

MOBKOI LIMITED

WEBSITE AND BUSINESS PARTNER PRIVACY POLICY

Last Updated March 2021

Mobkoi Limited (“**Mobkoi**”, “**we**”, “**us**” or “**our**”) provides digital advertising and creative services (our “**Services**”) to advertiser clients.

1 WHO THIS PRIVACY POLICY APPLIES TO

This privacy policy applies to persons who visit, use or contact us through mobkoi.com (the “**Site**”) and to persons that we deal with, including personnel of our business partners such as our clients and suppliers, in connection with the marketing, sale and delivery of our Services.

Please note that this privacy policy does not apply to the end-users of digital properties of third-party publishers that use our the advertising technologies that we use in connection with our Services. For details of how we collect and use personal data through these technologies, please see our [Advertising Platform Privacy Policy](#).

2 PURPOSE OF THIS PRIVACY POLICY

This privacy policy (“**Privacy Policy**”) explains our approach to any personal information that we might collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. This Privacy Policy also sets out your rights in respect of our processing of your personal information.

This Privacy Policy will inform you of the nature of the personal information about you that is processed by us and how you can request that we delete, update, transfer it and/or provide you with access to it.

This Privacy Policy is intended to assist you in making informed decisions when using the Site and interacting with us. Please take a moment to read and understand it.

Please also note that this Privacy Policy only applies to the use of your personal information obtained by us, it does not apply to your personal information collected during your communications with third parties.

3 WHO WE ARE

The Site and our Services are operated by Mobkoi Limited, (“**we**”, “**us**” or “**our**”).

*Mobkoi Limited is 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.*

4 HOW TO CONTACT US?

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us by:

- sending an e-mail to contact@mobkoi.com; or
- calling us on: +44 (0)20 3950 7885

5 WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

Our primary goal in collecting personal information from you is to: (i) verify your identity; (ii) help us improve our Services and develop and market new services; (iii) carry out requests made by you on the Site; (iv) investigate or settle inquiries or disputes; (v) comply with any applicable law, court order, other judicial process, or the requirements of a regulator; (vi) enforce our agreements with our clients and suppliers; (vii) protect the rights, property or safety of us or third parties, including our other clients, suppliers and their personnel and users of the Site; (viii) provide support for the provision of our Services; and (ix) use as otherwise required or permitted by law.

In particular, we use your personal information for the following purposes:

➤ **Use of our Site.**

*When you browse our Site, we collect and process analytics data relating to your browsing activity or interaction with our Site. This data includes [information about when your current or previous sessions started; details about any pages you viewed on the Site; and identifiers and technical information such as your IP address, device identifiers, browser type and operating system]. This is collected through the use of Google Analytics cookies. **Please see our Cookie Policy** to find out more about the cookies we use and how to manage and delete cookies.*

➤ **Fulfilment of our Services.**

We collect and maintain personal information that our clients and/or their personnel submit to us in connection with the fulfilment of our Services. We use the contact details you have provided to us so that we can fulfil the Services we have agreed to provide to you.

➤ **Receipt of products and services from our suppliers and partners**

If we have engaged the organisation you represent to provide us with products or services (for example, if you or the organisation you represent are a publisher we purchase advertising inventory from, or is a provider of IT support services), we will collect and process your personal data in order to manage our relationship with you or the organisation you represent, to receive the products and services from the organisation you represent and, where relevant, to provide our Services to our clients. The personal data that we collect from you may include your name and contact details any other personal data you volunteer which is relevant to our relationship with you or the organisation you represent.

➤ **Client and partner enquires.**

You can use the Site to request information, or you may otherwise contact us, to enquire about our Services and/or products and services that you provide. Contact information may be requested or collected in each case, together with details of other personal information that is relevant to your enquiry. This information is used in order to enable us to respond to your requests.

➤ **Business administration and legal compliance.**

We use your personal information for the following business administration and legal compliance purposes:

- *to comply with our legal obligations;*
- *to enforce our legal rights;*
- *protect rights of third parties; and*
- *in connection with a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets.*

Who do we share your personal information with for these purposes?

We will share your personal information with professional advisers such as lawyers and accountants and/or governmental or regulatory authorities.

6 WHAT IS OUR LEGAL BASIS?

Where we use your personal information in connection with the prospective or actual delivery of our Services, or receipt of products and services, the processing is necessary for the performance of a contract that we have (or potentially will have) with you or it is otherwise in our legitimate interest to use your data in order to supply our Services or receive products and services efficiently.

Where we use your personal information for business administration and legal compliance purposes, it is in our legitimate interest to do so or it is our legal obligation to use your personal information to comply with any legal obligations imposed upon us, such as a court order.

7 HOW DO WE OBTAIN YOUR CONSENT?

Where our use of your personal information requires your consent, you can provide such consent:

- at the time we collect your personal information following the instructions provided; or
- by informing us by e-mail, post or phone using the contact details set out in this Privacy Policy.

8 THIRD PARTY LINKS AND SERVICES

Our Site contains links to third party sites and services. Please remember that when you use a link to go from our Site to another website or you request a service from a third party, this Privacy Policy no longer applies.

Your browsing and interaction on any other sites, or your dealings with any other third party service provider, is subject to that website's or third party service provider's own rules and policies.

We do not monitor, control, or endorse the privacy practices of any third parties.

We encourage you to become familiar with the privacy practices of every website you visit or third party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices.

This Privacy Policy applies solely to personal information collected by us through our Service and does not apply to these third party sites and third party service providers.

9 HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We keep your personal information for a period of 3 years from the date of our last interaction with you.

If your information is only useful for a short period e.g. for specific marketing campaigns we may delete it.

10 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION

We are committed to keeping the personal information you provide to us secure and we will take reasonable precautions to protect your personal information from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- *unauthorised access;*
- *improper use or disclosure;*
- *unauthorised modification; and*
- *unlawful destruction or accidental loss.*

All of our employees and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all users of our Services.

11 HOW TO ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS?

You have the following rights in relation to the personal information we hold about you:

➤ **Your right of access.**

If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

➤ **Your right to rectification.**

If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

➤ **Your right to erasure.**

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

➤ **Your right to restrict processing.**

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us processing it. It won't stop us from storing your personal information though. We'll tell you before we lift any restriction. If we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

➤ **Your right to data portability..**

With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

➤ **Your right to object.**

You can ask us to stop processing your personal information, and we will do so, if we are:

- *relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or*
- *processing your personal information for direct marketing.*

➤ **Your rights in relation to automated decision-making and profiling.**

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

➤ **Your right to withdraw consent.**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

➤ **Your right to lodge a complaint with the supervisory authority.**

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

12 CHANGES TO THIS PRIVACY POLICY

We may make changes to this Privacy Policy from time to time.

To ensure that you are always aware of how we use your personal information we will update this Privacy Policy from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We will notify you by e-mail of any significant changes. However, we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.