



ADVERTISING PRIVACY POLICY

Last update: July 2025

1. INTRODUCTION.

Seedtag provides online advertising services through technology that allows for the analysis of the content of the URLs users navigate or by the information on their device (such as smartphone or Connected TV -CTV-) (all together '**Digital Properties**'), in order to understand the context of such content (text, images, format, streaming content etc.) and the user behavior, and subsequently deliver integrated advertising on the analyzed Digital Properties related to the previously examined content.

For these purposes, Seedtag has implemented a privacy-by-design concept where, in most cases, it does not identify the end user; it only analyzes the content of the Digital Properties to display advertisements based on the context of what they read, search, and watch. In this way, Advertisers (as explained below) can offer relevant advertisements based on the content of the web space or platform you visit instead of your search history, thereby limiting the impact on your privacy. That's why we are a "Privacy-First" company, committed to user privacy.

However, in order to display ads to the user, when a user visits a Digital Property with Seedtag's advertising technology to display ads, Seedtag collects and processes certain information that, while not directly and unmistakably identifying the user (by their name or surname), may detect other relevant information about the user or their devices.

Additionally, Seedtag provides these services on smart devices, such as smartphones or CTV. In this regard, Seedtag covers the delivery of the advertisement to you as a user of these devices and the usage of any personal data processed.

The purpose of this Advertising Privacy Policy is to provide information about the processing of personal data that we undertake in the context of our advertising services, on how we collect this personal data and the end users' rights in relation to such processing.

By way of introduction, Seedtag provides its services to Publishers and Advertiser, and in particular:

- (i) **Publishers** or their intermediaries (e.g., publisher networks) use Seedtag's advertising technology to monetize their advertising space; and
- (ii) **Advertisers** or their intermediaries (e.g., marketing agencies) display their advertising campaigns, via Seedtag technology, on the Digital Properties of our Publisher partners.

We may therefore process your personal data when you visit a Publisher's or Advertiser's Digital Property our technology to serve online advertisements and you consent to the use of cookies (or similar technologies, such as pixel tags) that enable their functioning, further information about which can be found [here](#).

If you would like to find out what personal data we process when you access our own website and/or the cookies we use on it, you can access our [Web Privacy Policy](#) and [Web Cookies Policy](#).



Although Seedtag operates in a multitude of countries, the core of our activity is in Spain. Therefore, this Privacy Policy is based on the provisions of Regulation (EU) 2016/679, General Data Protection Regulation, which is one of the most comprehensive regulations worldwide for the protection of personal data. Notwithstanding the foregoing, in some cases we may supplement it with additional information required by local regulations, depending on the country in which you reside or are located.

2. WHO IS THE DATA CONTROLLER FOR THE PROCESSING OF YOUR PERSONAL DATA? HOW TO CONTACT OUR PERSONAL DATA PROTECTION OFFICER?

The data controller for the processing of your personal data is Seedtag Advertising, S.L. with NIF B86978996 and located at Calle Marqués de Valdeiglesias 6, 28004 Madrid (hereinafter, "**Seedtag**" or "**we**").

Seedtag has appointed a Data Protection Officer who will centralize the management of data protection under this Advertising Privacy Policy. The Data Protection Officer serves as the common point of contact and is the individual you can reach out to for any inquiries related to the processing of your personal data. You can contact them at the following email address: gdpr@seedtag.com.

Seedtag is a member of IAB Europe and participates in the IAB Europe [Transparency and Consent Framework](#) (TCF), complying with its specifications and policy. This framework enables users to express their choices and informs the advertising supply chain operators. Seedtag's identification number in the framework is 157.

3. WHAT TYPES OF PERSONAL DATA DO WE PROCESS AND FROM WHAT SOURCES DO WE OBTAIN IT? HOW LONG DO WE KEEP IT?

Seedtag collects information from the following sources:

- **In the Publisher's environment**, Seedtag collects information through its tag, i.e., a small piece of code that is inserted into the source code of the Publisher's Digital Properties. The main categories of personal data collected in this context and their retention periods are detailed below:

Categories of data processed	Applicable retention period
User IP address (a unique address that identifies your connection)	360 days
Your non-precise location (country, region, postcode) derived from a truncated IP address.	
Truncated IP is a partial version of a full IP address that has been shortened to hide some of its information. We use it in the context of online geolocation to provide	



Categories of data processed	Applicable retention period
general location data without revealing precise details about the actual IP address. For example, a full IP address, such as "192.181.1.110", could be truncated to "192.181.X.X", where specific parts of the IP address have been replaced with "X" to hide the more detailed information, but an approximate location can still be inferred.	
Type of browser you use (e.g., Google Chrome, Safari, Mozilla)	
Type of connection you use (Wi-Fi or mobile network)	
Type of device you use (mobile device, computer or CTV)	
Your choice of cookies or similar technologies as expressed through the consent console provided by the Publisher	
User ID (a unique code that may be assigned to you by us or by the Publisher/Advertiser to recognize you as a user between sessions, websites and/or devices).	13 Months
Your interactions with the advertisements (click, tap, swipe, scroll), including the date and time and/or duration of such interaction, as well as the URL of the page on which the event took place. Your interactions with the advertisements (click, tap, swipe, scroll), including the date and time and/or duration of such interaction, as well as the URL of the page on which the event took place	

- **In the Advertiser environment**, which you may reach once you click on a Seedtag ad, we place a javascript pixel that allows us to collect information about your activity on the Digital Property (e.g., time spent on the Digital Property, number of pages viewed, or specific actions performed).

Likewise, in certain cases, to measure advertising campaigns and thus inform Advertisers about their performance, we collaborate with our **technology partners** and **AdServers** (computer



systems that store and distribute advertisements used in advertising campaigns), who may provide us with your personal data, collected from the Advertiser's environment.

The main categories of personal data collected in this context and their retention periods depending on the purpose of their processing are set out below:

Categories of data processed	Applicable retention period
User IP address (a unique address that identifies your connection)	• 90 days for the rendering of advertisements; and • The duration of the advertising campaign in question for the measurement of the campaigns.
User ID (a unique code that may be assigned to you by us or by the Publisher/Advertiser to recognise your login between sessions and/or Digital Properties s)	
Your non-precise location (country, region, postcode) derived from the IP address	
Your interactions with the ads (click, tap, swipe, scroll), including the date and time and/or duration of such interactions	
Type of browser you use (e.g., Google Chrome, Safari, Mozilla)	
Type of connection you use (Wi-Fi or mobile network)	
Type of device you use (mobile device or computer)	
Your choice of cookies expressed through the consent form provided by the Advertiser.	

- Finally, as part of the **cookie synchronization process** with third parties, Seedtag may generate and assign you a random user ID to identify you as a user. This allows us to exchange information with third parties about users passing through our system to ensure that it is up to date. This information will be retained for a period of 360 days.

4. FOR WHAT PURPOSE AND ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA?



In the context of our advertising activity, we may process the personal data referred to in section 3 above, depending on the environment concerned, for the following purposes:

- A. Real-time ad targeting and rendering:** Your personal data may be processed to make positive and negative ad targeting (i.e., to show you certain content or to prevent you from seeing it), as well as to control the frequency of the ads we serve you and to sequence the order in which you see them. This purpose includes cookie synchronization process where we match your cookies IDs with third-party IDs to deliver relevant ads to you more effectively.
- B. Measuring advertising performance:** Your personal data may be processed to measure the success of the advertising campaigns we serve, including calculating the number of users who interacted with an ad (the duration and nature of the interaction - click, tap, swipe, scroll), the time the ad was viewed, the characteristics of the device on which the ad was viewed, ad attribution, ad conversions and the corresponding increase in sales, among others.
- C. Create and use profiles for personalized advertising and content:** Your personal data about your activity (such as content you look at) can be stored and combined with other information about you (for example, information from your previous activity on this service and other Digital Properties). This is then used to build or improve a profile about you to be used to present advertising more relevant based on your possible interests, such as by adapting the order in which content is shown to you.
- D. Understanding audiences through statistics:** Your personal data may be processed to provide aggregate reports to Publishers, Advertisers, and/or their representatives (e.g., media agencies) on the reach of their online services and/or audiences for their advertisements and to identify common characteristics (e.g., to determine which target audiences are most receptive to an advertising campaign or certain content).

The legitimate basis for the processing of your personal data for the above purposes (A, B, C, and D) is your CONSENT, granted, where applicable, through the consent management console on the Publisher's and/or Advertiser's Digital Properties, as appropriate.

- E. To serve ads in a technically correct manner:** Our mission is to show you advertising that is of interest to you and in the most efficient way possible, so we will process your personal data in order to ensure the technical compatibility of the advertising we serve with the type of device you are using. For example, when you click on a link in an advertisement, your browser sends a request to a server to obtain the content you requested. The server uses technical information from your device to correctly display the ad, including the images and information that make up the ad. This exchange of information is necessary to provide the content you see on your screen in a smooth and error-free manner. In addition, by knowing this technical information, we can better adapt the format of the ads we serve to fit the characteristics of your device and, in this way, improve your interaction with them.
- F. Detect and prevent fraud and correct errors:** We will process your information to monitor and prevent unusual and potentially fraudulent activity (for example, automated ad clicks by bots) and to ensure that the information systems we use and the processes that enable the flow of information with Publishers and Advertisers operate correctly and securely, ensuring



continuity of service and the confidentiality of your personal information at all times. They may also be used to correct any problems that you, the Publisher or Advertiser may encounter in the receipt or delivery of advertisements, as appropriate, and in your interaction with them.

The legitimate basis for processing your personal data for the above purposes (D and E) is our LEGITIMATE INTEREST (i) in ensuring that information is correctly transmitted to serve advertising efficiently; on the one hand, and (ii) to provide a secure and functional environment to deliver advertising services, protecting our resources and users' interests; on the other hand. In order to decide whether to apply this legitimate basis, a legitimate interest balancing test has been carried out, which has confirmed an overriding interest on our part that enables us to have recourse to this legitimate basis. The data subject may access the conclusions of this test by contacting our personal data protection officer at the address indicated in the section 2 above. As a result, you will be able to see ads that are more relevant based on the context of the Digital Property you are visiting (mainly the content and language of the Digital Property). At no time will we base our analysis on your browsing history.

- G. Train our machine learning algorithm that we use to develop and improve our services, and in particular to optimize decision-making in advertising auctions:** We will process your personal data collected in the advertising services we provide in order to train our algorithm and thus serve advertising campaigns more accurately and efficiently.

The legitimate basis for processing your personal data for this purpose (G) is our LEGITIMATE INTEREST in improving the efficiency of the advertising services provided to Publishers and Advertisers. In order to decide on the application of this legitimate interest, a legitimate interest balancing test has been carried out, which has confirmed an overriding interest on our part that allows us to use this legitimate interest. The data subject may access the conclusions of this test by contacting our personal data protection officer at the address indicated in the section 2 above.

- H. Train our machine learning algorithm by analyzing information from publicly available online sources:** In order to train our algorithm (mainly so that it can recognize the context of the web page and link it to a relevant advertisement) we automatically analyze web pages, extracting relevant information and converting it into an intelligible format.

As part of this process, we may view certain information published on publicly accessible Digital Properties that includes your personal data (e.g., a photograph of an event or a CV published on a corporate website).

The legitimate basis for processing your personal data for this purpose (H) is our LEGITIMATE INTEREST in improving the efficiency of the advertising services provided to Publishers and Advertisers. In order to decide on the application of this legitimate interest, a legitimate interest balancing test has been carried out, which has confirmed an overriding interest on our part that allows recourse to this legitimate interest. The data subject may access the conclusions of this test by contacting our personal data protection officer at the address indicated in the section 2 above.



If, under the local regulation where you are located, the legitimate interest cannot be used as a legal basis, and consent is required for these purposes. We will collect your consent (with proper information) for these purposes.

5. TO WHOM WILL YOUR PERSONAL DATA BE COMMUNICATED?

As part of our advertising activity, Seedtag may share your personal data with third parties to provide services to Publishers and Advertisers, as detailed in the section 4 above. In particular, we may disclose your personal data to the following recipients:

- Publishers (including networks of publishers);
- Advertisers (including marketing agencies);
- Demand Side Platforms (DSP) that allow Advertisers to buy advertising space;
- SSP (Supply Side Platform) platforms that allow Publishers to manage the supply of their digital advertising space; and
- AdServers that allow the storage and distribution of advertisements used in advertising campaigns.

In the following [link](#) you can find a list of the main third parties with which Seedtag has a collaboration agreement. We will try to update it periodically in order to provide you with the information in force at any given time. However, given the nature of our activity (and specifically, of the public auction in which third parties with whom we do not have an agreement may participate), we cannot provide you with specific information on each and every one of the recipients who may access your personal data throughout the process.

You can find information about possible communications of your personal data to third parties by Publishers and Advertisers in their respective privacy policies. In some Publishers' and Advertisers' cookie banner, consent management platform, or cookie policy you could find a link to the vendor list, where you could find out which third parties are involved in your data processing.

On the other hand, we may give access to your personal data to our data processors, i.e., those entities that must process your personal data strictly according to our instructions and solely for the purpose of providing the service to us. Seedtag's data processors include the owners of advertising campaign management platforms, data hosting companies or back-office services.

Finally, please note that some of the recipients and processors we work with may access your personal data from organizations and/or countries outside the European Economic Area that do not have an adequacy decision from the European Commission and therefore do not guarantee a level of protection for your personal data equivalent to the European level. In these cases, we adopt the appropriate safeguards contained in the applicable regulations, such as Standard Contractual Clauses, in order to strengthen the protection of your personal data. [Here](#) you can find information on the main international data transfers that we carry out in the framework of our activity.



You can request detailed information on the international data transfers we carry out at the following e-mail address: gdpr@seedtag.com.

6. WHAT ARE YOUR DATA PROTECTION RIGHTS?

We inform you that you have the following rights regarding your personal data:

- **Right of access:** The right to have us confirm whether or not your personal data are being processed and, where appropriate, to request access to them and to certain information about their processing (purposes, categories of data processed and recipients, among other aspects).
- **Right of rectification:** The right to request the rectification of your inaccurate personal data and/or the completion of your incomplete personal data.
- **Right of erasure:** The right to request the erasure of your personal data when, among other reasons, your personal data are no longer necessary in relation to the purposes for which they were collected.
- **Right to restriction of processing:** The right to obtain a restriction on the processing of your personal data in certain circumstances, for example, where you challenge the accuracy of your personal data, in accordance with applicable law.
- **Right to data portability:** The right to receive the personal data you have previously provided to us in a structured, commonly used, and machine-readable format. You may also ask us to transfer your personal data directly to a third party of your choice (where technically feasible).
- **Right to withdraw your consent:** Where we process your personal data on the basis of your consent, you may withdraw your consent at any time.
- **Right not to be subject to automated decisions:** The right not to be subject to a decision based solely on automated processing of your data, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- **Right not to sell your personal data:** in accordance with local legislations of the United States of America, like California (CCPA), Colorado, Connecticut, Montana Oregon, Texas and Virginia.
- **Right to confirm the existence of processing of your personal data,** in accordance with the Brazilian General Data Protection Law (LGPD).

You may exercise your rights with respect to any of the processing of your personal data referred to in this Privacy Policy at the following email address: gdpr@seedtag.com managed by Seedtag. This is without prejudice to your right to withdraw your consent to the installation of our cookies (and similar tracking technologies) on the corresponding pages of our Publishers and Advertiser partners.

Finally, you can file a complaint about our processing of personal data with the competent Data Protection Authority. For contact details:



- **EU data protection authorities:** https://edpb.europa.eu/about-edpb/about-edpb/members_en
- **Swiss data protection authority:**
<https://www.edoeb.admin.ch/edoeb/en/home/deredoeb/kontakt.html>.
- **UK data protection authority:** <https://ico.org.uk>.
- **Brazilian data protection authority:** https://www.gov.br/anpd/pt-br/canais_atendimento/cidadao-titular-de-dados/denuncia-peticao-de-titular
- **Australian data protection authority:** <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us>
- **Canadian Office of the Privacy Commissioner:** <https://www.priv.gc.ca/en/report-a-concern/>
- **Quebec's Commission:** <https://plainte.cai.gouv.qc.ca/default?l=en-us>
- **Californian Privacy Protection Agency:** <https://cppa.ca.gov/webapplications/complaint>
- **Mexican data protection authority can be contacted by sending an email to:**
enlaceinai@inpi.com.mx
- **Colombian data protection authority can be contacted by sending email to:**
contactenos@sic.gov.co
- **Argentinian data protection authority:** <https://www.argentina.gob.ar/servicio/denunciar-incumplimientos-de-la-ley-de-proteccion-de-datos-personales>
- **Chilean data protection authority:** <https://www.consejotransparencia.cl/proteccion-datos-personales/>
- **Peruvian data protection authority:** <https://www.gob.pe/9271-denunciar-el-mal-uso-de-datos-personales>