

Effective date: December 20, 2019

Introduction

Welcome to BYYD's Privacy Policy ("**Policy**"). In this Policy, we use the terms "**BYYD**", "**our**", "**us**" and "**we**" to refer to BYYD, Inc. and our affiliates.

BYYD is committed to protecting the privacy of individuals ("**users**", "**you**", "**your**") when we process data about them via our platform (the "**Platform**"), when they visit our website at www.byyd.me (the "**Website**") and when we engage in marketing activities based on contact information they provide to BYYD through other means described in this Policy.

1. Important information and who we are

Purposes of this Policy

This Policy sets out how BYYD collects and processes personal data about you via the Platform, when you visit the Website, and when we engage in marketing activities based on contact information you provide to BYYD through other means described in this Policy. It also sets out our practices regarding our use of such data, the steps we take to protect it, the parties with whom we share it, and the choices and rights that you have regarding how we collect and process personal data about you.

You should read this Policy carefully so that you are fully aware of how and why we are using your personal data.

Who we are

BYYD is a global provider of digital advertising media and data management technology. We provide a technology platform and services which help advertisers do a more effective job of reaching their targeting audiences. This technology delivers greater performance, transparency, and control to advertisers and a better Internet experience to users. As a Demand-Side Platform, our clients, which include advertisers and agencies, use our technology to purchase advertising, including display, video, native, and Rich Media ads, in an automated fashion. As a Data Management Platform, our technology enables our clients to control and activate data and provides them tools to onboard, segment and understand their data.

How to contact us

If you have any questions about this Policy, including any request to exercise your legal rights, please contact us as follows.

- By email to hello@byyd.me
- By post to BYYD Inc., 838 6 Avenue, 6th Floor, New York, NY 10001, USA

You have the right to lodge any complaints you have regarding our processing of your personal data with a regulatory authority. We care about your privacy, and we appreciate the chance to address your concerns before you do so.

Changes to the Policy

From time to time BYYD may revise this Policy. The date of the last update can be found at the top of the Policy. If we make revisions that materially change or affect whether or how we collect or use personal data, we will notify you by email (if, as a user of our Website or recipient of our marketing communications, you have provided us your email address) or by means of a notice on our Website prior to the change becoming effective. If you would like to stay up-to-date on our most current policies and practices, you should review the Website periodically.

Data pertaining to children

BYYD's products and services are not designed for children, and we do not knowingly collect personal data from or about any children. If we are made aware that we have received personal data from or about a child, we will use reasonable efforts to remove that data from our records.

Links, other websites and other third parties

This Policy relates solely to the personal data we collect and process about you in relation to our Platform, our Website, and other interactions you may have with BYYD described in this Policy. BYYD's Website contains links to other sites, and the ads delivered by the Platform may run on a variety of other sites. Clicking on those links, accessing other sites, or enabling those connections may allow third parties to collect or share data about you. BYYD does not control these third-party sites and is not responsible for the privacy practices of such other sites. You should refer to the privacy statements of such third-party websites to find out how they collect and use your personal data and whether and for what purpose they use cookies. Also, as explained below in Section 5, third parties may process personal data from you when you visit the Website. Such processing is governed by privacy statements of such third parties.

BYYD and General Data Protection Regulation (GDPR)

We have both implemented and regularly update organizational, technical and operational measures to ensure compliance with applicable provisions on data protection and data security by BYYD and as well contracted 3rd party providers. (Art. 32 GDPR)

Definition of personal information under GDPR

As defined in Art.4 No. 1 of the GDPR, personal data is any information relating to an identified or identifiable natural person, which could be used to obtain personal or factual details about the data subject (such as name, address, telephone number, date of birth or e-mail address). Information that cannot (directly or indirectly) be associated with a natural person, for example, anonymous information, is not personal information.

2. The data collected via the Platform

While BYYD collects certain categories of personal data in the course of delivering an ad to you via the Platform, we do not intentionally collect data that reveals your real-world identity, such as your name, address, phone number, or any government identifiers such as your Social Security Number. Instead, BYYD collects certain data about your device through the use of cookies and other similar technologies, as explained below.

We may assign a unique identifier called a BYYD ID to your mobile device when we serve an ad to it or you use it to access a client's digital properties, including their websites, emails, apps, and websites, emails, and apps where their ads appear ("**Digital Properties**"). The BYYD ID enables the Platform to determine within a reasonable level of confidence that a device is the same as one with which the Platform has previously interacted. For example, the BYYD ID allows us to determine that a device to which we served an ad on Monday is likely to be the same device for which we observed a purchase on Tuesday. In some cases, based on third-party data, we are able to infer within a reasonable probability that a particular computer or device should be associated with the same BYYD ID. For example, a client may provide us with hashed personal data that (if unhashed) would reveal your real-world identity, and we may use that data to associate your devices with each other. Also, our partners may provide us with associations that they have made based on data they collect from you. Where we are able to make such inferences, we may use this information to deliver targeted ads across multiple computers or devices. This is sometimes referred to as cross-device advertising.

The BYYD ID can be a mobile advertising ID (a unique ID assigned by the mobile operating system, e.g. Apple ID for Advertising or Android Advertising ID) or a statistical ID (created by BYYD). We use information about your device to generate the statistical ID, including your operating system, user-agent string, Internet Protocol ("**IP**") address, installed fonts, and similar information. This information makes your device distinct enough for our systems to

determine within a reasonable probability that they are encountering the same device over time, including in environments where BYYD cookies are not supported.

Your BYYD ID is associated with other categories of personal data that we collect about you. These categories include the following:

- **Bid Request Data and Impression Data:** BYYD collects personal data about you when we have the opportunity to show you an ad on Digital Properties and when we deliver an ad. We refer to this data as Bid Request Data and Impression Data, and we receive this data from media supply sources, such as publishers (i.e. organizations who operate Digital Properties) and exchanges or supply-side platforms who display ads on publishers' Digital Properties. This data includes: your imprecise location (e.g., country, region, postal code), browser type (e.g., Chrome or Internet Explorer); operating system (e.g., Mac OS or Windows); browser language (e.g., English or Spanish); IP address; Internet Service Provider (e.g., Vodafone or Verizon); and either a BYYD ID or an ID that one of our partners may assign to your browser or device, which we may associate with the BYYD ID that we assigned to your device. It also may include Precise Location Data, such as GPS-level latitude-longitude coordinates or location-based radio frequency signal triangulation. When we process Precise Location Data, the mobile app publisher or other media supply source is responsible for enabling you to provide or withdraw consent with respect to the collection and use of your Precise Location Data. Please check the settings of the mobile app and your device if you would like to change your preferences in relation to Precise Location Data.
- **Pixel Data and Other Client Data:** BYYD clients may use the Platform to collect data regarding your interactions with them when you visit their Digital Properties. We also may collect the same data when you visit the Website. This includes information such as the time you visited the site, the page URL, your IP address, your browser type (e.g., Chrome or Internet Explorer), the operating system (e.g., Mac OS or Windows), the type of device you use (e.g. laptop or desktop), and data regarding your activities on the Digital Properties. For example, if you are shopping for a product online, place a product in your online shopping cart, or make an online purchase, the client associated with the website or app may use the Platform to collect that data and later show you an ad on a different site or app related to that product. BYYD clients also may use the Platform to collect hashed personal data that (if unhashed) would reveal your real-world identity, such as hashed email addresses. We refer to everything described above as Pixel Data. Clients also may import data

that they have obtained outside the Platform, such as segments that our clients create or obtain independently from other third-party sources. A segment is a grouping of users who share one or more attributes (e.g., “car enthusiast”). Clients also may import data that they may possess or independently obtain offline, such as data regarding a purchase you made in the client’s store. The client’s offline data is first processed by a third party, which removes any data that reveals your real-world identity, appends a BYYD ID, and transmits the file to BYYD for processing. We refer to this data as Other Client Data.

- **Third-Party Segment Data and Other Third-Party Data:** When they choose to provide it to us, we also receive personal data from third parties. We work with data providers who create and provide us with segments for our clients to use for advertising purposes. We refer to this as Third-Party Segment Data. We also send personal data to and receive personal data from third-party partners that allows them and/or us to associate the BYYD ID with those partners’ identifiers (through a process called “cookie syncing”) as well as data that associates your different devices with each other. We refer to this data in the Policy as Other Third-Party Data.
- **Special or Sensitive Categories of Personal Data:** We do not knowingly collect any special categories of personal data about individuals in the EEA, including: personal data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; personal data concerning your health, sex life, or sexual orientation; and genetic or biometric data. BYYD also does not knowingly collect any data about other sensitive categories such as personal data about children, financial account numbers, insurance plan numbers, and criminal convictions or offenses.

3. How data is collected via the Platform

The Platform uses various technologies to collect your personal data from Digital Properties. We also may receive your personal data directly from our clients and partners.

Cookies and other ad-targeting technologies

Like most digital marketing platforms, BYYD uses cookies and other technologies to recognize devices and collect the categories of data described above in Section 2 so that we and our clients are able to understand your interests, deliver more relevant advertising to you, measure the impact of that advertising, and better understand your digital media usage patterns.

The types of technologies used via the Platform that enable us, our clients, and our partners to identify a device, and enable the Platform to function and serve more relevant ads include:

- **Cookies** – Cookies are small text files that contain a string of characters. BYYD uses cookies to uniquely identify an Internet browser. Certain browsers or browser settings sometimes block cookies, and cookies may not work effectively on some mobile devices.
- **Pixel Tags** – Pixel tags are transparent images, iFrames, or JavaScript that we, our clients, and our partners use to understand how users interact with their Digital Properties.

Collection of data from third parties

As described above, we receive personal data from our clients and partners. Specifically, our clients and partners may send us segments that include you and personal data they have obtained about you, our partners may provide us with data that allows us to associate the BYYD ID with unique identifiers that they may have and data that associates your different devices with each other, and media supply sources, such as publishers and the digital advertising companies with whom publishers work, may send us Bid Request Data and Impression Data. We receive this data in a number of ways, including through server-to-server transfers, a process called “cookie syncing” and other partner calls to BYYD originating from the browser.

4. How the Platform uses data

We use the personal data that we collect to deliver more relevant ads to you. We also use it to improve our Platform and the products and services that we provide to our clients and partners, and to create new products and services. We have set out below a description of specific ways we use your personal data in the Platform.

Purpose/Activity

- Enabling BYYD clients to create marketing campaigns;
- Creating segments;
- Facilitating BYYD clients’ creation of segments;

- Making decisions related to the opportunity to display an ad (e.g., deciding which clients' campaigns are a good match for a bid opportunity and what price to bid in each case) and placing the bid;
- Setting, reading and modifying a BYYD cookie, reading a mobile advertising identifier, or generating a statistical ID;
- Collecting information about a browser or device;
- Facilitating our partners' collection of personal data, including by placing partners' pixels or tags on our clients' Digital Properties;
- Delivering ads based on your interests or activities on Digital Properties;
- Measuring the effectiveness of those ads and attributing your activities to our clients' campaigns;
- Generating and providing to clients reports and user-level data related to their campaigns in the Platform;
- Automated decision-making and profiling based on personal preferences, interests, behavior or location;
- Transferring data to a third-party service provider where clients have elected to use its services or where BYYD has engaged a service provider to provide certain functionality or capabilities as a part of the Platform or to improve our Platform and the products and services that we provide to our clients and partners; and fraud detection and prevention.
- Honoring opt-out requests for users who have opted out.
- Pixeling BYYD clients' Digital Properties.
- Synchronizing BYYD cookie ID with third-party partners.
- Associating multiple browsers and devices with each other; and
- Development, management, and commercialization of BYYD's identify management mapping that associates your different devices with each other.

Creation of segments

As described above, a segment is a grouping of users who share one or more attributes. Our clients may use health-related segments about non-sensitive conditions such as an inferred interest in health and wellness or cough medicine and allergy medications.

While BYYD does not knowingly create segments that are based upon what we consider to be sensitive information (for example, we do not create segments of EEA users based on personal data considered to be sensitive in the EEA, such as personal data revealing your

racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, personal data concerning your health, sex life or sexual orientation, or genetic or biometric data), our clients may use the Platform to process some sensitive data, which may come from our clients' Digital Properties or our partners. We take steps designed to ensure that this is done in compliance with applicable laws and self-regulatory guidelines, including through our contracts and policies with our clients and partners.

Automated decision-making and profiling

The Platform uses proprietary algorithms to make decisions about whether or not to bid on opportunities to serve you ads and, if so, how much to bid. The ads you see are the result of client campaigns that specify how much to spend and on what basis to spend combined with the use of our algorithms. The ways in which we use algorithms to determine bid prices may be considered automated decision-making in certain jurisdictions. Additionally, these processes, in combination with client campaigns described below, may constitute profiling in certain jurisdictions.

The automated processes that we use do not affect your legal rights (such as your right to vote, take legal action, or freely associate with others) or your ability to receive social benefits or obtain citizenship, nor do they have legal effects on you. Also, we do not knowingly process or make automated decisions about EEA users based on any data that falls into special categories in the EEA. As described below, you have the right to object to this automated processing at any time and you may have additional rights described in Section 11.

Legal basis for processing

Our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the specific context in which we process it. However, we will normally collect personal data from you only where the processing is in our (or a third party's, such as our clients') legitimate interests and not overridden by your rights, such as your right to opt out. If we collect and use your personal data in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate the Platform and serve you ads on behalf of our clients. We may have other legitimate interests and, if appropriate, we will make clear to you at the relevant time what those legitimate interests are.

Opt-out and choice mechanisms

If you want to limit the data BYYD collects and processes about you and want us not to target ads that are based on your interests to your browsers or devices, you may opt out from BYYD tracking and interest-based advertising at any time through one of the ways described below. **If you opt out, you will still see ads, but those ads are not likely to have anything to do with products or services you care about.** With interest-based advertising, you receive ads and offers that are more likely to be useful to you.

Your opt-out is only applicable to the Platform and does not opt you out from platforms provided by third-party companies. However, you can opt out from both BYYD and many third-party companies at once; to do so, please see “Other ways to opt out” below. When you opt out, BYYD will collect and process data from your browser, app, or device only as needed to honor your opt-out and for limited research and development purposes to improve our browser- and device-recognition technology, which also helps to improve our ability to honor your opt-out. When you opt out, BYYD also stops targeting interest-based advertising to the opted-out app or device.

If you use multiple devices and wish to limit the data BYYD collects and processes and do not wish to receive BYYD interest-based advertising on any of them, you must opt out from each device individually.

Other ways to opt out

You may learn more about interest-based advertising and opt out of interest-based advertising from BYYD and other online advertising companies that are also members of applicable self-regulatory organizations by visiting their opt-out links:

- Network Advertising Initiative – <http://optout.networkadvertising.org/>
- Digital Advertising Alliance (DAA) – <http://optout.aboutads.info/>
- Digital Advertising Alliance Canada – <http://youradchoices.ca/choices>
- Digital Advertising Alliance EU – <http://www.youronlinechoices.com/>
- DAA AppChoices page – <http://www.aboutads.info/appchoices>

Other ways to limit ad tracking in the mobile Device application environment

You also may limit ad tracking in mobile app environments on your mobile device. For the most effective and up-to-date methods for doing so, you should consult instructions provided by those device manufacturers. We offer the following information solely for

informational purposes, and we cannot guarantee that the methods below are the most current:

- [Apple instructions for how to Limit Ad Tracking on devices such as iPhones, iPads and Apple TV](#)
- [Google instructions for how to express choice on Android devices](#)

Where BYYD receives a signal to limit ad tracking, we will collect and process data from your device only as needed to honor your choice and for limited research and development purposes to improve our device-recognition technology, which also helps to improve our ability to honor your choice. Where BYYD receives a signal to limit ad tracking, BYYD also will not serve interest-based advertising in the apps on your mobile device.

If you have questions about how to opt out or limit ad tracking, please contact us at hello@bbyd.me

5. The data collected via the Website or offline and how we collect it

If you visit our Website or certain third-party marketing applications used by BYYD, or if you interact with BYYD in other ways described below, BYYD collects certain personal data from you when you choose to reveal it to us, and we also automatically collect certain personal data. Third parties may collect personal data from you if you use certain features on the Website. The Website also may reflect certain personal data provided to us separately when you provide your consent for such display.

Personal data you provide

When you visit the Website, you may choose to provide your personal data to set up an account, request information such as a demonstration of our products, or send us questions. You also may choose to provide us with your personal data through sources other than the Website, including, for example when you register for or attend an event hosted by BYYD. The personal data may include your name, email address, company, title, and region, as well as information about your business such as industry, size, revenue, and address. You have the ability to provide additional information at your discretion.

You also may provide us with your personal data on the publicly accessible blogs on our Website. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them.

We do not link the personal data described in this section with personal data that we may have about you in the Platform. You may choose to stop receiving marketing communications at any time by following the unsubscribe instructions included in any marketing communications we send you or by contacting us via email at hello@byyd.me. Also, you may request removal of your personal data from our blog, community forum, or our marketing database by contacting us the same way. In some cases, we may not be able to remove your personal data from publicly accessible blogs on the Website, in which case we will let you know if we are unable to do so and why.

Personal data collected automatically

As is true of most websites, we gather certain personal data automatically when content is displayed to you on the Website and store it in log files. This information may include IP address, browser type, Internet Service Provider, referring and exit pages, operating system, date and time stamp, and/or clickstream data. We do not link this data stored in log files to other information we collect about you.

We also automatically collect, and allow certain of our partners and service providers automatically to collect, personal data from you when you visit the Website. This is done using various technologies including cookies and pixels. Examples of service providers include video providers and email service providers. We consider the data that we collect from you on the Website using cookies and pixels as Pixel Data, which is described above in Section 3. Our partners and service providers also may collect personal data, may sync with additional third parties, and may allow third parties with whom they partner to set cookies on the Website. Please note, BYYD does not control these partners and service providers. You should refer to the privacy statements of such parties to find out what personal data they collect, how they use cookies and how they interact with other third parties. For further information on the cookies and pixels we use on the Website, including a list of the partners and service providers described above, and how you can opt out, please see our Cookie Notice.

Social media features and widgets

The Website includes Social Media features that allow you to share news, events and blog posts from the Website on platforms such as Facebook, Twitter and LinkedIn or by email. These Social Media features are hosted by the third parties providing them, and your interactions with these features are governed by the privacy policy of the company providing it, which you should read and ensure you understand.

Testimonials

We display testimonials from satisfied clients on the Website in addition to other endorsements. We will obtain our client's permission before we place these testimonials on the Website. If you are a client who wishes to update or delete your testimonial, please contact us at hello@byyd.me

Legal basis for processing

Our legal basis for collecting and using the personal data described above in this Section 5 will depend on the personal data concerned and the specific context in which we collect it. However, we will normally collect personal data from you only where the processing is in our legitimate interests and not overridden by your rights, such as your right to opt out, or where we have your consent to do so. If we collect and use your personal data in reliance on our legitimate interests, this interest will normally be to operate the Website, communicate with you, send you marketing communications (where we have your permission to do so, if such permission is required by applicable law), and show you ads on Digital Properties. We may have other legitimate interests and, if appropriate, we will make clear to you at the relevant time what those legitimate interests are.

In some cases, we also may have a legal obligation to collect personal data from you. If we ask you to provide personal data to comply with a legal requirement, we will make this clear at the relevant time and advise you whether the provision of your personal data is mandatory or not (as well as of the possible consequences if you do not provide your personal data). Where we are required by applicable law to obtain your consent, for instance (in some cases) in order to send you marketing communications, we will do so, and in such cases the legal basis for our processing of personal data will be your consent. If you have questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us via email hello@byyd.me

6. How we use data collected via our Website

Information you provide

When you provide your personal data to BYYD on the Website or through other means described in this section, including, for example, when you attend an event hosted by BYYD, we may use the data for the following purposes:

- To respond to your inquiry;
- To understand your business and offer you potential business opportunities;

- To know or infer your interest in marketing products and services;
- To enrich certain personal data you provide, for example your IP address or company information with information obtained from third parties;
- To segment (group) you with similar individuals;
- To provide you with information and offers about BYYD products and services, information resources (e.g. reports and webinars), industry news and opinions, and announcements about BYYD;
- To inform you about and invite you to events, educational opportunities, or training opportunities;
- To ask you to share BYYD information, offers, and invitations with other people; and
- To attribute your responses or actions to specific marketing campaigns, activities, and channels.

As mentioned above, you may choose to stop receiving marketing communications at any time by following the unsubscribe instructions included in any marketing communications we send you or by contacting us via email at hello@byyd.me. You also may request removal of your personal data from our blog, community forum, or our marketing database by contacting us the same way. We may not be able to remove your personal data from publicly accessible blogs on the Website, but we will let you know if that is the case.

Information collected automatically

BYYD uses information from the Website log files for troubleshooting and security purposes. We use the Pixel Data that we collect from you on the Website for the purposes described in Section 4 above. Accordingly, each purpose and activity that applies to our clients in Section 4 could apply to BYYD. For example, we may use Pixel Data that we collect from you on the Website to deliver ads to you when you visit other Digital Properties, and we may collect additional personal data from you on those Digital Properties, such as Bid Request or Impression Data. We use other data that is collected on the Website using cookies and pixels to determine how you found out about us, what your interests are regarding our services, and how to further improve the functionality of the Website and our service towards you as well as to analyze trends and administer the Website. For further information on the cookies and pixels we use on the Website and how you can opt out, please see our Cookie Notice.

7. Disclosure of data from the Platform and Website

We may share your personal data with the following categories of third parties for the purposes set out in Section 4 and Section 6 above:

- With our clients, resellers and partners where this is necessary in order to operate the Platform and the Website, to provide our products and services, to improve our Platform, products and services, and to create new products and services. These partners include but are not limited to segment providers, any provider with whom we synchronize cookie IDs, and partners who receive data exported from the Platform at our clients' request.
- With media supply sources such as publishers (i.e. organizations who operate Digital Properties) and exchanges or supply-side platforms who display ads on publishers' Digital Properties in connection with the opportunity to purchase advertising inventory.
- With third parties with whom we contract to help with the operation of the Platform and Website, the provision of our products and services and our business operations. Services provided in connection with the Platform include data storage and computing infrastructure, content delivery, dynamic creative optimization, ad measurement, audience modeling, data enrichment and the AdChoices icon. Services provided in connection with the Website and our marketing activities include email services, event management, maintenance of our marketing database, web analytics, recruitment, management of marketing and customer relationship and social media.
- With third parties when we consider this to be necessary: to establish or protect the legal rights of BYYD or its employees, agents and contractors, as well as the legal rights of its clients or other third parties; to protect the safety and security of users and visitors to our Website; to protect against fraud; or to comply with the law or legal process.
- When we are required to or allowed to do so by law (for example in response to subpoenas, to comply with a binding court order, legal process, or government requests, including in response to a public authority to meet national security or law enforcement requirements).

We require third parties to respect the security of your personal data and to treat it in accordance with applicable laws. We also define the permissible scope and, where appropriate, restrict the use by third parties of your personal data. We require our third parties who provide us services to only use the information that we provide to them in connection with the services they perform for us and in accordance with our instructions.

We also may publish or otherwise make public anonymous, aggregate, or summary information regarding campaigns run in the Platform on behalf of our clients. For example,

we may publish a report that reflects aggregated statistics regarding seasonal trends in shopping patterns or geographic differences in advertising impression opportunities.

8. International transfers

The information that we collect from you and about you may be transferred to and stored in a country other than your country of residence, such as the USA, which may not offer the same level of protection of personal data as your country of residence. However, we will take contractual and/or other measures to ensure your personal data is protected. We take all reasonable measures to help maintain data we collect through our DSP in a secure manner. This will be done according to the highest industry norms and standards.

For individuals in the EEA

BYDD has its headquarters in the USA and many of our partners or vendors are based outside of the EEA. Whenever we transfer your personal data out of the EEA, we ensure that it receives a similar degree of protection by implementing at least one of the following:

- Reliance on our or our applicable partners' or vendors' Privacy Shield certification if the transfer is to the United States.
- Entering into contracts approved by the European Commission with our group companies and applicable partners or vendors.

EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield

BYDD, Inc. complies with the EU-U.S. Privacy Shield Framework and the Swiss–U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal data transferred from the EU and Switzerland to the United States, respectively.

BYDD, Inc. has certified to the Department of Commerce that for all personal data it receives from the EU and Switzerland, it will adhere to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfers, Security, Data Integrity & Purpose Limitation, Access, and Recourse, Enforcement and Liability.

If there is any conflict between the terms in this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To find out more about the Privacy Shield, access the Privacy Shield List, and find details of our certification, please visit: <https://www.privacyshield.gov/list>.

Under the Privacy Shield, BYYD, Inc. may remain liable if its third-party service providers process your personal data in a manner inconsistent with the Privacy Shield Principles, unless we prove that we are not responsible for the event giving rise to the damage.

Residents of the EU or Switzerland who believe that their personal data has not been processed in compliance with the Privacy Shield Principles may raise their complaint in the following ways:

1. You can contact BYYD, Inc. directly using hello@byyd.me. We will respond to your complaint within 45 days of receipt.
2. We have further committed to refer unresolved privacy complaints under the Privacy Shield via the Better Business Bureau ("**BBB**"), an alternative dispute resolution provider located in the United States. If you do not receive a timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by us, please visit <https://www.bbb.org/EU-privacy-shield/for-eu-consumers/> for more information and to file a complaint directly with the BBB.
3. Further, your complaint can be made or referred to the U.S. Department of Commerce or the Federal Trade Commission for further investigation.
4. For residual disputes that cannot be resolved by the methods above, you may be able to invoke a binding arbitration process under certain conditions. To find out more about the Privacy Shield's binding arbitration scheme, please see: <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

The Federal Trade Commission has investigation and enforcement authority over our compliance with the Privacy Shield.

9. Data security and integrity

BYYD implements appropriate technical and organizational measures to safeguard personal data in our possession against being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. No transmission of data over the Internet, however, is guaranteed to be completely secure. It may be possible for third parties not under the control of BYYD to intercept or access transmissions or communications unlawfully. While we strive to protect your personal data, we cannot ensure or warrant the security of any data you transmit to us or that we collect about you. We have procedures in place to address any suspected personal data breach, and if we are required by law, we will notify you of any such breach.

BYVD processes information in a way that is compatible with and relevant for the purpose for which it was collected. To the extent necessary for those purposes, we take reasonable steps to ensure that any information in our care is accurate, complete, current, and reliable for its intended use. If you have any questions about security on the Website or through the Platform, you can contact us at hello@byvd.me

10. Data retention

Retention of data collected on the platform

As described above, we process your personal data for different purposes, and the length of time that we retain your personal data varies depending on the processing purpose, the category of personal data and certain external factors.

We will retain the BYVD ID and, where applicable, its association with other devices for as long as it is necessary for our legitimate business purposes.

We will retain all other categories of personal data that we collect or receive on the Platform, including Bid Request Data and Impression Data, Pixel Data and Other Client Data, and Third-Party Segment Data and Other Third-Party Data, for no longer than thirteen months, and we retain much of this data for shorter periods of time. Furthermore, we may delete personal data in response to a request from a user under applicable law or when contracts with our clients end. Also, most cookies set via the Platform expire within thirteen months, while certain cookies that are not used for tracking are refreshed for as long as such cookies are necessary for our legitimate business purposes.

Retention of data collected on the Website and for marketing

If you provide us with your personal data on our Website or through other means described above in Section 5, we will retain your information for as long as it is necessary for our legitimate business purposes. For example, if you sign up for an account or request information on the Website, we will retain the data you provide for as long as we think you may have an interest in receiving information from us. Similarly, we retain log files for as long as it is necessary for our legitimate business purposes.

We retain the Pixel Data that we collect as described above in the section 'Retention of data collected on the platform'.

11. Rights of the "Data Subject" under GDPR regulation

According to the EU General Data Protection Regulation, you:

- Have the right to request access to your personal data (Art. 15) as well as rectification (Art. 16), erasure (Art. 17) or at least restriction of processing (Art. 18) of your personal data.
- Have the right to data portability (Art. 20).
- Have the right to revoke any consent given to the processing of personal data at any time (Art. 7).
- Have the right to object to processing based on the balancing of legitimate interests (Art. 21(4) GDPR).
- In addition, you have the right to appeal to the competent data protection supervisory authority.

Unless otherwise indicated in the Policy, we try to fulfill legitimate requests within 30 days. If it will take longer, we will notify you and keep you updated.