

# Machine Privacy Policy

In this Privacy Policy & Data Protection Statement we inform you of how we collect and use certain information concerning Internet end users, in the course of our mobile advertising services.

This information is in compliance with EU Regulation 2016/679, otherwise known as the General Data Protection Regulation (GDPR). In particular, we aim to comply with the transparency and information requirement set in Articles 13 and 14 GDPR.

## Who we are

Machine Advertising Limited ("Machine") is the industry leader in app install fraud protection and risk management, headquartered in the United Kingdom, Studio 411, Exmouth House, 3-11 Pine Street, London EC1R 0JH. Machine is registered with the UK's Information Commissioner's Office under registration number ZA328239.

## What categories of data we collect and/or process

When you visit a website or use an application that uses our technology, we collect certain information about you and your device, for the purpose of serving advertisements to you. Some of this information (including for example your IP addresses and certain unique device identifiers), may identify a particular computer or device, and may be considered personal data in some jurisdictions, such as the European Union.

We collect the following information that may be regarded as personal data:

- IP address
- Device identifiers such as cookie identifiers and unique device identifiers
- Data concerning the displaying of the advertising, such as date/time of viewing, and the website or application where the advertisement was displayed,
- Certain data concerning your activities and actions on the advertiser sites, in case you click on the advertising
- Geolocation (including city, region, country, zip code, and potentially geographic coordinates if you have enabled location services on your device).

## How we collect personal data

Most of this data is not directly collected by Machine, but collected transferred to us by third parties supplied within the online advertising supply chain, such as real time bidding markets. Where applicable, such parties have obtained consent from the relevant data subject, in order to transfer their data to us.

We currently work with the following mobile measurement platforms (MMP's)

- Adjust
- AppsFlyer
- Kochava
- Tune
- Tenjin

In addition to that, we use cookies and other standard web technologies to collect information,

including:

- “Tags and Pixels” are blocks of code that we and our customers may use to track your navigation of websites or apps using our technology, and your browsing behaviour. We use pixels to synchronize information that we have collected with information independently collected by our suppliers, clients, and other third parties that are interested in providing you with ads.
- “Cookies” are data files that often include a unique identifier, and are placed on a visitor's device or computer. We use cookies on our customers' websites in order to operate our technology and collect User Information. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>
- “SDKs” or “Software Development Kits” are blocks of code similar to tags and pixels that are embedded into an app that allow us to track certain information relating to your use of apps using our technology.

We also use standard device identifiers, for example the “IDFA” advertising identifier used on Apple's iOS devices or the “GAID” advertising identifier used on Google's Android enabled devices, to track your use of mobile apps. Additionally, we use other technologies, including locally stored objects, to collect User Information in order to assist with the delivery of ads and to provide reporting to our customers.

## What categories of data we do NOT collect

We do not collect the following categories of data:

- Data that might be regarded as sensitive under Article 9 GDPR, that is information concerning your race, sexual orientation, political affiliation or religious beliefs, among others.
- Data that might be used for the purpose of online behavioural advertising, that is data concerning your Internet navigation over time, and that might be used in order to infer your personal interests.

## What do we use this data for

Machine's clients are advertisers who advertise and promote mobile phone apps. Machine's proprietary AdServer, ClickServer and Helix product allows advertisers to detect and remove fraudulent app installs from their supply chain.

We use the categories of data mentioned above primarily in order to detect fraudulent impressions, fraudulent clicks and fraudulent app installs.

In particular, we can divide all the potential processing of the data in three different categories:

1. *Impression Monitoring.* By using device identifiers and contextual data such as geolocation, visited website, and date and hour of visit, we can deliver advertisement specifically to your phone. Managing advertising campaigns also means that we use your data for ancillary activities, such as enabling standard advertising controls, and to protect and investigated fraudulent or illegal activity.
2. *Click Monitoring.* By looking at the IP addresses of the devices clicking on adverts, we look for and identify patterns of suspicious behaviour. We use the IP addresses to block traffic from fraudulent publishers.
3. *Install and post install event processing.* By using device and cookie identifiers, we can track whether users that click on or simply see the advertisement we manage actually download and installs the app of our clients, and whether they actually buy or subscribe to any product or service.

We do not carry out automated decision-making processes, as described in Article 22 GDPR.

## Retaining data

We may store the information we collect, such as IP address and other information described above, for up to 6 months.

## Sharing data

We share the data with other companies operating in the online advertising industry, in order to carry out the campaign management, performance monitoring, and retargeting and segmenting functions outlined above.

In particular, we may enter data processing agreements with the following categories of data recipients:

- With demand side platforms, for the purpose of managing advertisement campaigns.
- With our clients (i.e. advertisers and advertising agencies), for the purposes of removing fraudulent inventory
- Where our operations entail a transfer of data outside the European Economic Area, Machine has entered into 'model clause' agreements with the relevant data recipient.

## Legal basis of data processing

The data processing operations described above are carried out on the grounds of two autonomous and independent legal basis.

In addition to that, Machine makes an effort to obtain consent from the relevant data subject for every data processing. Given that Machine does not interact directly with Internet end users, consent must be obtained and transferred by other companies within the advertising supply chain that have a direct relationship with the end user.

In order to obtain, transfer and revoke such consent, we use the following technological solutions:

- The IAB standard for GDPR consent management.

## Exercise your rights

If you are a resident of the European Economic Area, you have the right to access personal information we hold about you and to ask that your personal information be corrected, updated and deleted. You also have the right to withdraw any consent.

If you would like to exercise this right, please see our Data Subject Rights Policy for instructions on how to do so:

[\[Data Subject Rights Policy\]](#).

Please note that because most of the information we store can only identify a particular browser or device, and cannot identify you individually, we require you to provide us with some additional information to ensure that we provide you with accurate information.

In addition, you may also opt-out of receiving marketing communications from Machine. If you would like to exercise this right, please write to us at the contact details provided below.

## Contact our Data Protection Officer

Please do not hesitate to contact our Data Protection Officer in case you want to exercise any of your data protection rights, or if you have any question concerning our privacy and data protection policy. Our Data Protection Officer can be accessed at the following online and post addresses:

[privacy@machineadvertising.com](mailto:privacy@machineadvertising.com)

Machine Advertising Limited  
Studio 411, Exmouth House,  
3-11 Pine Street,  
London EC1R 0JH

You also have the right to lodge a complaint with our Data Protection Supervisory Authority, the Information Commissioner's Office (ICO).

## Changes to Our Privacy Policy

Machine may change and update this Privacy Policy at any time. If we make material changes to our Privacy Policy, we will notify you through a notice on our Website home page. Any material change or update to this Privacy Policy will be posted on our Website under "Privacy Policy". The date the privacy policy was last revised is identified at the bottom of the page. Your continued use of the Machine's products and services after the effective date of any changes will constitute your acceptance of all of the changes. Machine's updated Privacy Policy will apply to information that we collected after the effective date of the changes; all information collected prior to that will be subject to the terms of the then current version of our Privacy Policy.

## Contacting Us

If you have questions regarding our privacy practices, please submit a privacy inquiry or send us an email at [privacy@machineadvertising.com](mailto:privacy@machineadvertising.com).

## Miscellaneous

This Privacy Policy is incorporated by reference into our Terms of Use. We operate servers around the world and the data used by our Technology is transferred to the European Economic Area and the United States. If you are located outside of the European Economic Area or the United States, please be aware that any information you provide to us may be transferred to the European Economic Area or the United States.

Updated October 11th, 2017