

## **PRIVACY POLICY – LIVEWRAPPED AB**

### **1 WHO ARE WE?**

Livewrapped AB, reg. no. 559101-1969, (“**Livewrapped**”, “**our**”, “**us**”, “**we**”) connects sellers of ad inventory, such as publishers (“**Client(s)**”) with buyers of ad inventory (“**Buyer(s)**”) by utilizing so called “header bidding” technology on our platform (“**Platform**”). We are an independent, publisher-focused Platform that helps our Clients monetize their websites so that they can continue offering users (“**you**”, “**your**”) content.

Our Platform functions as an intermediary between Buyers and you as a user of our Client’s services. As such, we provide a link between you and the Buyer’s personal data about you.

### **2 SCOPE OF THE PRIVACY POLICY**

Livewrapped mainly acts as a data processor in relation to the Platform, meaning that we process data on behalf of our Clients. We also process certain personal data about you as a data controller. This Privacy Policy therefore covers both the processing of personal data that Livewrapped performs as a data controller (where you are a Client representative or subject to our Platform services) (see section 6) and as a data processor (see section 5) when providing the Platform.

In this Privacy Policy, we explain what kind of personal data we, or the Client, may process and for what purposes. Furthermore, we explain what choices and rights you have. We kindly ask you to read this Privacy Policy carefully and make yourself familiar with its content.

Please contact us if you have any questions or concerns regarding privacy at [privacy@livewrapped.com](mailto:privacy@livewrapped.com). You can also contact the relevant Client directly.

### **3 IAB EUROPE TRANSPARENCY & CONSENT FRAMEWORK**

Livewrapped participates in the IAB Europe Transparency & Consent Framework and complies with its Specifications and Policies. Livewrapped’s identification number within the framework is 919.

## 4 HOW DO WE COLLECT DATA?

### *Collecting of data*

Livewrapped uses technologies like cookies, tags, and mobile SDKs to collect the personal data and store it on your device. An SDK, or Software Development Kit, is the software used by our Clients to integrate our Platform in their mobile application (iOS and Android).

Cookies are small text files that contain a string of characters, stored in the user's device. They allow us to recognize and remember your browser.

The Livewrapped tag is a small piece of code that is inserted into a Client's website source code, which allows our Clients to have access to and manage our Platform.

### *Opt-out and withdrawing of consent to cookies*

For the sake of transparency, Livewrapped has adopted a cookie opt-out policy, allowing each Internet user to opt-out from our Platform. This ensures that your browser will no longer be identified by our Platform. Please note that for us to acknowledge your desire to opt-out, one cookie will be placed on your device in order to ensure the performance of your opt-out. Moreover, this opt-out will only be available for the device on which it was created and for as long as the opt-out cookie is installed on the device and has not been removed by you or your browser.

If you wish to opt-out, [click here](#). A blank page will open, confirming the opt-out process has been completed and we will no longer place cookies on your computer.

You can also avoid cookies being placed on your computer by disabling the function for cookies in your web browser settings. If you do not permit cookies, some features on the sites you are visiting may not function as intended.

When you as representative for our Client access the Platform we store certain information on your computer in the form of cookies. We use cookies for login and session management purposes and when you choose personalized features.

If you do not want to accept our use of cookies, you need to disable the function for cookies in your web browser settings. If you do not permit cookies, some features of the Platform will not function as intended and you may not be able to login to the Platform.

## 5 LIVEWRAPPED ACTING AS A DATA PROCESSOR

Livewrapped processes the following personal data in accordance with the Client's instructions, meaning that we rely on the Client's legal bases and retention periods for each purpose. To the extent that the legal basis is legitimate interest, please refer to the relevant Client's Privacy Policy for an explanation of its legitimate interest(s) at stake.

5.1 Personal data processed and for what purposes, legal bases etc.

**Store and/or access information on a device**

Why we process this data	The personal data we process	Legal basis for doing so	How long will we keep your data?
<ul style="list-style-type: none"> <li>For storing cookie matchings between Livewrapped and vendor</li> <li>For machine learning to improve and develop the Platform</li> </ul>	Cookie ID	Consent.	30 days.

**Use limited data to select advertising**

Why we process this data	The personal data we process	Legal basis for doing so	How long will we keep your data?
<ul style="list-style-type: none"> <li>Filter vendors that are only active in certain countries</li> <li>Forward real-time information in request to vendors received in the incoming request</li> </ul>	<ul style="list-style-type: none"> <li>Non-precise geolocation data</li> <li>Real-time information (such as IP address, non-precise geolocation, User Agent data, device characteristics, privacy choices, page URL and information about page content)</li> </ul>	Consent or legitimate interest.	0 days.

**Ensure security, prevent and detect fraud and fix errors**

Why we process this data	The personal data we process	Legal basis for doing so	How long will we keep your data?
For detecting of bots using User Agent	User Agent data (such as device type, browser, browser version, Operating System)	Consent or legitimate interest.	0 days.

***Deliver and present advertising and content***

Why we process this data	The personal data we process	Legal basis for doing so	How long will we keep your data?
<ul style="list-style-type: none"> <li>• Receive and respond to ad requests</li> <li>• Deliver ad content to calling entity</li> <li>• Logging of ad delivery</li> </ul>	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Web browser ID</li> <li>• Webpage/URL</li> <li>• Device information</li> <li>• Location Data</li> <li>• Pseudonymous ID of audience segmentation</li> <li>• Other information about identifiers assigned to end-user devices (IDFA, AAID)</li> </ul>	Consent or legitimate interest.	0 days.

***Measure advertising performance***

Why we process this data	The personal data we process	Legal basis for doing so	How long will we keep your data?
<ul style="list-style-type: none"> <li>• Providing metrics to Clients using our Platform</li> <li>• Measure delivery of ads</li> <li>• Measure in-view metrics according to IAB standard</li> </ul>	<ul style="list-style-type: none"> <li>• Aggregated data about browser, device, Operating System</li> <li>• Country</li> </ul>	Consent or legitimate interest.	0 days.

**6 LIVEWRAPPED ACTING AS A DATA CONTROLLER**

**6.1 Personal data processed and for what purposes, legal bases etc.**

Livewrapped processes the following personal data as a data controller.

***Client administration***

When you as a representative for a Client contacts us, we will process the personal data you have provided us with as a data controller. Please find detailed information below.

<b>Why we process this data</b>	<b>The personal data we process</b>	<b>Legal basis for doing so</b>	<b>How long will we keep your data?</b>
<ul style="list-style-type: none"><li>• To maintain contact with the Client you represent</li><li>• To manage contracts regarding the Platform</li><li>• Manage invoicing and payments</li><li>• To promote and market Livewrapped and our services, such as offers, newsletters and invitations to events</li></ul>	<ul style="list-style-type: none"><li>• Contact information (such as name, email address, phone number)</li><li>• Your title or role</li><li>• Information about the Client which you represent</li></ul>	Legitimate interest, meaning that the processing is necessary for our legitimate interest to initiate, maintain and follow up on our relations with the Client which you represent as well as to provide the Client with information and relevant offers on our products and services.	For as long as you represent the Client, alternatively as long as we have an on-going business relationship with the company which you represent. We will delete your personal data as soon as we receive information from you that you no longer represent the company, alternatively when we no longer have an on-going business relationship with the company which you represent.

***Develop and improve services***

We process personal data as a data controller in order to secure, amend, enhance and improve the Platform. Please find detailed information below.

Why we process this data	The personal data we process	Legal basis for doing so	How long will we keep your data?
<ul style="list-style-type: none"> <li>Build machine learning models used for optimizing in-view of ads, timeouts for vendors</li> </ul>	Technical data (such as IP address, device type, Operating System, browser, ISP)	Consent.	30 days.
<ul style="list-style-type: none"> <li>Floor price optimization</li> </ul>		Consent.	

### ***Accounting legislation***

Why we process this data	The personal data we process	Legal basis for doing so	How long will we keep your data?
To fulfil legal requirements	<ul style="list-style-type: none"> <li>Contact information (such as name, e-mail address, phone number)</li> <li>Information about the Client</li> </ul>	Legal obligation.	Up to 7 years.

## **6.2 Recipients of the personal data**

Livewrapped may share your personal data with the categories of recipients listed below.

- a) Business partners and suppliers who provide us with their services, for example assistance with invoicing, orders or financial administration, marketing agencies or other marketing platforms, recruitment companies or suppliers of IT and cloud services;
- b) Authorities in Sweden or other countries that exercise supervision over our business and in regard to which we have an obligation under law or contract to provide requested information or transparency;
- c) Authority, court of law or other third party when required by applicable law or regulation as well as to assert, establish or defend legal claims, or to protect your or any other person's fundamental interests;
- d) Potential buyer (and its representatives and advisers) in connection with a proposed purchase, merger or acquisition; and

- e) Other parties that you have given your consent to such sharing, or when required as a result of exercising any of your rights in accordance with section 6.4.

### 6.3 **Transfer of personal data outside of the EU/EEA**

Livewrapped does not transfer your personal data outside of the EU/EEA as a data controller.

### 6.4 **Your rights**

#### ***Right to information and access***

You have the right to know if we process personal data about you. If we do, you also have the right to receive information about the personal data we process and why we do it. You also have the right to receive a copy of all personal data we have about you.

If you are interested in specific information, please indicate it in your request. For example, you can specify if you are interested in a certain type of information (e.g. what contact and identification information we have about you) or if you want information from a certain time period.

#### ***Right to have erroneous data corrected***

If the data we hold about you are incorrect, you have the right to have it corrected. You also have the right to supplement incomplete information with additional information that may be needed for the information to be correct.

Once we have corrected your data, or it has been supplemented, we will inform those we have shared your data with about the update, provided that it is not impossible or too cumbersome. If you ask us, we will also tell you who we have shared your data with.

If you request to have data corrected, you also have the right to request that we limit our processing during the time we investigate the matter.

#### ***Right to have data deleted***

In some cases, you have the right to have your data deleted. You have the right to have your data deleted if:

- a) The data is no longer needed for the purposes for which we collected it;
- b) You withdraw your consent, if applicable;
- c) The data is used for direct marketing and you unsubscribe from it;

- d) You oppose use that is based on our legitimate interest and we cannot show compelling grounds that outweigh your interests;
- e) The personal data has been used illegally; or
- f) Deletion is required to fulfill a legal obligation.

However, we may preserve data for legal reasons or to prevent harm.

If we delete data following your request, we will also inform those we have shared your data with, provided that it is not impossible or too cumbersome. If you ask us, we will also tell you who we have shared your data with.

### ***Data portability***

You have the right to receive personal data about you in a structured, generally used and machine-readable format if the processing of your personal data is being based on your consent and have been provided by you. You are also entitled to transfer such personal data to another controller.

### ***Objecting to data use***

You have the right to object to processing that is based on our legitimate interest. If you object to the use, we will, based on your particular situation, evaluate if our interests in using the data outweigh your interests in the data not being used for that purpose. If we are unable to provide compelling legitimate grounds that outweigh yours, we will stop using the data you object to - provided we do not have to use the data to establish, exercise or defend legal claims. If you object to the use, you also have the right to request that we restrict our use during the time we investigate the matter.

You always have the right to object to, and thus unsubscribe from, direct marketing.

### ***Right to withdraw consent***

You have the right to withdraw your consent for a specific processing at any time. You can withdraw your consent by contacting us at [privacy@livewrapped.com](mailto:privacy@livewrapped.com).

Your withdrawal will not affect processing that has already been carried out.

### ***Right to request restriction***

Restriction means that the data is marked so that it may only be used for certain limited purposes. The right to restriction applies:



- a) When you believe the data are incorrect and you have requested correction. If so, you can also request that we limit our use while we investigate if the data are correct or not.
- b) If the use is illegal but you do not want the data to be deleted.
- c) When we no longer need the data for the purposes for which we collected it, but you need it to be able to establish, assert or defend legal claims.
- d) If you object to the use. If so, you can request that we limit our use while we investigate if our interest in processing your data outweighs your interests.

Even if you have requested that we restrict our use of your data, we have the right to use it for storage, if we have obtained your consent to use it, to assert or defend legal claims or to protect someone's rights. We may also use the information for reasons relating to an important public interest.

We will let you know when the restriction expires.

If we limit our use of your data, we will also inform those we have shared your data with, provided that it is not impossible or too cumbersome. If you ask us, we will also tell you who we have shared your data with.

#### **6.5 Right to file complaint to the supervisory authority**

If you have any concerns regarding our processing of your personal data, please contact us at [privacy@livewrapped.com](mailto:privacy@livewrapped.com). You also have the right to file a complaint to the supervisory authority in the Member State where you reside, work or where you consider that the personal data have been processed in violation of data protection laws. In Sweden, the supervisory authority is the Swedish Supervisory Authority for Privacy Protection (IMY) ([www.imy.se](http://www.imy.se)).

#### **6.6 Changes to this Privacy Policy**

We may change or update this Privacy Policy at any time. In such case, we will publish information on the changes or updates on our website.

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