

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

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- **Who we are**

LoopMe means LoopMe Limited (company number 07979184), a company registered in England and its affiliated subsidiaries (collectively, "LoopMe," or "we", "us", "our"). We partner with publishers and marketers across the globe.

LoopMe is a member of the [European Interactive Digital Advertising Alliance \("EDAA"\)](#) and the [Network Advertising Initiative \("NAI"\)](#) (US) self-regulatory bodies and adheres to the EDAA guiding principles and the NAI Codes of Conduct respectively. LoopMe was also awarded the [ePrivacy seal](#) for EU data protection, following an in-depth audit of the entirety of LoopMe's business, products and third party commercial relationships against high technical and legal standards relating to GDPR and other applicable legislation. [ePrivacy](#) is a leading independent body specialising in European data protection and privacy.

LoopMe also follows the Digital Advertising Alliance ("DAA") Self-Regulatory Principles and is a member of the IAB (Internet Advertising Bureau) in the UK. LoopMe participates in the IAB Europe Transparency and Consent Framework and complies with the Policies and Specifications of this framework. LoopMe's identification number for this framework is Vendor Number 109. 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 can be found below:

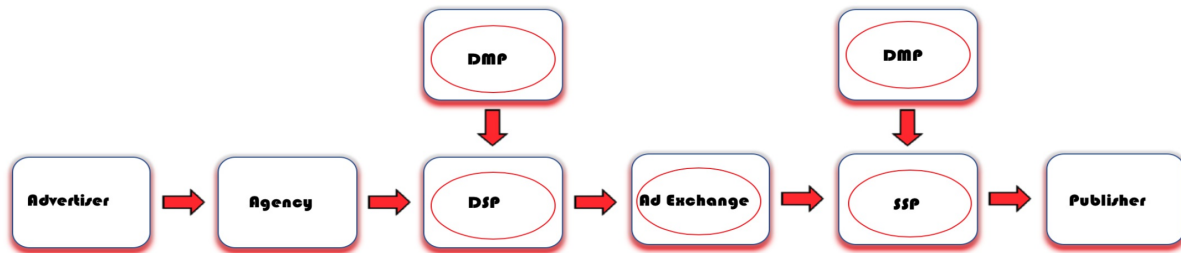
Term	Definition
Ad Exchange	A technology platform that facilitates the buying and selling of Ad Inventory between Publishers and Advertisers through real time bidding (or RTB).
Ad Inventory	Refers to space for advertising that a Publisher has available on its websites and/or apps at any given time.

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 an individual 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 deliver 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 Ad 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 - SSP, Ad Exchange, DSP and DMP. We have circled the different roles we may play below:



2. What information we collect and why

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

Identifiers	<ul style="list-style-type: none"> • 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 where the advertising space is located (e.g. application name or IDFA). • Probabilistic identifiers included in the bid stream.
Information about your device	<ul style="list-style-type: none"> • Type of device (e.g. smartphone, laptop, Connected TV ("CTV")/over the top "OTT" device) • Operating system of your device version, language, date and time • Network carrier information (e.g. Wifi, 4G or Wired connection)
Browsing events	<ul style="list-style-type: none"> • Page or app URL (e.g., www.publishersite.com) • Browser Information (e.g. Safari or Chrome) usage. • 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	<ul style="list-style-type: none"> • 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). • Location data: On mobile apps, we may collect your 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. Where you chose to provide it, this may include sensitive personal information such as information about any health conditions you suffer from. Survey responses are recorded against Identifiers which we receive from our Open RTB partners in connection with showing our survey to you.
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).
Privacy choices	We record your preferences regarding the processing of your data, based on the information you have received.

We collect this information from the following sources:

- **Automatically from your device.** We may automatically collect information from your device (e.g. smartphone, laptop, CTV/OTT) when you visit websites or apps of advertisers and publishers that we work with. Cookies, device or similar online identifiers (e.g. login-based identifiers, randomly assigned identifiers, network based identifiers) together with other information (e.g. browser type and information, language, screen size, supported technologies etc.) can be stored or read on your device to recognise it each time it connects to an app or to a website, for one or several of the purposes set out below. 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 Global Vendors under the IAB's transparency and consent framework ("TCF"). For a detailed list of TCF Registered Global Vendors please see [here](#).

We use this information we collect for the following purposes:

- **Use limited data to select advertising** – Advertising presented to you can be based on limited data, such as the website or app you are using, your non-precise geolocation, your device type or which content you are (or have been) interacting with (for example, to limit the number of times an ad is presented to you).
- **Create a personalised advertising profile about you** – Information about your activity on a website or app (such as forms you submit, content you look at) can be stored and combined with other information about you (for example, information from your previous activity on that or other websites or apps) or similar users. This is then used to build or improve a profile about you (that might include possible interests and personal aspects). Your profile can be used (also later) to present advertising that appears more relevant based on your possible interests by us or other entities.
- **Use an advertising profile about you to select personalised advertising** – Advertising presented to you on a website or app

can be based on your advertising profiles, which can reflect your activity on that or other websites or apps (like the forms you submit, content you look at), possible interests and personal aspects.

- **Measure ad performance** - Information regarding which advertising is presented to you and how you interact with it can be used to determine how well an ad has worked for you or other users and whether the goals of the advertising were reached. For instance, whether you saw an ad, whether you clicked on it, whether it led you to buy a product or visit a website, etc. This is very helpful to understand the relevance of advertising campaigns.
- **Understand audiences through statistics or combinations of data from different sources** - Reports can be generated based on the combination of data sets (like user profiles, statistics, market research, analytics data) regarding your interactions and those of other users with advertising or (non-advertising) content to identify common characteristics (for instance, to determine which target audiences are more receptive to an ad campaign or to certain contents).
- **Develop and improve our products** - Information about your activity on a website or app, such as your interaction with ads or content, can be very helpful to improve our products and services and to build new products and services based on user interactions, the type of audience, etc. This specific purpose does not include the development or improvement of user profiles and identifiers.
- **Ensure security, prevent and detect fraud, and fix errors** – Your data is used to monitor for and prevent unusual and possibly fraudulent activity (for example, regarding advertising, ad clicks by bots), and ensure systems and processes work properly and securely. It can also be used to correct any problems you, the Publisher or the Advertiser may encounter in the delivery of ads and in your interaction with them.
- **Deliver and present advertising** – Certain information (like an IP address or device capabilities) is used to ensure the technical compatibility of the advertising, and to facilitate the transmission of the ad to your device..

Additionally:

We preserve and share information when we seek legal advice or seek to protect ourselves in the context of litigation and other disputes. This includes matters such as violations of our Terms and policies

We preserve and share information with others including law enforcement bodies and to respond to legal requests where not compelled by law.

We process information when we comply with a legal obligation including, for example, to access, preserve or disclose certain information if there is a valid legal request from a regulator, law enforcement or others.

To achieve these purposes, we also do the following:

- **Link different devices** - In support of the above purposes, your device might be considered as likely linked to other devices that belong to you or your household (for instance because you are logged in to the same service on both your phone and your computer, or because you may use the same Internet connection on both devices).
- **Match and combine data from other data sources** – Information about your activity on a website or app may be matched and combined with other information relating to you and originating from various sources (for instance your activity on a separate online service, your use of a loyalty card in-store, or your answers to a survey), in support of the purposes explained in this notice.
- **Identify devices based on information transmitted automatically** - Your device might be distinguished from other devices based on information it automatically sends when accessing the Internet (for instance, the IP address of your Internet connection or the type of browser you are using) in support of the purposes exposed in this notice.
- **Use precise geolocation data** - With your acceptance, your precise location (within a radius of less than 500 metres) may be used in support of the above purposes.

- **Actively scan device characteristics for identification** - With your acceptance, certain characteristics specific to your device might be requested and used to distinguish it from other devices (such as the installed fonts or plugins, the resolution of your screen) in support of the above purposes.
- **Interest inferences** - we may make inferences about your interests in order to categorise you as suitable for receiving certain types of ads.

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

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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.

- **Advertiser Cookies**

LoopMe uses cookies and other technologies for advertising, including serving and personalising ads based on users' interests. Our 'viewer_token' advertising cookie is used for recording which adverts have been displayed on the page you visited and enables us to ensure you are not shown the same ads too many times. We can also use the data in this cookie to report on effectiveness of the ads for the advertiser. The viewer_token cookie is set to expire after 90 days.

- **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?

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

- **Group companies** supporting our services for business and operational purposes. These include LoopMe Inc, LoopMe Singapore Pte Ltd and LoopMe LLC.
- **Service providers** who provide data processing services to us or otherwise process personal information for purposes described in this Privacy Notice on our behalf. A list detailing some of these providers is provided [here](#).
- **Third Party Partners** in the advertising ecosystem such as ad networks, data providers and other AdTech service providers. A list detailing some of the third party providers LoopMe works with and may share data with or receive data from please see this [link](#). Please note, in very limited circumstances, LoopMe Limited's US subsidiary LoopMe Inc. acts as joint controller with LoopMe Ltd, e.g. transfers to US DSPs which have contracted with LoopMe Inc.
- **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

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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 advertisements delivered by LoopMe however, these will not be personalised. LoopMe will still use information about the Partner Site you are viewing (i.e., contextual information) to provide you advertisements 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 interest based advertising purposes, the DAA and NAI provide websites where you can learn more about these practices 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, UK 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 interest-based ads by LoopMe based on app usage data, through your device settings. 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. Note, we provide the following descriptions solely for informational purposes.

Additional Rights (EEA and UK Users only) Territory Citizens

If you are a resident of the European Economic Area or 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 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

In the EEA or UK we must satisfy a "legal basis" for processing your information. Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the purpose for which we use it.

Consent

We process information for the purposes described below when you have given us your consent to do so. The categories of information used and why and how it's processed are set out below:

Why and How we process your information	Information categories used
<ol style="list-style-type: none"> 1. Create a personalised advertising profile about you – Information about your activity on a website or app (such as forms and survey responses you submit, content you look at) can be stored and combined with other information about you (for example, information from your previous activity on that or other websites or apps or responses to previous surveys) or similar users. This is then used to build or improve a profile about you (that might include possible interests and personal aspects). Your profile can be used (also later) to present advertising that appears more relevant based on your possible interests by us or other entities. 2. Use an advertising profile about you to select personalised advertising – Advertising presented to you on a website or app can be based on your advertising profiles, which can reflect your activity on that or other websites or apps (like the forms and survey responses you submit, content you look at), possible interests and personal aspects. 3. Measure ad performance - Information regarding which advertising is presented to you and how you interact with it can be used to determine how well an ad has worked for you or other users and whether the goals of the advertising were reached. For instance, whether you saw an ad, whether you clicked on it, whether you responded to a survey, whether it led you to buy a product or visit a website, etc. This is very helpful to understand the relevance of advertising campaigns. 4. Understand audiences through statistics or 	<p>Identifiers</p> <p><i>LoopMe online identifiers</i></p> <p><i>IP address</i></p> <p><i>Advertising identifiers (e.g., such as Apple's IDFA or Google's AAID)</i></p> <p><i>Information about the application where the advertising space is located (e.g. application name or IDFA)</i></p> <p>Information about your device</p> <p><i>Type of device (e.g. smartphone, laptop, CTV/OTT device)</i></p> <p><i>Operating system of your device, version, language, date and time</i></p> <p><i>Network carrier name and information (e.g. Wifi, 4G or Wired connection)</i></p> <p>Browsing events</p> <p><i>Page or app URL Browser Information (e.g. Safari or Chrome) usage</i></p> <p><i>App usage</i></p> <p><i>User Interactions</i></p> <p>Location information</p> <p><i>Non-precise location information at the country, city, neighborhood or similar level that are derived from user IP Address</i></p>

combinations of data from different sources - Reports can be generated based on the combination of data sets (like user profiles, statistics, market research, analytics data and survey responses) regarding your interactions and those of other users with advertising or (non-advertising) content to identify common characteristics (for instance, to determine which target audiences are more receptive to an ad campaign or to certain contents).

5. Develop and improve our products - Information about your activity on a website or app, such as your interaction with ads or content, can be very helpful to improve our products and services and to build new products and services based on user interactions, the type of audience, etc. This specific purpose does not include the development or improvement of user profiles and identifiers.

6. Use limited data to select advertising - Advertising presented to you can be based on limited data, such as the website or app you are using, your non-precise geolocation, your device type or which content you are (or have been) interacting with (for example, to limit the number of times an ad is presented to you).

Survey data

Inferred data

Privacy choices

Identifiers

LoopMe online identifiers

Advertising identifiers (e.g., such as Apple's IDFA or Google's AAID)

Information about the application where the advertising space is located (e.g. application name or IDFA)

Information about your device

Type of device (e.g. smartphone, laptop, CTV/OTT device)

Operating system of your device, version, language, date and time

Network carrier name and information (e.g. Wifi, 4G or Wired connection)

Browsing events

Page or app URL

Browser Information (e.g. Safari or Chrome) usage

App usage

Geolocation information

Non-Precise Geolocation data: On web and web mobile, non-precise location information at the country and/or city level that are derived from user

IP Address

Precise Geolocation data: On mobile apps, precise

geolocation on the publisher's app (latitude / longitude)

Privacy choices

Legitimate interests

We rely on our legitimate interests or the legitimate interests of a third -party where they are not outweighed by your interests or fundamental rights and freedoms ("legitimate interests"), as follows:

<u>Why And How We Process Your Information</u>	<u>Legitimate Interests Relied On</u>	<u>Information Categories Used</u>
We preserve and share information when we seek legal advice or seek to protect ourselves in the context of litigation and other disputes. This includes matters such as violations of our Terms and policies.	<p>It is in our interest and in the interest of the public to respond to complaints, prevent and address fraud, violations of our Terms and policies, or other harmful or illegal activity.</p> <p>It is in our interest to seek legal advice and protect ourselves (including our rights, personnel, property or products), our users or others, including as part of investigations or regulatory inquiries and litigation or other disputes.</p>	<p><i>Identifiers</i></p> <p><i>LoopMe online identifiers</i></p> <p><i>Advertising identifiers (e.g., such as Apple's IDFA or Google's AAID)</i></p> <p><i>Information about the application where the advertising space is located (e.g. application name or IDFA)</i></p> <p><i>Information about your device</i></p> <p><i>Type of device (e.g. smartphone, laptop, CTV/OTT device)</i></p> <p><i>Operating system of your device, version, language, date and time</i></p> <p><i>Network carrier name and information (e.g. Wifi, 4G or Wired connection)</i></p> <p><i>Browsing events</i></p> <p><i>Page or app URL</i></p> <p><i>Browser Information (e.g. Safari or Chrome) usage.</i></p> <p><i>App usage</i></p> <p><i>User Interactions.</i></p>

		<p>Geolocation information</p> <p><i>Non-Precise Geolocation data:</i> <i>On web and web mobile, non-precise location information at the country and/or city level that are derived from user IP Address</i></p> <p><i>Precise Geolocation data: On mobile apps, your precise Geo Location on the publisher's app (latitude / longitude)</i></p> <p>Survey data</p> <p>Inferred data</p> <p>Privacy choices</p>
<p>We preserve and share information with others including law enforcement bodies and to respond to legal requests where not compelled by law.</p>	<p>It is in our interest to protect ourselves (including our rights, personnel, property or products), our users or others, including as part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm.</p> <p>Relevant law enforcement, government, authorities and industry partners have a legitimate interest in investigating and combating abusive or illegal behaviour.</p>	
<p>Ensure security, prevent and detect fraud, and fix errors - Your data is used to monitor for and prevent unusual and possibly fraudulent activity (for example, regarding advertising, ad clicks by bots), and ensure systems and processes work properly and securely. It can also be used to correct any problems you, the Publisher or the Advertiser may encounter in the delivery of ads and in your interaction with them.</p>	<p>It is in our interest and in the interest of the public to prevent and address fraud, violations of our Terms and policies, or other harmful or illegal activity.</p>	<p>Identifiers</p> <p><i>LoopMe online identifiers</i></p> <p><i>Advertising identifiers (e.g., such as Apple's IDFA or Google's AAID)</i></p> <p><i>Information about the application where the advertising space is located (e.g. application name or IDFA)</i></p> <p>Information about your device</p> <p><i>Type of device (e.g. smartphone, laptop, CTV/OTT device)</i></p>

Operating system of your device, version, language, date and time

Network carrier name and information (e.g. Wifi, 4G or Wired connection)

Browsing events

Page or app URL

Browser Information (e.g. Safari or Chrome) usage.

App usage and browsing information from apps a User has installed on their device.

User Interactions.

Geolocation information

Non-Precise Geolocation data: On web and web mobile., non-precise location information at the country and/or city level that are derived from user IP Address

Precise Geolocation data: On mobile apps, your precise Geo Location on the publisher's app (latitude / longitude) (subject to your consent where required

Privacy choices

Deliver and present advertising - Certain information (like an IP address or device capabilities) is used to ensure the technical compatibility of the advertising, and to facilitate the transmission of the ad to your device

It is in our interest, as an advertising platform, to process data for the technical purpose of delivering ads and content.

You have the right to object to, and seek restriction of, this processing. To exercise your rights, please see section 5 of this Privacy Policy

Compliance With A Legal Obligation

Why And How We Process Your Information

We process information when we comply with a legal obligation including, for example, to access, preserve or disclose certain information if there is a valid legal request from a regulator, law enforcement or others.

Examples of laws that could give rise to an obligation requiring us to process information we hold about you are:

- Corporate and taxation matters: to comply with our obligations under companies legislation and tax law.
- Regulatory matters: to comply with our obligations to engage with regulators, such as data protection regulators.
- Court Matters: a court order may require us to process or disclose personal data for a particular purpose.
- Criminal matters: to comply with requests from applicable enforcement bodies to provide information in relation to a criminal investigation, as required by applicable law.

Information Categories Used

The actual information used depends on the specific legal obligation, but could include any of the following:

The categories of information depend on the specific circumstances of each mandatory request or obligation. Only the information necessary to comply with the relevant legal obligation will be processed. This may include:

Identifiers

LoopMe online identifiers

Advertising identifiers (e.g., such as Apple's IDFA or Google's AAID)

Information about the application where the advertising space is located (e.g. application name or IDFA)

Information about your device

Type of device (e.g. smartphone, laptop, CTV/OTT device)

Operating system of your device, version, language, date and time

Network carrier name and information (e.g. Wifi, 4G or Wired connection)

Browsing events

Page or app URL Browser Information (e.g. Safari or Chrome) usage.

App usage and browsing information from apps a User has installed on their device.

User Interactions.

Geolocation information

Non-Precise Geolocation data: On web and web mobile, non-precise location information at the country and/or city level that are derived from user IP Address

Precise Geolocation data: On mobile apps, your precise Geo Location on the publisher's app (latitude / longitude)

Survey data

Inferred data

Privacy choices

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 (and UK equivalent) 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 and/or UK data protection law. As mentioned above in Section 4, in very limited circumstances, LoopMe Limited's US subsidiary LoopMe Inc. acts as joint controller with LoopMe Ltd, e.g. transfers to US DSPs which have contracted with LoopMe Inc.

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. LoopMe deletes all event level data (ad views, clicks etc.) after 13 months. User profiles (against which the event level data is stored) are classified as active or dormant. If a profile has had an event within the last 60 days it will be classed as Active. If there has been no event data the profile will become Dormant after 60 days. Dormant profiles are deleted where there has been no activity on the profile for a period of 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.

If you have any questions about LoopMe's data retention policy, please do get in touch using the contact information in Section 13 (How to Contact Us).

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. U.S. Privacy Rights



If you live in certain states, the law of your state may grant you certain privacy rights and entitle you to receive certain disclosures. This section explains those rights and provides those disclosures.

Your privacy rights.

As a resident of a state with a consumer privacy law, 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.

- **Opt-Out of Sales, Sharing, and Targeted Advertising.** You have the right to opt out of any practices that entail the “sale,” “share,” or use of your personal information for “targeted advertising” purposes as such terms are defined by the law in the state where you live.
- **Access.** You may request a copy of the Personal Information that we hold about you.
- **Deletion.** You may ask us to delete the Personal Information that we have collected from you.
- **Correction.** You may ask that we correct the Personal Information that we hold about you if it is inaccurate.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination. We will not penalise you for exercising your rights.

How to Opt out of Sales, Shares, and Targeted Advertising

We use the data we collect to show ads that are more relevant to your interests, and we may provide information to others for such purposes. These activities may constitute “selling,” “sharing,” or processing personal information for targeted advertising purposes under relevant state laws. You may opt out of these practices by clicking [here](#) or by visiting our services with a legally recognized opt out preference signal, like Global Privacy Control, enabled.

How to exercise your right to Access, Correct, or Delete Your Information

You may request to access, correct, or delete your data by emailing privacy@loopme.com.

We may ask for additional information in order to verify your request.

Additional Disclosures for California Residents

This section applies only to California residents. It describes how we collect, use and disclose Personal Information of California residents in operating our business. For purposes of this section, “Personal Information” has the meaning given in the California Consumer Privacy Act of 2018 (as amended, the “CCPA”). The chart below summarises how we collect, use, disclose and sell 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	Source of the PI	Purpose for collection	How we may share,
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	personal information (PI) click here for details			disclose or “sell” information.
End users who visit websites where our technology is used or who fill out our surveys	Identifiers Online Identifiers Location Data Inferences Internet or Network Activity Information	Users Advertisers Data provider partners Open RTB partners	See “what information we collect and why” section above	We may disclose or make available your Personal Information to our trusted partners for the purposes described in this policy.

We also collect any information you provide in response to a LoopMe survey, including any sensitive information you choose to provide (such as information about information about any health conditions from which you suffer), however we do not use any such information other than is permitted by the CCPA.

You have the right to opt out of any sharing or sales of your personal information, to limit use of sensitive personal information for advertising purposes, and to request access to and deletion or correction of your personal information. Please see the section immediately above for more information about your privacy rights and how to exercise them. If you have any issues exercising your rights, you may also call us toll free at 1-866-I-OPT-OUT and enter service code 815#. If you exercise your rights, we may require you to provide evidence that the data relates to you (and only to you) and may deny your request if you cannot provide such information. You may also designate an authorised agent to make such requests on your behalf, as permitted under CCPA. If you do so, we will require the agent to provide proof that they are acting on your behalf, and we may ask you to verify your identity and to confirm that you provided the agent with permission to submit the request on your behalf. You will not be discriminated against for the exercise of such rights. Please note that if you wish to exercise any of your rights with our clients or partners, you must make your request directly with those clients and partners. We do not “sell” the personal information of any end user whom we know to be under 16.

12. Health Segments (US Only)



Health Segments (US Only): LoopMe does not target on the basis of sensitive data or conditions (as defined by the [NAI](#)). Instead, LoopMe may work with partners on a case by case basis to help them reach a more relevant audience based on demographic factors. Survey responses relating to any sensitive health conditions/treatment may ONLY be used to determine corresponding demographic data points (age, gender, coarse geo, broad purchasing patterns, etc.) and LoopMe then builds/refines an audience comprising new users for that advertiser’s ad based on those demographics only. Recent audiences built using this methodology were intended to reach people who were more likely to be interested in learning about the diagnosis of, and/or treatments for, heart attacks/failure, alcohol dependency, ADHD and diabetes.

Additionally, in accordance with the [NAI's policy on health segments](#), please see LoopMe’s list of [standard off-the-shelf health related segments](#).

13. 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.