

PRIVACY POLICY

Last updated: November 14th, 2022

1. Who we are

1.1. We are Adnative LLC, Registered address: H 27, N.Tigranyan street, Arabkir 0014, Yerevan, Armenia, LEI 53636385.

1.2. This Privacy Policy sets out how we collect and use information, that we obtain through our website, <https://ads2.bid>, as well as through our advertising platform service, which serve ads either on our website or on third-party websites or mobile apps (“Services”) and the choices available to you in connection with our use of this information (the Privacy Policy).

The use we make of the Information, including Personal Information, collected through the website and Services may vary depending on whether you are (i) a customer ("Customer"), i.e., a publisher, advertiser, partner, with whom we have a contractual relationship; (ii) a visitor of our Customers' websites who interacts with our Services ("User"); or (iii) or a visitor of our own website ("Site Visitor"), which may include Customers as well as prospective customers.

2. This Privacy Policy

2.1. By making available the Services we, acting reasonably and in good faith, believe that you:

- (a) have all necessary rights to register on and use the Services;
- (b) provide true information about yourself to the extent necessary for use of the Services;
- (c) are aware of and accept this Privacy Policy.

2.2. We do not check the user information received from you, except where such check is necessary in order for us to fulfill our obligations to you.

3. Cookie Policy

3.1. We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this website. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

3.2. You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this website. Therefore it is recommended that you do not disable cookies.

3.3. The Cookies we set

- Account related cookies

If you create an account with us then we will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out however in some cases they may remain afterwards to remember your site preferences when logged out.

- Login related cookies

We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.

- Orders processing related cookies

This site offers e-commerce or payment facilities and some cookies are essential to ensure that your order is remembered between pages so that we can process it properly.

3.4. Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

- Third party analytics are used to track and measure usage of this site so that we can continue to produce engaging content. These cookies may track things such as how long you spend on the site or pages you visit which helps us to understand how we can improve the site for you.

4. Information we collect about you

4.1. In order to provide you with access to the use of the Services, to improve, develop and implement new features to our Services, to enhance the available Services functionality and in compliance with applicable laws, we will collect, store, aggregate, organise, extract, compare, use, and supplement your data. We will also receive and pass this data, and our automatically processed analyses of this data to our affiliates and partners as set out in the table below and section 4 of this Privacy Policy.

4.2. We set out in more detail the information we collect when you use our Services, why we collect and process it and the legal bases below.

Information Collected

Purpose

Legal Basis

About Customers

- | Information Collected | Purpose | Legal Basis |
|---|--|--------------------------------------|
| 1 Data you provide for registering in the Services including your email and/or mobile phone number | We use this information in order to manage and administer the Services provided to you. | Legitimate interests |
| | We use this data to fulfill our obligations towards you as part of the Services (e.g. in cases where you request restoration of your account). | Performance of our contract with you |
| 2 Where necessary, a copy of your identity or another document containing your name, surname, photograph, number of the principal identity document of you or your representative, payment details and another additional data, with that you may provide us, including through our support service.

We may take additional verification steps where we consider reasonable in order to verify your account. | We use this data in order to identify you, verify your account and prevent abuse and infringements of your or other persons' rights. | Legitimate Interests |
| | For example, we use this information to verify your identity if you lose your credentials and wish to access your account with us. | Performance of our contract with you |

3	Additional data you provide when you edit your profile page at including your first and last name, nickname, gender, date of birth, avatar picture and language preferences.	We use this information in order to provide our Services to you, to manage and administer Services and as additional information to verify your account to prevent abuse and infringements of your or other persons' rights.	Legitimate interests
		We also use this information in order to provide you with updates and information on our and selected third parties' products and services we think you may be interested in.	Performance of our contract with you
4	Additional data received when you access the Services, including information regarding technical devices, technical interaction with the Service such as your IP-address, time of registration in the Service, device ids, country and language settings, device model and operating system used, type of browser and your browsing behavior.	We use your data for internal review in order to constantly improve the content of our Services and web pages, optimizing your user experience, to understand any errors you may encounter when using the Services, to notify you of changes to the Services and to personalise the use of our Services.	Legitimate Interests

5	Information that is automatically received at the time of access to the Services with the use of cookies.	Please see our cookies policy which sets out the types of cookies we use and what we use these cookies for.	Consent
6	Email address and contents of a message that you may submit through our website.	We use this information to communicate with Customers, including via email, about the Customer's account; to respond to Customer inquiries or complaints; to provide Customers with news, best practices or other information we think may interest them; to provide Customers with newsletters, special offers, and promotions, including via email; to contact Customers about products or services we think may interest them; and for other marketing, advertising, and promotional purposes.	Legitimate interests Performance of our contract with you

7	Information that is created by you while placing requests to our Services support.	We use this information in order to verify your identity and to fulfill your support request.	Legitimate interests
		We may also use this data in order to investigate any complaints on your behalf and to provide you with a more efficient service.	Performance of our contract with you
8	Information that is received as the result of your using payment functionality on the Site (e.g. first and last four digits of your card number that are needed for the option of matching these details with user's id number).	We use this information in order to manage and administer the Site including providing our Site Services to you.	Legitimate interests
		We may also use this data in order to investigate any complaints on your behalf and to provide you with a more efficient service.	Performance of our contract with you

About Users

1	<p>Information automatically collected through User's interaction with our Services through cookies and other technologies. This Information may include, without limitation, information about a User's operating system, IP address, the webpages accessed by Users within our Customers' websites, the link that led a User to a Customers' website, the dates and times a User accesses a Customers' website and general location information (e.g., country, city).</p>	<p>We use this information to provide our Services to Users and our Customers.</p>	<p>Legitimate interests</p>
		<p>We also use this information to tailor the content and information that we may send or display to Users; to retarget content to Users through our Services and elsewhere; and to otherwise personalize your experiences while using our Services.</p>	

2	<p>Information automatically collected through a User's interaction with our Services via our Customer's mobile apps. This Information may include, without limitation, device identifiers (e.g. IDFA, Google Advertising ID, Android (Google) ID), device information (e.g. brand, model, Screen resolution, OS version, language), app version data, network data (IP address, MAC address, wifi and other networks devices have connected to).</p>	<p>We use this information to provide our Services to Users and our Customers.</p>	<p>Legitimate interests</p>
		<p>We also use this information to tailor the content and information that we may send or display to Users; to retarget content to Users through our Services and elsewhere; and to otherwise personalize your experiences while using our Services.</p>	
3	<p>Information that is automatically received at the time of access the Services with the use of cookies.</p>	<p>Please see our cookies policy which sets out the types of cookies we use and what we use these cookies for.</p>	<p>Consent</p>
		<p>We use this information in order to tailor and improve the advertisements that are presented on the Customers' websites and mobile apps and to measure the effectiveness of these ads.</p>	

About Site Visitors

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| 1 Information collected directly from you, when you send us an email asking a question, or submit a form on our website. We will also collect any other Information that you choose to provide to us, such as the contents of a message that you submit through our website. | We use this information to provide and manage our website and Services. | Legitimate interests |
| | We also use this information to communicate with you, including via email, about our Services; to respond to your inquiries or complaints; to provide you with news, best practices or other information we think may interest you; to provide you with newsletters, special offers, and promotions, including via email; to contact you about products or services we think may interest you; and for other marketing, advertising, and promotional purposes. | |

2	<p>Information automatically collected through your use of the website. Such information may include, without limitation, information about your operating system, IP address, settings and system configurations, device model, device ID and other unique device identifiers, mobile related information, the webpages you access within our website, the website that led you to our site, the website to which you go after leaving our site, the dates and times you access our website, event information (e.g., system crashes) and web log data.</p>	<p>We use this information to provide and manage our website and Services.</p> <p>We also use this information to tailor the content and information that we may send or display to you on our website, and to otherwise personalize your experiences while using our website.</p> <p>We also use this information to better understand how individuals access and use our website, both on an aggregated and individualized basis; to respond to their desires and preferences; and for other research, analytical or statistical purposes.</p>	<p>Legitimate interests</p>
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4.3. Our legitimate interests include (1) maintaining and administrating the Services; (2) providing the Services to you; (3) improving the content of the Services; (4) processing of the information that you choose to provide to us via email or submitting on our website or Service; (5) ensuring your account is adequately protected; and (6) compliance with any contractual, legal or regulatory obligations under any applicable law.

4.4. Your personal information may also be processed if it is required by a law enforcement or regulatory authority, body or agency or in the defense or exercise of legal claims.

4.5. You may withdraw your consent the collection of location data and your apps by amending your privacy settings of your mobile device.

4.6. Please note, if you do not want us to process sensitive and special categories of data about you (including data relating to your health, racial or ethnic origin, political opinion, religious or philosophical beliefs, sex life, and your sexual orientation) you should take care not to send this information to us.

4.7. Please note, if you withdraw your consent to processing or you do not provide the data that we require in order to maintain and administer the Services, you may not be able to access or register or properly use the Services.

4.8. If we intend to further process your data for any other purpose to those set out in this Privacy Policy, we shall provide you with details of this further purpose before we commence processing.

5. Data sharing

5.1. We may share your data with affiliates. Sometimes we may also need to share your data with a third party in order to provide our Services to you or to administer the Services, for example if you choose to share your data across other social media platforms.

5.2. Our ad management and recommendation system is designed so that your information will not be shared directly with our third party advertisers. An advertiser or maker of a recommendation can only choose to target advertisements to groups of users falling within criteria such as age, gender or location, or to target communities according to type, e.g. cars or fashion. If you fall within one of the target groups you will receive an advert or recommendation.

5.3. An advertiser or maker of recommendations may also choose to upload a list of emails, phone numbers and identities to our systems so that we (but not the adviser or maker of recommendations) can check for user matches. They will see the number of matches but not the matches themselves.

5.4. We may disclose non personally identifiable User Information to Customers. For example, we may provide publishers with information about the viewing and click-through patterns of postings of the content they publish and may provide advertisers with information to inform them about conversion rates for analytics purposes.

6. International Transfers

6.1. We may transfer and maintain on our servers or databases some of your personal information outside the European Economic Area (EEA) including in Russia.

6.2. The countries to which we transfer your data may not have the same data protection laws as your jurisdiction. We take reasonable cyber security measures and/or put in place the Standard Contractual Clauses (e.g. Model Clauses, Data Processing Agreement/Addendum) to ensure your data is adequately protected.

7. Retention Periods

7.1. We will retain collected information for as long as required to perform the purposes for which the data was collected depending on the legal basis for which that data was obtained and/or whether additional legal/regulatory obligations mandate that we retain your personal information during the term that is required and/or permissible under applicable/relevant law.

8. Your Rights

8.1. You have the following rights, in certain circumstances, in relation to your personal information:

- (a) Right to access your personal information.
- (b) Right to rectify your personal information: you can request that we update, block or delete your personal data, if the data is incomplete, outdated, incorrect, unlawfully received or no longer relevant for the purpose of processing.
- (c) Right to restrict the use of your personal information.
- (d) Right to request that your personal information is erased.
- (e) Right to object to processing of your personal information.
- (f) Right to data portability (in certain specific circumstances).
- (g) Right not to be subject to an automated decision.
- (h) Right to lodge a complaint with a supervisory authority.

8.2. If you would like to exercise these rights, please send your request to us at info@adnative.am or in writing to: H 27, N.Tigranyan street, Arabkir 0014, Yerevan, Armenia. We will aim to respond to you within 30 days from receipt of request. We will need to verify your identity before we are able to disclose any personal data to you.

9. Security Measures

9.1. We take technical, organizational and legal measures, including, where suitable, encryption, to ensure that your personal data are protected from unauthorized or accidental access, deletion, modification, blocking, copying and dissemination.

9.2. Access to the Services is authorized using your login (e-mail address or mobile phone number) and password. You are responsible for keeping this information confidential. You should not share your credentials with third parties and we recommend you take measures to ensure this information is kept confidential.

9.3. If you forget your login details, you can request us to send you an SMS or email, which will contain a restoration code.

9.4. To reduce the probability of third parties gaining unauthorized access, if you login to your account from an unusual place or after several failed attempts to provide valid login details, we may block entry to your account. You will then need to contact Service support and provide certain additional information to verify your credentials and gain access to your account.

10. Changes to this Policy

10.1. From time to time, we may change and/or update this Privacy Policy. If this Privacy Policy changes in any way, we will post an updated version on this page. We will store the previous versions

of this Privacy Policy in our documentation archive. We recommend you regularly review this page to ensure that you are always aware of our information practices and any changes to such.

11. Contact Us

11.1. If you have any questions, please send your inquiries to us, in writing to H 27, N.Tigranyan street, Arabkir 0014, Yerevan, Armenia. So we can deal with your enquiry effectively, please quote this Privacy Policy. We will aim to respond to you within 30 days from receipt of request.

11.2. All correspondence received by us from you (written or electronic inquiries) is classified as restricted-access information and may not be disclosed without your written consent. The personal data and other information about you may not be used without your consent for any purpose other than for response to the inquiry, except as expressly provided by law.

11.3. The e-mail address of our DPO is info@adnative.am