

# ADSPADE PRIVACY POLICY

UPDATED: May 17th 2018

## **Statement**

The following describes the overall company privacy policy (the "Privacy Policy") of Adspade Media 360 SL. (hereinafter referred to as the "Company") in relation to use and disclosure of information you share via Adspade Website (hereinafter referred to as "website", "us", "we" or "our"). The Privacy Policy was created to inform you what information we collect when you visit our website as well as our customer's ("Advertisers") websites; and how that information is collected and used by companies that display advertisements ("Partners" or "Publishers").

We are providing you with this Privacy Policy to help you make an informed decision as to whether to use or continue using the website. The Company reserves the right to update the policy periodically, and these updates are effective upon posting. It is imperative that this document is read thoroughly and often.

This Privacy Policy applies to the information that we collect or receive from you and other individuals who use the website, register on the website or participate in the promotions or offers available on the website; or with whom we communicate through email or other means.

## **Collection of Information**

The Company does not seek any personal information by illegal means. We collect only necessary information from you and other individuals who use the website (Advertisers and Partners) by means of online or offline surveys, order forms, registration pages, telephone or cell phone communication, and other similar means.

## **Personal data**

Personal data is any data that can be used to distinguish or trace an individual's identity, either alone or in combination with other information, or may be of private or sensitive nature.

As part of this voluntary registration, we may request contact information (such as name, mailing address, email address, etc.) and other data required for operating these services. We may only collect personal information from you if you voluntarily provide it. By voluntarily providing this personal information to us, by sending us a comment or suggestion, you will be consenting to the collection, use and distribution of your personal information by us for the purposes set out herein.

## **Non-Personal data**

Non-Personal data Information is data that cannot be used on its own to identify, trace, or identify a person, i.e. information without particular reference to the identity of the user from which such information was collected.

When you visit our Website, information about your visit (e.g. how you navigate the site) may be collected and stored. This information may include the length of your visit, the date and time of your visit, the pages you look at and the sites you visit before and after leaving our site. It does not include personally-identifiable information such as your name, mailing or email address or telephone number. We use this non-identifiable and aggregate information to better design our website and for the purpose of optimizing our services and/or business. We also may share this general non-identifiable information with our affiliates, suppliers, sponsors and advertisers.

### **Cookies**

The Company uses Cookies and Web Beacons to associate certain Internet-related information about you and other individuals who use the website (Advertisers and Partners) with information about you in our database.

A cookie is a small amount of data stored on the hard drive of your computer that allows us to identify you with your corresponding data that resides in our database. Cookies do not reveal personal information. The only personal information a cookie can be linked to is information you supply yourself such as email address, or information on your actions and behavioral data while using our Website, such as purchases and preferences. Cookies cannot read data from your hard drive. If you want to delete cookies from your computer, please go to your browser settings and do it manually.

### **Log and Credit Card Information**

When you log in to access your account, our servers may automatically record and archive certain information that web-browsers send whenever visiting the website. These server logs may include information vital to validating your authorization to access the account. Information, such as a web request, Internet Protocol (the "IP") address, browser type, browser language, referring pages, exit pages and visited URLs, platform type, click counts, pages viewed and in what order, time spent, date and time of the request, and other important data is necessary to validate and authorize your entry and activity on the website.

Credit Card Information includes credit card numbers and related information, such as the expiration date of the card, etc. We do not collect your Credit Card information on our website.

### **Use of Information**

The Company will only use information provided by you and other individuals who use the website (Advertisers and Partners) for purposes that you have provided it for, including those to operate, provide, improve, and maintain our website and services; to respond to your inquiries and provide other customer services; as well as for other administrative and internal business purposes.

Your Personal data will be used to establish your account, to communicate with you and for ongoing record keeping, required by the Company.

Your Non-Personal data Information including cookies, web beacons, etc., will be used only for system administration and for improvement of our services (e.g. to keep track of visitors sent by the Company's Partners to Advertisers' websites). This ensures our Partners get credited for services they provide to Advertisers, and Advertisers get complete package of services the Company provides.

Your log information is necessary to validate and authorize your entry and activity on the website.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of.

### **General Data Protection Regulation**

On May 25, 2018, the European Union's [General Data Protection Regulation](#) (GDPR) becomes officially operative. General Data Protection Regulation (EU) 2016/679 is a European Union law governing privacy and data protection for all residents of the EU. The provisions of GDPR can be also applied to how data is processed and verified outside the European Union.

GDPR is intended to empower the citizens of the European Union to control their personal information. In accordance with the applicable laws, users are authorized to access and modify their own data held by the companies, which includes data collection, ad tracking, surveys, cookies, location data, and every other bit of a user's "digital footprint". Users are also entitled to transmit their personal details to other organizations. The GDPR also enforces companies to determine their in-house data security policies.

We maintain our commitment to protect the privacy of our users and abide by the legislation of all regions we operate in, including compliance with the GDPR.

Taking into account the above, personal data (if any) of our users is processed under the "purposes of legitimate interests" as outlined in [GDPR Article 6\(1\)\(f\)](#). Such an approach also helps us to fight against fraud and reimburse our contractors and agents. In accordance with the GDPR requirements, we will strive to, at any time, (i) streamline the data handling controls, (ii) specify our relationships with data partners, and (iii) provide the data subjects with an understanding and direct management of the way their personal information is used.

### **GDPR measures**

#### **Controller Classification:**

As a Processor by the classifications of GDPR, we cooperate with our partners (Data Controllers and other Data Processors) to make sure any kind of user data is handled under the agreed terms and in compliance with the pertinent regulations.

As a Controller by the classification of GDPR, we have the appropriate technical and organizational measures in place ensuring that data processing is performed in accordance with GDPR. Such measures will be reviewed and updated if necessary and in accordance with the specifics of the gathered data.

**Data Security:** We have assigned a Data Protection Officer (DPO) who can be contacted at [contact@adspade.com](mailto:contact@adspade.com).

**Personal Information:** Personal information will be pseudonymized and encrypted to ensure the user privacy. The collected information will be handled for standard cases of use described in this Privacy Policy.

**Sub-Processors:** We will, to the best of our ability, make sure that our sub-processors operate in full accordance with GDPR requirements before starting cooperation with them and require such sub-processors to comply with this Privacy Policy and maintain appropriate security to protect user information from unauthorized access or processing, unless we have no ability to do so (for example, where we are sharing information with regulatory authorities or courts). Nevertheless, we cannot be held responsible or liable for the use of any information that a sub-processor may execute, or that is gathered by sub-processors. Whenever applicable, users should acquaint themselves with Privacy Policies of any of the involved sub-processors' websites.

**Data Retention:** We will retain the gathered data for the period of the cooperation, but in no case longer than the maximum allowed by the existing legislation, unless you choose to withdraw it yourself.

Requests and removal of the data

You (data subject) may send official requests to us regarding your personal data via email to the following address: [contact@Adspade.com](mailto:contact@Adspade.com)

At any time, you have the right:

To access your personal information that we hold;

To request the rectification of your personal information that we hold;

To request the erasure of your personal information that we hold;

To request to restrict processing of your personal information;

To object to processing of your personal information by us;

To request to transfer your personal information that we hold (e.g. data portability);

To file a complaint to a supervisory authority in your jurisdiction; and

To withdraw any consent related to your personal information given by you.

Your request will be executed no later than 30 (thirty) days from the initial request receipt but we will do everything possible to process it within the first 48 working hours.

Should a data breach related to your personal information occur, we will notify the relevant supervisory authority within 72 hours thereof.

## **The use of email addresses**

Your email address will only be used for the purposes of contacting you in order to fulfill the services offered by Company. This may include notifications on offer changes, your campaign updates, Company newsletters, notes about your results, etc and may, for this purpose, be shared with the tools Adspade uses to execute those services (such as Salesforce, Amazon etc). Email addresses will never be provided to any third party, without a written approval, or an electronic consent from you. Users can opt out from Company newsletters and from other email related activities by adjusting settings of their accounts, by unsubscribing from the newsletters themselves using an opt-out link, or by providing the company with a written notice (email is sufficient).

## **Dissemination of Information**

Your Personal Information will not be shared unless we have first given you notice that we might share your data, and you have authorized us to do so. The Company receives information from you and other individuals who use the website (Advertisers and Partners), and have the right to use this data (sometimes, in connection with Non-Personal data), but is generally prohibited from sharing this information with other companies or people.

Your Non-Personal data will not be linked with your Personal Information or be shared, unless we have given you notice as described above and you have given us authorization to do so.

## **Security**

Security of your information (Personal data and Non-Personal data) is our utmost priority. We take many strict measures in order to protect our data from unauthorized access, unauthorized disclosure or destruction of data. Our data is only stored in centers that provide the highest quality security for your information. Only authorized employees have access to the information you provide us.

## **Consent and Contacts**

By visiting the Company website, you consent to the collection and use of any personal or non-personal data as outlined above.

Do not hesitate to contact us if you have questions about this policy.

If you do not agree to these terms, or wish to limit the use of any of your personal information that we may have, You may withdraw your consent in your account settings, or contact us via email or regular mail at the following addresses:

- **ADDRESS**

Avda. Ricardo Soriano, 72 Edif. Golden B, 1ª Planta 29601 - Marbella Spain

- **EMAIL**

You may contact us by email at [contact@adspade.com](mailto:contact@adspade.com)