

Privacy Notice

Last updated: May 18th, 2018

Purple Brain SAS (t/a Adincube) respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights.

What does AdinCube do?

AdinCube operates an advertising mediation platform available on <http://www.adincube.com/> (the “**Website**”). This allows publishers of mobile applications (“**Apps**”) to maximize the monetization of their Apps by optimizing ad campaigns provided by various third party advertising partners (the “**Service**”). The ads are displayed to the users of the publishers’ Apps (the “**Users**”). You can view the current list of AdinCube partners with whom we share your data: https://storage.googleapis.com/adincube-resources/doc/Partners_List.pdf

This Privacy Notice explains AdinCube’s privacy practices for processing personal information on the AdinCube Service (Part 1) and on the Adincube Website (Part 2).

PART 1: The AdinCube Services Privacy Notice

What User personal information does AdinCube collect through Apps and why?

When a User interacts with an App that has integrated with AdinCube, AdinCube may collect/receive the following information (the “**User Data**”):

- **App information**, such as app name and the version name.
- **Device information**, such as device type and model, network provider, browser type, language device IP address, network connection type and device GPS location (only if you have expressly provided permission).
- **Operating system Information**, such as whether the device is an Android or iOS device.
- **Mobile advertising identifiers**, such as your device's unique advertising ID (Apple IDFA or Google AAID).
- **Information AdinCube may receive from publishers**, such as your age, gender, marital status (in all cases, only if you have expressly provided permission through the publisher app).

Why does AdinCube process personal information?

AdinCube collects User Data in order to provide, improve and continue developing the Services and for other specific purposes, as described below in this Privacy Notice.

Who does AdinCube share my personal information with and why?

We share the User Data in the following ways and with the following parties:

- **Advertising partners:** for the purpose of serving you with contextual and/or targeted ads that are relevant to you and may interest you and for ad reporting purposes. These advertising partners are companies that advertisers work with to serve the ad that is most relevant to you.
- **Publishers:** to help them understand how Users are engaging with ads, what kind of Users are most engaging with certain types of ads on their Apps, and what kind of ads are published on their Apps. Publisher partners are the companies that develop the Apps that you use and that integrate the AdinCube Services in order to show you advertising in their Apps.
- **Security and fraud prevention partners:** for the purposes of security and fraud detection (e.g. protecting against click-fraud and similar unlawful activities).
- **Legal Purposes:** We may share User Data with other third parties for the following purposes:
 - To comply with laws or to allow us to enforce the terms of this Privacy Notice.
 - To respond to lawful requests and legal processes.
 - To protect the rights and property of AdinCube, our agents, customers, and others.
 - To protect the safety of our employees and agents, our partners or any other person.
- **AdinCube affiliates and service providers:** We may share User Data with other companies within the AdinCube group of companies and our service providers, and require these companies only to process the User Data for the purposes described in (and subject to the protections described in) this Privacy Notice.

Our policy towards children

We do not knowingly collect or process User Data from children under the age of 16. If you believe we have inadvertently collected User Data from or about a child, please contact us using the details provided under the heading "Contact Us" below.

Accordingly, AdinCube does not permit its partners to use the Service to collect information from Apps directed to children under the age of 16. Publishers displaying content for children under the age of 16 acknowledge that it is their responsibility to respect any applicable laws.

Publishers willing to address children under the age of 16 should only select on the AdinCube platform the advertising partners that are compliant with applicable laws. When selecting advertising partners that are not clearly defined as compliant by AdinCube, our publishers commit to only address individuals over 16 years old.

Your data protection rights

AdinCube collects the minimum amount of User Data that is necessary to provide the AdinCube Services and does not store this User Data.

As a result, we cannot provide access to the User Data we process about you because it is processed only transiently by us for the purposes of providing our Services. Similarly, we do not hold any User Data against which you can exercise rights of updating, deletion, restriction or portability. Our advertising partners may process your User Data for longer periods.

Accordingly, if you have any questions about your data protection rights with respect to User Data, please contact the relevant AdinCube advertising partner directly. A list of the advertising partners with whom we work is available at the outset of this Privacy Notice (under the heading "What does AdinCube do?").

If you have any other questions about our processing of User Data, please contact us using the contact details supplied below. Finally, please note you also have the right to complain to your local data protection authority if you have any concerns about our data processing.

General

International Data Transfer

User Data may be transferred to and processed by AdinCube, our group companies, service providers and our advertising partners in countries outside the EEA.

Users should be aware that the data protection and privacy regulations that apply in countries outside the EEA may not offer the same level of protection as provided for inside the EEA.

When we transfer User Data outside of the European Economic Area, we will ensure that there are appropriate safeguards in place for the User Data by:

- transferring the User Data to countries which have been deemed to provide an adequate level of protection by the European Commission; or
- implementing other appropriate safeguards, such as: (i) the Standard Contractual Clauses adopted by the European Commission for transfers of personal information

outside of the EEA, which are available on the European Commission's website here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en; and (ii) transferring User Data to recipients in the United States of America who have certified their compliance with the EU-US Privacy Shield administered by the US Department of Commerce.

If you have any questions about our international transfers of User Data, please contact us using the contact details provided below.

Legal basis for processing personal information

In general, we collect, use and share the personal information contained in User Data where we have your consent to do so via a publisher partner's app.

Our publisher partners who use our Service must first obtain your consent so that AdinCube and our partners can process your personal data for the purposes of serving you ads. If you provide your consent, we will process the User Data described above for the purpose of serving you personalized advertising that AdinCube and our partners believe is most relevant to you.

You can withdraw consent at any time if your device permits, by changing the settings of your advertising ID by clicking the button titled "opt out of interest-based advertising" by following these instructions:

- For Android: open Google Settings on your Device > Services > Ads > Reset Advertising ID.
- For iOS: open Settings on your Device > Privacy > Advertising menu > Limit Ad Tracking > Reset Advertising ID.

Users should be aware that clicking this opt-out button will disable interest-based ads from all advertising networks that use advertising IDs, although Users will still see untargeted advertisements.

Data security

We seek to use appropriate organisational, technical and administrative measures to protect User Data within our organisation. Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the internet is not completely secure.

Retention

As noted above, AdinCube does not retain the User Data it processes to provide the AdinCube Services.

Updates to this Privacy Statement

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

Contact Us.

If you have any questions or concerns regarding our data usage practices or this Privacy Notice, please send us a message to our data protection officer at DPO@adincube.com.

The data controller of any personal information contained within User Data is Purple Brain SAS (t/a AdinCube), whose address is 6 rue de Berri 75008 Paris, France.

PART 2: The AdinCube Website Privacy Notice

Personal information we process if you are a publisher or mediated demand partner through the Website

The personal information that we may collect broadly falls into the following categories:

- Information that you provide voluntarily
Certain parts of our Website may ask you to provide personal information voluntarily: for example, we may ask you to provide your contact details in order to register an account with us, to subscribe to marketing communications from us, and/or to submit enquiries to us. We may also collect personal information from you necessary to process payments from or to you. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.
- Information that we collect automatically
When you visit our Website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type,

broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” below.

- *Information about Users*

If you are a publisher partner, then when selecting a specific mediated demand partner on AdinCube, you acknowledge that you will be transmitting personal information about Users of your App to a third party for advertising purposes. It is your responsibility to consult the privacy policy of each of the mediated demand partner to know how they will process and protect your Users’ personal information. You must also ensure that you have obtained all necessary consents, in accordance with applicable data protection laws, before transmitting Users’ personal information through AdinCube to selected mediated demand partners.

Who does AdinCube share my personal information with and why?

We may disclose our partners’ personal information to the following categories of recipients:

- to our **group companies, third party services providers and partners** who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information.
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform

the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;

- to any **other person with your consent** to the disclosure;
- Users' personal information will be shared with the parties identified in our Services Privacy Notice (Part 1).

Your data protection rights

The Adincube platform provides online tools to access, correct, or modify personal data you have provided to us in association with your publisher partner account. If you wish to delete your account, you may do so by logging into the publisher platform on adincube.com and following the instructions to request account deletion. Unless we have another legal basis to store your personal data, such as compliance with tax or accounting laws, we will delete or de-identify the personal data we have stored about you upon your request to delete your account.

If we send you marketing e-mails in accordance with your marketing preferences, you can choose to opt-out of these communications at any time by clicking the unsubscribe link in the e-mails we send.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. If you wish to exercise any other data protection rights (such as the restriction or portability), please contact us using the details provided below.

Finally, please note that you also have the right to complain to a data protection authority if you are unhappy with our processing of your personal information.

General

Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contact with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

Please contact us using the details provided below if you require further information about the lawful basis (including any legitimate interests) we rely upon to process your personal information.

Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, “**Cookies**”) to collect and use personal information about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice: https://storage.googleapis.com/adincube-resources/doc/Cookie_policy.pdf

How does AdinCube keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

Specifically, our Website servers are located in the United States, and our group companies and third party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries.

However, we will take appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. These may include:

- transferring your personal information to countries which have been deemed to provide an adequate level of protection by the European Commission; or

- implementing other appropriate safeguards, such as: (i) the Standard Contractual Clauses adopted by the European Commission for transfers of personal information outside of the EEA, which are available on the European Commission's website here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en; and (ii) transferring personal information to recipients in the United States of America who have certified their compliance with the EU-US Privacy Shield administered by the US Department of Commerce.

If you have any questions about our international transfers of personal information, please contact us using the contact details provided below.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Updates to this Privacy Statement

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

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