

Monochrome Media Privacy Policy

[Last Revised: May 24, 2022]

Monochrome Media LTD (“we” “us” “our” or “**Monochrome Media**”) is a global ad-tech company that operates and provides an online supply side platform currently known as “Compass” (“**SSP**”). Company’s SSP provides third party partners (“**Advertisers**”) with a proprietary technology, designed and developed to offer an end-to-end solution, which enables third party publishers (“**Publishers**”) to display online advertisements to end users who use or otherwise interact with certain mobile webpages and desktop websites (“**Digital Assets**”) using available solutions in the market, such as real time bidding, tag integration, header bidding and other advanced hybrid solutions.

Monochrome Media recognizes the importance of your privacy and we take this issue very seriously. To this end, we have designed the Monochrome Media Privacy Policy in a format that is easy to read so that you can clearly understand our privacy practices. This Policy describes Monochrome Media’s collection and use of the information provided or collected on or through our various services and features (collectively shall be defined hereinafter as the “**Services**”), which includes, our website which is currently located at www.MonochromeMedia.com (“**Site**”) as well as our SSP for the purpose of displaying online advertisements within Digital Assets. We are committed to treating any information we collect with care and respect.

If you have any questions about this Policy, please contact us at: at: partners@MonochromeMedia.com (or as described below).

TYPES OF INFORMATION WE COLLECT

The **first type** of information is non-identifiable information which may be made available or gathered via your use of Services, or users interaction with Digital Assets, to clarify, we are not aware of your identity (“**Non-Personal Information**”). The Non-Personal Information which is being collected includes, among others, your aggregated usage information and technical information transmitted by your device, including: (i) certain software and hardware information (i.e., browser type); (ii) actions within the Site or certain data regarding the use of your Service (such as if you have viewed the advertisement or visited our Site); and (iii) approximate geo-location (country level location).

We further may process certain information which could be individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual (“**Personal Information**”) as follows:

- **Identifiers:** certain identifiers such as IP address are collected by us and others might be collected by the Advertisers (i.e., by placing Cookies on the Digital Assets as detailed below). Note that the IP address we collect is considered “Personal Information” in many jurisdictions (such as the EEA), therefore, we treat the Identifiers as such and comply with applicable laws.
- **Contact details:** If you choose to contact us in any manner, including through the “Contact Us” page in the Site, support, or any other request or

notification, whether by submitting an online form that we make available or by sending an email to an email address that we display, or in any other manner, you may be required to provide us with certain information such as your name and email address.

If we combine Personal Information with Non-Personal Information, the combined information will be treated as **Personal Information** for as long as it remains combined.

USE OF YOUR INFORMATION BY MONOCHROME MEDIA

Monochrome Media uses the information it collects about you to provide the Services. We may use your information:

- in order to enhance your experience with the Services;
- for our legitimate interests of operating, providing, maintaining, protecting, managing, customizing and improving our Services;
- in order to optimize the content served through the SSP based on the User's preferences, uses and interactions with the Services;
- in order to perform research, as well as for analytical and statistical purposes;
- in order to respond to your inquiries and provide you with requested service when you contact us, as well as inform you about our services, such as upcoming changes or improvements;
- in order to protect our or third parties' rights or property, resolve disputes and enforce our policies;
- in order to audit and track usage statistics and traffic flow, audit our affiliates, calculate payments and detect fraud, security or technical issues in connection with the Services;

HOW WE COLLECT INFORMATION

Depending on the nature of your communication with us, we may collect the above detailed information from you, as follows:

1. automatically, including through the use of cookies (as detailed below), or other similar tracking technologies when a user interacts with a Digital Assets; or
2. when you voluntarily choose to provide us with information, i.e. when you contact us, all as detailed in this Policy. Whenever technically possible and required under applicable law, we will ask for your consent to collect your Personal Information and offer you the choice to opt-out.

COOKIES AND SIMILAR TECHNOLOGIES AND OPT OUT FROM TARGETTED ADVERTISING

Advertisers, using our SSP platform use industry-wide technologies such as "cookies" (or similar technologies), which store certain information on your device (i.e., locally stored) and which will allow them or us (as applicable) to customize the Service and content as well as. The third-party Advertisers provide ways for you to opt out from or limit their collection of information from and about you. Please refer to these third party's privacy policies. Please note however, that we are not responsible for these third-party privacy practices. Lastly, note that once you opt out, you may still receive content and advertising, however it will not be targeted.

Our Publishers may also provide ways for you to opt out from or limit their collection of information from and about you. Please refer to the privacy policies for the Digital Assets to learn more about the privacy practices of our Business Partners. Please note, however, that we are not responsible for the privacy practices of our Publisher, or other third parties.

The cookies used by us are created per session and do not include any Personal Information, other than your preference, navigation on the applicable Digital Assets as well as the session key and allow us to analyze trends, track users' movements around the Site, which are removed as your session ends. Most browsers will allow you to erase cookies from your device, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you block or erase cookies your experience may be limited. One of the cookies we use is Google Analytics for the purpose of tracking and analyzing your use of our Site or Service, this information does not include Personal Information except for IP address. To learn more about how Google uses data from our use of Google Analytics Cookies, we recommend you review Google's policies located at: www.google.com/policies/privacy/partners. We also encourage you to review the Google Analytics' currently available opt-outs for the web tool available at: <https://tools.google.com/dlpage/gaoptout/>

In addition, you may opt-out from various tracking cookies through your browser or mobile device by adjusting the privacy and security settings.

Website opt out:

Please refer to the support page of the browser you are using. In this regard, following are some links which you may find useful:

- **Google Chrome:**<https://support.google.com/chrome/answer/95647?hl=en>;
- **Firefox:**<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>;
- **Internet Explorer:**<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>;
- **Safari:**<https://support.apple.com/kb/PH21411>;

- **Edge:**<https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge);
- **Opera:**<http://www.opera.com/help/tutorials/security/cookies/> ;

Mobile Opt-out:

- Learn how to opt-out from **Android**–<https://support.google.com/ads/answer/2662922>
- Learn how to opt-out from **iOS**–<https://support.apple.com/en-il/HT205223>.
- You may control how your browser responds to cookies by adjusting the privacy and security settings of your web browser.

Self-Regulation Opt-out:

You may opt-out directly from third party retargeting cookies or other ad-technology trackers through self-regulator services such as (1) the Network Advertising Initiative’s (“NAI”) website – [NAI consumer opt-out page](#) or (2) the Digital Advertising Alliance’s (“DAA”) website – [DAA opt-out page](#) or (3) If you wish to opt out of interest-based advertising, you may click here. Please note you will continue to receive generic non targeted ads.

In the event, that you have any additional complaints about your privacy rights, please initially contact the Data Protection Officer. Please note that you have the right at any time to contact your local data protection authority.

You may also Contact Us at: partners@Monochrome Media.com and we will be happy to assist you. Note that once you opt out, part of the Services provided by us might no longer be available and some features may not work if you revoke the data transfer.

SHARING YOUR INFORMATION WITH THIRD PARTIES

Monochrome Media will **not** share the Personal Information it collected with any third parties or any of its partners except in the following:

1. Authorized Disclosures. We may disclose your Personal Information to third parties when you consent to a particular disclosure of your Personal Information. Please note that once we share your information with another company, that information becomes subject to the other company’s privacy practices. In addition, we may share Identifiers, for the purpose of operating our business and providing the Services, as well as to calculate payments and detect fraud, security or technical issues in connection with the Services.
2. Compelled Disclosures. To the extent required, Monochrome Media will share Personal Information to comply with any applicable law, regulation, legal process or governmental demand (e.g., pursuant to law enforcement inquiries, subpoenas or court orders), or when we believe, in good faith, it is required in order to enforce our policies (including our policies and agreements) including investigations of potential violations thereof or to detect, prevent, or take action regarding illegal activities or other wrongdoing,

suspected fraud or security issues. In addition, we will share your information, solely to the extent required to establish or exercise our rights to defend against legal claims or to prevent harm to the rights, property or safety of us, our users, yourself or any third party or for the purpose of collaborating with law enforcement agencies or in case we find it necessary in order to enforce intellectual property or other legal rights.

3. Service Providers. We may disclose Personal Information to our service providers in order for such service providers to perform requested services on our behalf.
4. Business Transfers. We may share Personal Information, in the event of a corporate transaction. In the event of the aforementioned, our affiliated companies or acquiring company will assume the rights and obligations as described in this Policy.
5. We may share identifiers collected by us (as detailed above), for the purpose of operating our business and providing the Services, as well as to calculate payments and detect fraud, security or technical issues in connection with the Services.
6. Non-Personal Information. We may share aggregate or Non-Personal Information with our Business Partners and additional third parties in accordance with the terms of this Policy. We may store Non-Personal and Personal Information on our servers or our cloud servers, use or share Non-Personal Information in any of the above circumstances, as well as for the purpose of providing and improving our Service, aggregate statistics, marketing and conduct business and marketing analysis, and enhance your experience with the Digital Assets.

YOUR CHOICES AND CONTROLS

Data protection and privacy laws provide you with the ability to exercise some rights regarding your Personal Data that we hold (which might be different in each jurisdiction) such as; (i) you may request to access your Personal Data that we hold; (ii) you may request the rectification of your Personal Data that we hold; (iii) you may request the erasure of your Personal Information that we hold (as long as we do not have a legitimate reason for retaining the data); (iv) you may request to restrict processing of your Personal Data; (v) you may object to processing of your Personal Information by us; (vi) you may request to exercise your right of data portability; (vii) you may exercise your right to file a complaint to a supervisory authority in your jurisdiction; and (viii) you have the right to withdraw consent (if applicable).

These right apply solely to personal data processed on you and solely as applicable and based on our lawful basis for collection.

We provide you with the ability to exercise certain choices and controls in connection with our treatment of your Personal Information. Depending on your relationship with us, to exercise your rights contact us at: partners@Monochrome Media.com. Note that we may require certain information from you in order to verify your identity and locate your data and that the process of locating and deleting the data may take up to one (1) month in accordance with applicable law. Data privacy and related laws in your jurisdiction may provide you with different or additional rights related to the data we collect from you, which may also apply. If you would like additional information about the choices please contact us at: partners@Monochrome Media.com or contact our Data Protection Officer at: dpo@Monochrome Media.com.

CHILDREN'S PRIVACY

You represent and warrant that, (i) if you are located in the US, you are at least 13 years of age; or if you are located in any other GEO, you are above the age defined as "child" under applicable laws in your jurisdiction (collectively "**Child**" or "**Children**"); and (ii) you are of legal competence to enter into this Privacy Policy. If you are under 18, please be sure to read the terms of this Privacy Policy with your parents or legal guardians. The Services are not directed or intended for Children, as defined under applicable law, and we do not knowingly collect or solicit information from children. If we obtain actual knowledge that a User is considered as a Child under applicable law, we will take steps to immediately delete such User's Personal Information. If you become aware or have any reason to believe that a Child has shared any information with us, please contact us at: partners@Monochrome Media.com.

DATA SECURITY AND INTEGRITY

Your privacy is very important to Monochrome Media and we are committed to protecting your Personal Information from unauthorized access, use or disclosure. We have implemented physical, technical and administrative security measures for the Services that comply with applicable laws and industry standards. For additional information regarding Monochrome Media's security measures please see: <http://www.Monochrome Media.com/security-policy/>.

Monochrome Media also protects your privacy by seeking to minimize the amount of data that we store on our servers in the first place. If you feel that your privacy was treated not in accordance with our policy, or if any person attempted to abuse Monochrome Media please contact us at: partners@Monochrome Media.com directly.

Further, in the event of a data breach, in which we discover your Personal Information is at risk, we will notify you and the applicable authority (if required subject to applicable laws).

DATA RETENTION

We retain the Non-Personal Information we collected for as long as needed to provide the Service and to comply with our legal obligations, resolve disputes and enforce our agreements. Monochrome Media will retain data collected for online behavioral advertising for as long as commercially useful to carry out its business purpose, in accordance with applicable laws, or until an individual expresses an opt-out preference. Further, we retain the Personal Information, we collected for as long as legally permissible, in accordance with

applicable laws. Monochrome Media may rectify, replenish or remove incomplete or inaccurate information, at any time and at its sole discretion.

TRANSFER OF DATA

As a part of an international group, we may store or process your Personal Information in the United States or in other countries. If you are a resident of the European Economic Area (“EEA”) we will take appropriate measures to ensure that your personal data receives an adequate level of data protection upon its transfer outside of the EEA. If you are a resident of a jurisdiction where transfer of your personal data requires your consent, then your consent to this Privacy Policy includes your express consent for such transfer of your data.

DO NOT TRACK DISCLOSURE

The Service does not respond to Do Not Track signals. For more information about Do Not Track signals, please see <http://www.allaboutdnt.com/>.

DATA PROTECTION OFFICER

If you have any requests regarding the data collected under this Policy, including without limitation, requests to remove, delete, amend, modify or transfer the data, please contact our Data Protection Officer at: dpo@Monochrome Media.com.

Please be sure to include your name, address and email address in any correspondence to us so that we can respond to your inquiry in a timely manner.

MODIFICATIONS AND UPDATES

We reserve the right to periodically amend or revise this policy, at our sole discretion. The most recent version of the policy will always be posted on the site. If we do make any changes, the updated date at the top of the policy will be reflected in the “last revised” heading. If we make any material changes, that will substantially affect your use of the service or the data collection by us, we will provide you with applicable notifications or by means of a notice on this site. We encourage you to review the policy periodically to ensure that you understand how we collect, use and share information through the services. Any changes to the policy will become effective immediately upon the display of the revised policy. Your continued use of the digital assets or services following the display of such revised policy, constitutes your acknowledgement and consent of such amendments and your agreement to be bound by the terms therein.

CONTACT US

If you have any questions or comments about this Policy, please write to us at:

Monochrome Media LTD

Koenigsallee 83,14193 Berlin Germany