

# Cookie and Privacy Policy

## We take privacy seriously and so should you!

This cookie & privacy policy has been updated on February 17th, 2014.

## What this policy covers

This policy explains:

- how the ad serving technology Adcombi uses powers our business
- how and which tracking methods are used by Adcombi to collect data, which data is collected and the purposes for which the tracking methods and the information collected thereby are used
- the choices regarding the acceptance of these tracking methods
- the personal data collected and processed by Adcombi; the choices regarding the use and sharing of personal information by Adcombi

## Details about the ad serving technology

Adcombi runs an online advertising network. Adcombi buys and sells ad space available on websites and engages in online advertising. Our clients are all kinds of businesses engaged in online advertising: especially, advertisers and media agencies. The ad serving technology Adcombi uses (and which is offered by Platform 161 [[www.platform161.com](http://www.platform161.com)]) powers this business. When ad space on a website of a publisher (website owner) is sold to an advertiser or media agency, Adcombi's technology fulfils this transaction by delivering the ad of the advertiser on that publisher's site. In practice, you come into contact with Adcombi when you by means of e.g. your computer, tablet or smart phone - view an ad that has been served by Adcombi on a publisher's website. The ads sent by the Adcombi technology are sent from the domains [ads.adcombi.nl](http://ads.adcombi.nl) or [ads.createve-serving.com](http://ads.createve-serving.com)

## Cookie and Technology policy

### Introduction

The ad serving technology used by Adcombi delivers an ad on a website. The technology uses information collected from several sources to decide the best and most relevant ad to display to you.

## Tracking technologies used, data collected and purposes

This section of the policy describes the technologies used on our client's websites to help deliver the most relevant ad to you: Cookies. Cookies are small text files that are stored within a browser.

Adcombi uses the following types of cookies:

Cookie Name	User Matching	Targeting & Optimisation	Reporting & Attribution	Information held in cookie	Persistent	Expiry (days)
fl_inst	N	N	N	Hash flash? 0/1	Permanent	7
pvc2	N	N	Y	Impression context	Permanent	730
pcc2	N	N	Y	Impression context	Permanent	730
trc	N	N	Y	Impression context	Permanent	730
tuuid	Y	Y	Y	User ID	Permanent	730
ad2	N	N	Y	Impression context	Permanent	730

### Adcombi drops cookies through every ad it serves for the following purposes:

1. For Targeting and Optimisation:

- to recognize a user ID visiting a website (user matching);
- as part of the (targeted) ad serving process;

- to collect information about the user's online interaction (over multiple websites) and use that information to build user profiles;
- to maintain a list of ads previously delivered by the technology used;
- to remember the times the same ad was delivered to a user;

## 2. For Reporting and Attribution:

- to collect the number of times a user clicked on an ad served by the technology Adcombi uses
- to track and assess the number of times a user engages in a business transaction (i.e. makes purchases) on the advertisers network
- To determine, count and attribute conversions. For example: a user clicks on an ad served by Adcombi on a website. Once on the website the ad links to, the user makes a purchase on that website. This purchase is counted by means of cookies and Adcombi receives a fee on every counted purchase.

Next to the data that are been gathered by Adcombi through dropping our own cookies, third party data can also be used to optimize our campaigns. These third party data come from third party data providers that live up to current law and industry standards.

Adcombi cookies will be stored for 2 years after being dropped on a device.

### **Ad tags**

The technology Adcombi uses, responds to requests from 'ad tags' placed on the website you are visiting. Ad tags provide Adcombi with information and enable Adcombi to determine the correct size and location of an ad.

### **Pixel tags**

Adcombi's technology also uses pixel tags (also known as javascript or 1x1 pixels) to drop cookies. A pixel tag is a tiny graphic or script placed on a website that is not visible to the user. These pixel tags communicate with the technology used by Adcombi and enable Adcombi to recognize a user by means of its UUID, or in the event that no UUID has been assigned to a user, to drop a cookie on the user's equipment and assign a UUID to the user. The use of pixel tags allows Adcombi on behalf of our clients, especially advertisers, to measure campaign effectiveness, to optimize campaign performance and to provide more relevant advertising. Pixel tags furthermore allow Adcombi on behalf of our clients to

create and identify consumer segments and to select the appropriate ad based on the consumer segment.

## Transparency

The technology that Adcombi uses, uses cookies for ad selection in order to enhance ad effectiveness. Adcombi believes that the tracking technologies used by Adcombi and described above enhance your web experience by limiting the repetitiveness of advertising and increasing the level of relevant ads delivered to you.

Besides the data collected when a cookie is dropped, the technology Adcombi uses also collects the following possible personal data: such as the date and time of ad delivery to a user, the IP-address, zipcode, region and country of a user, language setting, the type of browser, operating system used and connection speed, status of a user (unknown, accepting or not accepting cookies), the web page address(es) where the ad has been delivered, and administered clicks on ads. This information helps our technology to decide the best and most relevant ad to display to a user.

The technology Adcombi uses, collects and stores aggregated ad delivery reporting data. This data is used to provide our clients with campaign reporting and used for billing purposes. A typical report includes information about the ads delivered, including the date and time of ad delivery, the websites on which the ads were shown, and statistics on user response. A report also includes statistics about browser types, date and time of ad delivery, and inferred geography.

Finally, the information collected (by means of cookies and/or other tracking methods) is processed for internal purposes only: i.e. to possibly built user profiles that enable Adcombi to optimize and personalize advertiser campaigns.

To the extent that the data referred to above constitutes personal data within the meaning of the Dutch Data Protection Act, Adcombi B.V. will as a data controller within the meaning of the Dutch Data Protection Act with respect to the processing of such data.

## Information Sharing and Disclosure

Your data is not being transferred to other parties than Adcombi, including the advertisers and agencies Adcombi works with.

Adcombi may provide copies of log files to advertisers, clients and certain partners relating to the specific transaction they are a party to. These files contain information that allows clients to analyse the

effectiveness and performance of their advertising campaign. Our clients also have the ability to use any or all of the information collected in connection with our services for their own purposes. The information provided to our clients does not contain personally identifiable information about you. In cases where Adcombi provides information to our clients, our clients are obliged to use the information they receive in compliance with applicable laws and regulations.

Adcombi may share the information it collects with selected partners, vendors, agents or others who work on our behalf, in order to provide products or services you have requested, or when we have your permission. Adcombi may share information about you if Adcombi is acquired by or merged with another company.

Adcombi may also share information in the event that we are asked to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims, or as otherwise permitted by law.

## Security measures

Adcombi maintains safeguards to protect the security, integrity and privacy of the personally identifiable information in our control. Adcombi safeguards ensure that personally identifiable information is protected against loss and unlawful processing. They also aim at preventing unnecessary processing.

## Updates & Questions

Adcombi may update this policy from time to time. Please check this Cookie & Privacy Policy for updates.

If you have any questions about our Cookie & Privacy Policy or would like to obtain more information about the data we process about you, please contact us:

[support@adcombi.com](mailto:support@adcombi.com)

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