

Privacy Policy - Introduction

The integrity of individuals is an important factor of Arvato's business success. Arvato's advertisers, publishers, media agencies and other customers (hereafter the "Client/Clients") that from time to time provide Arvato with personal data, as well as web surfers whose digital data is processed by Arvato as part of its provision of services to its Clients (hereafter the "User/Users"), must be able to trust that data is processed by Arvato in accordance with applicable privacy laws and regulations.

This Privacy Policy was created in order for Clients and Users to better understand how information relating to them is processed by Arvato. The Privacy Policy is not exhaustive, but contains certain fundamental privacy principles applied by Arvato which Arvato considers to be of particular importance for Clients and Users to be aware of.

- Part 1 of the Privacy Policy contains Arvato's general privacy principles with regard to its processing of personal data provided by Clients, Users or other individuals.
- Part 2 of the Privacy Policy contains information regarding Arvato's processing of digital information about Users in relation to Arvato's Interest Based Advertising activities. It also contains requirements on publishers with whom we have contracted to serve Interest Based Advertising and other marketing services, to notify Users about Arvato's services on their websites.
- Part 3 of the Privacy Policy contains contact information for different kinds of inquiries and requests relating to Arvato's processing of data and this Privacy Policy.

This Privacy Policy was last revised on 01 June 2014. Arvato may at any time and without notice change it, e.g. to keep it compliant with applicable laws. You should therefore read this Privacy Policy each time you intend to provide Arvato with personal data.

Part 1 - General privacy principles

Personal data and controller of personal data

Personal data comprises all information that directly or indirectly can be referred to a natural person who is alive, e.g. name, postal address, e-mail address and phone number. A controller of personal data is the natural or legal person who processes personal data and who decides why and how such data shall be processed.

Arvato is the controller of personal data provided by you through the website <https://adobe.tradedoubler.com/login>. Depending on the issue in question, Arvato or any of its subsidiaries is the Controller of personal data provided to us by you through sub-sites of <https://adobe.tradedoubler.com/login> published and maintained by Arvato or its subsidiaries (all Arvato websites hereafter are referred to as the "Site"), or personal data that you are asked to provide us with in other situations if not otherwise is indicated.

Collection of personal data

Personal data for which Arvato is controller may be provided by you to us e.g. in the following situations:

- If you are a Client you may be required to provide us with personal and corporate information, such as name, address, email address and other account information, in order to be able to access and use our services;
- As part of our sales efforts, we may collect and store data through online forms for contact purposes;
- If you are a prospect Client, you may provide us with personal data through this Site when applying to join our network;
- You may provide us with personal data when you send us inquiries relating to our services or in relation to this Privacy Policy.

Use of personal data

Arvato is committed to protect any personal data you provide to us and to process your personal data in accordance with this Privacy Policy and applicable laws.

Personal data provided to Arvato may be used, without limitation, for the following purposes: provide you requested products and services; manage Arvato's agreed obligations and rights towards you; process payments; administration; internal analysis to improve or more effectively tailor Arvato's Site, business or offerings generally; allow you access to agreed products and services; direct marketing; any other purpose you have consented to or which is allowed under applicable law. Your personal data may also be processed for additional purposes stated on any relevant part of the Site or otherwise in connection with the provision to us of your personal data. Your personal data may be combined with other information collected

Disclosure and transfer of personal data

Personal data may be transferred to other companies within the Arvato group of companies. Arvato may as a consequence of service agreements with third parties, also transfer personal data to such third parties who process

personal data on behalf of Arvato. Such service agreement shall contain obligations for third parties to process data only in accordance with Arvato's instructions and to take appropriate measures to secure that the processing of the personal data is secure.

For any of the purposes described herein, personal data may be transferred to Arvato's business partners within or outside the EU/EEA. Should any of the recipients reside in a country without adequate legal protection for personal data, Arvato will make reasonable efforts to make the recipient adopt the principles described in this Privacy Policy.

Consent

Where it is required by law or where Arvato otherwise deems it appropriate, Arvato will seek consent from you before Arvato processes your personal data. Such consent may e.g. be obtained by asking you to accept processing of your personal data in accordance with this Privacy Policy. If you do not agree to this Privacy Policy and/or other terms and conditions stated in connection with the collection, please do not provide personal data to Arvato. Arvato reserves the rights not to provide you certain products or services should you choose not to provide required personal data.

Withdrawal of consent

You are at all times entitled to withdraw your consent to process personal data that you have provided to Arvato. In such case Arvato will not process your personal data based on consent any more.

You are entitled to request that Arvato shall not process your personal data for direct marketing purposes (such as direct marketing by e-mail, letter or telephone).

Contact details for withdrawal of consent and/or for request that Arvato shall not process your personal data for direct marketing purposes are set out in Part 3 below.

Right to information and rectification of personal data

Arvato will take reasonable measures to rectify, block or erase personal data that it is shown incorrect without undue delay. Part 3 of this Privacy Policy contains information about who you should contact if you would like us to correct personal data that we hold on you and which you consider incorrect.

To the extent required by law, we will inform you about Arvato's processing of your personal data in connection with the initial collection or registration of your personal data. Such information may e.g. be provided by notifying you about this Privacy Policy.

You may request a copy of the personal data that Arvato holds about you ("Subject Access Request"). You are entitled to such information free of charge once a year. This information will include information regarding what personal data Arvato processes about you, where such information has been collected, for which purpose the information is being processed, and to whom, or to which categories of persons, the information is being disclosed. Contact information for Subject Access Request is set out in Part 3 of this Privacy Policy.

Destruction of personal data

Any personal data that we hold on you is only stored as long as it is required for us to keep them in order to fulfill the purposes for which they were collected. Data may however be necessary to store for a longer period due to legal requirements, e.g. for accountancy purposes.

Security

Arvato is dedicated to maintain the security of personal data and preventing unauthorized access through the implementation of appropriate technical and organizational measures, as far as is reasonably possible. Such security measures also include that personal data may be accessed only by a limited number of persons within Arvato.

Our employees are made aware of and must comply with Arvato's security standards. When we occasionally use third-party contractors to perform tasks that might otherwise be performed by our employees, these contractors are required to adhere to this Privacy Policy and they are subject to similar restrictions as our employees.

Cookies

The Site contains cookies. According to applicable law, everyone who visits a website containing cookies shall receive information about how the cookies are used and how they can be avoided.

This Site sends your browser a cookie - a small piece of data stored on your computer's hard drive. The purpose of the cookie is to improve your reading of and your search possibilities on our Site. If you are a registered Client (e.g. a publisher), the cookie will also manage and control your login and session on those part of our Site that are only available to registered Clients.

If you do not want to accept that your computer receives and stores cookies, you can alter your security settings on your web browser (Internet Explorer, Netscape etc.). However, note that certain parts of our Site may only be used fully if your browser allows cookies. Thus, your reading experience of our Site may be affected negatively by removing and not allowing cookies.

In addition, Arvato may serve ads on this and other websites using our own ad-serving technology. In doing so, one of our ad servers will place or read a unique ad-serving cookie on your computer and will use non-personal information about your browser and your activity at this site to serve ads on this and other sites. The ad-serving cookie is a persistent cookie. Please see <https://publisher.tradedoubler.com/include/functions/optout.html> for more information about Arvato ad serving or to opt-out of the Arvato ad-serving cookie.

Part 2 - Interest Based Advertising privacy principles

Introduction

Arvato processes digital information about Users (web surfers) who visit websites belonging to Clients with whom Arvato has contracted to serve advertisements (the "Advertising Network"). This part of the Privacy Policy lets you know what information we collect and process about you as a User on behalf of our Clients, why we collect it and how it is used in relation to our Interest Based Advertising services to our Clients. The Policy contains instructions on how you can display and delete information collected by Arvato yourself and how you can opt-out from further Interest Based Advertising activities of Arvato. Further, the Policy contains instructions to our publishers on how to notify Users about Arvato's services on their websites.

What is Interest Based Advertising and what services are provided by Arvato?

There exists a range of different kinds of online Interest Based Advertising services; from fairly simple forms to the far-reaching monitoring of web surfer activities carried out by search-engine owners or services carried out in partnerships between technology companies and Internet Service Providers. As a common denomination, you could say that Interest Based Advertising is intended to make online display advertising more relevant to web surfers' likely interests.

Arvato's Interest Based Advertising services are cookie based. "Cookies" are small simple text files (not programs or spyware) stored on the hard drive of a web surfer's computer. Based on the anonymous information stored in User's cookie, Arvato is able to create an interest profile of that User in order to provide more relevant advertising to the User on behalf of our Clients. For example, a User that visits sports sites often will be categorized in the "sports fan" segment, and will primarily be served advertisements that are relevant to the interests of a sports fan.

The fundamental integrity principle underlying all Arvato's processing of digital data relating to Users, is that such data shall be anonymous. Therefore, we do not store IP addresses on the cookie of a User, only a unique randomly generated ID that does not allow Arvato to trace the User; we do not have, and will not initiate, any co-operation with Internet Service Providers in order to trace the identities of Users. The data stored on the cookie is limited to information collected at the User's visits to websites belonging to Arvato's Advertising Network. With the exception of a marginal proportion of cookies saved for statistic purposes solely, a User's cookie can only be viewed by Arvato when the User visits a website that belongs to our Advertising Network.

Information stored on cookies

The cookie information stored on the User's hard drive for Interest Based Advertising purposes is: (i) User segment hits (for example a User that visits a sport site of one of Arvato's Clients, will record a hit in the 'sports' segment) and (ii) time and date stamp of the latest update of the User profile. The User segments used by Arvato for cookie hits are: (1) Animals; (2) Humanities; (3) Automotive (4) Business; (5) Computers & electronics; (6) Entertainment; (7) Finance; (8) Food & drink; (9) Gaming; (10) Health & beauty; (11) Home & garden; (12) Insurance; (13) Lifestyle & society; (14) News & current events; (15) Reference; (16) Shopping & retail; (17) Social; (18) Sports & recreation; and (19) Telecom & utilities. If the cookie is deleted by the User, the profile stored cannot be tied back to the User or the unique randomly generated ID.

For the sake of clarity, no segments relating to information which Arvato considers sensitive have been or will be created, such as segments relating to political opinions, religious beliefs, physical or mental health conditions or sexual life. Further, Arvato is very sensitive to the issue of children's privacy and marketing directed to children. No segments are intended to be established for the profiling of children.

Use of collected digital data

Arvato will use the User data in order to better target advertisements on behalf of our Clients, to provide aggregated non-personal reporting to our Clients, and to improve our advertising systems and products. The data may be combined with other anonymous information collected from other sources so that we may better serve Users with offers that may be of interest to them. We may also share anonymous data between companies within the Arvato group of companies.

Security

Arvato is dedicated to maintain the security of all its data and to prevent unauthorized access through the implementation of appropriate technical and organizational measures, as far as is reasonably possible. Such security measures also include access restrictions, i.e. that data may be accessed only by a limited number of persons within Arvato.

Our employees are made aware of and must comply with Arvato's security measures. When we occasionally use third-

party contractors to perform tasks that might otherwise be performed by our employees, these contractors are required to adhere to this Privacy Policy and they are subject to similar restrictions as our employees.

Opt-out

You may at any time easily block further cookie-based Interest Based Advertising activities from Arvato by opting-out from our program. To do so please follow the instructions on the following URL:

<https://publisher.tradedoubler.com/include/functions/optout.html>

In addition, note that you are always able to prevent cookies from any website from being installed on your computer by readjusting your browser settings. For more information about cookies and how to disable them, you should consult the help section of your browser.

Publisher notification

If you are a publisher, please note that you are obligated to notify visitors of your website about third parties who are serving advertisements on your website by way of use of cookies. As party to the publisher agreement with Arvato, you agree to provide clear and unambiguous notice about this. In relation to Arvato's Interest Based Advertising (if you have chosen to be provided with such services), such information shall at least include the following text:

"We use third-party advertising companies to serve ads when you visit our website. These companies may use information (not including your name, address, email address or telephone number) about your visits to this and other websites in order to provide advertisements about goods and services of interest to you. In order to do this, our advertising partners may place a cookie (a small text file) on your computer. If you would like more information about this type of online interest based advertising, about use of cookies in such practice, and would like to know your options in relation to not having this information used by these companies, click here. For general information about use of cookies on this website, and how to block cookies, please [REFERENCE TO INFORMATION]."

For avoidance of doubt, please note that the foregoing requirement of notification does not limit any of your obligations according to applicable law. You are yourself as a publisher responsible for providing relevant and accurate information required by law, including applicable privacy laws.

Part 3 - Contact information

Contact details for inquiries and requests:

- For general inquiries concerning this Privacy Policy or Arvato's processing of data, please send an e-mail to the following address: AdobeAffiliates@Arvato-scs.com;
- For: (i) a withdrawal of a consent to process your personal data previously provided by you to Arvato; (ii) a request that Arvato shall not process your personal data for direct marketing purposes; (iii) a requirement that Arvato shall rectify certain personal data held on you, or; (iv) a Subject Access Request, please send an e-mail to the following address: AdobeAffiliates@Arvato-scs.com;

Please provide relevant details in your e-mail in order for Arvato to be able to process your request or inquiry