

SUBJECT ACCESS REQUEST POLICY

VRTCAL is committed to transparency, and we want you to have access to personal data that we may have about various devices that you may use to access the Internet. As stated in our privacy policy, our advertising technology does not collect any information that directly identifies you as an individual, and instead only collects certain device identifiers that may identify your device (each, a “**Device Identifier**”). As such, in order to provide you with access to personal data connected with your Device Identifiers, you will need to provide us with additional information, as explained below, to enable us to locate relevant records.

Your Rights

If you make a subject access request as set out in this policy, you are entitled to the Device Identifiers of yours that VRTCAL may store. Additionally, because VRTCAL is committed to transparency, we also commit to provide you with other information that we may have stored and associated with your Device Identifiers—for example, transaction logs reflecting where one of our customers used or attempted to use our advertising technology to deliver an advertisement to a browser or an application that you accessed.

Please note, however, that we have a very short retention period for most files with Device Identifiers that we store or process. As such, we may not be able to provide you any files at all. In such cases, however, we will inform you that we have not been able to locate any records associated with your Device Identifiers.

How to Make a Request

Step 1: Locating Your Device Identifiers

In order for us to locate relevant records, we will need you to provide us with your Device Identifiers. You can find your Device Identifiers as follows:

- Web Browsing

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>.

- Mobile Devices

Additionally, certain mobile devices (for example, mobile phones or tablets using the iOS or Android operating systems) generate persistent a “Advertising Identifier” per device,

which, among other things, can be used by third parties for purposes of providing you with targeted advertising. On iOS devices, your Advertising Identifier may be referred to as an “IDFA,” “IFA,” or an “ID for Advertising.” On Android devices, your Advertising Identifier may be referred to as an “Advertising ID.” Please follow instructions from your mobile device manufacturer on how to locate your specific Advertising Identifier.

Step 2: Verification of Your Device Identifiers

In order to make sure that we are only providing personal data to the correct person, we also will need some supporting proof to demonstrate that you are indeed connected to the Device Identifiers you located in Step 1. Please take a screenshot of a screen that displays the Device Identifier. Additionally, please fill out and sign the affidavit listed below that we have prepared, which attests that the Device Identifiers you have located are indeed associated with you.

Once you have located your Device Identifiers and can provide us with verification of those Device Identifiers, you should reach out to us. The easiest way to do so would be to email us at info@vrtcal.com. Please make sure to include the following information in your email:

- Your full name
- The country in which you are located at the time you are making your request
- A full list of your Device Identifiers
- Supporting proof, as described in Step 2
- A signed affidavit

You can also make a subject access request by mail, by sending a written request with all of the above-listed information to the following address:

VRTCAL Markets, Inc.
Attn: Privacy Officer
351 Paseo Nuevo
Santa Barbara, CA 93101

Subject Access Request – Affidavit

I, the undersigned Data Subject, do hereby swear, certify, and attest that:

1. I am a citizen and/or resident of _____, which is located within the European Economic Area;

2. I own and operate one or more mobile devices with the following Device Identifier(s) (as that term is used in VRTCAL’s Subject Access Request Policy):

_____;

3. I have the authority under relevant laws, rules, and regulations, to submit a subject access request for personal data associated with the above listed identifiers; and

4. I am not requesting this information for any fraudulent, criminal, malicious, or otherwise unlawful purpose.

I declare under penalty of perjury that the foregoing is true and correct.

Signature

Full Name

Date