

Privacy Notice Supplement for GDPR Countries and the United Kingdom

Last modified on July 1, 2023.

This Privacy Notice Supplement for GDPR Countries and the United Kingdom supplements Lotame's Services Privacy Notice.

Lotame has responsibilities as both a controller and a processor under the European Union's (EU/EEA), Switzerland's, and the United Kingdom's General Data Protection Regulation ("GDPR"). When the GDPR is applicable, Lotame will process your [Personal Data](#) in accordance with the GDPR and the agreements with our [Business Customers](#) and [Data Partners](#).

In the sections below we describe:

1. [Our Legal Basis for Processing Personal Data](#)
2. [International Transfers of Personal Data](#)
3. [Privacy Shield](#)
4. [Data Subject Access Requests](#)

1. Our Legal Basis for Processing Personal Data

Lotame's legal basis for processing your [Personal Data](#) is consent, which is given by you to our [Business Customers](#) and [Data Partners](#) and provided to Lotame via the [IAB Europe Transparency and Consent Framework](#) or directly to Lotame using Lotame's Consent API.

For the transmission of legal bases for processing [Personal Data](#) in the EU/EEA and the UK Lotame primarily supports and recommends that all our [Business Customers](#) and [Data Partners](#) implement the latest version of [IAB Europe's Transparency and Consent Framework \(TCF\)](#), which is TCF 2.2. Lotame is registered as a TCF vendor (Vendor ID 95).

2. International Transfers of Personal Data

Lotame transfers all [Personal Data](#) to the United States for processing and uses the applicable Standard Contractual Clauses for such transfers. For information about data transfers to the United States pursuant to Article 46 of the GDPR following the Schrems II decision, please review the information [here](#).

3. Privacy Shield

While Lotame no longer relies on EU-U.S. and Swiss-U.S. Privacy Shield as a lawful basis for international transfers of [Personal Data](#) from EU/EEA and Switzerland to the U.S., Lotame remains certified under both EU-U.S. and the Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use and retention of [Personal Data](#) transferred from the EU/EEA and Switzerland to the United States. To learn more about the Privacy Shield program please visit <https://www.privacyshield.gov/>. Lotame's certification can be viewed [here](#).

In compliance with the [Privacy Shield Principles](#), Lotame commits to resolving complaints about our collection or use of [Personal Data](#). EU and Swiss individuals with inquiries or complaints should first contact Lotame at:

Lotame Privacy Team

8890 McGaw Road, Suite 250
Columbia, MD 21045
Email: privacy@lotame.com

If you do not receive a timely acknowledgment of your complaint from us, or if we have not resolved your complaint to your satisfaction, please visit ANA's [Privacy Shield Dispute Resolution](#). The services of ANA are provided at no cost to you.

Lotame is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC). Under certain conditions, more fully described on the Privacy Shield website [here](#), you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

4. Data Subject Access Requests

As a resident of a GDPR Country or the United Kingdom, you have the right to request certain information from Lotame or the right to request Lotame to take certain actions related to your [Personal Data](#) that Lotame is processing ("**Privacy Rights**").

How to exercise your Privacy Rights. You can make a request to exercise your Privacy Rights by submitting your request using our [Privacy Manager](#). You can also make a request to exercise your Privacy Rights by contacting us at privacy@lotame.com; however, due to the nature of the [Personal Data](#) we process and the need to verify certain types of Privacy Rights requests, use of our [Privacy Manager](#) is the best way to submit your request. You may also opt-out of our use of [Cookies](#) for [Tailored Advertising](#) at: www.youronlinechoices.eu.

Please note that with respect to [Personal Data](#) we receive from our [Business Customers](#) that those [Business Customers](#) use for their own business or commercial purposes, Lotame will not be able to take action regarding your [Personal Data](#) without providing the name of the [Business Customers](#) for which we process such [Personal Data](#).

Using Authorized Agents. If you want to use an authorized agent to submit your Privacy Rights request, please have the authorize agent follow the instructions below:

- *Using an authorized agent without power of attorney to submit a Privacy Rights request.* An authorized agent without power of attorney must submit a signed permission from the individual authorizing the agent to submit the Privacy Rights request(s) on their behalf by using the form located here.
- *Using an authorized agent with power of attorney to submit a Privacy Rights request.* An authorized agent with a valid power of attorney, must submit the valid power of attorney executed lawfully under the appropriate law by using the form located here.

5. Contact Us

You can contact us via email at privacy@lotame.com or regular mail to the address below:

Lotame Solutions, Inc.
c/o Privacy Team
8890 McGaw Road, Suite 250
Columbia, MD 21045