

|         |   |
|---------|---|
| PL      | 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 programs that have post impression tracking activated   |
| EH_0    | The Event History Cookie contains information about up to tree latest tracks (clicks) and the ten latest closures per program. This information is used to be able to connect clicks with closures. |
| GUID    | 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  |