

# MOBKOI LIMITED

## ADVERTISING PLATFORM PRIVACY POLICY

Last Updated March 2021

### 1 ABOUT MOBKOI'S SERVICES

Mobkoi Limited (“**Mobkoi**”, “**we**”, “**us**” or “**our**”) and its affiliates provide digital advertising services (our “**Services**”) to advertiser clients. In connection with these Services, Mobkoi and its affiliates purchase digital advertising space available on digital properties (including websites and apps) (“**Publisher Sites**”) that are owned and/or operated by third-party publishers (“**Publishers**”), and Mobkoi collects personal data from the end-users of the Publisher Sites (“**End Users**”) in order to display advertisements to those End Users when they visit those Publisher Sites.

### 2 WHO THIS PRIVACY POLICY APPLIES TO

This privacy policy (“**Privacy Policy**”) applies to End Users of Publisher Sites. We may update this Privacy Policy from time to time to reflect any changes or proposed changes to our use of personal data, or to comply with changes in applicable law or regulatory requirements. We encourage End Users to review this Privacy Policy periodically to keep up to date on how we use their personal data.

This Privacy Policy does not apply to users of our site at mobkoi.com and/or persons that we deal with, including personnel of our business partners, such as our advertiser clients and suppliers, in connection with the marketing, sale and delivery of our Services. For details of how we collect and use personal data in connection with those purposes, please see our [Website and Business Partner Privacy Policy](#).

### 3 PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy explains how and why we process the personal data of End Users in connection with their use of Publisher Sites. This Privacy Policy also sets out End Users' rights in respect of our processing of their personal data.

*When we talk about “personal data”, we mean any information which relates to an identified or identifiable living individual. Individuals might be identified by reference to an identification number, location data, an online identifier (such as an IP address) or to other factors that are specific to them.*

*This Privacy Policy only applies to the use of your personal data obtained by Mobkoi. It does not apply to personal data collected by third parties, including Publishers and our Advertising Partners. For further information about our Advertising Partners please see the “[Our Advertising Partners](#)” section below.*

### 4 WHO WE ARE

Mobkoi Limited an English company with registered company number: 09045201 and whose registered office is at Wework Old Street, 145 City Road, Hoxton, London, United Kingdom, EC1V 1LP. Mobkoi Limited has affiliates and/or offices in other jurisdictions, but Mobkoi Limited is the data controller responsible for End User data in connection with the Services.

Mobkoi participates and complies with the rules of an advertising industry framework called the IAB Europe Transparency & Consent Framework (“**IAB TCF**” or “**Framework**”), which consists of a set of technical specifications and policies to which members must adhere. Mobkoi's Framework identification number is 898.

### 5 HOW TO CONTACT US

If you have any questions about this Privacy Policy or want to exercise [your rights as a data subject](#) that are set out in this Privacy Policy, you can contact us by:

- sending an email to [contact@mobkoi.com](mailto:contact@mobkoi.com); or
- calling us on +44 (0)20 3950 7885.

## 6 HOW AND WHY WE COLLECT AND USE END USER PERSONAL DATA

### ➤ To display ads to you on Publisher Sites

When you visit a Publisher Site that we have partnered with, we receive a request from the Publisher Site to display one of our advertiser client's advertisements ("**Content**") to you. We receive this request through the use of a Mobkoi tag (a piece of code) on the Publisher Site which collects your IP address, information about the device you are using (for example the operating system and/or browser that you are using) and details of the Publisher Site that you are visiting.

We use the data that we receive as part of the request to deliver the Content to you on the Publisher Site. In order to do this, we partner with two third party Advertising Partners, OpenX Software Ltd ("**OpenX**") and Celtra, Inc. ("**Celtra**"). In particular:

- in some cases, we provide your IP address and information about the browser you are using to OpenX (who in turn provide this information to other advertising platforms that our advertiser clients work with); and
- we provide the advertiser's Content (together with the tracking pixels referred to in the section below) to Celtra. We then serve, on the Publisher Site, a Celtra tag which results in the Content being displayed to you.

For more information about Celtra and OpenX, please see the "[Our Advertising Partners](#)" section below.

### ➤ To determine what ads to show to you

In addition, in some cases, we determine your approximate location (e.g. the city that you are in) from the IP address that we receive, and we use the other information referred to above, in order to determine what advertisement will be most relevant to you. For example, if the Publisher Site is a car website and we determine that you are accessing the car website from the United Kingdom, we may use this information to display an advertisement for a UK-based car dealer.

However, please note that we do not collect information about your activity, interests, demographics or any other information in order to create a profile of you and/or to target advertisements to you based on your behaviours or interests.

### ➤ Verification, measurement and fraud prevention

We determine your approximate location (e.g. the city that you are in) from the IP address that we receive in order to verify the location of the End Users that receive our advertiser's Content.

We and our advertiser clients also embed third party tags in the Content which collect information from your device in order to: (i) verify that the Content has been delivered to you; (ii) measure the effectiveness of the Content; and (iii) protect us and our advertiser clients against fraudulent activity. The tags that we use for these purposes are operated by the following third parties:

- DoubleVerify Inc ("**Double Verify**"); and
- Oracle Corporation (aka Oracle Data Cloud - Moat) ("**Moat**").

Please note, our advertiser clients may use other measurement tags that are operated by other third parties.

In addition, we serve on the Publisher Sites tags that are operated by OpenX and our advertiser clients' advertising platforms (as referred to in the section above). These tags are

used by OpenX and the advertising platform for verification purposes and any other purposes disclosed in their privacy notices.

For further information about the third parties referred to in this section, please see the "[Our Advertising Partners](#)" section below.

## **7 WHAT IS OUR LEGAL BASIS AND WHAT CHOICE DO I HAVE?**

It is in our (and our advertiser clients') legitimate interest to process your personal data for the purposes described in the "[How and why we collect End User personal data](#)" section above. In particular, we carry out the above activities in order to effectively deliver our advertiser clients' advertising and to reach End Users that are most likely to be interested in our advertiser clients' products and services (in particular based on their approximate location and/or the type of Publisher Site that the End User is visiting).

We participate and comply with the IAB TCF, which is designed to ensure that End Users are provided with a choice as to the purposes for which their personal data is processed and the companies that are permitted to process their data.

Where we work with Publishers that target End Users who reside in the European Economic Area and/or the United Kingdom, we only work with Publishers that use an IAB TCF compliant consent management platform in order to collect any and all necessary consents and permissions as are required by local law. We will respect the choice that you make. However, please note that the Framework does not require us to obtain your opt-in consent for the purposes described in this Privacy Policy. In addition, for certain purposes (e.g. technically delivering ads or content) the IAB TCF does not require us or Publishers to provide End Users with a choice.

Please note that our Advertising Partners may rely on a different lawful basis in respect of their processing of your personal data. For further information about our Advertising Partners, please see the "[Our Advertising Partners](#)" section below.

## **8 OUR ADVERTISING PARTNERS**

We work with various third party advertising partners, as set out in the "[How and why we collect End User personal data](#)" section above. These third parties, and their respective privacy notices (where they are a separate controller of your personal data) are as follows:

- Celtra: <https://celtra.com/privacy-policy/>
- OpenX: <https://www.openx.com/legal/privacy-policy/>
- Double Verify: <https://doubleverify.com/privacy-policy/>
- Moat: Not applicable – please note that Moat process your personal data under our instructions for the purposes described in this Privacy Policy.

Please note, these advertising partners all participate in the IAB TCF. As stated in the "[What is our legal basis and what choice do I have](#)" section, where we work with Publishers that target End Users who reside in the European Economic Area and/or the United Kingdom, the IAB TCF requires (in certain circumstances) us and our Advertising Partners to process your personal data in accordance with the choices that you make.

Please note that our clients may use other measurement tags that are operated by other IAB TCF certified third parties.

## **9 TRANSFERS OUTSIDE THE UK AND THE EUROPEAN ECONOMIC AREA ("EEA")**

Where necessary we will transfer personal data to countries outside the UK and the EEA.

Non-EEA countries do not have the same data protection laws as the UK and the EEA. In particular, non-EEA countries may not provide the same degree of protection for your personal data, may not give you the same rights in relation to your personal data and may not have a data protection supervisory authority to help you if you have any concerns about the processing of your personal data. However, when transferring your personal data outside the UK or the EEA, we will comply with our legal and regulatory obligations in relation to your personal data, including having a lawful basis for transferring personal data and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data. We will take reasonable steps to ensure the security of your personal data in accordance with applicable data protection laws.

*When transferring your personal data outside the UK or the EEA, we will, where required by applicable law, implement at least one of the safeguards set out below. Please contact us if you would like further information on the specific mechanisms used by us when transferring your personal data outside the UK or the EEA.*

<b>Adequacy decisions</b>	We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see <a href="https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en">https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en</a> .
<b>Model clauses</b>	Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it would have in Europe. For further details, see <a href="https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en">https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en</a> .

## 10 HOW LONG WE KEEP YOUR PERSONAL DATA

We do not retain or store the personal data described in this Privacy Policy.

## 11 YOUR RIGHTS AS A DATA SUBJECT

You have certain rights in relation to the personal data we hold about you. These rights include the right: (i) to obtain copies of your personal data; (ii) to have your personal data corrected or deleted; (iii) to limit the way in which your personal data is used; (iv) to object to our use of your personal data; (v) to transfer your personal data; (vi) not to be subject to decisions based on automated processing (including profiling); and (vii) to complain to a supervisory authority. If you would like to exercise any of these rights, please contact us using the details set out in the "[How to Contact Us](#)" section above. However, as stated above, please note that we do not retain or store the personal data described in this Privacy Policy and, therefore, certain rights may not be applicable.

## 12 CONCERNS OR COMPLAINTS

In addition to your above referenced rights, if you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, please contact us using the contact details provided in the "[How to Contact Us](#)" section above. You can also report any issues or concerns to a national supervisory authority in the Member State of your residence or in the place of the alleged infringement. You can find a list of contact details for all EU supervisory authorities at [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

As we are incorporated in the United Kingdom, our regulatory authority is the Information Commissioner's Office ("**ICO**"). Contact details for the ICO can be found on its website at <https://ico.org.uk>.