

PRIVACY POLICY

PRIVACY POLICY - Advertising

VRTCAL is committed to transparency, and we want you to fully understand how we may collect, use, and share data relating to you, and the choices that are available to you. This Privacy Policy governs our collection and use of data on websites and apps that use VRTCAL's technology to provide you with ads.

A. Information We Collect

When you visit a website or use an application that uses our technology, we collect certain information about you and your device. Some of this information (including for example your IP addresses and certain unique device identifiers), may identify a particular computer or device, and may be considered "personal data" in some jurisdictions in the European Union and elsewhere.

Information that we collect includes: IP address, domain, browser type and language, referring website addresses, date/time of visits, page view data, search keywords, visitor activities and actions on publisher's sites, browser history, Internet service provider, referring/exit pages, platform type, date/time stamp, geo-location (including city, country, zip code, and potentially geographic coordinates if you have enabled location services on your device), click data, types of advertisements viewed, and information about your device including device make, device model, device operating system, device operating system version, and data connection type. We do not collect any "sensitive personal data" as defined under European data protection laws.

How We Collect User Information

We use cookies and other standard web technologies to collect information, including:

- J "Tags and Pixels" are blocks of code that we and our customers may use to track your navigation of websites or apps using our technology, and your browsing behavior. We use pixels to synchronize information that we have collected with information independently collected by our customers and other third parties that are interested in providing you with ads.
- J "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 collect User Information. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>
- J "SDKs" or "Software Development Kits" are blocks of code similar to tags and pixels that are embedded into an app that allow us to track certain information relating to your use of apps using our technology.
- J Additionally, we use other technologies, including locally stored objects, to collect User Information in order to assist with the delivery of ads and to provide reporting to our customers.
- J We also use standard device identifiers, for example the "IDFA" advertising identifier used on Apple's iOS devices, to track your use of mobile apps.

- J We work with third parties that may separately collect User Information, to enable our customers to deliver targeted advertisements through our advertising technology. The collection and use of that information is not governed by this privacy policy, but rather is governed by the privacy policy of the third party that is collecting this data, and the party that is using this data. As an example, we work with Skyhook Wireless, Inc., a technology company that uses information about your visits to various websites or applications across multiple devices in order to provide you with content of interest to you across those devices. To learn more about Skyhook Wireless, Inc., and how to opt out of its cross-device technology on your desktop or mobile devices, please visit its privacy policy at <http://www.skyhookwireless.com/privacy>.

How We Use Information

We primarily use the information we collect to enable our customers to find and buy advertising space on publishers' websites and mobile applications. In particular, our customers (and, to a lesser extent, we) use information we provide, in conjunction with other information they have independently collected, to deliver you targeted advertising they believe will be of particular interest to you. 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>.

We may also use the information we collect to:

- J Operate and improve our technology;
- J Conduct research and development;
- J Enable standard advertising controls;
- J Prepare reports that summarize visitor activity;
- J Report on ad performance, campaign reporting, and campaign forecasting;
- J Assess user response to advertisements and promotions; and
- J Protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.

Information Retention

We may store the information we collect, such as IP address and other information described above, for up to 90 days before we aggregate that data into summary reports. We store the aggregated summary data (which for example, does not include IP address or other information that may be tied to a particular browser or device) for longer than 90 days.

Sharing of Information

We share information that we collect with others, including advertisers, advertising agencies, and website and app publishers, for a variety of reasons. For example:

- J We share information with our customers to help them identify and buy advertising on publishers' websites and mobile apps. 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) We may share information in connection with the sale or transfer of all or a part of our business or assets to a third party buyer.
- J) We may share information for legal, protection, security, and safety purposes, including:
 - o to comply with laws or regulatory requirements and to respond to lawful requests and legal process;
 - o to protect the rights and property of VRTCAL, our agents, customers, and others, including enforcing our agreements, policies, and terms of use and protecting our network and physical assets; and/or
 - o in an emergency, including protecting the safety of our employees and agents, our customers, or any person.
- J) We may share information with parties who may use that information to provide us with services or do work for us.

Information Our Customers Collect

Our customers and other third parties who use our technology may use their own tags, pixels, cookies, or other similar technology (or those of their other affiliates) within their advertisements and on certain websites. These customers maintain their own privacy policies and processes. We are not responsible for the privacy practices of customers that use our technology.

B. Your Opt-Out Choices

There are many ways to opt-out of receiving targeted advertising that our customers may conduct using our technology. If you opt-out of targeted advertising, we will continue to collect the same User Information described above. However, this information won't be used to target you with interest-based ads.

Display

Note: VRTCAL does not currently serve the desktop advertising sector.

Should you wish to opt-out of targeted advertising you receive on websites you access on a desktop computer or through a web browser (such as Chrome and Internet Explorer), which are provided using our "display" technology, you can e-mail us at info@vrtcal.com.

Additionally, you can opt-out by using any of the following three mechanisms. First, because we comply with the NAI and adhere to the NAI's code of conduct and mobile code of conduct, you can opt-out of targeted advertising by participating companies, including VRTCAL, at <http://www.networkadvertising.org/choices/>. Second, because we adhere to the Digital Advertising Alliance's ("DAA") Self-Regulatory Principles, you can visit the DAA's opt-out page at <http://www.aboutads.info/choices/>.

Please note that these opt-outs operate by placing a cookie on your device that is unique to the browser and device you use to opt-out. If you change browsers or computers, or delete the cookies on your computer, you will need to opt-out again. You also can set your browser to notify you when a cookie is being set and to block most cookies, including ours.

Mobile

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.

C. Your Rights

If you are a resident of the European Economic Area, you have the right to access personal information we hold about you and to ask that your personal information be corrected, updated, or deleted. 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 store 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.

In addition, you may also opt-out of receiving marketing communications from VRTCAL. If you would like to exercise this right, please write to us at the contact details provided below.

D. Security

We use many different measures to help protect information transmitted over or stored on our systems. No transmission of information, however, is guaranteed to be completely secure. In particular, we cannot guarantee that your data will not be disclosed, altered, or accessed accidentally, or through unlawful or unauthorized acts of others.

E. Changes

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 or by post using the details provided below:

VRTCAL Markets, Inc.
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