

Introduction

Last updated on 30th of April 2020. See previous versions at the bottom of this Privacy Policy.

Adform is a technology company which delivers online advertising services for the world's largest websites and advertisers, and we collectively refer to them as the "Services" in this document. Our Scandinavian roots mean that we take privacy very seriously. We would like to be transparent about our business and explain our technology in plain language so that users can understand how our Services process personal data. This Privacy Policy describes Adform's practices and policies with regard to the use and processing of data when providing the Service. It also has descriptions of how Adform enables or allows its clients to use the Services. Our clients and third-party partners using the Services own their own data, and Adform has only limited rights to use such data for the purpose of providing the Service on behalf of these third parties. This Privacy Policy does not describe the collection and use of data by Adform from its own corporate websites, which can instead be found here <https://site.adform.com/privacy-center/website-privacy/website-privacy-policy/>.

To ensure online privacy, Adform complies with the EU General Data Protection Regulation (GDPR), e-Privacy Directive and supports initiatives for self-regulation such as World Wide Web (W3), Privacy Preferences Projects (P3P), Internet Advertising Bureau (IAB) Good Practice Principles for Online Behavioral Advertising "OBA" (including Mobile), is a member in good standing of the Network Advertising Initiative (NAI) and adheres to the NAI Code of Conduct for Web and Mobile, and is certified within European Interactive Digital Advertising Alliance (EDAA) and has been granted the corresponding Trust Seal.

What we do

Adform provides a digital advertising technology platform. The platform provides tools for advertisers to buy advertising space on digital properties such as websites and mobile applications, and for publishers of websites and mobile applications to offer and sell their advertising space. We also provide tools to manage, buy, and sell data that can be used to ensure that advertisements are shown to users who are likely to have an interest in a particular ad, and we provide a technology that enables the delivery of advertising content to a website or mobile application. The Service also comprises other tools, such as features to measure the effectiveness of ads, to prevent fraudulent activities and malware, and to predict the reach of ads. The Service is provided and operated by Adform A/S, Silkegade 3B, ST. & 1., 1113 Copenhagen, Denmark.

What Information Do We Collect and Use

When we refer to the term "Information", we mean data that is generated through the Service as well as data that our clients and partners receive from other sources and use in our Service as described in further detail below. For some of the Information, Adform is legally responsible for the use of the data with respect to privacy regulation – in legal terms it acts as a Controller. Other parts of the Information are processed by Adform on behalf of its clients, and Adform is bound by the instructions of its clients when processing such data. This Privacy Policy describes how Information controlled by Adform is used within the Service. While this Privacy Policy may also explain how Adform enables its clients to use their Information within the Service, it does not otherwise apply to the use of Information by our clients or other third parties outside of the Services.

In order to operate the Service, Adform may collect and use the following Information:

- Cookie ID

In order to link each single interaction to an individual device, Adform generates a unique device ID for every new device which interacts with any form of Adform advertisements or website tracking. The unique device ID is stored locally by using a Cookie in the user's browser. The Cookie, by default, expires 60 days after the last interaction. The device ID is either generated as a truly random number or in some cases combined with an ID generated by static and dynamic variables from the browser and device configuration.

- Mobile Advertising ID
- The Mobile Advertising ID is the technical ID in Mobile App Environments, e.g., on smartphone operating systems like Android and Apple IOS, that is under full control of the user and owner of that device and that can be reset by the user.
- Cross-Device IDs
- This ID is a user ID generated by Adform by using statistical and probabilistic algorithms in an attempt to link devices and identifiers belonging to the same user. Adform generates and purchases 3rd party Cross-Device IDs for the purposes described in further detail below.
- Partner IDs
- Adform is connected to a large number of partners such as Google, Adobe, Oracle, Amazon, and many others. In order to enable the provisioning of our services in the cookie-based advertising ecosystem, Adform automatically exchanges

pseudonymous IDs with such partners. These IDs are strictly pseudonymous on both sides. ID synchronization is an essential prerequisite for the provision of the Service.

Adform also collects and stores certain Information for its clients related to the interaction that users have with ads and digital properties such as websites or mobile apps:

- The type of browser used by a user, and its settings.
- Information about the device operating system.
- Information about Cookie IDs and other IDs assigned to a device.
- IP addresses from which a device interacts with a client's website or mobile application; IP addresses may be truncated or encrypted or both based on local legislation or other requirements.
- Information about a user's interaction and activity on web pages and mobile apps, including time of the interaction or activity, the internet addresses involved, and search terms entered into a search engine.
- Information about the approximate geographic location (city, region, zip code) of the device when it accesses a website or mobile app derived from truncated IP address information or truncated GPS data.

Adform may also receive Information from third parties to enable targeted and tailored advertising on websites and mobile applications. While Adform may provide such data for use by its clients through the Service, it will always do so strictly in accordance with the permissions and restrictions imposed by the third party providing such data.

Adform does not collect, use, or allow its clients to transfer to or use on the Platform, data that, by itself, directly identifies an individual, such as name, address, phone number, email address, or government identifier. We also prohibit certain categories of sensitive data from being collected, used, or transferred on the Platform, and we use technical solutions to detect directly identifiable data in the Service and take appropriate action. To enforce this principle, we actively scan data for any breaches as such.

How we collect Information

The Service uses cookies, beacons, tagging scripts, mobile SDKs and pixels to collect Information associated with a browser or mobile device. Adform also participates in the exchange of IDs with partners.

Cookies are small text files stored in a web browser by a website or ad server. By saving information in a cookie, websites and servers can remember preferences or recognize web browsers from one visit to another or from one website to another.

Beacons, pixels, tagging scripts, and mobile SDKs are elements allowing communication between a web browser and a server. A beacon or pixel is a small transparent image that is placed on a web page. A tagging script is a small piece of website code that is run by the web browser. A mobile SDK is a piece of computer code that runs in mobile applications.

We may also receive Information from our partners and clients via server-to-server connection, or via secure file transfer.

Our Use of Cookies

Adform uses cookies for different purposes. When we refer to the term "cookies", we mean cookies and other identifiers, such as mobile advertising identifiers. Generally, cookies enable our clients to target ads to users, to evaluate how well their ads work, and to see users' opt-out choices. For a detailed description of our cookies, see at <https://site.adform.com/privacy-center/adform-cookies/>. The purposes for which we use cookies are as follows:

- The use of cookies enables our clients to distinguish between and recognize web browsers, and to store Information for advertising purposes, including targeted and tailored advertising.
- The use of cookies allows us to store data about the delivery of ads for reporting purposes, such as which ad was shown, the frequency of an ad, and the last time an ad has been delivered to a particular browser.
- The use of cookies enables our clients to track user responses (clicks and conversions) to ads purchased on the platform.
- We use cookies to participate in the synching of devices across different platforms.
- The use of cookies enables our clients to use cross-device linking, i.e. a feature that predicts whether cookies from different browsers or devices might be associated with each other.

How do we use this Information

Adform uses the Information to provide services to its clients. These services comprise many features for which Information may be used. In particular, Adform may process Information for the following advertising-related purposes:

- We use Information to analyze and report on advertising performance. The Information is processed so that user actions can be attributed to campaigns, targeting data, publishers, and specific advertisements.
- We use Information to improve online advertising experience and efficiency, e.g. to display ads in a sequence, display particular products in response to users' interest, display ads based on statistical probabilities, or to decide what ad to show or whether to show it. This includes capping the frequency of ads shown to a particular user, and the prediction of a likelihood that a particular user will interact with an advertisement.
- We may use IDs for cross-device mapping in order to limit advertising exposure for consumers and facilitate more relevant advertising.
- We may use Cookies and IDs to satisfy end user opt-out requests.
- We may use Information in order to detect traffic that is not "real" traffic, and to prevent fraudulent activities, such as the use of robots, malware and other suspicious activities.
- We may use Cookie IDs and other IDs to synchronize our Service with other online advertising services. This process is a core function of the digital advertising ecosystem, as it enables our clients to link up data from multiple advertising services providers. No other Information is used for this purpose.
- We may use Information to facilitate the process of buying and selling online advertising. This includes calculating a price for a bid or bid request, and submitting bid requests or bids to third-party partners.
- Within the purposes explained in this section, we may also use Information and IDs for internal research and development, i.e. to analyse the use of our services; to design new, and improve existing, features and functionality of our services; and to develop and train the computer algorithms which form part of our services.

With whom we share Information

With Clients

The Services allow clients to provide and share Information with each other. Clients have access to the Information they collect, upload or use within the Services, and may have access to Information generated through their use of the Service.

With Third Parties

We may share Cookie IDs or other IDs with partners for the purpose of ID synchronization. A list of such partners is available at: <https://site.adform.com/privacy-center/adform-cookies/>.

We may also share Information with our affiliates and third-party services providers who provide data processing services to us and support us in providing our Service (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Service), or who otherwise process Information for purposes that are described in this Privacy Policy.

If instructed by our clients, we may also share Information that is controlled by our clients and which we process on behalf of our clients with third parties.

Also, we may disclose Information to the following categories of recipients:

- To a potential buyer (and its agents and advisers) in connection with any 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 Policy.
- To any competent law enforcement body, regulatory, government agency, court or other third party where 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 any other person with your consent to the disclosure.

Data Retention

The Cookies Adform sets in browsers expire 60 days after the last interaction.

Mobile Advertising IDs are technical IDs in mobile application environments. Mobile Advertising IDs are resettable by the user; however Adform does not have control of a Mobile Advertising ID. Adform will see the same Mobile Advertising ID as long as it is not changed by the device user or updated by the device.

Adform does not keep any Cookie-based Information longer than 13 months. In other words, any data that can be related to your internet devices are deleted after maximum 13 months.

International Data Transfers

Information may be transferred to and processed in countries outside of the European Union. These countries may have data protection laws that are different from the laws of your country and, in some cases, may not be as protective.

Some of the recipients of Information may operate outside the European Union (e.g. in the United States of America). This means that when we transfer your information to these

third parties, your information will be processed outside the European Union. We have taken appropriate safeguards to ensure an adequate level of data protection in accordance with this Privacy Policy on the side of the recipients.

Legal Basis for Processing

If you are a visitor from the European Economic Area (EEA), our legal basis for collecting and processing the information described above will depend on the information concerned and the specific context in which we collect and process it.

We collect and process Information only where we have your consent (Article 6, paragraph 1 of GDPR) or where we have a legitimate interest to do so.

By way of example, we rely on our legitimate interests to process cookie IDs for advertising-related purposes, including the purposes mentioned in the section "How do we use this information?" above. Where we process Information on behalf of our clients, we may process Information on the basis of consent obtained by our clients, or where our clients have a legitimate interest to use the Information within the Service.

If you wish to learn more about specific legal ground(s) we rely on to process your information for any particular purpose (including any legitimate interests we have to process information), then please contact us using the details provided below under "Contact Us".

Data Security and Protection

Adform implements high standard security measures to protect all data collected, used and processed by Adform on behalf of its clients. At every step, Adform adapts all relevant security and safety practices, and employs modern security hardware and software provided by recognized world-leading manufacturers. Physical environment security is also ensured; thus, Adform solutions are hosted and data are stored only in Tier 3 or Tier 4 data centers, classified according to official data center classification.

Adform conducts annual ISO 27001 audits and certifications which includes all data centers and internal processes within Adform.

[Linking to Other Sites](#)

Ads served by Adform usually link to other web sites, which may have privacy assurance practices that differ from ours. Adform does not control and cannot be held responsible for the content of these web sites and data collection on these web sites by any third

party. To make sure your privacy is protected, please consult the respective privacy policy of the web site you are visiting.

Your Data Protection Rights

You have the following data protection rights:

- If you wish to opt-out from targeted advertising that employs the Service, please refer to the section "Internet User Choices" below.
- 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, if you are a resident of the European Union, you can object to 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 receive any Adform newsletters by email then you have the right to opt-out these at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the e-mails.
- If you have given any website your consent to use Adform, then you should be able to withdraw your consent at any time on the same website where you have given it. 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.
- We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Your California Data Protection Rights

If you are a California resident you may have the following rights: right of information and access, right of deletion, right of non-discrimination when exercising your rights, right of

opt out. Your options regarding the personal information that Adform may collect or receive about you are described in **Your Data Protection Rights** of [Adform Product and Services Privacy Policy](#) and in **Rights of Data Subject** of [Corporate Privacy Policy](#).

Internet User Choices

Adform allows Internet Users to Opt-out of:

- Cookie-based targeted advertisements using Adform technology for online behavioral advertisements (OBAs)
- Tracking of visits across domains of different media or advertisers' sites through Adform technology
- Any type of cookie-based tracking by third-party technology through Adform
- Mobile device-based targeted by changing settings/resetting advertising identifiers on Android and Apple IOS

Opting-Out from Targeted Advertisements and Tracking on Websites

The opt-out process erases the previously set cookie and places an alternative Adform cookie into the Internet user's browser with a special indication of an "opt-out" choice and with no other data. Since random identification numbers of those two cookies are different, no data attributed to the previously set cookie can be attributed to the new "opt-out" cookie.

The cookie applies to the specific computer or mobile device and browser combination only. If an Internet user wishes to opt-out on other browsers, computers or mobile devices, he or she must repeat the process. Please also note that if all cookies are erased from the computer or mobile device, the opt-out cookie is also erased and the process must be repeated. Furthermore, if cookies on your browser are blocked or if for other reasons third-party cookies are blocked by default, the opt-out may not function. Unfortunately, cookie-based opt-out is in many cases the only technical way Adform is able to recognize that you have decided to opt-out. Please click <https://site.adform.com/privacy-center/platform-privacy/opt-out/> if you wish to opt-out from targeted advertisements and tracking on Websites.

Opting-Out from Advertising and Tracking in Mobile Applications

For opt-out of ad tracking and targeting on many mobile devices such as iPhones, iPads, Android, TV streaming devices, or other Smart TV devices, you should preferably consult your device settings and instructions provided by the device manufacturer. Below is

exemplary information solely for informational purposes for which we disclaim any warranty or representation that the opt-out methods will work or that they are most current. For user's choices and to learn more on how to opt-out of advertising that uses identifiers provided but Connected TV systems, click [here](#).

1. Apple iOS Example

On iOS version 14 and later only, you may withdraw your consent by disabling the “Allow Apps to Request to Track” setting in your iOS settings (precise directions may be different on different iOS versions).”

On iOS version 13 and earlier only:

- Opt-out of ads targeted based on location. Open “Settings”, tapping “Privacy,” tapping “Location Services”, tapping “System Services”, and sliding the Location-Based iAds switch to “off”.
- Opt-out of targeted advertising. Open “Settings”, tap on “Privacy”, then “Advertising”, and set Limit Ad Tracking to “on”.
- To reset your Advertising Identifier on iOS, open “Settings”, tap “Privacy”, tap “Advertising”, and tap “Reset Advertising Identifier”.

2. Android Example

Open the Google Settings app, select Ads then “Reset advertising ID” and choose “Opt-out of interest-based ads”.

You may also choose to opt-out from interest-based advertising via the [Network Advertising Initiative](#).

Do Not Sell My Information

When using Adform's Services, Adform clients may buy and sell personal information as defined in the CCPA. When a California resident wishes to exercise any of his rights with any of Adform's clients, the resident must make such request directly to those Adform clients, according to such clients' procedures as disclosed on their digital properties. Adform gives you the choice to opt out as described in the “ [Opt-out of Targeted Advertisement](#)”.

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 policy 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
Silkegade 3B, ST. & 1., 1113 Copenhagen, Denmark

More Information

To learn more about data collection, online behavioral advertisements, web analytics, cookies or other aspects from the perspective of Internet security and privacy, please visit these public sites: www.youronlinechoices.com and www.iabeurope.eu.

Updates

We may update this policy from time to time. We will post a prominent notice on our website notifying users when it is updated. Adform ensures that privacy practices described in this privacy policy are up to date and reflect current ad-serving and data collection mechanisms employed by Adform.

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