

Last Updated: July 18, 2018

## **PRIVACY POLICY - Advertising:**

This policy applies to the data VRTCAL (“**VRTCAL**,” “**we**” or “**us**”) receives from individuals (“**end users**” or “**you**”) who interact with Mobile Applications and Sites that use VRTCAL’s technology to provide you with ads. VRTCAL is committed to transparency, and we want you to fully understand how we may receive and share data relating to individuals (like you), and the choices that are available to you.

This privacy policy does not govern (i) the collection and use of data on our website ([www.vrtcal.com](http://www.vrtcal.com)) – that information can be found at <https://vrtcal.com/docs/PrivacyPolicy-Corporate.pdf>; and (ii) our customer’s collection, use and disclosure of information through their Mobile Applications and Sites, which is governed by their own privacy policies and practices.

### **About Us**

VRTCAL provides a digital advertising technology platform that connects advertising buyers (advertisers) with sellers (publishers, specifically Mobile Applications and Sites) of advertising inventory. Specifically, advertisers (or their agents) may use our technology to buy Mobile Application and Site inventory.

#### **A. Information We Receive**

When you visit a Mobile Site or use a Mobile Application that uses our technology, we receive and share with our advertisers, certain information about you and your device (“**User Information**”). Some of this information (including for example your IP addresses and certain unique device identifiers), may identify a particular device, and may be considered “personal data” in some jurisdictions, including the European Union.

Information that we receive and share includes:

- J) **Information about your device:** including information about your IP address, device make, device model, device operating system, device

operating system version, latitude/longitude location, carrier, and data connection type;

- J) **Information about your browser:** including information about your browser type and language, and browser history; and
- J) **Information about your behavior on our publishers' Digital Media Properties:** including information about the domain, your referring website addresses, date/time of visits, page view data, search keywords, visitor activities and actions on publisher's sites, referring/exit pages, platform type, date/time stamp, geolocation (including city, country, zip code, and potentially geographic coordinates if you have enabled location services on your device), click data, and types of advertisements viewed.

We do not collect any "sensitive" or "special categories of personal data" as defined under European data protection laws.

## How We Receive User Information

We use tags, cookies and other standard technologies to receive information:

- J) **"Tags":** Tags are blocks of code that we provide our Mobile Application and Site Publishers so that VRTCAL can receive User Information in the ad requests sent by publishers which VRTCAL shares with our advertisers in order to deliver advertisements.
- J) **Pixels:** Advertisers and VRTCAL embed a pixel in the advertiser's creatives to send back verification whether or not an ad has been rendered on a Mobile Application and Site. Advertisers pay when an ad is rendered so pixels provide a way for both VRTCAL and its advertisers to account for how many ads are rendered and thus how much publishers earn from advertisers.
- J) **Mobile device identifiers:** For Mobile Applications, VRTCAL currently does not have its own SDK, so third party SDKs collect and pass on to VRTCAL standard device identifiers, for example the "IDFA" advertising identifier used on Apple's iOS devices and the "Google Advertising ID" advertising identifier used on Android devices, to track your use of Mobile Applications.
- J) **Cookies:** Cookies are data files that often include a unique identifier, and are placed on a visitor's device or computer. We use cookies on our

customers' websites in order to operate our technology and receive User Information. For more information about cookies, and how to disable cookies, visit: <http://www.allaboutcookies.org>.

### **Other technologies:**

In addition, we also work with third party advertising platforms that may separately collect and use User Information to enable our and their customers to deliver targeted advertisements using our advertising technology. As an example, we work with companies that use information about your visits to various Mobile Applications and Sites across multiple devices in order to provide you content and ads of interest across those devices. Our customers may use this third-party data in combination with your User Information to deliver you targeted ads across multiple devices.

### **How We Share User Information**

We primarily share the User Information we receive to enable our customers to find and buy advertising space on publishers' Mobile Applications and Sites. In particular, our customers use information we pass on to them, in conjunction with other information they have independently collected, to deliver end users targeted advertising they believe will be of particular interest to you based on interests that might be inferred from the User Information that we share. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>. Secondly, because we adhere to the Digital Advertising Alliance's ("DAA") Self-Regulatory Principles as they apply to our activities, you can refer to <http://aboutads.info/principles>.

### **Legal basis for Processing User Information (EEA end users only)**

If you are an end user located in the European Economic Area, our legal basis for receiving and sharing the User Information is described above. We rely on our legitimate interest to receive User Information from you, except where such interests are overridden by your data protection interests or fundamental rights and freedoms. Where we rely on our legitimate interests to process your User

Information, they include the interests described in the section headed “How We Share User Information”.

If you have questions about or need further information concerning the legal basis on which we receive and use your User Information, please contact us using the contact details provided under the “Contact Us” heading below.

### **Information Retention**

We never store any data longer than we need it and we do not store User Information. We use internal ID’s to identify Publishers and their respective Mobile Applications and Sites and store accounting metrics such as Requests, Wins, Impressions, Revenues, Clicks, Completion Rates, and View Rates in order to properly invoice our Advertisers and pay our Publishers. We typically store aforementioned data for up to 90 days before we aggregate that data into summary reports.

### **Sharing of User Information**

We share User Information that we receive as follows:

- J) **Customer:** We share User Information with our advertisers to help them identify and buy advertising on publishers’ Mobile Applications and Sites. Customers may use this information in conjunction with other information they have independently collected to provide you targeted advertising and to help them evaluate whether a particular ad campaign may be of interest to you.
- J) **Vendors, partners and other service providers:** We may share User Information with our vendors and partners who perform functions on our or our customers’ behalf and require access to such information to provide us with services or do work for us. Examples include: analyzing data, fraud prevention, hosting data, engaging technical support for our technology platform, and performing analysis related to our technology platform and related services.

### **Information Our Customers and Vendors Use**

Our customers, our vendors, and our customers' vendors, who use our technology may use their own tags, pixels or other similar technology (or those of their other affiliates) within their advertisements and on certain Mobile Applications and Sites. We are not responsible for our customers, vendors and/or our customer's vendors use of such tracking technologies or for their privacy practices.

## **B. Your Opt-Out Choices**

You may opt-out of receiving targeted advertising that our Advertisers deliver using our technology. If you opt-out of targeted advertising, we will no longer share User Information described above from your device.

### Mobile Applications

Your device may give you the ability to opt-out of the use of information about the apps you use in order to serve you ads that are targeted to your interests ("Opt out of Interest-Based Ads" or "Opt out of Ads Personalization" on Android devices or "Limit Ad Tracking" on iOS devices). You may stop the collection of location information by particular apps or from your device as a whole at any time by changing the preferences on your mobile device.

- J For iPhone/iOS users: For instructions on how to "Limit Ad Tracking" on the iOS, please visit <https://support.apple.com/en-us/HT202074> or see the instructions below:
  1. Go to "Settings" > "Privacy" > "Advertising."
  2. Turn on "Limit Ad Tracking."
  
- J For Android users: For instructions on how to opt out of interest-based ads in the Android OS, please visit <https://support.google.com/ads/answer/2662922?hl=en> or see the instructions below:
  1. Open Google settings on your device (may be an application called Google Settings or an entry in your phone's Settings menu, depending on your device)
  2. Tap "Ads"

3. Switch on “Opt out of interest-based ads” or “Opt out of Ads Personalization.”

### Mobile Sites

Should you wish to opt-out of targeted advertising you receive via cookies on sites you access through a mobile web browser, VRTCAL directs you to two (2) options.

) VRTCAL’s opt-out feature located at <https://vrtcal.com/opt-out>.

Because our tracking mechanisms operate at the device and browser level, to fully opt-out across devices, you will need to do so on each device and browser individually.

If your browsers are configured to reject cookies, your opt-out may not be effective, since we identify your choice to opt-out based on an opt-out cookie we deliver to you. In this case, you will need to confirm that your browser is configured properly in order for the opt-out to be effective.

) NAI instructions.

Please refer to this link for instructions on browser controls:  
<http://www.networkadvertising.org/understanding-online-advertising/what-are-my-options>.

### Precise Location Data

VRTCAL relies on mobile publishers to receive proper opt-in consent from consumers before passing it precise location data. Below are links for how to find out what data you have permissioned on different mobile applications on Android and iOS:

#### Android:

For Android 6.0 and above:

- <https://support.google.com/googleplay/answer/6270602?hl=en>

For earlier versions of Android:

- <https://support.google.com/googleplay/answer/6014972>

iOS:

- <https://support.apple.com/en-us/HT207056>

### **C. European Data Subject Rights**

If you are a resident of a country in the European Economic Area (“EEA”), you have certain rights and protections under the law regarding the collection, processing, and use of information about you. As stated above, the information that we share about you when you visit Mobile Applications and Sites that use our advertising technology may include certain digital identifiers that are considered “personal data” under European law. We process this data as it is necessary to further the legitimate interests of our publisher customers, who rely on the ability to deliver you and other users with advertisements (including targeted advertisements) in order to fund the Mobile Application and Site content they deliver to you.

As a resident of a country in the EEA, you have the right: (i) to request access and obtain a copy of your User Information, (ii) to request rectification or erasure; (iii) to restrict the processing of your User Information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your User Information.

If you would like to exercise this right, please see our Subject Access Request policy for instructions on how to do so: <https://vrtcal.com/docs/subject-access-request-policy.pdf>. Please note that because most of the information we receive can only identify a particular browser or device, and cannot identify you individually, we require you to provide us with some additional information to ensure that we provide you with accurate information.

### **D. Security**

We use industry-standard technical and organizational security measures to help protect information transmitted over or stored on our systems. Please note that no transmission or storage of information, however, can never be guaranteed to

be completely secured, though we take all reasonable precautions to protect against security incidents.

#### **E. Changes to this Policy**

This Privacy Policy may be amended or updated from time to time. You are advised to consult this Privacy Policy regularly for any changes.

#### **F. Contact Us**

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact VRTCAL by e-mail at [info@vrtcal.com](mailto:info@vrtcal.com) or by post using the details provided below:

**VRTCAL Markets, Inc.**  
Attn: Privacy Officer  
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Santa Barbara, CA 93101