

## **Addy Privacy Policy**

Effective Date: April 1, 2023

Welcome to Addy (“Addy,” “we,” or “us”) where we make your advertising buying decisions less stressful and more affordable. Our Privacy Policy explains how we collect, use, disclose, and protect information that applies to adverter.com website, any mobile app we may provide, and any related tools and services (collectively, the “Services”), and your choices about the collection and use of your information. Capitalized terms that are not defined in this Privacy Policy have the meaning given them in our [Terms of Use](#).

### **1. How We Collect and Use Information.**

#### **Personal Information**

When you use the Services, you may encounter areas that allow you to voluntarily enter personal information, which includes contact information such as your name, email address, telephone number, and mailing address.

You may provide this information to us when you sign up for our newsletter, request information about products, engage with the Services and pay for the Services, apply for a job, fill out surveys, or otherwise provide personal information to us.

We may use personal information for, among other things:

- Providing you with the Service and completing your orders;
- Internal record keeping and auditing;
- Communicating with you about Services updates and your inquiries and use of the Services, as well as offer products, content, and services that we believe may be of interest to you;
- Customizing the Services;
- Verifying customer information; and
- For other purposes disclosed at the time of collection.

If you would prefer not to receive communications from us in the future, please follow the unsubscribe instructions available in each communication.

We may retain your information for as long as necessary to fulfill a legitimate business need, such as to provide you with information or services, comply with our legal obligations, resolve disputes, and enforce our agreements.

#### **Usage Information**

When you browse or use our Services we may also collect various types of usage information about your browser or device, including, but not limited to, online identifiers such as your IP address and your mobile device identifier, as well as information about your internet activity such as the web pages visited, links clicked, ads interacted with, and your operating system and browser type.

We and our partners may automatically record real-time session information generated in the course of your interactions with the Services, such as mouse movements, clicks, page visits, text entered, how long you spent on a page, and other details of your actions on the web pages visited.

Such information is used for the purpose of operating, debugging, customizing, and improving our Services, analyzing demographic and statistical research about Service usage, customizing offers, and to monitor the Service for compliance with our terms of service and the law, to detect security incidents and malicious, deceptive, fraudulent, or illegal activity, as well as other purposes. This usage information may be collected through various technologies, including but not limited to “cookies,” clear gifs, web beacons, session replay and other similar technologies when you visit the Services.

We use Google Analytics to better understand how visitors interact with our Services. This service provides usage information including but not limited to data on where visitors came from, what actions they took on our Websites, and where visitors went when they left our Websites. We use this information to improve your experience when visiting our Websites. Please [click here](#) to learn more about this service and how to opt out of data collection by Google Analytics.

## **2. How We Share of Information**

We will not rent or sell your information to third parties outside Addy and its group companies (including any parent, subsidiaries, and affiliates) without your consent, except as noted below. We may share or disclose personal and usage information in certain circumstances, including sharing with:

- Service providers that perform a business function for us for purposes like CRM management, marketing the Services, and infrastructure support;
- Advertisers, Agencies, or third-party business partners for the purpose of providing the Services to you;
- Entities, such as government agencies, as required by a court order, subpoena, warrant, or when otherwise required by law;
- Entities as part of a sale or merger of all or part of our business, including at bankruptcy;
- Third parties for our direct marketing purposes; and
- Entities to protect our rights and the rights of third parties.

The Service may contain links to third party websites that we do not control, and to which this privacy policy does not apply. We encourage you to read the privacy policy of every website you visit. We may also aggregate or otherwise strip data of all personally identifying characteristics and may share that aggregated data with third parties.

## **3. How We Protect Information**

Addy uses commercially reasonable safeguards to help preserve the integrity and security of information collected through the Services.

## **5. Your Choices About Information**

**A. You can update your account information and settings:** You may update your account information and email-communication preferences at any time by logging into your account and changing your profile settings. If you have any questions about reviewing or modifying your account information, you may contact us directly at [support@adverator.com](mailto:support@adverator.com).

**B. Opting out of collection of your information for Interest-Based Advertising:** We may partner with ad networks and other ad serving providers (“Advertising Providers”) who serve ads on behalf of us and others on non-affiliated sites. Some of those ads may be personalized, meaning that they are intended to be relevant to you based on information Advertising Providers collect about your visits to this site and elsewhere on the Internet over time, as well as from various mobile applications you use, across different associated devices.

You may visit [www.aboutads.info/choices](http://www.aboutads.info/choices) to learn more about this type of advertising and how to opt-out of this type of advertising by companies participating in the Digital Advertising Alliance self-regulatory program. Additionally, if you would like to opt-out of this type of advertising in mobile apps, [you can visit here](#) and download the opt-out app for your device.

Addy adheres to the Digital Advertising Alliance’s Self-Regulatory Principles. Note that electing to opt out will not stop advertising from appearing in your browser or applications. It may make the ads you see less relevant to your interests. In addition, note that if you use a different browser or devices, erase cookies from your browser, or reset a device identifier you may need to renew your opt-out choice.

## 6. Children under 13

This Service is not intended for the use of children under the age of 13. We do not knowingly collect personal information from children under the age of 13.

## 7. How to Contact Us

If you have any questions about this Privacy Policy or the Services, please contact us at [support@adverator.com](mailto:support@adverator.com).

## 8. Changes to our Privacy Policy

Addy may modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and so you should review this page periodically.

**U.S. State Privacy Rights** This section contains disclosures required by the laws in California, Colorado, Connecticut, Utah, and Virginia (“Certain States”). If you are a resident of such states, this section of the Privacy Policy contains disclosures required by law and explains rights that may be available to you. Our use of the terms “sell” and “share” below generally refers to these California definitions. Consumers with disabilities may access this notice by using a standard screen reader.

**Personal Information We Collect.** In the preceding 12 months, we collected the following categories of personal information about residents of Certain States.

<b>Categories of Personal Information</b>	<b>Disclosed for business purposes to the following categories of third parties:</b>
Personal and online identifiers (such as first and last name, email address, or unique online identifiers)	All categories listed below.
Internet or other electronic network activity information (such as browsing history, search history, interactions with a website, email, application, or advertisement)	All categories listed below.
Payment and commercial transaction information	Service Providers.
Professional or employment-related information.	Service Providers.

**Categories of Sources.** We collect personal information from the following categories of sources:

- Our advertising customers;
- Website visitors;
- Service providers;
- Job applicants and employees;
- Affiliates not under the Addy brand.

**Why We Collect, Use, and Share Information.** We use and disclose the personal information we collect for our commercial and business purposes, as further described in this Privacy Policy. These commercial and business purposes include, without limitation:

- Our commercial purposes, including marketing, advertising, our products and services, as well as such activities on behalf of our clients. We also use personal information to enable commercial transactions between us and our clients.
- Our business purposes, which include:
  - Auditing related to our interactions with you;
  - Legal compliance;
  - Detecting and protecting against security incidents, fraud, and illegal activity;
  - Debugging;
  - Performing services (for us or our service provider) such as account servicing, processing orders and payments, and analytics;
  - Internal research for technological improvement;
  - Internal operations;
  - Activities to maintain and improve our services; and
  - Other one-time uses.

We use information about you in connection with your employment roles and responsibilities for a variety of purposes, for example:

- Processing applications;

- Providing you with services and tools to use in connection with your employment, such as email service and information technologies;
- Responding to your requests;
- Maintaining compliance with our policies and procedures;
- Paying you and administering your employment benefits, including those provided to other individuals like family members; and
- Responding to emergencies or safety concerns, such as by maintaining and using your emergency contact information

### **Recipients of Personal Information.**

We disclose the categories of personal information designated above to the categories of third parties listed below for business purposes:

- Service providers including internet service providers, data analytics providers, and operating systems and platform providers.
- Third parties such as advertising networks.

**Information Retention.** We will retain each category of personal information we collect in accordance with applicable laws and as reasonably necessary for our processing purposes set out under this Privacy Policy.

**Rights Regarding Personal Information.** Residents of Certain States have certain rights with respect to the personal information collected by businesses. You may exercise the following rights regarding your personal information, subject to certain exceptions and limitations contained in the relevant state law:

- The right to confirm whether we process personal information about you.
- The right to correct inaccuracies in the personal information we have collected about you.
- The right to know the categories and specific pieces of personal information we collect, use, disclose, and sell about you; the categories of sources from which we collected personal information about you; our purposes for collecting or selling/sharing personal information about you; the categories of personal information about you that we have either sold or disclosed for a business purpose; and the categories of third parties with which we have shared personal information.
- The right to request that we delete the personal information we have collected from you.
- The right to opt out of (i) the sharing of personal information for targeted advertising or (ii) the sale of personal information. Please note that if you opt out of certain types of activity, we may be unable to provide you with the services that rely on such activity. Additionally, we do not knowingly sell or share personal data of individuals under 16.

- Depending on your state, the right to receive a portable and readily usable copy of the personal information we have collected about you, to the extent feasible.
- Depending on your state, the right to limit our processing of certain “sensitive” personal information (or to withdraw consent for such processing if you previously gave it).
- The right not to receive discriminatory treatment for the exercise of these privacy rights.

To exercise any of the above rights, please contact us using the following information and submit the required verifying information, as further described below:

- Online [here](#)
- By email at [privacyrights@addy.co](mailto:privacyrights@addy.co)

We do not use or disclose sensitive personal information for purposes other than as permitted under the CCPA.

**Verification Process and Required Information.** Note that we may need to request additional information from you to verify your identity or understand the scope of your request, although you will not be required to create an account with us to submit a request or have it fulfilled. We will require you to provide, at a minimum, your name, business email address, and business phone number.

**Authorized Agent.** You may designate an authorized agent to make a request on your behalf by submitting a signed permission to the agent to act on your behalf.

For Colorado, Connecticut, or Virginia residents, if you have submitted a request that you feel we have not reasonably fulfilled, you may contact us to appeal our decision by sending an email to [privacyrightsappeals@addy.co](mailto:privacyrightsappeals@addy.co)

**Contact for More Information.** For questions or concerns about Addy’s privacy policy or practices, please contact us by using the information below. Global Headquarters One World Trade 60th Floor New York, NY 10007 [privacy@addy.co](mailto:privacy@addy.co)