

Cloud Technologies Internet Advertising Privacy Policy

1. General information

- 1) In this Privacy Policy terms "we", "us" and "our" should refer to Cloud Technologies S.A. with its registered office in Warsaw, Poland (address: ul. Żeromskiego 7, 05-075 Warsaw), entered into the register of entrepreneurs of the National Court Register, maintained by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register, under the number 0000405842, NIP (Taxpayer Identification Number): 9522106251, REGON (Statistical Number): 142886479.
- 2) This Privacy Policy is binding exclusively in relation to advertising services provided by Cloud Technologies S.A. over the Internet. Those advertising services include, but are not limited to, interest-based advertising, including retargeting.
- 3) Whenever necessary you can contact us traditionally by writing to the address of our headquarter (indicated in point 1) above), by e-mail: biuro@cloudtechnologies.pl and by phone: 00 48 22 535 30 50.
- 4) In any case related to processing of data as described in this Privacy Policy please contact our data protection officer. Our data protection officer's contact details are: privacy@cloudtechnologies.pl.

2. Collected and processed data

- 1) In this section we have set out:
 - a) the general categories of data that we process;
 - b) the source and specific categories of personal data – for personal data we do not obtain directly from you;
 - c) the purposes for which we process personal data; and
 - d) the legal bases of the processing.
- 2) We process information about your use of our website and services we render and services that are provided by our clients. This information is not personal data ("**usage data**"). The usage data may include numbers of users visiting website owned or managed by Cloud Technologies S.A. and its clients and partners, along with time and duration of visits, numbers of users displaying our advertisements, technical data of users' web browsers and operating systems, data of effectiveness of our advertisements, including amount of clicks they generated, interest category or categories, to which users have been assigned to, anonymized (incomplete) IP addresses.
- 3) The source of the usage data is our analytics system or our clients' and partners' systems. This usage data may be processed for the purposes of analyzing the use of the website and services. The legal basis for this processing is consent of the user (collected through our website or through website of our partners) and our legitimate interests, namely advertising services of ours or of our clients'.
- 4) We will take reasonable steps to ensure that end user is provided with clear and comprehensive information about, and gives consent to, the storing and accessing of cookies and other information on the end user's device where such activity occurs and where providing such information and obtaining such consent is required by law.
- 5) We do not collect, use and process any personal data, including personal data of users such as name, age, address, gender, place of residence, personal identification numbers, e-mail, phone numbers etc.
- 6) We do not collect, use and process sensitive personal data (such as data about religion, political opinion, health etc.).
- 7) No personal data shall be transferred by us to any third parties except for the companies that provide services to us, such as accountants, lawyers, advisory companies, IT vendors under respective data processing agreements.
- 8) We do not collect, use and process the data, in particular in interest-based advertisements, any data from users known to us to be under the age of 16 years, any data from websites

directed to children under the age of 16 years, any data originating from adult, gambling or governmental websites, and any other sensitive information such as financial or health status, race, commission of crime, political beliefs, sexual orientation etc.

- 9) We collect information in order to increase the relevancy of the ads being displayed to you i.e. advertisements of products they may be likely interested in, and other advertising-related purposes. Estimation of advertisements which may be of interest to a user is made by checking past browsing behavior of a user based on a cookie stored by the user's web browser, and by assigning the user to one or more interest categories. Information collected through ads are also used for subsequent use in targeting or re-marketing. Statistical (not individual) information about users and effectiveness of advertisements may be passed to Cloud Technologies S.A. customers – advertisers, in order to allow them to make informed decisions regarding their advertising campaigns and assess their effectiveness. Information may be also passed to third parties if it is technically required to display advertisements to users. We will also pass data if required by applicable law.
- 10) The data we collect is also used for reporting purposes, to give our clients and partners more information about the performance of their advertising campaigns, and to improve performance over time.
- 11) If we or our client or partner obtain personal data and has no legal basis for the access to and processing of that data, we or our client or partner should quickly cease collection and storage of the data and refrain from passing the data on to other parties, even if those parties have a legal basis.
- 12) We will follow the IAB Transparency & Consent framework, <http://advertisingconsent.eu/> therefore we are going to update our bid requests in accordance with the latest specification.

3. Cookies and other technical means

- 1) We are storing on users' computer systems telephone or other device from which you access cookie files (short text files) containing in particular information on user's interest category and advertisements clicked by the user.
- 2) We are also using other technical means necessary to provide its advertising services, such as web beacons and pixels.
- 3) Cookie files:
 - a) collect data regarding your use of the Website, and their main purpose is to facilitate the use of the Website and customize the Website to your needs and expectations;
 - b) are placed on the User's end device and may also be used by advertisers and partners cooperating with us;
 - c) do not store information constituting personal data of the User;
 - d) are not used to determine the identity of the User;
 - e) are used on the Website, based on the consent of the Website User expressed through appropriate software settings, in particular through a web browser.
- 4) You may at any time revoke or change the scope of any previously expressed consent to use cookie files on the Website and delete them from your browser.
- 5) You may also at any time limit or disable cookie files in your browser through the settings. In this case, however, your use of the Website may be less efficient, you may not have access to certain content or be able to use some of the Website's functionalities, and in extreme cases the correct display of the Website pages may be completely blocked.
- 6) We will retain cookie files for a period of 12 months, we are not able to give the retention period concerning our partners, so please consider checking their privacy policy
- 7) We may use Google services to serve Cloud Technologies S.A. advertisements. In such cases Google's DoubleClick advertising cookies will be stored on users' computer systems. Google's privacy policy is applicable to such cookies. Cloud Technologies S.A. may also use other third-party technology to serve the advertisements.

- 8) Our service providers use cookies and those cookies may be stored on your computer when you visit our website. We and our partners use cookies to help us and our partners to display advertisements that will be relevant to you.

4. Opting out

- 1) You may prevent data collection, processing and transmission to third parties by downloading and storing a following cookie in <http://green.erne.co/> a web browser it is using. If you are using more than one web browser or more than one computer system, a cookie must be downloaded and stored in each of the browsers. Clearing a browser's cache from cookies will require re-downloading of an opt-out cookie.
- 2) You may also disable cookies and local storage in its web browser. However, it will hinder web browsing experience, as many websites are using cookies to store user preferences.

5. Your rights

- 1) Under data protection law and "GDPR" you are entitled to:
 - a) the right to access your data and receive a copy thereof, i.e. obtain information whether we process your personal data and specific information about such processing
 - b) the right to rectify (amend) their data, i.e. request to amend inaccurate personal data;
 - c) the right to delete data, restrict the processing of data, provided that one of relevant ground for such action apply;
 - d) the right to object to data processing;
 - e) the right to data transfer, i.e. receive data you provided us with in a structured, commonly used and machine-readable format and if necessary to request transmitting those data to another controller;
 - f) the right to complain to a supervisory authority; and
 - g) the right to withdraw consent.
- 2) If you consider that our processing of your information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 3) To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 4) You may exercise any of your rights in relation to your personal data by written notice to us as indicated in Section 1.

6. International transfers of your personal data

Should the relationship with one of our clients or partners involve cross-border data flows outside the European Union, our partner shall formally undertake to comply with the best data protection standards by adhering without any restrictions or limitations to the Standard Contractual Clauses adopted by the European Commission.

7. Retaining and deleting personal data

- 1) This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 2) If we are the data processor of your personal data that we process in accordance with the data controller's instructions such data shall not be kept for longer than specified by the data controller.
- 3) If we are the data processor of your personal data we will retain your personal data for a minimum period of 12 months following your subscription.
- 4) Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation.

5) Usage data (aggregated) are not personal data and may be stored up to 24 months.

8. Amendments

- 1) We may update this policy from time to time by publishing a latest version on our website.
A new policy enters into force immediately after its publication on the website.
- 2) We will inform you of any such changes via [email notification / notification on our website].