



Hitch Digital – GDPR Policies

In line with the implementation of the General Data Protection Regulation (GDPR) act coming into law on 25 May 2018, Hitch Digital and its subsidiaries plan to provide a better and more transparent online experience for internet users by providing internet users transparency into, and greater control over, the audience segments our company's clients are using to target ads to them on our various Digital Advertising Platforms.

How will GDPR impact me?

GDPR heightens the requirements for publishers and advertisers to inform users about how their data is used, and *in certain instances* it requires that users provide their consent before their data is collected and used. Therefore, companies participating in the online advertising ecosystem require greater control over which third parties can access their users' devices and browsers and use their personal data, and the ability to offer transparency to users on this, and if needed, gain, and pass on their users' consent.

Below are more GDPR Resources & links available for each of our Digital Advertising Platforms:

AppNexus

AppNexus' Role as a Data Controller and a Data Processor

According to the GDPR, "a 'controller' is the natural or legal person... which, alone or jointly with others, determines the purposes and means of the processing of personal data... while a 'processor' is a natural or legal person... which processes personal data on behalf of the controller."

AppNexus' Role - Console Platform (SSP, Ad Server, Exchange, DSP)

Recognizing there is room for different opinions, our analysis on our different processing activities performed on different types of Platform Data is the following:

AppNexus is a **data processor** with respect to personal data collected or received by us:

- In the form of segment data, when we receive batch uploads of user IDs associated with segments created by our clients and third-party partners that make their data (or other third parties' data) available for our clients' use on the AppNexus Platform.
- When our clients use our pixels to place their users into interest-based segments.

This is because interest-based segments are created by our clients, or by data providers making available interest-based segments to our clients to use. These segments are used by us at the instruction of our clients and solely on a client-by-client basis. We do not place

users into interest-based segments (meaning we do not decide/assign segments to users of our own accord). Segment data is permissioned on a client-by-client basis. Our clients control the lifecycle of segments and associated segment data and if we do use segment data for optimization, it is only used for the client that created the segment or at the permission of the client that created the segment.

AppNexus is an **independent data controller** with respect to any personal data collected or received by us:

- When receiving an ad call to fill advertising inventory on a publisher's web page (direct supply), we are a co-controller with the publisher.
- When receiving an ad call to bid on advertising inventory on a publisher's web page from an external supply source (SSP or other exchange), we are a co-controller with the SSP or exchange.
- When receiving calls from our measurement pixels (e.g., conversion and viewability), we are a co-controller with an advertiser or publisher.

This is because all Platform Data related to ad calls and measurement pixels firing are, unless the user has opted out, tied to our Platform's unique user ID. Those unique user IDs are used by our Platform to frequency cap and time cap across users across sites and apps of all our seller clients (e.g., to ensure advertisers using our Platform are not showing the same ad repeatedly to the same end user on the same day or at times the advertiser does not want to show its ad to that end user) and the Platform data related to ad calls and measurement pixels firing are logged into our data pipeline and used by us to optimize the purchase and sale of advertising inventory for all of our clients using our Platform. While we are not optimizing to a specific unique user (e.g., cookie or device advertising ID or IP address), we do use certain unaggregated impression level data that could be tied to a unique user (and can only tell if a user is unique based on our cookie ID for that user, which is the same for that user across all of our clients) to train our models and feed our algorithms. We also use certain Platform data collected across users across our various clients' sites and apps for the detection of invalid inventory, fraud detection and security.

We understand that some clients, particularly sellers who are operators of websites and apps, can be uncomfortable when technology vendors like AppNexus argue that they are controllers of user data, as that can be taken to be a bid to claim to "own" the user or data about the user. **We do not claim controller status in order to establish ownership of the users' or our clients' data and per the terms of our contracts, our clients own their data.** We have reached the conclusion that we are an independent data controller in relation to these categories of data because we independently make decisions on how the data is used and, we believe that, pursuant to the text of the GDPR and the existing EU guidance, this makes us a controller of the data with respect to those purposes.

How AppNexus Differs from Other Advertising Technology Providers

All advertising technology providers are unique. We all collect, use, and store data in different ways, and this variation of methods and modes impacts each party's classification as a data controller or data processor (or both, according to our different technology components and offerings) under the GDPR.

A few things that make AppNexus different:

- While we collect/receive segment data from our clients and third parties for our clients to use on our Platform, we do not create segments or decide/assign segments to users of our own accord.
- While we use impression level data that may be tied back to a pseudonymous identifier to optimize the purchase and sale of advertising inventory, we do not optimize at a specific user level (in other words, we do not optimize to a cookie ID, advertising ID, or IP address).

For further details on the above please refer to <https://www.appnexus.com/en/company/gdpr>

Google/DoubleClick

Please visit resources below for more information on Google's data collection policies:

https://privacy.google.com/businesses/compliance/#?modal_active=none

<https://doubleclick-advertisers.googleblog.com/2018/03/changes-to-our-ad-policies-to-comply.html>

https://support.google.com/dfp_premium/answer/7686480?hl=en

<https://www.blog.google/topics/google-europe/gdpr-europe-data-protection-rules/>

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Twitter

Please visit resources below for more information on Twitter's data collection & privacy policies:

<https://twitter.com/en/tos#update>

<https://twitter.com/en/privacy#update>

Facebook

Please visit resources below for more information on Facebook's data collection & privacy policies:

<https://www.facebook.com/business/gdpr>

Snap Inc.

Please visit resources below for more information on Snap Inc's GDPR regulations:

<https://www.snap.com/en-US/privacy/privacy-policy/>

LinkedIn

Please visit resources below for more information on LinkedIn GDPR regulations:

<https://www.linkedin.com/legal/preview/privacy-policy>