

## **A note to our visitors**

AdDon has updated its privacy policy in compliance with EU Cookie legislation. Please read this to review the updates about which cookies we use and what information we collect on our site. By continuing to use this site, you are agreeing to our updated privacy policy.

## **Privacy Policy**

### **Introduction**

The integrity of individuals is an important factor of AdDon's business success. AdDon's advertisers, publishers, media agencies and other customers (hereafter the "Client/Clients") that from time to time provide AdDon with personal data, as well as web surfers whose digital data is processed by AdDon as part of its provision of services to its Clients (hereafter the "User/Users"), must be able to trust that data is processed by AdDon in accordance with applicable privacy laws and regulations.

This Privacy Policy was created in order for Clients and Users to better understand how information relating to them is processed by AdDon. The Privacy Policy is not exhaustive, but contains certain fundamental privacy principles applied by AdDon which AdDon considers to be of particular importance for Clients and Users to be aware of.

Part 1 of the Privacy Policy contains AdDon's general privacy principles with regard to its processing of personal data provided by Clients, Users or other individuals.

Part 2 of the Privacy Policy contains information regarding AdDon's processing of digital information about Users in relation to AdDon's Interest Based Advertising and retargeting activities. It also contains requirements on publishers with whom we have contracted to serve Interest Based Advertising, Retargeting and other marketing services, to notify Users about AdDon's services on their websites.

Part 3 of the Privacy Policy contains contact information for different kinds of inquiries and requests relating to AdDon's processing of data and this Privacy Policy.

This Privacy Policy was last revised on 31st March 2015. AdDon may at any time and without notice change it, e.g. to keep it compliant with applicable laws. You should therefore read this Privacy Policy each time you intend to provide AdDon with personal data.

### **Part 1 – General privacy principles**

#### **Personal data and controller of personal data**

Personal data comprises all information that directly or indirectly can be referred to a natural person who is alive, e.g. name, postal address, e-mail address and phone number. A controller of personal data is the natural or legal person who processes personal data and who decides why and how such data shall be processed.

AdDon is the controller of personal data provided by you through the website '[www.addon.ie](http://www.addon.ie)'. AdDon is the Controller of personal data provided to us by you through sub-sites of [www.addon.ie](http://www.addon.ie), that are published and maintained by AdDon or its subsidiaries (all AdDon websites hereafter referred to as the "Site") unless otherwise indicated when such data is collected, or personal data that you are asked to provide us with in other situations if not otherwise is indicated.

### **Collection of personal data**

Personal data for which AdDon is controller may be provided by you to us e.g. in the following situations:

If you are a Client you may be required to provide us with personal and corporate information, such as name, address, email address and other account information, in order to be able to access and use our services;

As part of our sales efforts, we may collect and store data through online forms for contact purposes;

If you are a prospect Client, you may provide us with personal data through this Site when applying to join our network;

You may provide us with personal data when you send us inquiries relating to our services or in relation to this Privacy Policy.

### **Use of personal data**

AdDon is committed to protect any personal data you provide to us and to process your personal data in accordance with this Privacy Policy and applicable laws.

Personal data provided to AdDon may be used for the following purposes; provide you requested products and services; manage AdDon's agreed obligations and rights towards you; process payments; administration; internal analysis to improve or more effectively tailor AdDon's Site, business or offerings generally; allow you access to agreed products and services; direct marketing; any other purpose you have consented to or which is allowed under applicable law. Your personal data may also be processed for additional purposes stated on any relevant

part of the Site or otherwise in connection with the provision to us of your personal data. Your personal data may be combined with other information collected from you or third parties for the above purposes.

#### **Disclosure and transfer of personal data**

Personal data may be transferred to other companies within the AdDon group of companies. AdDon may as a consequence of service agreements with third parties, also transfer personal data to such third parties who process personal data on behalf of AdDon. Such service agreement shall contain obligations for third parties to process data only in accordance with AdDon's instructions and to take appropriate measures to secure that the processing of the personal data is secure.

For any of the purposes described herein, personal data may be transferred to AdDon's business partners within or outside the EU/EEA. Should any of the recipients reside in a country without adequate legal protection for personal data, AdDon will make reasonable efforts to make the recipient adopt the principles described in this Privacy Policy.

#### **Consent**

Where it is required by law or where AdDon otherwise deems it appropriate, AdDon will seek consent from you before AdDon processes your personal data. Such consent may e.g. be obtained by asking you to accept processing of your personal data in accordance with this Privacy Policy. If you do not agree to this Privacy Policy and/or other terms and conditions stated in connection with the collection, please do not provide personal data to AdDon. AdDon reserves the rights not to provide you certain products or services should you choose not to provide required personal data.

#### **Withdrawal of consent**

You are at all times entitled to withdraw your consent to process personal data that you have provided to AdDon. In such case AdDon will not process your personal data based on consent any more.

You are entitled to request that AdDon shall not process your personal data for direct marketing purposes.

Contact details for withdrawal of consent and/or for request that AdDon shall not process your personal data for direct marketing purposes are set out in Part 3 below.

#### **Right to information and rectification of personal data**

AdDon will take reasonable measures to rectify, block or erase personal data that it is shown

incorrect without undue delay. Part 3 of this Privacy Policy contains information about who you should contact if you would like us to correct personal data that we hold on you and which you consider incorrect.

To the extent required by law, we will inform you about AdDon's processing of your personal data in connection with the initial collection or registration of your personal data. Such information may e.g. be provided by notifying you about this Privacy Policy.

You may request a copy of the personal data that AdDon holds about you ("Subject Access Request"). You are entitled to such information free of charge once a year. This information will include information regarding what personal data AdDon processes about you, where such information has been collected, for which purpose the information is being processed, and to whom, or to which categories of persons, the information is being disclosed. Contact information for Subject Access Request is set out in Part 3 of this Privacy Policy.

### **Destruction of personal data**

Any personal data that we hold on you is only stored as long as it is required for us to keep them in order to fulfill the purposes for which they were collected. Data may however be necessary to store for a longer period due to legal requirements, e.g. for accountancy purposes.

### **Security**

AdDon is dedicated to maintain the security of personal data and preventing unauthorized access through the implementation of appropriate technical and organizational measures, as far as is reasonably possible. Such security measures also include that personal data may be accessed only by a limited number of persons within AdDon.

Our employees are made aware of and must comply with AdDon's security standards. When we occasionally use third-party contractors to perform tasks that might otherwise be performed by our employees, these contractors are contractually bound to adhere to this Privacy Policy and they are subject to similar restrictions as our employees.

### **Cookies**

AdDon respects the privacy of all visitors to our website.

This Cookie Policy outlines our policy concerning the use of cookies on [www.addon.ie](http://www.addon.ie). We may update our Cookie Policy from time to time to reflect any changes in technology, or legislation, which may affect the way in which cookies are used by us and how you, as a user, can manage

them.

### **What are cookies?**

Cookies are small text files sent from a website and stored in the user's web browser while user is browsing a website.

When a user visits a website more than once, the browser sends cookies back to the website, allowing the website to recognize the user and remember things like their personalized details, or preferences.

More information about cookies and details of how to manage or disable them can be found on [www.aboutcookies.org](http://www.aboutcookies.org).

### **What cookies do AdDon use?**

When you use the [www.addon.ie](http://www.addon.ie) website, the following types of cookies can be set on your device:

#### **Strictly necessary cookies:**

These cookies enable services you have specifically asked for – e.g. Identifying you as being signed in with an AdDon website ID and keeping you logged in throughout your visit.

These cookies do not contain any personally identifiable information and are typically set by AdDon

#### **Performance cookies**

These cookies are used to collect statistical information about visitors to our website and the pages they view.

These cookies do not collect information that identifies a visitor; all information is aggregated and used anonymously. AdDon use these cookies to understand what content is popular.

Some examples of services that use these types of cookies include Google Analytics and AddThis.com.

For more information on how to manage cookies, including opt-out of performance cookies please visit: <http://www.aboutcookies.org/Default.aspx?page=1>

### **Functional cookies**

These cookies allow the website to remember choices you make and provide enhanced and more personal features.

AdDon occasionally use these types of cookies.

For more information on how to manage cookies, including opting-out of functional cookies please visit: <http://www.aboutcookies.org/Default.aspx?page=1>

### **Targeting and advertising cookies**

These cookies are used to deliver advertising that is more relevant to you and your interests.

They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign.

Some examples of services that use these types of cookies include Google AdSense or Double Click.

## **Part 2 – Interest Based Advertising and Retargeting privacy principles**

### **Introduction**

AdDon processes digital information about Users (web surfers) who visit websites belonging to Clients with whom AdDon has contracted to serve advertisements (the "Advertising Network"). This part of the Privacy Policy lets you know what information we collect and process about you as a User on behalf of our Clients, why we collect it and how it is used in relation to our Interest Based Advertising and Retargeting services to our Clients. The Policy contains instructions on how you can display and delete information collected by AdDon yourself and how you can opt-out from further Interest Based Advertising and Retargeting activities of AdDon. Further, the Policy contains instructions to our publishers on how to notify Users about AdDon's services on their websites.

### **What is Interest Based Advertising and Retargeting?**

There exists a range of different kinds of online Interest Based Advertising and Retargeting services; from fairly simple forms to the far-reaching monitoring of web surfer activities carried

out by search-engine owners or services carried out in partnerships between technology companies and Internet Service Providers. As a common denomination, you could say that Interest Based Advertising and Retargeting is intended to make online display advertising more relevant to web surfers' likely interests.

AdDon's Interest Based Advertising and Retargeting services are cookie based. "Cookies" are small simple text files (not programs or spyware) stored on the hard drive of a web surfer's computer. Based on the anonymous information stored in the User's cookie, AdDon is able provide more relevant advertising to the User on behalf of our Clients. For example, a User that visits sports sites often will be categorized in the "sports fan" segment, and will primarily be served advertisements that are relevant to the interests of a sports fan, and a User that shows interest in a certain car model or a certain computer model, may be served advertisements or specific offers for such car model or computer model.

The fundamental integrity principle underlying all AdDon's processing of digital data relating to Users, is that such data shall be anonymous. Therefore, we do not store IP addresses on the cookie of a User, only a unique randomly generated ID that does not allow AdDon to trace the User; we do not have, and will not initiate, any co-operation with Internet Service Providers in order to trace the identities of Users. The data stored on the cookie is limited to information collected at the User's visits to websites belonging to AdDon's Advertising Network. With the exception of a marginal proportion of cookie data saved for statistical purposes solely, a User's cookie can only be viewed by AdDon when the User visits a website that belongs to our Advertising Network.

### **Targeting information**

#### Information stored on cookies

The cookie information stored on the User's hard drive for Interest Based Advertising and Retargeting purposes is: (i) User segment hits or information on a specific product, service, brand or model in which the User has shown interest during its visit to a certain website (for example a User that visits a sport site of one of AdDon's Clients, will record a hit in the 'sports' segment and a User that has shown interest in a certain car model will record a hit of that car model) and (ii) time and date stamp of the latest update of the User profile. The User segments used by AdDon for cookie hits are: (1) Animals; (2) Humanities; (3) Automotive (4) Business; (5) Computers & electronics; (6) Entertainment; (7) Finance; (8) Food & drink; (9) Gaming; (10) Health & beauty; (11) Home & garden; (12) Insurance; (13) Lifestyle & society; (14) News & current events; (15) Reference; (16) Shopping & retail; (17) Social; (18) Sports & recreation; and (19) Telecom & utilities

**If the cookie is deleted by the User, all profile data is removed.**

For the sake of clarity, no segments relating to information which AdDon considers sensitive have been or will be created, such as segments relating to political opinions, religious beliefs, physical or mental health conditions or sexual life. Further, AdDon is very sensitive to the issue of children's privacy and marketing directed to children. No segments are intended to be established for the profiling of children.

#### **Use of collected digital data**

AdDon will use the User data in order to better target advertisements on behalf of our Clients, to provide aggregated non-personal reporting to our Clients, and to improve our advertising systems and products. The data may be combined with other anonymous information collected from other sources so that we may better serve Users with offers that may be of interest to them. We may also share anonymous data between companies within the AdDon group of companies.

#### **Security**

AdDon is dedicated to maintain the security of all its data and to prevent unauthorized access through the implementation of appropriate technical and organizational measures, as far as is reasonably possible. Such security measures also include access restrictions, i.e. that data may be accessed only by a limited number of persons within AdDon.

Our employees are made aware of and must comply with AdDon's security measures. When we occasionally use third-party contractors to perform tasks that might otherwise be performed by our employees, these contractors are contractually bound to adhere to this Privacy Policy and they are subject to similar restrictions as our employees.

#### **Opt-out**

You may at any time easily block further cookie-based Interest Based Advertising and Retargeting activities from AdDon by opting-out. To do so please follow the instructions above the heading 'Targeting information'.

In addition, note that you are always able to prevent cookies from any website from being installed on your computer by readjusting your browser settings. For more information about cookies and how to disable them, you should consult the help section of your browser.

#### **Publisher notification**

If you are a publisher, please note that you are obligated to notify visitors of your website about

third parties who are serving advertisements on your website by way of use of cookies. As party to the publisher agreement with AdDon, you agree to provide clear and unambiguous notice about this. In relation to AdDon's Interest Based Advertising and Retargeting (if you have chosen to be provided with such services), such information shall at least include the following text:

"We use third-party advertising companies to serve ads when you visit our website. These companies may use information (not including your name, address, email address or telephone number) about your visits to this and other websites in order to provide advertisements about goods and services of interest to you. In order to do this, our advertising partners may place a cookie (a small text file) on your computer. If you would like more information about this type of targeted advertising, about use of cookies in such practice, and would like to know your options in relation to not having this information used by these companies, click here. For general information about use of cookies on this website, and how to block cookies, please [REFERENCE TO INFORMATION]."

For avoidance of doubt, please note that the foregoing requirement of notification does not limit any of your obligations according to applicable law. You are yourself as a publisher responsible for providing relevant and accurate information required by law, including applicable privacy laws.

### **Part 3 – Contact information**

Contact details for inquiries and requests:

For general inquiries concerning this Privacy Policy or AdDon's processing of data, please send an e-mail to the following address: [needmorecare@addon.ie](mailto:needmorecare@addon.ie);

For: (i) a withdrawal of a consent to process your personal data previously provided by you to AdDon; (ii) a request that AdDon shall not process your personal data for direct marketing purposes; (iii) a requirement that AdDon shall rectify certain personal data held on you, or; (iv) a Subject Access Request, please send an e-mail to the following address: [needmorecare@addon.ie](mailto:needmorecare@addon.ie);

Please provide relevant details in your e-mail in order for AdDon to be able to process your request or inquiry.