Privacy Notice

Last updated: 19th of March 2019

Purple Brain SAS (t/a Ogury formerly 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.

Purple Brain operates an advertisement mediation platform as part of the Ogury Group’s Intelligent Monetization product. References below to Ogury are to Purple Brain SAS as the operator of this advertisement mediation platform only.

The Privacy Policy covering all other Ogury products and services can be found here.

What does Ogury do?
Among other services Ogury operates an advertising mediation platform available on http://ogury.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 “Mediation Service”). The ads are displayed to the users of the publishers’ Apps (the "Users"). You can view the current list of Ogury partners with whom we share your data for the Mediation Service here.

This Privacy Notice explains Ogury’s privacy practices for processing personal information on the Mediation Service.

What User personal information does Ogury collect through Apps and why?
When a User interacts with an App that has integrated with Ogury, Ogury 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 Ogury 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 Ogury process personal information?
Ogury collects User Data in order to provide, improve and continue developing the Mediation Services and for other specific purposes, as described below in this Privacy Notice.

Who does Ogury 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 Mediation Service 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 Ogury, our agents, customers, and others.
  - To protect the safety of our employees and agents, our partners or any other person.

- **Ogury affiliates and service providers:** We may share User Data with other companies within the Ogury 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, Ogury does not permit its partners to use the Mediation 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 Ogury platform the advertising partners that are compliant with applicable laws. When selecting advertising partners that are not clearly defined as compliant by Ogury, our publishers commit to only address individuals over 16 years old.

**Your data protection rights**

Ogury collects the minimum amount of User Data that is necessary to provide the Mediation Service 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 Mediation Service. 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 Ogury 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 Ogury 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 Ogury, 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 Mediation Service must first obtain your consent so that Ogury 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 Ogury 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 Settings on your Device and go to Google > Ads > Opt-out of Ads Personalisation.
- For iOS: open Settings on your Device > Privacy > Advertising menu > Limit Ad Tracking.

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, Ogury does not retain the User Data it processes to provide the Mediation Service.
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@ogury.com.

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