LoopMe Privacy Notice

LoopMe is committed to protecting consumer privacy and respecting your right to choice as it relates to advertising and the data used to help serve interest-based advertising.

This privacy notice ("Privacy Notice") explains who we are, how we collect share and use personal information about you, and how you can exercise your privacy rights. This Privacy Notice applies to LoopMe's use of User's personal information in connection with our services. You are a User when you visit a page of a website or app of one of LoopMe's partners where LoopMe is serving interest based advertising.

1. Who we are and what we do +

- **Who we are**

LoopMe means LoopMe Limited (company number), a company registered in England and Wales and its affiliated subsidiaries (collectively, "LoopMe," or "we", "us", "our"). We partner with publishers and marketers across the globe.
We follow the Digital Advertising Alliance ("DAA") Self-Regulatory Principles, the Network Advertising Initiative ("NAI") Code of Conduct and we are a member of the IAB (Internet Advertising Bureau) in the UK.If you have any questions or concerns about our use of your personal information, please get in touch using the details in the How to contact us section below.

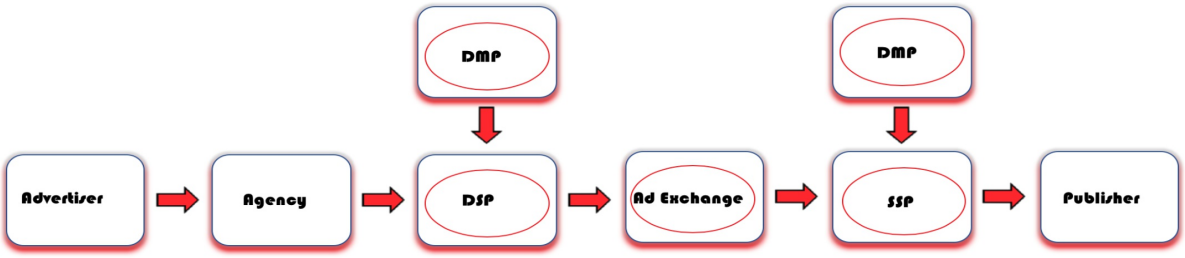
- **What we do**

LoopMe is an outcomes-based video platform closing the loop on brand advertising.
We work with a number of businesses helping advertisers to promote their products and services to interested audiences by connecting them with websites and apps with space to offer for advertising (these we refer to as publishers). LoopMe helps advertisers to deliver relevant online advertising to visitors (i.e. you) to publisher websites and apps.
At LoopMe, we understand the advertising technology ecosystem and its many acronyms may be complex to understand. To help, we have produced a glossary of the common industry terms, which you can view here.

Term	Definition
Ad Exchange	A technology platform that facilitates the buying and selling of Ad Inventory between Publishers and Advertisers through real time bidding (or RTB).
Ad Inventory	Refers to space for advertising that a publisher has available on its websites and/or apps at any given time.
Ad Tech	A general term that refers to any technology used by the advertising industry that helps to improve media effectiveness and increase operational efficiencies. It can encompass a number of technology platforms, including Demand Side Platforms (DSPs), Data Management Platforms (DMPs), Supply Side Platforms (SSPs) and Ad Exchanges.
Ad Network	A technology platform that matches a Publisher's supply of Ad Inventory with Advertisers wishing to display their Advertisements on such Ad Inventory. An Ad Network uses Programmatic Buying to facilitate this.
Advertiser	A brand, company or individual interested in opportunities to promote their service, product or brand by placing Advertisements on websites and/or apps audiences likely to be interested in their service, product or

	brand.
Advertisement (or Ad)	Refers to any form of audio, visual or textual form of information (creative) with the purpose of promoting a service, product or brand of Advertiser. Advertisements are displayed on Publisher websites and/or apps for certain fees and will typically contain links and prompts to redirect the user to the Advertiser's website upon engaging with it.
Agency	Also referred to as an advertising agency, ad agency, or a "creative agency", is a business dedicated to creating, planning, and handling advertising and sometimes other forms of promotion and marketing for Advertiser clients.
Data Management Platform (or DMP)	A technology platform used for collecting and managing data. They also allow businesses to identify audience segments (interests of audiences) in turn used to target specific users and contexts with specific Advertisements.
Demand Side Platform (or DSP)	A technology platform that offers Advertisers (or their Agencies) a centralised interface to manage their buying of Ad Inventory through Open RTB.
First Party Data	Refers to data about a consumer used by the party who collected it (brand, media company, etc.).
IDFA	The Identifier for Advertisers (IDFA) is a random device identifier assigned by Apple to a user's device. Advertisers use this to track data so that they can deliver customised advertising.
MAID	Mobile Advertising IDs (MAIDs) is a user specific, resettable identifier assigned to mobile devices which helps Advertisers delivery customised advertising to a particular user.
Open RTB	Also referred to as Real-Time Bidding (RTB), is an initiative sponsored by the IAB (the Interactive Advertising Bureau) which provides standards and technical specifications to facilitate the automated trading of digital media between buyers and sellers of Advertising Inventory.
Programmatic Buying	Is the process of executing transparent planning and buying of Ad Inventory using automation. Agencies use Programmatic Buying on behalf of their Advertiser clients to increase marketing efficiency, helping them to get more out of media budgets.
Publisher	The owner of a website and/or app with Ad Inventory to sell to Advertisers.
Supply Side Platform (or SSP)	A technology platform that enables Publishers to offer their Ad Inventory for Ad Exchanges and Demand-Side Platforms to bid on through Open RTB.

LoopMe plays multiple roles within the ecosystem, from SSP, DSP to DMP, we have circled the different roles we may play below:



2. What information we collect and why +

- **The information we collect broadly falls into the following categories:**

Identifiers	• LoopMe online identifiers (this is the numerical sequence of letters and numbers which LoopMe assign to each User which is unique to LoopMe) • IP address) • Advertising identifiers (e.g., such as Apple's IDFA or Google's AAID) • Information about the application (e.g. Application name or IDFA)
Information about your device	• Type of device (e.g. smartphone, laptop) • Operating system of your device Version, language, date and time • Network carrier information (e.g. Wifi, 4G or Wired connection)
Browsing events	• Page or app URL (e.g., www.publishersite.com) • Browser Information (e.g. Safari or Chrome) usage and bookmarks. • App usage and browsing information from apps a User has installed on their device. • User Interactions (e.g., UUID 123 interacts with mainly content related to travel).
Geolocation information	• Non-Precise Geolocation data: On web and web mobile, we collect non-precise location information at the country and/or city level that are derived from user IP Address (e.g., a user lives in New York) • Precise Geolocation data: On mobile apps, we may collect your precise Geo Location on the publisher's app (latitude / longitude) (subject to your consent where required
Survey data	We may collect additional data that you submit to us directly via surveys created that we or our business partners ask you to complete.
Inferred data	We may also infer or collect additional information about you based on what we or our partners collect

	(including through real time bid requests).

- **We collect this information from the following sources:**
- **Automatically from your device.** We may automatically collect information from your device when you visit websites or apps of advertisers and publishers that we work with. We do this using cookies and similar tracking technologies. For more information see What cookies and similar technologies we may use? below.
- **Advertisers.** We may receive information (such as device identifiers) from our advertiser customers looking to target or reach specific devices with their advertisements.
- **Data provider partners.** Our trusted partners (such as MaxMind) provide us with information, in order to help us obtain a better understanding of your preferences. For a list of our trusted partners please see here.
- **Open RTB partners.** We receive information from advertising vendors participating in OpenRTB in connection with real time bids for advertising space / opportunities. Many of these partners are registered as TCF Global Vendors. For a detailed list of TCF Registered Global Vendors please see here.

We use this information we collect for the following purposes:

- **Select basic ads –** To show you basic ads based on the content you are viewing, the website or app you are using, your approximate location or your device type and capabilities.
- **Create a personalised advertising profile –** To build a profile about you and your interests (based on information collected about your device and website and app visits) in order to show you personalised ads that are relevant to you.
- **Select personalised ads –** To select personalised ads to show you based on LoopMe's user profile about you (e.g., a user's prior activity, interests, visits to sites or apps, location, or demographic information).
- **Measure ad performance -** To measure the performance and effectiveness of ads that you see or interact with (e.g., whether an ad was clicked on by a user) and provide reporting to LoopMe's clients about the effectiveness of their advertising.
- **Apply market research to generate audience insights –**To apply market research and insights to learn more about users who visit websites or apps and provide aggregated reporting insights to advertisers (e.g., the type of audiences which viewed an advertiser's ad).
- **Develop and improve our products -** To improve our existing systems and software and develop new products.
- **Ensure security, prevent fraud, and debug –** To monitor for and prevent fraudulent activity, and ensure systems ad processes work properly and securely.
- **Technically deliver ads –** To allow you to see and interact with ads, your device can receive and send information.

To achieve these purposes we also use the following features:

- **Link different devices** - we may infer or determine which different devices are used by the same User or the same household for one or more of the above purposes.
- **Match and combining offline data sources** – we may combine data obtained from offline sources with data collected online in support of one or more of the above purposes.

3. What cookies and similar technologies we use in our services?	+

We use cookies and similar tracking technologies to collect and use personal information about you:

● Cookie based identification
Cookies are alphanumeric identifiers that are created on your device through your web browser for record-keeping purposes. Cookies are used to identify a user and store a randomly generated identifier to identify his or her browser across visits. LoopMe drops cookies if you are using a web or mobile browser in order to identify you as a unique user.

● Cookieless identification
If you or your browser has blocked the dropping of cookies, LoopMe may use identification methodology based on IP address, browser and device characteristics. This allows LoopMe to uniquely identify a user in order to provide the effective delivery of our services and in order continue serving advertising which is relevant to that user's interests.

● Pixels
In addition to the above, certain LoopMe advertisers may implement the LoopMe pixel, their own pixels and or their partner's pixels on their websites (collectively, the "Pixels"). Pixels are utilised for the purposes of providing analytics to advertisers with regards to the advertiser's campaign (for example, to see how many users viewed the advertiser's campaign). We require our advertisers to disclose the use of third party pixels and/or cookies to end users via their website. As these cookies and/or pixels are added at the sole discretion of our advertisers you will be subject to that advertiser's privacy notice and/or privacy policy.

4. Who we share your information with? +

We may disclose your personal information to the following categories of recipients:

- **Group companies** supporting our services for business and operational purposes
- **Third party service providers and/or partners** who provide data processing services to us or otherwise process personal information for purposes described in this Privacy Notice. These may including the categories of partners listed below. For a detailed list of third party providers with whom we may share data please see this link. In addition, for more details on what these partners do, please refer to our Glossary.
- **An actual or potential buyer (and its agents and advisers)** in connection with any actual or proposed business transition, such as a merger, acquisition by another company, or sale of all or a portion of our assets, provided that your information is only used for the purposes disclosed in this Privacy Notice.
- **Any competent law enforcement body, regulatory agency, 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;
- Anyone else with your consent.

5. Your rights +

- **LoopMe Opt Out**

You may opt out of receiving LoopMe's personalised advertisements on your device or browser at any time via our Opt Out Page here.

Please note that, even though you have opted out of LoopMe:

- You will still see LoopMe recommendations however, these will not be personalised. The recommendations will still use information about the Partner Site you are viewing (i.e., contextual information) to provide you recommendations on that page.

- The opt out is cookie based and device/browser specific. If you browse the web from several devices and/or browsers, you will need to opt out from each device and/or browser.
- Opting out of personalisation tracking is not the same as blocking cookies.
- **Alternative Opt-Out Options.**

If you'd like to opt-out from having LoopMe use your web viewing data and other information for web-based IBA purposes, the DAA and NAI provide websites where you can learn more about IBA and opt out of receiving targeted ads from our advertising partners who participate in the DAA or NAI programs. You can access these websites at www.aboutads.info/choices and at www.networkadvertising.org/choices. Residents of the EEA and Switzerland may visit www.youronlinechoices.com.If you are located in Canada, you can access this information at https://youradchoices.ca/choices/.

If you are using a mobile device, you may be able to opt out of receiving IBA by LoopMe based on app usage data, through your device settings as described below. We provide the following descriptions solely for informational purposes. For additional information and up to date methods of opting out, you should consult your device settings, and instructions provided by device manufacturers. Additional information can be found at www.networkadvertising.org/understanding-online-advertising/what-are-my-options.

- **Additional Rights (EEA and UK Users only) Territory Citizens**

  If you are a resident of the European Economic Area or (after the end of the UK's transitional period) the UK, you have the following additional rights:

- the right to request **access to**, **correction** of, **updates** to, or **deletion of** your personal information;
- the right to **object to processing** of your personal information, ask us to **restrict processing** of your personal information or request portability of your information;
- where we process your personal information on the basis of consent, the right to **withdraw your consent** at any time;
- the right to **complain to a data protection authority** if believed that the processing of your personal data is in violation of the legislation. For more information please contact your local data protection authority.

If you are in the UK, or the European Economic Areas, the controller of your data is LoopMe UK Limited. 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 have any questions or would like to exercise any of these rights by contacting us at privacy@loopme.com.

6. Legal Basis for Processing (EEA and UK user only) +

We use cookies and similar tracking technologies to collect and use personal information about you:

● Cookie based identification
Cookies are alphanumeric identifiers that are created on your device through your web browser for record-keeping purposes. Cookies are used to identify a user and store a randomly generated identifier to identify his or her browser across visits. LoopMe drops cookies if you are using a web or mobile browser in order to identify you as a unique user.

● Cookieless identification
If you or your browser has blocked the dropping of cookies, LoopMe may use identification methodology based on IP address, browser and device characteristics. This allows LoopMe to uniquely identify a user in order to provide the effective delivery of our services and in order continue serving advertising which is relevant to that user's interests.

- **Pixels**

In addition to the above, certain LoopMe advertisers may implement the LoopMe pixel, their own pixels and or their partner's pixels on their websites (collectively, the "Pixels"). Pixels are utilised for the purposes of providing analytics to advertisers with regards to the advertiser's campaign (for example, to see how many users viewed the advertiser's campaign). We require our advertisers to disclose the use of third party pixels and/or cookies to end users via their website. As these cookies and/or pixels are added at the sole discretion of our advertisers you will be subject to that advertiser's privacy notice and/or privacy policy.

7. How we keep personal information secure

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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.

8. International Data Transfers

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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 primary servers are located in Germany, 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 have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA or the UK in accordance with European Union data protection law.

9. Data retention

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LoopMe retains personal information based on how long the specific data is required for legal or business purposes (for example, we will keep a browsing event information for 13 months).

When we no longer need personal data, we securely 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. Aggregated data, which cannot identify a device/browser (or individual) and is used for purposes of reporting and analysis, is maintained for as long as commercially necessary.

10. Children

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None of our services are directed to children under 16. We do not knowingly collect personal data from anyone under 16 years of age. If we determine upon collection that a personal data belongs to an individual under 16, we will not use or maintain his/her personal data. If we become aware that we have unknowingly collected personal data from a child under the age of 16, we will make reasonable efforts to delete such information from our records.

11. California Privacy Rights

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This section applies only to California residents. It describes how we collect, use and share Personal Information of California residents in operating our business, and their rights with respect to that Personal Information. For purposes of this section, " Personal Information" has the meaning given in the California Consumer Privacy Act of 2018 ("CCPA") but does not include information exempted from the scope of the CCPA.

1. Your California privacy rights

2. How to exercise your rights

3. Right to opt-out of the "sale" of your personal information

4. Personal information that we collect, use and share

Your California privacy rights.

As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
- The categories of Personal Information that we have collected.
- The categories of sources from which we collected Personal Information.
- The business or commercial purpose for collecting and/or selling Personal Information.
- The categories of third parties with whom we share Personal Information.
- Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of third party recipient.
- Whether we've sold your Personal Information, and if so, the categories of Personal Information received by each category of third party recipient.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-out of sales.** If we sell your Personal Information, you can opt-out. In addition, if you direct us not to sell your Personal Information, we will consider it a request pursuant to California's "Shine the Light" law to stop sharing your personal information covered by that law with third parties for their direct marketing purposes.
- **Opt-in.** We contractually prohibit our publishing and advertising clients from placing our technology on pages that target individuals younger than 16 years old. If we learn that you are younger than 16 years old, we will be asking for your permission (or if you are younger than 13 years old, your parent or guardian's permission) to sell your Personal Information before we do so.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination. This means that we will not penalise you for exercising your rights by taking actions such as denying you services; increasing the price/rate of services; decreasing service quality; or suggesting that we may penalise you as described above for exercising your rights.

How to exercise your rights

You may exercise your California privacy rights described above as follows:
Right to information, access and deletion. You can request to exercise your information, access and deletion rights by:

- calling us toll free on 1-866-I-OPT-OUT and entering service code 815# to leave us a message.
- emailing privacy@loopme.com
- sending a request by mail to LoopMe Limited, 107 Cheapside, EC2V 6DN, Attn: Privacy
- submitting a request by completing the webform found here.

Right to opt-out of the "sale" of your Personal Information.
California law classifies our use of these services as a "sale" of your Personal Information to the companies that provide the services. This is because we allow them to collect information from our website users (e.g., online identifiers and browsing activity) so they can help serve ads more likely to interest you. To opt-out of this " sale," click on this link where you can opt out of personalised recommendations. We will need to confirm your identity and California residency to process your requests to exercise your information, access or deletion rights. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

Personal information that we collect, use and share
The chart below summarises how we collect, use and share Personal Information by reference to the statutory categories specified in the CCPA, and describes our practices during the 12 months preceding the effective date of this Privacy Policy. Categories in the chart refer to the categories described above in the general section of this Privacy Policy.

LoopMeUser Type	Statutory category of personal information (PI) click here for details	Source of the PI	Purpose for collection	How we may share, disclose or "sell" information.
Users of our technology	Identifiers Online Identifiers Geolocation Data Inferences Internet or Network Information	Users	See "what information we collect and why" section above	We may disclose or make available your Personal Information to our trusted partners. In most cases when we do so, we have contractually restricted their uses of this data for agreed business purposes.

12. How to contact us +

If you have any questions, comments and requests regarding our use of your personal information or this Privacy Notice please feel free to contact us / our data protection officer at privacy@LoopMe.com.