



## CONTEXTUAL ADVERTISING PRIVACY POLICY

Last update: March 2024

### 1. INTRODUCTION.

The purpose of this Contextual Advertising Privacy Policy is to provide information about the processing of personal data by Seedtag in the context of our provision of contextual advertising services. These services allow us to optimise the rendering of advertisements through contextual analysis of web pages. In this way, Advertisers (as explained below) can deliver relevant advertising to you based on the content of the web space you visit rather than your search history, thus limiting the impact on your privacy.

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

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

We may therefore process your personal data when you visit a Publisher's or Advertiser's website that uses our technology to serve online advertisements and you consent to the use of cookies (or similar technologies, such as pixel tags) that enable their operation, 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 our [Cookie Policy Web](#).

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

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

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

For certain processing purposes, expressly identified as such in section 4 of this Contextual Advertising Privacy Policy, we may operate as co-processors, together with Publishers and Advertisers. Should you wish to obtain a summary of the essential terms of the co-responsibility agreement that



we enter into with these entities, you may request it from our data protection officer via the email address below.

Seedtag has appointed a personal data protection officer who will centralise the management of data protection under this Contextual Advertising Privacy Policy, being the common contact of the co-responsible parties and whom you can contact for any questions regarding the processing of your personal data (and in case you have any doubts about co-responsibility and its operation) at the following e-mail address: [gdpr@seedtag.com](mailto: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 policies, allowing users to express their choice and inform operators in the advertising supply chain. 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 web page. 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
User ID (a unique code that may be assigned to you by us or by the Publisher/Advertiser in order to recognise your login between sessions and/or websites)	
Your approximate location (country, region, postcode) derived from the 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 general location data without revealing precise details about the actual IP address.	



Categories of data processed	Applicable retention period
For example, a full IP address, such as "192.181.1.110", could be truncated to something like "192.181.X.X", where the specific parts of the IP address have been replaced by "X" to hide the more detailed information, but an approximate location can still be inferred.	
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 (wifi or mobile network)	
Type of device you use (mobile device or computer)	
Your choice of cookies as expressed through the consent console provided by the Publisher	

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

Likewise, in certain cases, in order 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
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User IP address (a unique address that identifies your connection)	<ul style="list-style-type: none"><li>• 90 days for the rendering of the advertisements; and</li><li>• The duration of the advertising campaign in question for the measurement of the campaigns.</li></ul>
User ID (a unique code that may be assigned to you by us or by the Publisher/Advertiser in order to recognise your login between sessions and/or websites)	
Your approximate location (country, region, postcode) derived from the IP address	
Your interactions with ads (click, tap, swipe, scroll), including the date and time and/or duration of such interaction. We also collect the URL of the web page where the interaction took place.	
Type of browser you use (e.g. Google Chrome, Safari, Mozilla)	
Type of connection you use (wifi 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 synchronisation process** with third parties, Seedtag may generate and assign you a random user ID in order to identify you as a user. This allows us to exchange information with third parties about users passing through our system in order 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 LEGITIMATE BASIS DO WE PROCESS YOUR PERSONAL DATA?

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



#### **4.1. Acting on a co-responsibility basis with Publishers and Advertisers:**

We will process your personal data to provide our Publishers and Advertisers with contextual advertising services, including for the purposes set out below:

- 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.
- 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. **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 and C) is your CONSENT, granted, where applicable, through the consent management console on the Publisher's and/or Advertiser's website, as appropriate.**

- D. **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.
- E. **Detect and prevent fraud and correct errors:** We will use 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 contextual advertising services, protecting our resources and users' interests; on the other hand. In order to decide whether to apply this legitimate interest, a legitimate interest balancing test has been carried out, which has confirmed an overriding interest on our part that enables 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 below. 2 above.

As a result, you will be able to see ads that are more relevant based on the context of the website you are visiting (mainly the content and language of the website). At no time will we base our analysis on your browsing history.

#### **4.2. Acting as the sole controller of your personal data:**

- A. **To train our *machine learning* algorithm that we use to develop and improve our services, and in particular to optimise decision-making in advertising auctions:** We will process your personal data collected in the contextual 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 (A) is our LEGITIMATE INTEREST** in improving the efficiency of the contextual 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 below. 2 above.

- B. **Train our *machine learning* algorithm by analysing information from publicly available online sources:** In order to train our algorithm (mainly so that it can recognise the context of the web page and link it to a relevant advertisement) we automatically analyse 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 websites 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 (B) is our LEGITIMATE INTEREST** in improving the efficiency of the contextual 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 below. 2 above.



## 5. TO WHOM WILL YOUR PERSONAL DATA BE COMMUNICATED?

As part of our contextual advertising activity, Seedtag may share your personal data with third parties in order to provide services to Publishers and Advertisers, as detailed in the section below. 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.

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 organisations 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 within 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](mailto: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.

You may exercise your rights with respect to any of the processing of your personal data referred to in this Contextual Advertising Privacy Policy at the following email address: [gdpr@seedtag.com](mailto: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 or go to the [Spanish Data Protection Agency](#), the supervisory authority for data protection.