

# PRIVACY POLICY

## PRIVACY POLICY – Advertising

This policy applies to the data VRTCAL (“**VRTCAL**,” “**we**” or “**us**”) receives from individuals (“**end user**”, “**user**” or “**you**”) who interact with Mobile Applications, Mobile Sites, OTT (over-the-top), and Smart TV platforms (which we collectively refer to as “Digital Media Properties”) 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 publishers’ collection, use and disclosure of information through their Digital Media Properties, 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’ Digital Media Properties) of advertising inventory. Specifically, advertisers (or their agents) may use our technology to buy Digital Media Property advertising inventory.

#### A. Information We Receive

When you use a Digital Media Property that uses our technology, we receive and share with our advertisers and vendors, 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 device, and may be considered “personal data” in some jurisdictions, including the European Union.

Information that we receive includes:

**Information about your device:** Subject to applicable jurisdictional laws such as GDPR, data from your device may include information about your IP address,

device make, device model, device operating system, device operating system version, latitude/longitude location, carrier, data connection type, third party apps installed on the device, iOS Identifier for Vendors (IDFV), a VRTCAL-specific identifier, device identifiers assigned by publishers, advertisers, or VRTCAL partners and sensor information such as barometric pressure, accelerometer measurements, gyroscope measurements, device orientation, magnetic field measurements, direction of travel, motion activity (e.g. walking), or other similar sensor measurements;

- **Information about your browser:** including information about your browser type and language, and browser history; and
- **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 many types of technologies to receive User Information:

- **"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.
- **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.
- **Mobile device identifiers:** For Mobile Applications, 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 as well as Identifier for Advertising "IFA" for OTT platforms.

- **Cookies:** Cookies are data files that often include a unique identifier, and are placed on a visitor's device or computer. The max age, or longest duration we set for cookies before they expire is one day (86,400 seconds). We use cookies on our Publishers' Sites 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>.
- **Integration Methods:** VRTCAL SDKs, OpenRTB, Server-to-Service, Prebid and other integration types with publishers enable VRTCAL to receive User Information in the ad requests sent by publishers.

### **Other technologies:**

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

### **How We Share Personal Information**

We primarily share the Personal Information we receive to enable our advertisers and vendors to find and buy advertising space on publishers' Digital Media Properties. In particular, our advertisers and vendors use Personal 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 Personal 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 Personal 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 User Information longer than we need it and we do not store Personal Information. We use internal ID’s to identify Publishers and their respective Digital Media Properties 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 Personal Information**

We share Personal Information that we receive as follows:

- **Advertising Buyers:** We share Personal Information with our advertisers to help them identify and buy advertising on publishers’ Digital Media Properties. Advertisers 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.

- **Vendors, partners and other service providers:** We may share Personal Information to our vendors and partners who perform functions on our or our publishers' behalf and require access to such information to provide us with services, advertising support, or do work for us. Examples include: analyzing data, supporting advertising, fraud prevention, hosting data, engaging technical support for our technology platform, and performing analysis related to our technology platform and related services.

### **Information Our Advertisers and Vendors Use**

Our advertisers, our vendors, and our advertisers' 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 Digital Media Properties. We are not responsible for our advertisers, vendors and/or our advertiser's vendor 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 Personal 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.

- 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."

- 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."

### Web Sites

Should you wish to opt-out of targeted advertising you receive via cookies on web sites you access through a 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 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”), UK, or Switzerland 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 Digital Media Properties 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 publishers, who rely on the ability to deliver you and other users with advertisements (including targeted advertisements) in order to fund the Digital Media Property content they deliver to you.

As a resident of a country in the EEA, UK, or Switzerland, 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. International Transfers**

VRTCAL commits to comply with the EU-US, the UK extension and Swiss-US [Data Privacy Frameworks](#) as set forth by the US Department of Commerce with respect to personal information concerning individuals from the EEA, UK and Switzerland. Please see our Data Privacy Framework policy located at [https://www.vrtcal.com/docs/data\\_privacy\\_framework.pdf](https://www.vrtcal.com/docs/data_privacy_framework.pdf) to learn more.

If there is any conflict between the terms in this Privacy Policy and the Data Privacy Framework Principles, the Data Privacy Framework Principles shall govern.

#### **E. California Resident Rights – CCPA**

If you are a resident of the State of California, you have the right to know what type of Personal Information we process, the categories of sources from which we obtain Personal Information, and the third parties with whom we share Personal Information which are described in Section A “Information We Receive.” You also have the right to request what information we process and how we use and disclose it – see table below for disclosure.

Category of Personal Information	Categories of Recipients	Purpose of Disclosure
----------------------------------	--------------------------	-----------------------



<p>Pseudonymous Identifiers</p>	<p>Advertiser clients, fraud prevention partners, cloud-based service providers</p>	<ul style="list-style-type: none"> <li>• To enable our clients to offer and buy, and to display advertising opportunities on Digital Media Properties;</li> <li>• To enable standard advertising controls;</li> <li>• To analyze and report on ad performance (such as tracking views of ad, ad fill rates, as well as click-through rates on ads), campaign reporting, and campaign forecasting;</li> <li>• To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.</li> <li>• To deliver end users targeted advertising;</li> </ul>
<p>Log and Usage Information</p>	<p>Advertiser clients, Digital Media Property clients, fraud prevention partners, cloud-based service providers</p>	<ul style="list-style-type: none"> <li>• To enable our clients to offer and buy, and to display advertising opportunities on Digital Media Properties;</li> <li>• To enable standard advertising controls;</li> <li>• To analyze and report on ad performance (such as tracking</li> </ul>
		<p>views of ad, ad fill rates, as well as click-through rates on ads);</p> <ul style="list-style-type: none"> <li>• To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.</li> </ul>

<p>Geolocation data</p>	<p>Advertiser clients, fraud prevention partners, internet service providers, cloud-based service providers</p>	<ul style="list-style-type: none"> <li>• To enable our clients to offer and buy, and to display advertising opportunities on Digital Media Properties;</li> <li>• To enable standard advertising controls;</li> <li>• To analyze and report on ad performance (such as tracking views of ad, ad fill rates, as well as click-through rates on ads),</li> <li>• To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.</li> <li>• To deliver end users targeted advertising;</li> </ul>
<p>Precise Location Information</p>	<p>Precise location information is only processed by VRTCAL should our clients provide it to us, and if the end user’s device settings permit. Should VRTCAL get passed this information, it is made available to Advertiser Clients.</p>	<p>To enable Advertisers to deliver end users targeted advertising</p>

Annual Request Statistics per CA Delete Act of 2023 (SB 362)

We received the following number of requests from individuals in the US:  
**2024 from Jan 1 – June 27:** 32 received requests to delete, 32 responded < 1 day average, 32 deletion requests were denied as we did not have any information relating to the individual’s information making the request  
**2023:** 53 received requests to delete, 53 responded < 1 day average, 53 deletion requests were denied as we did not have any information relating to the individual’s information making the request:

*Do Not Sell My Personal Information*

VRTCAL does not sell your Personal Information. Advertising Buyers may use our technology to buy or sell Personal Information as defined by California Law. If you wish to opt-out of use of Personal Information for interest-based advertising purposes, you may do so by following instructions in Section B. “Your Opt-Out Choices.” Note that because the opts-outs are specific to the device or browser

on which they are exercised, you will need to opt-out on each browser and device.

#### **F. 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.

#### **G. 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.

#### **H. 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  
104 W Anapamu Street, Suite F  
Santa Barbara, CA