

Adform Website Privacy Notice

Adform respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you when you use our website, and how you can exercise your privacy rights. This Privacy Notice only applies to personal information that we collect through our website at [adform.com](https://site.adform.com) (“Website”). For personal information that we collect when you use or interact with our services, please see our services privacy notice at <https://site.adform.com/privacy-center/platform-privacy/product-and-services-privacy-policy>.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

Quick links

We recommend that you read this Privacy Notice in full to ensure you are fully informed. However, if you only want to access a particular section of this Privacy Notice, then you can click on the relevant link on the navigation pane to the left to jump to that section.

What does Adform do

Adform is a provider of digital advertising technology, headquartered in Denmark with subsidiaries (“Adform Group”) all around the world. Our services enable advertisers to serve online adverts which users are likely to find more interesting, to only serve ads to those that might be interested and to limit unwanted repeat exposure to ads.

For more information about Adform, please see the “About” section of our Website at <https://site.adform.com/company/about/>.

What personal information does Adform collect and why?

The personal information that we may collect about you broadly falls into the following categories:

- *Information that you provide voluntarily*

Certain parts of our Website may allow you to provide personal information voluntarily: for example, we may ask you to provide your contact details in order to register an account with us, to subscribe to marketing communications from us, and/or to submit enquiries to us. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you

at the point we ask you to provide your personal information.

- *Information that we collect automatically*

When you visit our Website, we collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically can include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them and how certain features are used. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website and services. We may also use the data for targeting and tailoring online advertisement.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” below.

- *Information that we obtain from third party sources*

From time to time, we may receive data about you from third party sources such as data vendors or social media, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we may receive from third parties are such as segments that can be used for online advertising or any information that we could use to improve our advertising content and audience targeting.

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

The data controller of your personal information is Adform A/S.

Who does Adform share my personal information with?

We may disclose your personal information to the following categories of recipients:

- to **Adform Group companies, third-party services providers and partners who provide data processing services to us** (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information. A list of our current Adform Group companies is available here: <https://site.adform.com/company/affiliates/adform-as/>
- to any **competent law enforcement body, regulatory, government agency, court or other third party** in case it should occur that we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to a **potential acquirer** of Adform and its agents/advisers in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to any **other person with your consent to the disclosure.**

Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we need the personal information to fulfill our contractual obligations with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in relation to our legitimate interests (or those of any third party), this interest will normally be to operate our platform

and communicate with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us by sending an email to dpo@adform.com.

Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you, including to serve interest-based advertising. We use cookies for:

- Recording the number of visitors to our Website;
- Setting the order in which a visitor visits the various pages to our Website;
- Assessing which parts of our Website or services need adaptation;
- Optimizing the Website;
- Targeting and tailoring advertising towards previous visitors and users; and
- Segmenting users according to relevant categories for our advertising.

For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie notice at <https://site.adform.com/privacy-center/website-privacy/cookie-policy/>.

How does Adform keep my personal information secure?

We use appropriate technical and organizational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

To ensure a high standard, Adform conducts annual audits and has received ISO 27001 certification which includes all data centers.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you reside. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our Website servers are located in Denmark, but Adform Group companies, third-party service providers, and partners may provide their services out of other countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect the personal information they process from the EEA in accordance with European Union data protection law.

Our Standard Contractual Clauses can be provided on request. We have implemented similar appropriate safeguards with our third party service providers and partners and further details can be provided upon request.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by sending an email to dpo@adform.com or exercising your right via standard data subject rights request forms at <https://site.adform.com/privacy-center/platform-privacy/> and <https://site.adform.com/privacy-center/corporate-privacy/>.

- In addition, you can **object to the processing** of your personal information, ask us **to restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by sending an email to dpo@adform.com or exercising your right via standard data subject rights request forms at <https://site.adform.com/privacy-center/platform-privacy/> and <https://site.adform.com/privacy-center/corporate-privacy/>.
- If you chose to receive **marketing communications** from us, you have the right to **opt-out** at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “Contact us” heading below or by following this link <https://site.adform.com/contact-us/>.
- Similarly, if we have collected and processed your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. A list of the relevant data protection agencies can be found here: (http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

How to contact us

Adform has appointed a Data Protection Officer. If you have any questions or believe your personal information has been used in a way that is not consistent with this notice or applicable legislation, or you have any other data protection related issues or queries, please, contact our Data Protection Officer by e-mail sent to dpo@adform.com.

Written inquiries may be addressed to:

Data Protection Officer
 Adform A/S
 Wildersgade 10B, 1. sal. 1408 Copenhagen, Denmark

Updates

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take

appropriate measures to inform you, consistent with the significance of the changes we make.

This Privacy Notice will always include information on the effective date of the most recent version.

Effective date of the recent update of this Privacy Notice

Version applicable until 10th of February 2020.