

POLITYKA PRYWATNOŚCI

Audience Solutions S.A.

I. GENERAL INFORMATION

This privacy policy applies to all cases in which Audience Solutions S.A. is a data controller and processes personal data. This applies to cases where Audience Solutions S.A. processes personal data obtained directly from the data subject, as well as cases where Audience Solutions S.A. has obtained personal data from other sources.

Protection of your personal data is particularly important to us. We process your data only on the basis of applicable legal regulations, namely Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and the repeal of Directive 95/46/EC ('GDPR'), and the Act of 10 May 2018 on personal data protection.

Audience Solutions S.A. is a member of the IAB (Interactive Advertising Bureau - Internet Industry Employers Association), an association of entities from the internet industry whose goal is to represent the interests of these entities, promote activities, and ensure legal protection. Audience Solutions S.A. acknowledges the principles adopted by IAB within the IAB Europe Transparency & Consent Framework, which aims to create a standard for personal data processing and unify the principles of their processing in order to better protect them.

For all matters related to the processing of personal data and the exercise of rights related to data processing, you can contact the Data Protection Officer appointed by Audience Solutions S.A. via email at iod@justtag.com or by mail sent to the registered office address indicated below:

Audience Solutions S.A.

Al. Ujazdowskie 13

00-567 Warsaw.

II. DEFINITIONS

Data Controller/Company/Audience Solutions S.A. - Data controller within the meaning of Article 4(7) of GDPR. The Data Controller is Audience Solutions S.A. with its registered office located at Al. Ujazdowskie 13, 00-567 Warsaw, registered with the District Court for the Capital City of Warsaw, Warsaw, 12th Commercial Division of the National Court Register under KRS number 0000550668, and with a tax identification number (NIP) of 9511969310. GDPR - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

Personal Data - information about an identified or identifiable natural person ('data subject'). An identifiable natural person is someone who can be identified, directly or indirectly, by reference to an identifier such as a

first and last name, identification number, location data, internet identifier, or one or more factors specific to an individual's physical, physiological, genetic, mental, economic, cultural, or social identity.

Cookie files, Identifiers - (also known as 'Cookies') and other user identifiers - refer to small information files sent by the website that the user visits, which are then saved on the user's end device (computer, laptop, smartphone, tablet, etc.) that the user uses when browsing the website. These files may contain, among other things, information about the way the user uses a website.

User - a natural person whose personal data is saved in the cookies placed on websites by the Data Controller.

III. PERSONAL DATA

TYPE OF DATA PROCESSED AND THEIR RECIPIENTS

What data do we collect?

As part of the products and services we provide, we may process personal data:

1. As the data controller of personal data based on relevant contracts, user consents, and our legitimate interests (Article 6(1)(f) of the GDPR);
2. As a data processor - only for the benefit of the client or principal, based on agreements for the processing of personal data;
3. In order to operate our platform and provide products and services to our partners, we may collect and use:
 - a) Cookie file ID - using cookies collected through publishers' websites and suppliers or received from partners cooperating with us, we collect data on user behavior. We also collect demographic and professional data from registration/survey/login forms on websites;
 - b) Other online identifiers or technologies, as long as they meet security requirements and pseudonymization of data, which means that we protect it in the same way as all other personal data;
 - c) IP address, URL, type of device, and the version of the web browser used;
 - d) Demographic data.

Our data recipients may include:

1. Our employees and associates, who are authorized to process personal data and who require access to such data to carry out their duties;
2. Our partners who provide us with technical support, IT services, and other services related to our business activities;
3. Public authorities, where required by law.

We do not collect or use:

1. sensitive data, which are a special category of data and are subject to special protection, such as: sexual orientation, political views, religion, race or health information;

2. data directly identifying a natural person, such as: name, surname, address, PESEL number or non-pseudonymized email addresses or telephone number.

HOW DO WE USE THE COLLECTED DATA (IN WHAT PURPOSE)?

Thanks to the data collected on our platform, our clients can direct their advertising messages to the recipients they desire, thus increasing the effectiveness of their campaigns. Additionally, we help advertisers better understand their customers (i.e., buyers of goods or services) by providing advanced analytics services.

OUR PURPOSES OF DATA PROCESSING:

a) Contact by phone or email:

In this case, the basis for data processing is the consent of the data subject (Article 6(1)(a) of the GDPR) and the legitimate interest of the data controller (Article 6(1)(f) of the GDPR), which is expressed in the need to ensure contact with customers/contractors. The data is processed for the purpose of direct contact with the data subjects and will be processed until the consent is withdrawn or deleted as a result of periodic data review.

b) Keeping accounting records:

In this case, the basis for data processing is Article 6(1)(c) of the GDPR, and the data controller's actions are taken in order to fulfill the legal obligations incumbent on the controller and resulting from generally applicable regulations. The data will be processed until the obligations arising from generally applicable regulations expire.

c) Exercise of the right to claims:

In this case, the basis for data processing is the legitimate interest of the data controller (Article 6(1)(f) of the GDPR), which is expressed in the need to ensure the possibility of defending against claims of the entities whose data is processed or pursued against them. The data will be processed until claims expire.

d) Recruitment of employees:

In this case, the basis for data processing is the consent of the data subject (Article 6(1)(a) of the GDPR), the legitimate interest of the data controller (Article 6(1)(f) of the GDPR), which is expressed in the need to recruit new employees, and the legal obligation incumbent on the data controller related to the implementation of tasks resulting from the Labor Code (Article 6(1)(c) of the GDPR). Providing us with data is voluntary and involves the possibility of participating in the recruitment process. The scope of the processed data is specified in Article 22¹ §1 of the Labor Code and contains additional data provided to us by job candidates. The data will be processed for a period of 6 months from the end of the recruitment process or until the consent is withdrawn.

e) TC String dla Transparency and Consent Framework

in this case, the basis for the data processing is the legitimate interest of the controller (Article 6(1)(f) of the GDPR), which is expressed in the need for the Controller to prove that consent has been obtained for the processing of personal data in accordance with the global standard governing the processing of data in websites and mobile applications;

f) Social media profiles (fan pages):

In this case, the basis for data processing is the consent of the data subject (Article 6(1)(a) of the GDPR) and the legitimate interest of the data controller (Article 6(1)(f) of the GDPR), which is expressed in marketing the data controller's services. In this case of personal data processing, we treat comments posted on our fan pages and private messages sent to us as your consent to data processing. The scope of the processed data is consistent with the data made available to us on our social profiles, and this data will be processed until the consent is withdrawn.

Additionally, we would like to inform you that visiting the fan pages and interacting with them in any way will also give the social network access to your personal data as a separate data controller.

To find more information about the processing of personal data by Facebook, click here:
<https://www.facebook.com/privacy/explanation>

To find information about the processing of personal data by LinkedIn, click here:
<https://www.linkedin.com/legal/privacy-policy>

g) Audience Solutions S.A. Platform (including data recipients):

- Processing for marketing purposes, including profiling, which means that we use the collected data in an automated manner to assess, analyze, or forecast aspects related to users (demography and personal preferences). However, we do not make any decisions towards the data subject in an automated manner (i.e., without human intervention), which cause legal effects towards such a person or significantly affect such a person in a similar way (such as, for example, granting a loan). Personal data is processed based on your consent (Article 6(1)(a) of the GDPR).
- As part of marketing activities, we create marketing segments of users to adapt advertisements to the individual user. Personal data is processed based on your consent (Article 6(1)(a) of the GDPR).
- We generate reports and conduct analytics of users whose data we have, as well as analytics of website users of our partners (data providers) or clients (advertisers). Personal data is processed based on the consent granted to us (Article 6(1)(a) of the GDPR).
- We use identifiers to combine information we have about an individual user (from various websites and applications) to create or edit a user profile for the purpose of advertisements personalization.
- By providing the above-mentioned marketing services, we provide our clients (advertisers) with users' data in the form of their profiles. Personal data is processed based on consent (Article 6(1)(a) of the GDPR) or based on our legitimate interest as the data controller (Article 6(1)(f) of the GDPR), which is expressed in the need to implement contracts binding the data controller with other data controllers and for the purpose of providing the best-suited and profiled advertising content for users.
- We share the data with some data recipients (see the "Data recipients" section) to generate reports and conduct user analytics. Personal data is processed based on our legitimate interest as the data controller

(Article 6(1)(f) of the GDPR), which is expressed in the need to implement contracts binding the data controller with other data controllers.

DATA RECIPIENTS

We transfer the data we collect to:

1. Advertisers - in the form of marketing profiles / segments for the implementation of targeted advertising campaigns.
2. Other administrators collecting data in order to use them for advertising purposes.

List of cooperating partners:

a) Adrino Mobile Sp. z o. o. (KRS 0000528997) with its registered office in Warsaw, Al. Ujazdowskie 13, 00-567 Warsaw. The data provided includes Audience Solutions S.A. profiles that are used for marketing purposes, i.e. to target advertising campaigns directed to users. To find out more on data processing by Adrino Mobile Sp. z o. o. click here: <https://adrino.pl/user/images/Polityka-Prywatnosci-Adrino-Mobile.pdf>

b) Justtag Sp. z o. o. (KRS 0000463888) with its registered office in Warsaw, Al. Ujazdowskie 13, 00-567 Warsaw. The data provided includes Audience Solutions S.A. profiles, which are used to generate reports and conduct analytics as well as for advertising purposes. To find out more on data processing by Justtag Sp. z o. o. click here: https://www.justtag.com/PRIVACY_POLICY.pdf

3. Other categories of entities processing data on behalf of Audience Solutions S.A., including the owners of the servers on which the administrator stores personal data, or has technical solutions that enable data processing for marketing purposes (such as profiling);

4. Third parties performing legal, accounting and other related to the ongoing administrator's activities services at the request of the administrator, and authorized state authorities.

Personal data may also be transferred to recipients whose registered offices are located outside the European Economic Area. If data is transferred to any country for which a decision of the European Commission has been issued confirming an adequate level of protection, personal data is protected at the level of EU law. In other cases, they are transferred based on the use of standard EU data protection clauses in contracts between the administrator and recipients.

Providing personal information is voluntary.

How long do we process personal data?

We process personal data collected using our platform until:

1. A user exercises the rights he or she has under the GDPR;
2. A user configures his or her browser in a way that prevents data collection and processing;
3. A user exercises his or her "opt-out" option, i.e., withdraws consent to the processing of personal data;
4. Notwithstanding the above, Audience Solutions S.A. does not process personal data for a period longer than 365 days;
5. Other grounds for data processing expire (e.g., claims or obligations under the law).

IV. RIGHTS OF PERSONS WHOSE DATA ARE PROCESSED BY THE DATA CONTROLLER

The GDPR grants certain rights to persons whose data is processed, which in turn means that we, as the data controller, have certain obligations towards you. Audience Solutions S.A. provides appropriate technical and organizational means to fulfill them.

Right to access data:

You are entitled to obtain confirmation whether we process your personal data and access to information about the purposes of processing, categories of relevant personal data, the period of their storage, and recipients of this data (along with information on the security measures applied if your data is transferred to a third country or an international organization). If the data has not been collected from you, you also have the right to information about its source.

Right to rectification:

If your data is incorrect, you can request immediate rectification or completion of incomplete personal data.

Right to delete data ("Right to be forgotten"):

When you exercise this right, we are required to delete your personal data as soon as possible if:

- The collected data are no longer necessary for the purposes for which they were collected and processed;
- You have withdrawn the consent on which the processing is based;
- You have objected to the processing, and there are no overriding legitimate grounds for processing, or you have objected to the processing of your data for direct marketing purposes, including profiling;
- Personal data has been processed unlawfully or must be deleted to comply with a legal obligation provided for by law;
- Personal data has been collected in connection with offering information society services;
- Regardless of which circumstances are met, if we need to delete your personal data, we are also obliged to take reasonable steps to inform data controllers processing this data about your deletion request.

Right to restriction of processing:

You have the right to request the restriction of the processing of your data in cases where:

- You question their correctness - for a period of time allowing us to check the correctness of the data.
- The processing of personal data is unlawful, but as the data subject, you oppose their erasure, requesting the restriction of their use instead;
- We no longer need this personal data for the purposes of processing, but you need it to establish, pursue or defend claims;
- You have objected to the processing - until it is determined whether the legitimate grounds on our part override the grounds for your objection.

If we rectify, delete or restrict the processing of your personal data, we must inform each recipient to whom we have disclosed this fact, unless this proves impossible or involves disproportionate effort. If you request it - we will also inform you about recipients informed by us.

Right to object to data processing:

You have the right to object to the processing of your data based on the legitimate interest of the data controller.

Right to data portability:

In certain cases, you have the right to receive your personal data in a structured, commonly used format and make it available to another data controller. You can also request that we send your data to another data controller, and we will do so if it is technically possible.

You also have the right to lodge a complaint with the supervisory body - the President of the Office for Personal Data Protection.

If you want to exercise any of your rights, you can contact the Data Protection Officer (DPO) appointed by us.

DPO Mariusz Chojnowski

iod@justtag.com

Audience Solutions S.A.

Aleje Ujazdowskie 13

00-567 Warsaw

V. INFORMATION ABOUT COOKIES

Cookie files (so-called "cookies") are IT data, in particular text files, which are stored on your end device and are intended for use on websites. Cookies usually contain the name of the website they come from, their storage time on the end device, and a unique number.

As part of our website, two basic types of cookies are used: "session" (session cookies) and "permanent" (persistent cookies). Session cookies are temporary files that are stored on your end device until you log out, leave the website, or turn off the software (web browser). "Permanent" cookies are stored on your end device for the time specified in the cookie file parameters or until they are deleted by the User.

Cookies and other identifiers are used by publishers, our suppliers, partners, and Audience Solutions S.A. to recognize users who visit websites in order to enable more effective adaptation of advertising and content of these websites to their interests and expectations. We also use them to collect anonymous statistics about website visits and to check which content was of interest to users. Cookies greatly facilitate the use of the website interface, e.g., they allow you to store preference settings for the content displayed and any interaction with the website.

The user can individually change the settings and conditions for storing cookies and the settings for accessing the user's device using these files in his web browser. This applies in particular to blocking the automatic use of cookies by the browser and informing the user each time cookies are installed on his device. Detailed information on the possibility of setting cookie preferences is available in the software settings section (user's web browser). The user can delete cookies at any time using the functions provided by the web browser he uses.

Users who do not wish that information on visited websites be collected by Audience Solutions S.A. may use the opt-out mechanism. For technical reasons, if you delete all cookies using your browser or when using a different browser, you will need to repeat the opt-out procedure.

VI. OPT-OUT

We base the processing of personal data on your consent. You can withdraw or manage your consent at any time. If you do not want data about your visits to our partners' websites to be collected by our system, profiled, or made available to other data controllers, use the Opt-out mechanism. If you clear all cookies in the browser or use a different browser, you will need to use the Opt-Out mechanism again. Withdrawal of consent does not affect the lawfulness of the processing that was made based on consent before its withdrawal.

VII. CHANGE OF PRIVACY POLICY.

We reserve the right to make changes to this Privacy Policy from time to time to ensure that it meets applicable legal requirements and requirements caused by technological progress.

The content posted on the www.audience-solutions.com website is protected by copyright, and copying, distribution or similar activities require our consent.

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