

Privacy Policy

Updated and effective as of: July 20, 2022

Reset Digital Inc (“Reset Digital” or “we” or “our”) is committed to protecting your privacy. Reset Digital is an advertising services and technology company that provides advertisers and publishers with software and services to improve their advertising efforts. This Privacy Policy (“Privacy Policy”) describes how we collect, use, and share data and the options available to you. If you have any questions, you may contact us. See the “Contact Us” section below.

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1. SCOPE OF THIS PRIVACY POLICY

This Privacy Policy covers the information that we may collect or receive through all digital formats, notably: (1) visitors to our corporate website www.resetdigital.co, customers who use our web-based software applications, or correspondence through our website or publicly listed email addresses; and (2) information processed through our advertising technology platforms including our Demand Side Platform (DSP), Supply Side Platform (SSP), Data Management Platform (DMP) and Ad Server used by our advertiser customers and third parties (the “Platform”) (collectively, the “Services”).

2. WHAT INFORMATION WE COLLECT AND HOW WE COLLECT IT

This section describes the various types of personal information (aka personal data) we collect from and about you. In using our Services, we and our third party service providers may collect certain personal information directly from you or automatically through various technologies described below.

2.1. Information collected directly from you

We and our third party service providers may collect certain personal information directly from you via our website or through other digital means. For example, we collect your personal information when you request information about our services by filling out the “Contact Us Form.” This information includes the following:

- Your name;
- Your email address;
- Information you provide in the ‘Contact Us’ form, when you email us, or otherwise correspond with us.

2.2. Information collected automatically when you visit our website or through our Advertising Platform

When you access our website or digital properties (i.e., mobile applications, websites) that use our Platform (or that uses technology that transacts with other companies using our Platform), then we, our advertiser customers, and our third party service providers may automatically collect certain information about you which may identify you or a particular device. The information collected via automated means using our Platform includes the following:

- cookie identifiers (*see below for more information about our use of cookies*);
- IP addresses, which may provide your approximate geographical location;
- your activities on the digital properties, including the website or application, referring website, time spent on the pages of the properties, pages viewed, date and time of your visit, search keywords, and click data;
- your interaction with ads, ads served, ads viewed, and ads clicked on;
- operating system type and version of your device;
- information about your browser including browser type, version, and language;
- information about your device including device type and device or mobile advertising identifier (such as your Identifier for Advertising or IDFA, or your Google Advertising Identifier or AAID), and
- information about your Internet service provider.

2.3. Information collected from advertiser customers

We may collect certain information about you that we receive directly from our advertiser customers, which may include the following:

- cookie identifiers;
- IP addresses, which may provide your approximate geographical location;
- advertiser customer identifiers assigned to individuals, which can include pseudonymised personal information;

- Demographic information about you (e.g., age or gender) or inferences about your interests that an advertiser customer believes will help it to make the ads served to you more relevant;
- your activities on various digital properties, including the websites or applications, time spent on websites, pages viewed, dates and times of visits, search keywords, and click data;
- your interaction with our advertiser customers' ads, ads served, ads viewed, and ads clicked on;
- information about your browser including browser type, version, and language;
- information about your device including device type and device or mobile advertising identifier (such as your Identifier for Advertising or IDFA, or your Google Advertising Identifier or AAID); and
- information about your Internet service provider.

3. HOW WE USE INFORMATION

We use the information we collect from our Services for the following purposes:

- to operate and manage the Services;
- to send information to you, for example, information regarding Services updates or changes to our terms, conditions, and policies;
- to respond to your inquiries and fulfill your requests;
- to send you marketing communications from us that we believe may be of interest to you;
- for our business purposes, such as analyzing data, performing audits, monitoring for fraud, securing data, developing new products, improving the Services, identifying usage trends, and determining the effectiveness of our Services;
- if necessary or appropriate: (a) to enforce our terms and conditions; (b) to protect our operations and the security of the Services; (c) to protect our rights, privacy, safety or property, and/or that of you or others; (d) to allow us to pursue available remedies or limit the damages that we may sustain; (e) to prevent or stop activity we may consider to be, or poses a risk of being, illegal, unethical or legally actionable activity; (f) under applicable law; (g) to comply with legal process and our legal obligations; and (h) to respond to requests or requirements from public, law and government authorities (including national security and law enforcement requirements) and private parties; and
- for other purposes to the extent permissible by applicable law, and where required, with your consent.

3.1. Uses of information collected via digital properties using our Platform

In addition to the above, we, our advertiser customers, and our third party service providers may use information about you collected via digital properties using our Platform, for the following purposes:

- to provide our services to our advertiser customers, including:
 - enabling our advertiser customers to find and purchase ad space on digital properties,
 - enabling our advertiser customers to synchronize their data about you with data they obtain from our Platform to identify your interests and show you ads that may be of interest to you,
 - providing managed services to help advertiser customers configure advertising campaigns,
 - reporting on campaign and ad performance (such as reporting to our advertiser customers information about when and how you saw their ads or clicked on their ads),
 - investigating and protecting against fake or fraudulent traffic or unauthorized or illegal activity, and
 - providing log file data to allow advertiser customers to audit activities relating to their ads shown to you and to view the fees charged and payments made to companies involved in showing an ad to you;
- to allow advertiser customers to infer what you may be interested in and serve ads to you based on those inferred interests, including creating profiles about you that are created by advertiser customers;
- to allow publishers to sell ad space to advertisers;
- to improve your online experience when you see ads served through our Platform, including managing the number of times you see an ad so you don't see an ad too many times, showing ads in a particular sequence, showing ads based on the content that you are viewing, and showing ads based on your location, and
- to measure and report on the success of marketing campaigns.

3.2. *Uses of information collected from our advertiser customers*

In addition to the ways disclosed above, we may use information about you collected from our advertiser customers to provide services to our advertiser customers, including providing log file data to allow advertiser customers to audit activities relating to their ads shown to you and to view the fees charged and payments made to companies involved in showing an ad to you.

4. HOW WE SHARE INFORMATION

Your information collected from our Services may be shared:

- with other companies in the Reset Digital group, such as subsidiaries;
- with our third party service providers who provide services such as hosting and storage, web serving, anti-fraud, security, email delivery services, technical services, marketing analytics and other services. (We ask our service providers to confirm that their privacy and security practices are consistent with ours, we provide our service providers with

only the information necessary for them to perform the services we request, and we ask our service providers not to use such information for any purpose other than as specified by Reset Digital);

- with a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings); and
- if necessary or appropriate: (a) to enforce our terms and conditions; (b) to protect our operations and the security of our Platform and the Reset Digital Pages; (c) to protect our rights, privacy, safety or property, and/or that of you or others; (d) to allow us to pursue available remedies or limit the damages that we may sustain; (e) to prevent or stop activity we may consider to be, or poses a risk of being, illegal, unethical or legally actionable activity; (f) under applicable law; (g) to comply with legal process and our legal obligations; and (h) to respond to requests or requirements from public, law and government authorities (including national security and law enforcement requirements) and private parties.

4.1. How we share information collected via digital properties using our Platform

Your information collected via digital properties using our Platform may be shared with our advertiser customers so they can do the following:

- decide whether to bid on or purchase ad inventory;
- choose the best ad for you;
- measure, evaluate and report on those ads delivered to you;
- create demographic and interest-based profiles to improve the relevancy of ads they show you;
- target particular digital properties; and
- improve their products and services.

5. COOKIES AND SIMILAR TECHNOLOGIES

A cookie is a data file that is stored on your device when you use our services. Cookies help us track user-specific information and activities. For general information about cookies (including how to disable/enable them) visit <https://allaboutcookies.org/>.

We also employ other technologies (such as tags and pixels, locally stored objects, software development kits or SDKs, and mobile device IDs such as Identifier for Advertising or IDFA, Google Advertising Identifier or AAID).

5.1. How we use cookies and similar technologies

We use cookies and other similar technologies in a variety of ways.

5.1.1. On our Reset Digital website

Reset Digital and our service providers use cookies and other similar technologies (such as pixel tags), to:

- help us operate our website, including managing user sessions, authenticating users of our software apps, or adjusting settings and functionality on the pages;
- gather insights about how our website is used, including to identify which pages are viewed more than others;
- help us improve our website;
- Store your choice to opt out of interest-based advertising; and
- Learn more about the types of visitors to our website and devices or browsers used.

5.1.2. On our Advertising Platform

When we operate our Platform, cookies and similar technologies help us in a variety of ways including the following:

- to ensure ads are displayed properly;
- to store ad delivery and reporting data for our advertiser customers;
- to perform advertising and analytics functions such as showing ads to you based on your interests;
- to track users' responses to ads (e.g., did the user click on the ad);
- to limit the frequency of showing the same ad to you; and
- to store your choice to opt out of interest-based advertising.

5.2. How to opt out of cookies and similar technologies

You can opt out in the following ways:

- Through your browser. You can adjust your browser settings so that your browser blocks all or some cookies. You can also delete cookies that have already been placed. If you block cookies, you will not be able to use our opt out tool because our opt out is cookie-based. If you delete cookies, then you will need to opt out again because our opt out is cookie-based. Please note that our Services may not recognize automated browser signals regarding tracking mechanisms, such as “do not track” instructions.
- To opt-out of Reset Digital’s cookies...
- Through your mobile device.
 - On iPhone: Go to Settings, tap an app, and then tap to turn off Allow Tracking. Or go to Settings > Privacy > Tracking, and tap to turn on or off each app you'll see in the list of apps that have requested permission to track your activity.
 - On Android: Go to Settings, locate and tap Google > Ads, and turn ON Opt out of Ads Personalization.

- With each of our vendors individually. To learn more about our vendors and the cookies they use, please visit our cookie policy at ____.
- Through industry-wide opt out mechanisms. Consumers can submit an industry-wide opt out request for mobile and web interest-based advertising through the Digital Advertising Alliance's (DAA) opt out website which can be found at <https://youradchoices.com/control>.

Please note: after opting out of interest-based advertising from Reset Digital or any third party, you will still receive advertisements, but such advertisements will not be interest-based ads targeted by Reset Digital and such third party.

6. SENSITIVE INFORMATION

We do not collect sensitive information such as race, ethnicity, religious beliefs, gender, sexual identity, and sexual orientation. If we have such information, it is solely based on inferences. We ask that you not send us, and you not disclose to us, any sensitive information on or through the Reset Digital Pages or Platform or otherwise to us, except where such information is legally required.

7. YOUR PRIVACY RIGHTS AND HOW TO EXERCISE THEM

You have certain rights regarding your privacy. You may:

- Access the personal information we maintain about you;
- Delete the personal information we maintain about you, unless such information is necessary for compliance with our legal or regulatory obligations;
- Opt-Out of certain uses of your personal information. You can opt out of:
 - Email marketing - unsubscribe to our commercial email list by following the instructions provided in the email. Please note that if you do opt out of receiving marketing-related emails from us, we may still be required to send you administrative messages relating to your account or other service-specific messages from time to time.
 - Tailored advertising using our Platform. Please refer to the 'Cookies and Similar Technologies' above to learn how to opt out of tailored advertising.

You may exercise these rights by contacting us at privacy@resetdigital.co.

8. CALIFORNIA DISCLOSURE

The California Consumer Privacy Act or "CCPA" (Cal. Civ. Code § 1798.100 et seq.) grants California residents certain rights with respect to their Personal Information.

You have the right to know the categories of personal information we have collected about you in the last 12 months. This information is contained in the “Information We Collect and How We Collect It” section above.

Also, if you are a California resident, in addition to the rights above, you have the right to opt out of the “sale” of your Personal Information. You may exercise your choice to opt out of the sale of your Personal Information by following the above instructions related to cookies, or by emailing us at privacy@resetdigital.co.

9. EUROPEAN ECONOMIC AREA (EEA) DISCLOSURE

If you are a resident of the UK or EU, or more broadly, the European Economic Area (EEA) you have certain rights and protections under the General Data Protection Regulation (GDPR) regarding the processing of your Personal Data.

9.1. Controller-Processor Designation

For purposes of both this Privacy Policy and applicable law, we may be a ‘Controller’ or ‘Processor’ as defined by the GDPR as to any Personal Data that is collected and used as part of our Services.

- When we collect Personal Data from our website, we are the controller of the Personal Data.
- When we collect Personal Data using our Platform, we may be both the controller or processor of the Personal Data depending on the type of service provided by us.
- When we collect Personal Data from advertiser customers, we are the processor of the Personal Data on behalf of our advertiser customers and based on their instructions.

9.2. Legal Basis

Our legal basis for collecting and using Personal Data described herein will depend on the Personal Data concerned, and the specific context in which we collect it. Our legal bases for processing your Personal Data are outlined in the table below.

Processing Activity		Legal Basis
Reset Digital Website	Using your personal data to operate, manage, and improve the website.	Legitimate Interest.
	Sending administrative information to you, for example, information	Legitimate Interest.

	regarding the website and changes to our terms, conditions, and policies.	
	Responding to your inquiries and fulfilling your requests.	Consent. When you send us inquiries and requests, you give us consent to process your personal data in order to respond to you.
	Placing cookies on the website.	Consent. You may accept the use of cookies and similar tracking technologies when you visit our website.
	Sending you marketing communications that we believe may be of interest to you.	Legitimate Interest.
	Using your personal data for our business purposes, such as analyzing data, performing audits, monitoring for fraud, securing data, developing new products, improving the website, identifying usage trends, and determining the effectiveness of our website.	Legitimate Interest.
Platform	Using your personal data to operate, manage, and improve the Platform.	Consent for cookies, and Legitimate Interest for other activities.
	Providing our services to our advertising customers, including enabling our advertiser customers to find and purchase ad space from publishers and measuring and	Consent for cookies, and Contract Fulfillment for other activities.

	reporting on the success of marketing campaigns.	
	Providing our services to our publisher customers, including to sell ad inventory.	Consent for cookies, and Contract Fulfillment for other activities.
	Enabling our advertiser customers to synchronize their data about you with data they obtain from our Platform to identify your interests and show you ads that may be of interest to you.	Consent for cookies, and Contract Fulfillment for other activities.

In addition to the legal bases disclosed in the table above, we may further process your personal data with your consent or where we have a legal obligation.

9.3. Your Rights

If you reside in the UK or EEA, you have the following rights with respect to your personal data:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object;
- the right to lodge a complaint with a supervisory authority (you can find your supervisory authority at https://edpb.europa.eu/about-edpb/about-edpb/members_en; and
- The right not to be subject to a decision based solely on automated means.

To exercise these rights, email us at privacy@resetdigital.co, or send your request to:

Reset Digital, Inc.
 Attention: Privacy
 369 Lexington Avenue, 3rd Floor
 New York, NY 10036

9.4. International Data Transfers

We may process your information outside of the country where you live. For example, our servers and databases are located in the United States. As such, we may transfer your

information out of the EEA to countries that do not have an adequacy decision, such as the United States. In those instances, we rely on the Standard Contractual Clauses (SCCs) adopted by the European Commission. We ask all our partners, vendors and service providers to sign SCCs and implement supplemental measures as necessary to protect your personal data.

10. DATA SECURITY AND RETENTION

Information that we collect is stored using procedures and practices reasonably designed to help protect from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal information transmitted, stored, or otherwise processed by us. Please note that no transmission or storage of information can ever be guaranteed to be completely secure. Please also be mindful that we are not responsible for the security measures of third parties.

If you create an account on the Reset Digital Pages, you are responsible for protecting the security of your account, its content, and all activities that occur under the account. You must immediately notify Reset Digital of any unauthorized uses of your account or any other breaches of security by emailing us at privacy@resetdigital.co.

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy. We may also retain personal information if required by law, or for our legitimate interests, such as fraud detection and prevention, and defending ourselves from legal claims.

11. CHILDREN'S PRIVACY

Neither the Reset Digital website nor the Platform are intended for, or directed to, children. We do not collect information from the website from any person we actually know is an individual under the age of 16. Anyone under the age of 16 is not permitted to use the Reset Digital website and must not submit any personal information to us.

If we become aware that a child under the age of 16 has provided us with personal information, we will take steps to remove such data and terminate such child's account. If you become aware that your child has provided us with personal information without your consent, please contact us at privacy@resetdigital.co.

12. CHANGES TO THIS PRIVACY POLICY

Reset Digital may change this Privacy Policy at any time. The most recent version of the Privacy Policy is indicated by the "Updated and effective as of" date at the top of this Privacy Policy. Please review this Privacy Policy frequently to stay updated on changes that may affect you. Your continued use of the Reset Digital website and Platform signifies your continuing consent to be bound by this Privacy Policy. Where required by law, we will obtain your consent to make these changes.

13. CONTACT US

We expect this Privacy Policy to evolve over time and we welcome feedback about our privacy practices. If you would like to exercise your privacy rights or have any questions about this Privacy Policy or Reset Digital's privacy practices, you can reach out to us using the following details:

Reset Digital, Inc,
Attention: Privacy
369 Lexington Avenue, 3rd Floor
New York, NY 10017
privacy@resetdigital.co

For visitors from the EEA, the GDPR gives you the right to contact our Data Protection Officer (DPO). You may reach our DPO at dpo@resetdigital.co.