



VIVALU Data Privacy
2018

1. Data privacy at VIVALU.com

- (1) VIVALU GmbH takes the protection of your personal data seriously. Personal data about your visit to the VIVALU.com website is not collected or, when this cannot be avoided for technical reasons, is promptly deleted. This also applies for your IP address. VIVALU uses social marketing channels in order to make real time advertising more tangible and to provide information on the latest trends and concepts:

2. MediaMath (DSP)

- (1) MediaMath is a global provider of digital advertising media and data management technology. MediaMath's proprietary TerminalOne™ platform (the "Platform") activates data, automates execution, and optimizes advertising interactions across addressable media — delivering greater performance, transparency, and control to marketers and a better experience to consumers.
- (2) In the course of delivering an ad to you via the Platform, MediaMath does not intentionally collect information that reveals your real-world identity, such as your name, address, phone number, or Social Security Number. MediaMath collects data about your computer or device by usage of cookies, web-beacons and other similar technologies, as explained below. This information is pseudonymous and is not considered to be personal information in many jurisdictions in which we operate. In some other jurisdictions in which we operate, in certain contexts, such information, including Internet Protocol (IP) addresses and other pseudonymous information, may be considered personal information.
- (3) The information MediaMath collects includes common information found in every communication sent over the Internet, from which we infer such things as:
 - Browser type (e.g., Chrome or Internet Explorer)
 - Operating system (e.g., Mac OS or Windows)
 - browser language (e.g., English or Spanish);
 - Internet Protocol (IP) address;
 - Internet Service Provider (e.g., Comcast or Verizon)
 - Mobile advertising identifier for mobile devices such as smartphones and tablets
- (4) MediaMath may also collect data regarding your interactions with our clients and partners, including your use of our clients' sites and mobile apps, the sites and apps our clients advertise on, and other pages on the Internet. We may also capture additional data in order to calculate a statistical ID, as described below. We and our clients and partners use the information we collect to create data segments, and these data segments are generally based upon your interactions with our clients or other third party media suppliers, such as the websites that you visit and the mobile applications that you use. We also receive pseudonymous information from third parties, when they choose to provide it to us. This information may include identifiers (like mobile advertising IDs) and interest-based advertising data tied to those identifiers, including segments provided by third-party data providers for our clients to use in targeting ads through the Platform. MediaMath does not use this data to personally identify you. In some cases, MediaMath is able to infer within a reasonable probability that a particular computer or mobile device should be associated with the same MediaMath ID that we have

previously assigned to another computer or mobile device. In other words, in such cases we are able to infer that a device (e.g. your computer) and another device (e.g. your smartphone) are used by the same user. Where we are able to make such inferences, we may use this information to deliver targeted ads across multiple computers or devices, and to improve the services we provide to our clients. This is sometimes referred to as cross-device advertising.

- (5) MediaMath does not knowingly collect data or create data segments that are based upon what we consider to be sensitive information (for example, we don't create any data segments to determine credit worthiness, for insurance underwriting or similar purposes, nor do we create segments of EU consumers based on personal data considered to be sensitive in the EU, e.g. information about physical or mental health or condition, sexual orientation, race or ethnic origin, political opinions, religious or similar beliefs). Clients may use health-related segments (which are not comprised of sensitive health data) such as an inferred interest in health and wellness or cough medicine and allergy medications.
- (6) **Cookies, Web Beacons, and Other Ad Targeting Technologies**
Like most digital marketing platforms, MediaMath uses "cookies", mobile advertising identifiers, and other technologies to enhance users' experiences on the web, to deliver more relevant ads, and for ad delivery and reporting via the Platform. We use these technologies to help recognize a computer or device so that we and our clients are able to deliver relevant advertising to you, measure the impact of that advertising and better understand and recognize digital media usage patterns.
- (7) The types of technologies used via the Platform include:
Cookies | Mobile Advertising Identifiers | Pixel Tags | Statistical IDs
- (8) We retain the MediaMath ID and, where applicable, its association with other devices for as long as this is necessary for our legitimate business purposes. Cookies set via the Platform expire within 13 months. MediaMath also expires within 13 months the browsing data tied to your MediaMath ID (e.g., records of when we served an ad to your browser or identified it on a client's website or mobile app).

3. AppNexus (DSP)

- (1) AppNexus is a digital advertising technology platform. By "platform," we mean a technology that provides tools for advertisers, or buyers, to purchase ad space and for website and mobile application publishers, or sellers, to sell their ad space in the most efficient way possible.
- (2) The Platform is designed to use certain types of data, that all together we call Platform Data. It includes data generated through the Platform as well as data clients receive from other sources and then use on the Platform, or that they buy or sell through the Platform. This may include information about Internet users' browsers and devices, such as: the type of browser and its settings, information about the device's operating system, cookie information, information about other identifiers assigned to the device, and the IP address from which the device accesses a client's website or mobile application, information about the user's activity on that device, including web pages and mobile apps visited or used, information about the geographic location of the device when it accesses a website or mobile application, inferences or information about users' interests that are created, acquired, bought, sold, or used by our clients.

Most of the data that the Platform receives from browsers and devices might also be called "HTTP header data" or "clickstream data." The Platform ingests information provided by third-party sources to allow clients to use such data to target ads. To do this, clients and data providers may use ID syncing to enable the use of this information through the Platform. AppNexus does not collect, use, or allow its clients to transfer to or use on the Platform, data that, by itself, directly identifies an individual, such as name, address, phone number, email address, or government identifier. We also prohibit certain categories of sensitive data from being collected, used, or transferred on the Platform.

- (3) The platform uses cookies, beacons, tags, mobile SDKs and, in some cases, non-cookie technologies to collect platform data in connection with specific browsers or devices.
- (4) Through the platform, AppNexus customers can use their platform data to purchase and sell online advertising, including interest-based advertising, through real-time transactions. Specific promotional purposes for which AppNexus customers use the platform data on the platform are, for example:
 - Interest-based advertising (To disable interest-based advertising on the platform, please refer to the "What options do you have?" Section below.)
 - Limit the number of times a user sees a particular ad
 - Display advertisements in specific order
 - Customize advertising to specific regional features
 - Display advertising whose content is matched to the website on which it appears
 - Maintain user responses to ads
 - Report using aggregated statistics, for example on the effectiveness of an online advertising campaign
- (5) As a rule, the data provided to the platform and obtained there, is owned by the company using a platform such as the AppNexus platform. Although the AppNexus platform is designed for the use of certain types of data, platform customers can not directly transfer data to the platform that directly identifies individuals, but when customers remove their data from the platform, their use depends on their own and the applicable laws and regulations.
- (6) AppNexus uses generally accepted safety standards on the platform in the industry. Platform data will be stored on the platform in a non-aggregated form for up to 18 months from the date of its collection. Aggregated data is used for reports and analysis and can be stored on the platform for a further 2 years. When customers remove their data from the platform, the storage of the data is governed by their own privacy policies and the applicable laws and regulations. We do not allow data that by itself identifies an individual, such as name, address, phone number, email address, or government identifier, to be used on the Platform. AppNexus does not allow data that directly identifies an individual to be collected or used on the Platform.

4. Tabmo.io (Mobile DSP)

- (1) TabMo SAS ("TabMo") is a marketing services company focusing on the mobile application and web mobile marketplace. We are committed to maintaining the privacy of your information when you visit our website, and when we provide products that optimize the mobile marketplace on behalf of mobile application providers and companies looking to advertise via mobile applications and similar digital properties (our "Clients"). TabMo buys advertising space on mobile applications and similar digital properties on behalf of our Clients. Pursuant to those Services, we collect information across the mobile apps and sites you visit to create interest segments in order to make advertising messages more relevant. We also receive data from Clients to help inform and improve their advertising campaigns. Such "Client Data" is used subject to the privacy policies of TabMo's clients. None of this information may be used by TabMo to personally identify you.
- (2) The TabMo Services collect information pursuant to delivering advertising messages and when those messages are viewed, clicked or otherwise interacted with by users. This information can't be used to personally identify you and includes:
- (3) Device Information – information about your device, such as the kind of mobile device you use (e.g., iPhone, Samsung), the operating system for your mobile device (e.g., Android, Apple iOS), the mobile carrier name, the Internet Connection type, the IP address, user agent string, Internet browser (e.g., Chrome, Safari), and similar information, as well as unique device identifiers such as iOS Identifier for Advertising (IDFA) or Android Advertising ID. This information makes your device distinct enough for our systems to determine within a reasonable probability that they are encountering the same computer or device;
- (4) Mobile users are always able to reset your Advertising IDs (AAID/IDFA) and are also able to follow general instructions on how iOS users can enable Limit Ad Tracking and Android users can Opt Out of Interest-Based Ads.
- (5) Ad serving information – This information includes information about the particular ads, served, viewed, or clicked on, such as the type of ad, on which mobile app the ad was served, whether that ad was clicked on, the cost of the ad, and whether you visited our Client's website or purchased the product or service advertised;
- (6) Client Data – Sometimes Clients pass us information about their customers, including demographic information, information about customer activity in their sites and apps (e.g., registrations and purposes), including the content viewed or searches made, and language preferences.
- (7) We don't collect personally identifiable information unless you provide it to us.

5. Facebook

- (1) This website uses social plug-ins which are provided by the social network Facebook, which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA, and can be called at www.facebook.de. These social plug-ins are flagged with one of the Facebook logos or with the suffix "Facebook Social Plugin". The list and the look of the Facebook social plug-ins can be viewed here: <https://developers.facebook.com/docs/plugins/>. When you access a page of our website which contains such a social plug-in, a direct connection is set up from the browser you use to the Facebook servers. The content of the

social plug-ins is transferred from Facebook directly to your browser and integrated into the website. Consequently, we have no influence on the volume of data which Facebook collects with the help of the social plug-ins and can therefore provide you only with information which is correct to the best of our knowledge, as follows: Because the social plug-ins are integrated, Facebook will be informed that you have visited a particular page of our website even if you are not registered as a user of Facebook or are currently not logged in on Facebook. Your browser transmits this information together with your IP address to a Facebook server in the USA, where it is stored. According to information from Facebook, only an anonymized IP address is stored in the case of unregistered users in Germany.

- (2) If you are logged in on Facebook, Facebook can assign your call to our website directly to your Facebook account. Facebook receives the information about your visit to our website irrespective of whether or not you interact with the social plug-ins. If you interact with the social plug-ins, for example click the "Like" button or send a comment, the corresponding information is transferred directly to Facebook by your browser and is stored there. This information is also published on Facebook and displayed to your Facebook friends.
- (3) Details on the purpose and scope of data collection and on further processing and use of the data by Facebook, as well as details on and your associated rights and setting options to protect your private sphere can be found in the Facebook privacy policy at <http://www.facebook.com/about/privacy>.
- (4) If you are a registered user of Facebook and do not want Facebook to collect data about you via our website and to link this with your member data which is stored at Facebook, you must log out of Facebook before you visit our website.
- (5) It is also possible to block the social plug-ins with add-ons for your browser, e.g. using the Facebook Blocker, <http://webgraph.com/resources/facebookblocker/>

6. Google +

- (1) The "+1" plug-in of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, is integrated on this site, and can be recognized by the "+1" on a white or colored background.
- (2) When you call a page on our website which contains this plug-in, your browser will set up a direct connection to the Google servers and the content of the plug-in will then be transferred to your browser, which will incorporate it into the website. We have no influence on the scope or content of the data which is collected by Google using this plug-in. According to the information from Google, no personal data is collected without the plug-in being clicked on. Only in the case of Google+ members who are logged in is data reportedly collected and processed. If you are logged into your personal user account at Google+ or Google while you visit our website, Google can assign the website visit to this account. When you interact with plug-ins, e.g. click the button or leave a comment, information about this is transferred directly to Google and stored there. Furthermore, we cannot rule out that other Google services which are integrated into our website link data with your Google profile. If you want to suppress such data transfer, you must log out from your Google+ or Google account before you visit our website.

- (3) Google users can find details on the purpose and scope of data collection and on further processing and use of the data by Google, as well as on their associated rights and setting options to protect their private sphere, in the data privacy information about the "+1" plug-in at <http://www.google.com/intl/de/+/policy/+1button.html> and in the FAQ,s which can be called at <http://www.google.com/intl/de/+1/button/>.

7. Twitter

- (1) This website uses the buttons of the Twitter service which is offered by Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA. These plug-ins can, for example, be recognized by means of terms such as "twitter" or "tweet" or the Twitter logo. Among other things, they enable a text or page from this website to be shared on Twitter. When a user calls a website, which contains such a button, their browser will set up a direct connection to the Twitter servers. The content of the Twitter buttons is transferred by Twitter directly to the user's browser. Consequently, we have no influence on the volume of data which Twitter collects with the help of this plug-in and can therefore only supply you with information which is correct to the best of our knowledge: Log data such as the user's IP address, the site accessed previously etc., is then transferred. Further information on this is available in the Twitter data privacy statement at <http://twitter.com/privacy>.

8. Data privacy for commissioned activities

- (1) The technology used by VIVALU GmbH on behalf of its customers optimizes advertising measures by using data which as a rule have no reference to a person (anonymous data). If, in an exceptional case, it is possible to assign this data to a specific person, the reason for this is that you have done business with a business partner of VIVALU GmbH or have revealed who you are to this business partner in some other way. In such cases you can lay claim to your statutory rights with respect to this personal data vis-à-vis your contractual partner at any time. VIVALU GmbH will in no case attempt to assign the data in its possession to a particular person. In addition, you can suppress the storing of cookies and profile data on your computer, by means of your browser settings at any time.

9. Information on Online Behavioral Advertising (OBA)

- (1) As a company, we voluntarily comply with the self-regulation defined by the "German Data Privacy Council for Online Advertising" (DDOW). This concerns the responsible handling of data for advertising control with regard to transparency, usage and the option of lodging an objection.
- (2) You can view the self-regulation codex for third parties which applies to us at: http://meine-cookies.org/DDOW/dokumente/DDOW_%20OBA-SR_Kodex_3rd.pdf
- (3) By means of anonymously collecting and processing your usage behavior, we optimize the control of advertising for the products and services of our customers on your behalf. For this purpose, a cookie is stored on your computer. Cookies are small text files which are placed on your computer's hard disk and enable things to be recognized again but which do not permit you to be personally identified. This data is collected and used through technology provided by our technical contract partner, which is employed when customers make use of our services.

10. What data do we collect?

- (1) The usage data which is pseudonymized¹ during our activities to prepare and display digital advertising contains information on:
- (2) Retargeting measures: The last contact of the internet user with the website of our customer(s) is stored here – together with the date, time and assignment to the advertising measure or our customer(s). Based on this contact, the user can then be addressed again with a specific offer outside the website of our customer(s).
- (3) Specific interactions of the internet user with the website of our customer(s) or with their advertising measures can also be stored as a criterion for addressing them again. This can consist of visual contact or clicking on advertising material, or the user accessing or remaining on a website or a specific sub-page of our customer(s) for a certain time.

11. What other data do we use?

- (1) In order to fulfil our claim that we reduce wastage in delivering advertising, we may use target group data. This data is made available in the form of pseudonymous profiles of third parties. VIVALU only uses data from certified providers. This can be viewed under “Data Provider” at <https://open.mediamath.com/partners>.
- (2) An objection to using this data in the course of our advertising measures is provided with the objection option. You can obtain information on a general objection vis-à-vis the listed partners at: http://meine-cookies.org/cookies_verwalten/praeferenzmanager-beta.html
- (3) The IP address of your computer which is transferred for technical reasons will be anonymized or deleted after it has been used for local targeting measures (geo targeting) within the delivery of advertising. The IP addresses are never forwarded.
- (4) VIVALU does not at any time collect or use data which could be employed to deliver advertising material to children who are not yet 13 years old.

12. Flagging advertising materials which are relevant to OBA

- (1) In accordance with the OBA guidelines for third parties, VIVALU flags all advertisements which are subject to the codex with an icon licensed with the EDAA:
- (2) By default, this is located at the top right of the advertisement, but for design reasons can also be contained at one on the following three alternative positions:
- (3) After clicking on the blue icon, the internet user always has the option of obtaining information about the purpose of the anonymous data collection or the option of objecting to the control technology currently used.



¹ When pseudonymized, an identification feature is generated which, for instance, is based on combinations of several letters or numbers in order to exclude the person concerned from being identified.

13. Option to object

- (1) If you do not want to be shown behavioral advertising, you can object to this at the following link: [Opt-Out Predictive Behavioral Targeting](#)
- (2) You can always prevent cookies from being stored on your hard disk by selecting the “accept no cookies” setting in your browser. You can also set your browser so that it asks you whether you are in agreement before cookies are set. And finally, you can also delete cookies which have been set. Please following the instructions provided by your browser provider to do this. If you accept no cookies, this can result in functional restrictions on the website. Please note that you must use the opt-out link again after deleting a cookie and actively accepting cookies.

14. More information about data storage in cookies

- (1) Further information on this subject is provided by the “Bundesverband digitaler Wirtschaft” (German association for Digital Business) at the portal <http://meine-cookies.org/> | http://meine-cookies.org/cookies_verwalten/praefferenzmanager-beta.html. Here you can obtain general information on cookies and the topic of data privacy, as well as on individual preferences for permitting cookies.

15. Any other questions?

- (1) If you have any questions about this data privacy statement or the option of lodging an objection, please feel free to contact us at any time: vi-tag@vivalu.com
[VIVALU GmbH](#)
[Fürstenwall 70](#)
[40219 Düsseldorf](#)
- (2) If you contact us using the VIVALU.com website, the information you enter there will only be used in the context of the contact you have initiated. Any use above and beyond this will take place only with your given consent or insofar as this is legally permissible.