

## **FINANCEADS PT PRIVACY POLICY (PERSONAL AND NON-PERSONAL DATA) FOR ADVERTISERS AND PUBLISHERS**

### **PREAMBLE**

This Privacy Policy is intended to inform you about how Kwanko SA (hereinafter "FINANCEADS PT") collects and processes data, including personal data, in the scope of its business activity, as well as the rights you have over your personal data. It comes into effect on May 25, 2018.

The subscription agreements for our services contain the main rules applicable to the data collected and processed through our services and platform.

We impose these rules to all partners we work with and require them to comply with applicable laws and regulations under all services they provide to us.

The processing outsourced by FINANCEADS PT is strictly regulated by agreements with its partners, in accordance with the requirements of the regulations in force.

### **1. DATA COLLECTED BY FINANCEADS PT**

With this Privacy Policy, we want to inform you of the types of Data, including Personal Data that we may collect or otherwise have access to.

#### *1.1. Data collected via our website [www.financeads.pt](http://www.financeads.pt)*

When you visit our website [www.financeads.pt](http://www.financeads.pt), we may collect information concerning you.

You can visit our website without having to provide any information about yourself.

However, please note that our web servers temporarily record the traffic data provided by the device you use to enter our site (including the host name (IP address)), the date, time and duration of your visit, your browser and operating system data, as well as the name of your internet service provider, and the website to which you were redirected to our website (the so-called referring URL).

The collection and processing of this data is carried out for the purpose of facilitating the use of our website (setting up the connection) and ensuring the security and stability of our systems as well as the technical administration of the network infrastructure.

We do not store any personal data (your name, address, telephone number or e-mail address) other than that which you have provided voluntarily, for example in the context of a survey or in an attempt to establish a contractual relationship.

#### *1.2. Personal data collected when creating user accounts on the FINANCEADS PT platform.*

For this purpose, we collect and process the following data:

- Name and surname of the contact person(s) at our partners,
- Postal, telephone and electronic contact details,
- Language of use of the platform,
- Login and password to connect to the platform.

We may also collect billing information such as billing name, billing address, and bank account number or IBAN.

#### *1.3. Data collected for campaign performance measurement via FINANCEADS PT tracking*

We may collect IDs from our partners in order to know on which sites users have seen or consulted one or more advertisements and thus link a possible purchase to it.

For the purposes of calculating campaign performance, we process and store:

- CRM IDs of our advertising partners and/or e-mail addresses in hashed forms. (For example, the hashed form of name@email.com would be 95ad3e9a65078288849e0ce56cf032c4)
- Mobile advertising identifiers (such as the IDFA for iOS-based mobiles or the GAID for Android-based mobiles) which are technical identifiers created by mobile phone manufacturers for personalisation and analysis purposes in a secure and non-identifying way for users.

We may also collect technical identifiers from trusted partners in order to improve our cross device matching technology and thus provide our partners with a seamless experience when browsing a FINANCEADS PT network site or mobile application. FINANCEADS PT stores this parameter as a "match" identifier in order to link a sale to an advertisement (the data being encrypted and/or cut to allow no further use).

Our partners may or may not use deterministic technologies, but in all cases we require our partners to share with us only the matching data to the exclusion of any other data (personal or otherwise) that may be collected by those partners as part of their services and to provide users with a simple means of objecting to the collection and processing of their data

#### *1.4. Data collected via FINANCEADS PT cookies*

FINANCEADS PT uses cookies for its services to track views or clicks on an advertising link on websites) and thus link to a possible purchase.

FINANCEADS PT cookies are placed by website and application publishers on the devices of users who have followed a FINANCEADS PT advertising link for the sole purpose of linking the delivery of an advertisement on the website or application that is affiliated with the FINANCEADS PT platform.

Personally identifiable information about the user is not collected, processed or used in this tracking.

Tracking data is only collected for statistical purposes of navigation and to measure the performance of advertising on sites affiliated with the FINANCEADS PT platform.

We only collect non-directly identifiable data related to user navigation through cookies or equivalent identifiers that record:

- events related to user activity on our partners' websites (e.g. number of pages viewed, products viewed, searches performed on our partners' websites);
- information related to the users' computer, tablet or smartphone (type of device, operating system, version) and events related to the delivery of advertisements through the FINANCEADS PT platform such as the number of advertisements that were displayed.

#### *1.5. Data collected via our lead generation services ("landing page")*

Within the framework of our lead generation services, FINANCEADS PT collects personal data through a form made on behalf of its advertising partners, according to the purposes determined by the latter, with FINANCEADS PT acting only as a subcontractor.

In this context, FINANCEADS PT concludes a specific agreement on data protection with each advertising partner concerned.

#### *1.6. IP Address*

In line with industry best practice, we use IP addresses for fraud detection purposes and not for targeting purposes.

The purpose is to identify situations that cannot be associated with human behaviour, such as a massive volume of clicks within a limited timeframe, or to extract geographic information.

## **2. RETENTION OF PERSONAL DATA**

FINANCEADS PT will keep the Personal Data for the needs of the contracts signed with its partners, that is to say, for the time strictly necessary to allow FINANCEADS PT to carry out its contractual obligations towards its partners.

In case you are registered as an advertiser or publisher on our platform, FINANCEADS PT keeps your Personal Data as long as your account exists or as long as necessary to provide its services.

This includes Personal Data that you or third parties have provided to us as well as Personal Data generated or inferred from your use of the services.

FINANCEADS PT may also retain some of your Personal Information for a longer period of time, solely for the purpose of complying with any legal obligations or responding to any queries or complaints that may be made to it after the termination of the contractual relationship with you or its partners.

### 3. DATA SECURITY

FINANCEADS PT strives to protect all Data collected in order to prevent it from being lost, distorted, damaged or accessed by unauthorised third parties.

For example, we have put in place security measures to ensure the confidentiality, security and integrity of your Personal Data.

For example, we restrict access to Data to certain of our employees and only those employees of our service providers who need to know the Data and who have been trained to observe confidentiality rules.

These measures take into account the sensitivity of the Data we collect, process and store and the current state of technology.

Our data is hosted by Claranet (<https://www.claranet.fr/>) which has obtained ISO 27001 security certifications which are internationally recognised.

To learn more about our current practices and policies regarding Data security and privacy, please visit [Security Policy](#).

### 4. ACCESS AND CONTROL OF YOUR DATA

In case you have registered as an advertiser or publisher on our platform, you can access your customer account and delete or correct some of your data yourself.

Also you can manage all preferences related to receiving communications from our platform on your "Profile" page

In accordance with the legislation in force, and in particular with French Law n°78/17 of 6 January 1978 known as "Informatique et Libertés" and the RGPD, you have the right to access, rectify and delete your Data, as well as the right to limit the processing and portability of your Data.

You also have the right to object on legitimate grounds to the processing of your Data by FINANCEADS PT, as well as the right to file a complaint with your local Authority.

### 5. CHANGES TO THE PRESENT PRIVACY POLICY

FINANCEADS PT reserves the right to modify this Privacy Policy at any time. Changes will be effective twenty-four (24) hours after such changes are posted online.

You acknowledge that your continued use of FINANCEADS PT's services and platforms following the posting of changes to our Privacy Policy means that the collection, use and sharing of your Data will be subject to the updated version of the Privacy Policy.

### 6. CONTACT FINANCEADS PT

If you have any questions or complaints about this Privacy Policy, you can contact us online or also send us a letter to the following address KWANKO SA, 60 boulevard du Maréchal Joffre 92340 Bourg-la-Reine. You can also contact our Data Protection Officer (DPO) at [gdpr@kwanko.com](mailto:gdpr@kwanko.com).