

Machine Privacy Policy

In this Privacy Policy & Data Protection Statement we inform you of how we collect and use certain information concerning Internet end users, in the course of our mobile advertising services.

This information is in compliance with EU Regulation 2016/679, otherwise known as the General Data Protection Regulation (GDPR). In particular, we aim to comply with the transparency and information requirement set in Articles 13 and 14 GDPR.

Who we are

Machine Advertising Limited ("Machine") is the industry leader in app install fraud protection and risk management, headquartered in the United Kingdom, Machine Advertising Limited, 3rd Floor, 20-22 Berkeley Square, London W1J 6EQ. Machine is registered with the UK's Information Commissioner's Office under registration number ZA328239.

What we do

Machine searches for, detects and stops digital advertising fraud.

What categories of data we collect and/or process

When you visit a website or use an application that uses our technology, we collect certain information about you and your device, for the purpose of serving advertisements to you. Some of this information (including for example your IP addresses and certain unique device identifiers), may identify a particular computer or device, and may be considered personal data in some jurisdictions, such as the European Union.

We collect the following information that may be regarded as personal data:

- IP address
- Unique device identifiers (GAID, IDFA & OAID)
- Data concerning the displaying of the advertising, such as date/time of viewing, and the website or application where the advertisement was displayed,
- Certain data concerning your activities and actions on the advertiser sites, in case you click on the advert

How we collect personal data

Most of this data is not directly collected by Machine, but collected transferred to us by third parties supplied within the online advertising supply chain, such as ad networks, demand side platforms (DSP), real time bidding markets (SSP) and mobile attribution platforms (MMP). Where applicable, such parties have obtained consent from the relevant data subject, in order to transfer their data to us. Data collected directly by Machine is done so via the monitoring API located at <https://api.mchnad.com>.

We currently work with the following mobile attribution platforms (MMP's)

- Adjust
- AppsFlyer

UNCONTROLLED

This document is proprietary and is classified as uncontrolled. No part of this document may be shared in any manner to a third party without the prior written consent of Machine Advertising.

- Kochava
- Branch

In addition, we use standard web technologies to collect information, including:

- “Tags and Pixels” are blocks of code that we and our customers may use to track your navigation of websites or apps using our technology, and your browsing behaviour. We use pixels to synchronize information that we have collected with information independently collected by our suppliers, clients, and other third parties that are interested in providing you with ads.

What categories of data we do NOT collect

We do not collect the following categories of data:

- Cookies
- Data that might be regarded as sensitive under Article 9 GDPR, that is information concerning your race, sexual orientation, political affiliation or religious beliefs, among others.
- Data that might be used for the purpose of online behavioural advertising, that is data concerning your Internet navigation over time, and that might be used in order to infer your personal interests.

What do we use this data for

Machine's clients are:

1. Advertisers who advertise and promote mobile phone apps.
2. Advertising Networks (ad networks) that manage groups of publishers. Publishers are websites and mobile phone apps that display adverts

Machine's proprietary Impression Trackers, Click Server and Install analysis, allows advertisers and ad networks to detect and remove fraudulent app installs from their supply chain.

We use the collected data in order to detect unserved, non-viewable or fraudulent impressions, fraudulent clicks and fraudulent app installs.

In particular, we can divide all the potential processing of the data in three different categories:

1. *Impression Monitoring.* By using the device identifier, IP address and contextual data such as IP geolocation (IP country), visited website, and date and hour of visit, Machine verifies the impression meets agreed advertising standards and protects advertisers from fraudulent or illegal practices
2. *Click Monitoring.* By using the device identifier, IP address and contextual data such as IP geolocation (country), visited website, and date and hour of visit, Machine identifies patterns of suspicious behaviour. Machine uses the results of the processed data to protect advertisers advertising budget from fraudulent or illegal practices
3. *Install and post install event processing.* By using the device identifier, IP address and contextual data such as geolocation, visited website, and date and hour of visit, Machine can identify cases of artificial or farmed installs and attribution fraud (click stuffing or click injection)

We do not carry out automated decision-making processes, as described in Article 22 GDPR.

UNCONTROLLED

This document is proprietary and is classified as uncontrolled. No part of this document may be shared in any manner to a third party without the prior written consent of Machine Advertising.

Retaining data

We store log level data for between 2 days (impressions) to 30 days (clicks, installs and post install events).

We store aggregated data.

We may store the information we collect, such as IP address and other information described above, for up to 6 months.

Sharing data

Machine does not share or sell any raw data. Machine will share sufficient aggregated data with our clients so that they may avoid digital advertising fraud.

In particular, we may enter data processing agreements with the following categories of data recipients:

- With our clients (i.e. advertisers and ad networks), for the purposes of removing fraudulent inventory
- Where our operations entail a transfer of data outside the European Economic Area, Machine has entered into 'model clause' agreements with the relevant data recipient.

Legal basis of data processing

Machine does not interact directly with Internet end users, consent must be obtained and transferred by other companies within the advertising supply chain that have a direct relationship with the end user.

In order to obtain, transfer and revoke such consent, we use the following technological solutions:

- The IAB standard for GDPR consent management

End user opt-out

Apple® iPhone® - Turn Identifier for Advertisers On / Off

Note An identifier for Advertisers (IFA or IFDA) is a temporary number used by Apple iOS devices to limit the customer info accessed by advertisers or apps.

1. From the Home screen, navigate: Settings Settings icon > Privacy > Advertising.
2. To limit ad tracking, tap the Limit Ad Tracking switch to turn on Switch On or off Switch Off.
3. To reset advertising identifiers, tap Reset Advertising Identifier.
4. Tap Reset Identifier to confirm.

Android - Reset your Android advertising ID

1. Open Google Settings on your Android device by tapping on 'menu' and then on Google Settings once all apps are displayed on the screen.
2. Locate and tap on the Ads menu under Services.

UNCONTROLLED

This document is proprietary and is classified as uncontrolled. No part of this document may be shared in any manner to a third party without the prior written consent of Machine Advertising.

3. Tap on "reset advertising ID" on the new page. The page lists the current advertising ID on the same page.
4. Confirm the reset when the confirmation prompt is displayed. Once you reset the advertising ID, a new ID is displayed immediately on the same page. Since a new ID is assigned now, advertisers cannot link past actions anymore to the device if only the advertising ID was used for that.

Exercise your rights

If you are a resident of the European Economic Area, you have the right to access personal information we hold about you and to ask that your personal information be corrected, updated and deleted. You also have the right to withdraw any consent.

If you would like to exercise this right, please see our Data Subject Rights Policy for instructions on how to do so:

[\[Data Subject Rights Policy\]](#).

Please note that because most of the information we store can only identify a particular browser or device, and cannot identify you individually, we require you to provide us with some additional information to ensure that we provide you with accurate information.

In addition, you may also opt-out of receiving marketing communications from Machine. If you would like to exercise this right, please write to us at the contact details provided below.

Your California Privacy Rights

Shine the Light

This privacy policy describes how we may share your information, including for marketing purposes. California residents are entitled to request and obtain from Machine once per calendar year information about any of your personal information shared with third parties for their own direct marketing purposes, including the categories of information and the names and addresses of those businesses with which we have shared such information. To request this information and for any other questions about our privacy practices and compliance with California law, please contact us at privacy@machineadvertising.com.

Erasure Rights for Minors

If you are a California resident under the age of 18 and a registered user of any Machine services, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to privacy@machineadvertising.com. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

California Individual Privacy Rights

California residents can exercise the following privacy rights with respect to their Personal Information 2-times a year free of charge. If we cannot complete the request within 45-days of receipt, we will contact you and let you know when you can expect the request to be completed, and will not take more than an additional 45-day period to do so.

The right to know

You have the right to know (i) the specific pieces of Personal Information we have about you;

UNCONTROLLED

This document is proprietary and is classified as uncontrolled. No part of this document may be shared in any manner to a third party without the prior written consent of Machine Advertising.

(ii) the categories of Personal Information we have collected about you in the last 12 months; (iii) the categories of sources from which that Personal Information was collected; (iv) the categories of your Personal Information that we sold or disclosed in the last 12 months; (v) the categories of third parties to whom your Personal Information was sold or disclosed in the last 12 months; and (vi) the purpose for collecting and selling your Personal Information. Generally:

- Within the preceding 12 months, Machine has collected the categories of Personal Information detailed in Section 3 "What categories of data we collect and/or process" above.
- Within the preceding 12 months, Machine has sold the categories of Personal Information detailed in Section 3 "What categories of data we collect and/or process" above. We do not sell the Personal Information of minors under 16 years old without consent from either the minor or the parent/guardian.
- Within the preceding 12 months, Machine has disclosed the categories of Personal Information detailed in Section 3 "What categories of data we collect and/or process" above.

The right to deletion.

You have the right to request that we delete the Personal Information that we have collected or maintain about you. There may be circumstances under which we will be unable to delete your Personal Information, such as if we need to comply with our legal obligations or complete a transaction for which your Personal Information was collected. If we are unable to comply with your request for deletion, we will let you know the reason why.

The right to opt out of the sale of your Personal Information.

You have the right to opt out of the sale of your Personal Information. If you do not affirmatively opt out, and you are not a minor, your Personal Information may be sold as disclosed in this Privacy Policy. You can submit your request to opt out of the sale of your Personal Information by completing our "Do not Sell my Personal Information" request form available at: [Data Subject Rights Policy].

The right to equal service.

If you choose to exercise any of these rights, Machine will not discriminate against you in any way. If you exercise certain rights, understand that you may be unable to use or access certain features of Machine's Sites or services.

To exercise any of these rights, contact us at privacy@machineadvertising.com.

We will take steps to verify your identity before processing your request, which may include requesting information from you to match with information we already have about you.

You may use an authorized agent to submit a request to know or a request to delete. When we verify your agent's request, we may verify both your and your agent's identity and request a signed document from you that authorizes your agent to make the request on your behalf. To protect your Personal Information, we reserve the right to deny a request from an agent that does not submit proof that they have been authorized by you to act on their behalf.

Contact our Data Protection Officer

Please do not hesitate to contact our Data Protection Officer in case you want to exercise any of your data protection rights, or if you have any question concerning our privacy and data protection policy. Our Data Protection Officer can be accessed at the following online and post addresses:

privacy@machineadvertising.com

Machine Advertising Limited
3rd Floor,

UNCONTROLLED

This document is proprietary and is classified as uncontrolled. No part of this document may be shared in any manner to a third party without the prior written consent of Machine Advertising.

20-22 Berkeley Square,
London W1J 6EQ

You also have the right to lodge a complaint with our Data Protection Supervisory Authority, the Information Commissioner's Office (ICO).

Changes to Our Privacy Policy

Machine may change and update this Privacy Policy at any time. If we make material changes to our Privacy Policy, we will notify you through a notice on our Website home page. Any material change or update to this Privacy Policy will be posted on our Website under "Privacy Policy". The date the privacy policy was last revised is identified at the bottom of the page. Your continued use of the Machine's products and services after the effective date of any changes will constitute your acceptance of all of the changes. Machine's updated Privacy Policy will apply to information that we collected after the effective date of the changes; all information collected prior to that will be subject to the terms of the then current version of our Privacy Policy.

Contacting Us

If you have questions regarding our privacy practices, please submit a privacy inquiry or send us an email at privacy@machineadvertising.com.

Miscellaneous

This Privacy Policy is incorporated by reference into our Terms of Use. We operate servers around the world and the data used by our Technology is transferred to the European Economic Area and the United States. If you are located outside of the European Economic Area or the United States, please be aware that any information you provide to us may be transferred to the European Economic Area or the United States.

Version 4. Updated March 3rd, 2021