

Important information about AdsWizz:

AdsWizz Inc. and our subsidiaries (collectively referred to as “AdsWizz“, “we“, “us“) take our data protection and privacy responsibilities seriously. This privacy notice explains how we collect, use and share your personal information in the course of our business activities, including:

- What categories of personal information we collect and when and how we use personal information
- How we share personal information within AdsWizz, our parent companies and their subsidiaries, and with our service providers, regulators and third parties
- How we transfer personal information globally
- How we protect and store personal information
- Legal rights available to help manage your privacy
- How to contact us for additional support

The AdsWizz entity responsible for your personal information is the AdsWizz company that initially collects information from or about you. Unless we tell you otherwise, the entity that will be responsible for your personal information is AdsWizz Inc. The contact information for AdsWizz Inc. is set forth in the “Contact Us” section below.

We may amend this notice from time to time to keep it up to date with legal requirements and the way we operate our business. Please regularly check these pages for the latest version of this notice.

Our website may contain links to certain third party websites. This privacy notice does not apply to your use of any third-party sites.

I. WHAT CATEGORIES OF PERSONAL INFORMATION WE COLLECT AND WHEN AND HOW WE USE IT WHEN ACTING AS A DATA CONTROLLER

In this section you can find out more about:

- the categories of personal information we collect
- when we collect personal information
- how we use personal information
- the legal basis for our using your personal information

Information Collection:

We collect information about you if you:

- use one of our website(s), online services, or products;
- purchase or receive one of our services or products;
- identify yourself as a potential customer;
- provide services to us; or
- apply for a job at AdsWizz.

1. When you use our websites, online services or products

We collect personal information (such as your name, address, telephone number, and email address) via a voluntary submission form (including information on our services for current and prospective customers) on our website. Other information that may also constitute personal information (such as your browser type, operating system, IP address, domain name, number of times you visited our website, dates you visited our website, and the amount of time you spent viewing our website) may be collected via cookies and other tracking technologies. Aggregate Information (such as how many times

visitors log onto our website) may also be collected. To find out more about our use of cookies check out our [Cookie Policy](#).

We will use this information as described below if we are satisfied that we have an appropriate legal basis to do so:

How we use your information

What is the legal basis for our use of your information

To make improvements to our websites (including user experience).

The use of your personal information is based on our legitimate interest as a commercial organisation to improve our websites (including the user experience).

To respond to your inquiries through our website.

Our use of your personal information is based on our legitimate interest as a commercial organisation to respond to your inquiries.

To provide you with marketing materials for our products and services, and otherwise to identify products and services which we believe may be of interest to you.

Our use of your personal information is based either on your consent (if you have registered to receive our marketing communications) or on our legitimate interest as a commercial organisation to promote our goods and services.

2. When you purchase one of our products or services

When you or your company purchases or receives our services, we may collect:

- basic identification and contact information (such as your name, address, telephone number, gender, national ID number and email address) in order to provide our services and manage your company account;
- demographic information such as your age and information about your occupation;
- financial information (such as bank account information, tax registration information, billing and details) in order to manage and process payments you make to us;
- information held by credit references agencies and fraud prevention agencies, in order to assess your application for the use of our services; and
- information about your use of our products and services and your satisfaction with them, in order to continuously improve the products and services that we provide to you.

You may be required to provide us with certain personal information in order to purchase one of our products or services (e.g. details of your name, contact information and payment details). If you do not provide us with such information, we may not be able to provide you with our products and services.

We will use this information as described below if we are satisfied that we have an appropriate legal basis to do so:

How we use your information

What is the legal basis for our use of your information

Setting up and ongoing management of your account with us.

If you have entered into a contract to receive our services as an individual, our use of your personal information is necessary to perform our contract with you, and also on the basis that it is necessary for us to use such information in our legitimate

For credit control purposes and to analyse payments made against your account.

For credit vetting purposes, to assess your application to receive our services.

To provide general customer service and to respond to your inquiries and complaints in relation to our services.

To deliver our services to you as you request.

interest as a commercial organisation to provide our services to you.

If the company you work for has entered into the contract to receive our services, we will process your personal information on the basis that it is necessary to use your personal information in our legitimate interest as a commercial organisation to provide our services to your company.

Our use of your personal information is based on our legitimate interest as a commercial organisation to implement appropriate credit management processes.

Our use of your personal information is based on our legitimate interest as a commercial organisation to implement appropriate credit management processes.

If you have entered into a contract to receive our services in an individual capacity, our use of your personal information is necessary to perform our contract with you, and also on the basis that it is necessary for us to use such information based on our legitimate interest as a commercial organisation to provide our services to you.

If the company you work for has entered into a contract to receive our services, we will process your personal information on the basis that it is necessary to use your personal information based on our legitimate interest as a commercial organisation to provide our services to your company.

If you have entered into a contract with us to receive our services in an individual capacity, our use of your personal information is necessary to perform our contract with you, and also on the basis that it is necessary for us to use such information in our legitimate interest as a commercial organisation to provide our services to you.

If the company you work for has entered into a contract to receive our services, we will process your personal information on the basis that it is necessary to use your personal information in our legitimate interest as a commercial organisation to provide our services to your company.

To evaluate your use of our products and services in order to assist with our development of new products and services, and to make improvements to our existing products and services.

For fraud prevention purposes and to monitor our customers' use of our services in order to detect fraud.

To monitor, maintain and improve our IT environment and the applications that our customers use and that we use to manage our services.

To maintain your access to our network and applications.

To provide you with marketing materials for our products and services, and otherwise to identify products and services which we believe may be of interest to you.

Conducting focus groups and undertaking customer relationship management activities and customer satisfaction surveys in order to make improvements to our products and services.

For our employee training purposes.

In order to enable us to comply with any legal or regulatory requirements.

Our use of your personal information is based on our legitimate interest as a commercial organisation to develop and improve our products and services.

Our use of your personal information is based on our legitimate interest as a commercial organisation to put in place measures to detect and prevent fraud.

Our use of your personal information is in our legitimate interest as a commercial organisation to operate IT systems to provide our services.

If you have entered into a contract to receive our services in an individual capacity, our use of your personal information is necessary to perform our contract with you, and also on the basis that it is necessary for us to use such information in our legitimate interest as a commercial organisation to provide our services to you.

If the company you work for has entered into a contract to receive our services, we will process your personal information on the basis that it is necessary to use your personal information in our legitimate interest as a commercial organisation to provide our services to your company.

Our use of your personal information is based on our legitimate interest as a commercial organisation to promote our goods and services.

Our use of your personal information is in our legitimate interest as a commercial organisation in managing customer relationships and improving our products and services.

Our use of your personal information is based on our legitimate interest as a commercial organisation to provide appropriate training to our employees.

Our use of your personal information is necessary to comply with relevant legal or regulatory obligations to which we are subject.

3. When we identify you as a potential customer

If you are a company that we believe would like to learn more about our products and services, we may collect information directly from you, from other members of the AdsWizz group, and/or from third party lead generation providers. In these circumstances, we may collect basic identification and contact information (such as your name, address, telephone number, and email address) in order to provide you with marketing materials about our products and services.

Specifically, we may collect:

- basic identification and contact information (such as your name, address, telephone number, gender, and email address); and
- demographic information such as your age and information about your occupation.

We will use this information in the following ways if we are satisfied that we have an appropriate legal basis to do so:

How we use your information

To provide you with marketing materials about our products and services, and otherwise to identify goods and services which we believe may be of interest to you.

Conducting focus groups and customer surveys in order to make improvements to our products and services.

In order to enable us to comply with any legal or regulatory requirements.

What is the legal basis for our use of your information

Our use of your personal information is based on our legitimate interest as a commercial organisation to promote our products and services.

Our use of your personal information is based on our legitimate interest as a commercial organisation in improving our products and services.

Our use of your personal information is necessary to comply with a relevant legal or regulatory obligation to which we are subject.

4. When you provide services to us

Where you, or your employer, are engaged by us to provide goods or services to AdsWizz, we may collect:

- basic identification and contact information (such as your name, address, telephone number, and email address) in order to fulfill our contract with you and receive your services;
- demographic information such as your age and information about your occupation;
- financial information (such as bank account information, tax registration information, billing and details) in order to manage and process payments we make to you; and/or
- information held by credit references agencies and fraud prevention agencies, in order to assess your relationship with us.

We will use this information in the following ways if we are satisfied that we have an appropriate legal basis to do so:

How we use your information

For our internal budgeting purposes, maintenance of financial records, undertaking internal financial reporting and making payments to your employer

What is the legal basis for our use of your information

Our use of your personal information is based on our legitimate interest as a commercial organisation to put in place appropriate budgeting and financial reporting processes.

To make payments to you

If you have entered into a contract to provide services to us in an individual capacity, our use of your personal information is necessary to perform our contract with you.

For credit control purposes and to analyse payments made against your account.

Our use of your personal information is based on our legitimate interest as a commercial organisation to implement appropriate credit management processes.

To monitor, maintain and improve our IT environment and the applications that our customers use and that we use to manage our services.

Our use of your personal information is in our legitimate interest as a commercial organisation to operate IT systems to provide our services.

To provide you with marketing materials for our products and services, and otherwise to identify products and services which we believe may be of interest to you.

Our use of your personal information is based on our legitimate interest as a commercial organisation to promote our products and services.

Conducting focus groups and undertaking customer relationship management activities and customer satisfaction surveys in order to make improvements to our products and services.

Our use of your personal information is based on our legitimate interest as a commercial organisation in improving our products and services.

For employee training purposes.

Our use of your personal information is based on our legitimate interest as a commercial organisation to provide appropriate training to our employees.

In order to enable us to comply with any legal or regulatory requirements.

Our use of your personal information is necessary to comply with a relevant legal or regulatory obligation to which we are subject.

5. When you apply for a job using our website

If you apply for a job at AdsWizz, we may collect:

- basic identification and contact information (such as your name, address, telephone number, and email address) in order to be able to get in touch with you and schedule job interviews and keep you updated;
- demographic information such as your age and information about your current occupation;
- professional qualifications and information concerning your application and our assessment of it, your references, any checks we may make to verify information provided or background checks (including where permissible under local law, criminal records checks) and any information connected with your right to work. If relevant, we may also process information concerning your health and accommodations for working arrangements.

We will use this information in the following ways if we are satisfied that we have an appropriate legal basis to do so:

How we use your information

To evaluate your application

To schedule interviews/meetings

To build up our database of potential candidates database. (Unless you tell us otherwise, we may keep a copy of your CV to keep you informed about new job opportunities)

What is the legal basis for our use of your information

Our use of your personal information is in our legitimate interest to ensure we select the best suited candidate for the open position. Where we process your health data, this is on the basis that it is necessary for the purposes of carrying out our obligations under employment law

It is necessary to use your personal information in our legitimate interest to organize interviews meetings

Our use of your personal information is in our legitimate interest to develop a database of potential candidates for roles.

II. SHARING PERSONAL INFORMATION WITHIN ADSWIZZ, WITH OUR SERVICE PROVIDERS, AND OUR REGULATORS

In this section, you can find out more about how we share personal information:

- within AdsWizz;
- within our parent companies including Sirius XM Radio Inc and Pandora Media LLC (“Parent Companies”) and their subsidiaries
- with third parties that help us provide our products and services; and
- with regulators.

We share your information in the manner and for the purposes described below:

1. within the AdsWizz group and to our Parent Companies, its subsidiaries, where such disclosure is necessary to provide you with or assist you with our services or to manage our business;
2. with third parties who help manage our business and deliver services. These third parties have agreed to confidentiality restrictions; and use any personal information we share with them, or which they collect on our behalf, solely for the purposes of providing the contracted services to us. These third parties include IT service providers who help manage our IT and back office systems and marketing agencies who help us communicate with you about our products or services;
3. to our professional services providers, such as accountants and law firms;
4. with regulators to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies;
5. we may share in aggregate, statistical form, non-personal information regarding the visitors to our website, traffic patterns, and website usage with our service providers, affiliates or advertisers; and
6. with our successor in interest in the event of a corporate reorganization, merger or sale of all or substantially all of our assets.

III. TRANSFERRING PERSONAL INFORMATION GLOBALLY

In this section you can find out more about:

- how we operate as a global business and transfer data internationally; and
- the arrangements we have in place to protect your personal information if we transfer it overseas.

AdsWizz operates on a global basis. Accordingly, your personal information may be transferred and stored in countries outside the EU, including the United States of America, that are subject to different standards of data protection.

If you are located in the European Union, or your personal information is processed by an AdsWizz group company that is located in the European Union and that is acting as the controller of your personal information, the details below apply to the transfers of your personal information.

AdsWizz will take appropriate steps to ensure that: transfers of personal information are in accordance with applicable law and carefully managed to protect your privacy rights and interests and transfers are limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangement are in place to protect your privacy rights. To this end:

- we ensure transfers within AdsWizz will be covered by an agreement entered into by members of AdsWizz (an intra-group agreement) which contractually obliges each member to ensure that personal information receives an adequate and consistent level of protection whenever it is transferred within the AdsWizz group;
- where we transfer your personal information outside AdsWizz or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your personal information. Some of these assurances include certification schemes like the EU – US Privacy Shield for the protection of personal information transferred from within the EU to the United States; or
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information is disclosed.

You have a right to [contact us](#) for more information about the safeguards we have put in place (including a copy of relevant contractual commitments) to ensure the adequate protection of your personal information when we transfer your personal information.

IV. HOW WE PROTECT AND STORE YOUR INFORMATION

Security

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. Measures we take include: (i) requiring confidentiality requirements of our staff members and service providers; (ii) destroying or permanently anonymising personal information if it is no longer needed for the purposes for which it was collected; and/or (iii) encrypting personal information at rest where systems permit.

Storing your personal information

We will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this notice, and in order to comply with our legal, regulatory, tax, accounting requirements.

In the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings, we will retain your personal information until the relevant complaint, challenge or litigation has been resolved.

V. LEGAL RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY UNDER EUROPEAN LAW

If you are located in the European Union, or your personal information is processed by an AdsWizz group company that is located in the European Union and that is acting as the controller of your personal information, you have certain rights in relation to your personal information. These rights are subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking. Click on the links below to learn more about each right you may have:

- To access personal information
- To rectify / erase personal information
- To restrict the processing of your personal information
- To transfer your personal information
- To object to the processing of personal information
- To object to how we use your personal information for direct marketing purposes
- To obtain a copy of personal information safeguards used for transfers outside your jurisdiction
- To lodge a complaint with your local supervisory authority

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the requested personal information to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by [contacting us](#). Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfill your request.

Right to access personal information

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of: (a) the source of your personal information; (b) the purposes of processing; (c) the categories of personal data; (d) where possible, the period of time during which your personal data will be stored, or the criteria used to determine such period; (e) details about your data subject rights and the right to complain to a supervisory authority; (f) the existence of automated decision making and related details; and (g) the entities or categories of entities to whom your personal information may be transferred.

Right to rectify or erase personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent, and where there is no other legal ground for the processing); or
- following a successful right to object (see [right to object](#)); or
- it has been processed unlawfully; or

- to comply with a legal obligation to which AdsWizz is subject.

We are not required to comply with your request to erase personal information in certain circumstances, including if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defense of legal claims;

Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but you need us to retain it in order to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction in certain circumstances, including where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

Right to object to the processing of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

Right to object to how we use your personal information for direct marketing purposes

You can request that we change the manner in which we contact you for marketing purposes, and you have the right to object to our processing of your personal information for direct marketing purposes. If you object to our processing of your personal information for direct marketing purposes, we will no longer process your personal information for this purpose.

Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards we take if we transfer your personal information outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your [local supervisory authority](#) if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

VI. PROCESSING DATA THAT WE RECEIVE FROM THIRD PARTY CONTROLLERS

In this section you can find out more about

- the types of personal information we receive from third party controllers
- how we use personal information we receive from third party controllers
- transfers to third parties

As a technology provider that offers online radio and video publishers and advertisers audience insights by providing precise session-based measurements, we may receive personal data from publishers and advertisers. We act as a data processor for the personal information we receive from publishers and advertisers (data controllers). This means that we only process such personal information in accordance with the instructions of publishers and advertisers, and that such publishers/advertisers are responsible for our processing of your personal information on their behalf. We provide brief details below about our processing of such personal information. However, it is important to note that you should consult the data protection notices of the relevant publishers and advertisers for full details of how your personal information is processed.

1. Information we may receive from data controllers

Under the instructions of data controllers, we may collect and process personal data including location data, online identifiers, such as IP addresses and, when available, cookies or advertising IDs. We do not collect, receive or process your name, physical address, email address, or phone number on behalf of controllers. We may share your personal data with the following data sub-processors if instructed to do so by data controllers: demand-side platforms, data management platforms, ad networks, and/or analytics platforms.

2. How we use personal information we receive from data controllers

We use the personal data received from or collected on behalf of data controllers to:

- deliver digital audio to listeners and enable the publishers of digital audio content to adapt the listening experience and delivery of digital audio advertisements; and/or
- provide reports on advertising delivery, measurement reports, streaming and podcasting delivery.

3. With whom do we share personal information received from controllers?

We may share personal information with data sub-processors or independent data controllers if instructed to do so by the publishers (i.e., data controller). We may share personal data with the following parties based on the data controller's instructions: demand-side platforms, data management platforms, ad networks, and analytics platforms.

VII. CALIFORNIA RESIDENTS

Under California law, if you are a California resident you have the right to request and receive certain information about the disclosure of your personal information to third parties for such third parties own marketing use, and to opt-out of the disclosure of your personal information to third parties for such third parties' direct marketing purposes. Our policy is not to disclose personal information collected through our website to a third party for such third party's direct marketing purposes.

For additional information regarding AdsWizz’s privacy practices, see our [California Consumer Privacy Notice](#).

VIII. CONTACT US

AdsWizz Inc. is a California corporation with our headquarters located at 487A South El Camino Real, San Mateo, CA 94402, United States.

AdsWizz Inc. has appointed AdsWizz Romania, with a registered address at 246C Calea Floreasca, SkyTower – 18th & 35th floor, S1 – Bucharest, 014476 Romania, as its representative in the European Union for the purposes of the General Data Protection Regulation.

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us using the contact details below. We will investigate and attempt to resolve complaints and disputes and will make every reasonable effort to honor your wish to exercise your rights as quickly as possible and, in any event, within the required time-frame provided by the applicable data protection laws.

You may reach us at: privacy@adswizz.com

You may also contact our Data Protection Officer by emailing: dpo@adswizz.com.