

Services Privacy Notice

Last modified on July 1, 2023

This Services Privacy Notice (this “**Notice**”) describes how Lotame receives, handles, and processes your [Personal Data](#) on behalf of our [Business Customers](#) and [Data Partners](#). We receive [Personal Data](#) from our [Business Customers](#) in connection with their use of our Services and from [Data Partners](#) from which we license [Personal Data](#). Except for the limited purposes of advertising and marketing our Services and for our own recruiting purposes, Lotame does not interact directly with individuals like you.

This Notice does not cover any [Personal Data](#) we collect or process through our corporate website or as part of our human resources functions, which is covered by our [Corporate Privacy Policy](#).

In the sections below we describe:

1. [Our Services](#) – the services we offer and to whom we provide those services.
2. [Our Collection of Personal Data](#) – the types of [Personal Data](#) that we collect, the types of sources we collect it from, and how we collect [Personal Data](#).
3. [Our Sale, Sharing, and Disclosure of Personal Data](#) – the types of recipients to whom we disclose, share, or sell [Personal Data](#).
4. [Our Purposes for Collecting, Selling, Sharing, and Disclosure of Personal Data](#) – our business purposes for collecting and sharing [Personal Data](#).
5. [Retention Periods for Personal Data](#) – for what periods of time we retain personal information.
6. [Your Privacy Rights and Choices](#) – what rights you have under Data Protection and Privacy Laws, for instance, to request that we not sell or share your [Personal Data](#), and how to exercise your right to opt out of sale or sharing, right to request access or correction, and right to request deletion.
7. [Specific Country or U.S. State Privacy Notice Supplements](#) –
8. [Contact Us](#) – how you may contact us.

1. Our Services

Lotame operates an audience management and identity platform for the digital advertising industry (“**Spherical Platform**”). Our Spherical Platform provides the technology, services, and tools to provide audience management services, identity services, and data monetization services (our “**Services**”) to our [Business Customers](#) (and their customers) and [Data Partners](#).

- Our Audience Management Services facilitate the delivery of personalized marketing, advertisements, and content to you by [Publishers](#) and [Advertisers](#).

[Publishers](#) and other operators of [Digital Properties](#) that have space to show an ad want those ads to be relevant to their readers, which helps them to offer content to you for no cost or lower cost. [Advertisers](#), advertising agencies, and others that want to show an advertisement want to use their advertising dollars efficiently by reaching the right individuals, and by measuring the effectiveness of their ad campaigns. To accomplish those goals, our [Business Customers](#) use our Services to efficiently and effectively recognize and organize their customers or visitors to their [Digital Properties](#), and to help them personalize advertisements and content to you, such as through website and email personalization or dynamic marketing and advertising optimization.

Our Services are also used for the analytics and measurement of performance of our [Business Customers](#)' advertising campaigns. For example, our Services can help analyze how many ads were viewed and clicked, and if the consumer purchased any of the advertiser's products.

- Our Panorama Identity Services enables our [Business Customers](#) to connect your preferences across the various browsers and Devices you use. If you use multiple Devices (such as your desktop, your smartphone, and your tablet) to visit or use [Digital Properties](#), our Panorama Graph and Panorama ID allows our [Business Customers](#) to display advertisements and other content of interest to you no matter what Device you use.
- Our Data Monetization Services enables our [Business Customers](#) and [Data Partners](#) to extract value from the [Personal Data](#) they collect about you.

The Lotame Data Exchange is one of the world's largest marketplaces for third-party data and the standard for premium quality data at flexible and fair pricing, and scale that is unmatched in the industry. This data is cultivated from industry leading branded and unbranded [Data Partners](#) giving our [Business Customers](#) access to over a billion profiles across 30,000 Behavior categories that can be leveraged for Tailored Advertising, site optimization, custom segmentation and more to deliver the most relevant experiences to individuals at every touch point.

The Lotame Private Data Exchange (PDX) is a service that allows our [Business Customers](#) to sell or share their First Party Data with other [Business Customers](#) within the Spherical Platform or to sell or share their Audiences creating using their First Party Data on other Third Party Platforms.

Some of Lotame's Services are also hosted on Third Party Platforms that offer online marketplaces for on-demand web applications that run on or are offered through that platform (for example, Adobe Connections Manager). In cases where our Services are provided through those Third Party Platforms, this Notice applies; however, those Third Party Platforms may also collect Personal Data from you, in which case the privacy policy, notice, or statement of the Third Party Platform will apply.

2. Our Collection of Personal Data

The table below lists the categories of [Personal Data](#) that Lotame collects in the course of operating the Spherical Platform and providing our Services and the sources from which we obtain that [Personal Data](#). Please refer to [Section 4](#) for details about the purposes for which we collect [Personal Data](#).

Lotame Personal Data Categories	Sources
Pseudonymous IDs	<ul style="list-style-type: none"> • Business Customers • Data Partners • Graphing Partners
Declared IDs	<ul style="list-style-type: none"> • Business Customers • Data Partners • Graphing Partners
Behaviors	<ul style="list-style-type: none"> • Business Customers • Data Partners
Internet Log Data	<ul style="list-style-type: none"> • Business Customers • Data Partners
Event Data	<ul style="list-style-type: none"> • Business Customers • Data Partners

Non-Precise Geolocation Data	<ul style="list-style-type: none"> • Business Customers • Data Partners
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How We Collect Personal Data

We collect [Personal Data](#) for or from our [Business Customers](#) and [Data Partners](#) via the following methods:

- [Tags and Pixels](#)
- [SDK](#)
- [Server-Side Data Transfer](#)
- Application Programming Interface

For web-based [Digital Properties](#), we use [Cookies](#) in conjunction with [Tags and Pixels](#) to store certain information necessary to provide our Services. These [Cookies](#) contain our [Cookie ID](#) and other information that does not identify you or allow you to be identified without additional information. Our use of [Cookies](#) on [Digital Properties](#) is governed by the cookie or privacy policy, notice, or statement of our [Business Customers](#) and [Data Partners](#).

Our [Privacy Manager](#) includes information on how you can remove [Cookies](#) and stop further collection of your [Personal Data](#) using [Cookies](#).

Collection of Sensitive Personal Data

Lotame does not knowingly collect or process [Sensitive Personal Data](#) and contractually prohibits its [Business Customers](#) and [Data Partners](#) from providing Lotame with any [Sensitive Personal Data](#).

Collection of Personal Data of Minors

We do not knowingly collect [Personal Data](#) of minors under 16 years of age. Lotame contractually prohibits its [Business Customers](#) and [Data Partners](#) from providing Lotame with any [Personal Data](#) of minors under 16 years of age.

3. Our Sale, Sharing, or Disclosure of Personal Data

We sell or disclose [Personal Data](#) to or share [Personal Data](#) with the following categories of third parties. Please refer to [Section 4](#) for details about the purposes for which we sell, disclose, or share [Personal Data](#) with third parties.

Lotame Personal Data Categories	Third Parties
Pseudonymous IDs	<ul style="list-style-type: none"> • Advertising Platforms • Business Customers • Data Partners • Graphing Partners • Service Providers[†]
Declared IDs	<ul style="list-style-type: none"> • Advertising Platforms • Business Customers • Data Partners • Service Providers[†]

Behaviors	<ul style="list-style-type: none"> • Business Customers • Service Providers[†]
Internet Log Data	<ul style="list-style-type: none"> • Service Providers[†]
Event Data	<ul style="list-style-type: none"> • Business Customers • Graphing Partners • Service Providers[†]
Non-Precise Geolocation Data	<ul style="list-style-type: none"> • Business Customers • Data Partners • Service Providers[†]

[†] Lotame uses Amazon Web Services (AWS) for its production infrastructure; however, AWS is unable to access or view your Personal Data.

4. Our Purposes for Collecting, Selling, Sharing, and Disclosure of Personal Data

In general, we collect, sell, share, and disclose your [Personal Data](#) to deliver our Services. The purposes for which we collect, use, sell, or share [Personal Data](#) depends on, among other things, our relationship or interaction with our [Business Customers](#) and [Data Partners](#) or third party to which we sell or share [Personal Data](#). The table below lists and describes the purposes for which we collect, use, sell, or share [Personal Data](#).

Purpose	Explanation
Audience Analytics	Discovery, segmentation, and optimization of First Party Data to understand and develop insights about customers and visitors to/users of Digital Properties to increase reach for Tailored Advertising and improve Content Personalization .
Audience Creation	Creation of Audiences using First Party Data and Third Party Data , including Modeled Audiences .
Campaign Analytics	Measuring and reporting on how advertisements and content was delivered and interacted with by individuals to understand the individual's path to conversion and facilitate smarter marketing spend decisions.
Content Personalization	Tailoring and delivery of content based on an individual's profile or preferences.
Cross-ID/Device Linking	Determining probabilistically, and in certain cases, deterministically that two or more Pseudonymous IDs , Declared IDs, or Devices belong to the same individual or household.
Profile Creation	The creation or editing of a personalized advertising and content profile by combining it with Behaviors previously collected, including from across unaffiliated Digital Properties and Devices , for use by third parties (such as our Business Customers) in Tailored Advertising and Content Personalization .
Tailored Advertising	See Tailored Advertising on our Privacy Definition page for further information about Lotame's role in Tailored Advertising . Lotame itself does not engage in Tailored Advertising or Content Personalization .

We also may share any of the [Personal Data](#) we collect as follows:

Sharing With Service Providers: We share [Personal Data](#) with our Service Providers who process it on our behalf and in accordance with our instructions. Service Providers are contractually prohibited from using the [Personal Data](#) we provide to them for purposes outside of our instruction or contract. Our Service Providers may include, for instance, providers involved in tech or customer support, operations, web or data hosting, billing, accounting, security, marketing, data management, validation, or otherwise assisting us to provide, develop, maintain and improve our Services.

Sharing for Legal Purposes: We may share [Personal Data](#) with third parties in order to: (a) comply with legal processes or a regulatory investigation (e.g. a subpoena or court order); (b) enforce our agreements; and (c) respond to claims that any content violates the rights of third parties.

Sharing In Event of a Corporate Transaction: We may also share [Personal Data](#) in the event of a corporate transaction, for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets, or for purposes of due diligence connected with any such transaction.

5. Retention Periods for Personal Data

The retention periods for your [Personal Data](#) that we process varies based on the type of [Personal Data](#) and who provided your [Personal Data](#) to us. As such, we are unable to list a precise retention period in this Notice; however, in general, the retention periods for your [Personal Data](#) are specified in the table below.

Lotame Personal Data Type	
Pseudonymous IDs	90 days after the Pseudonymous ID is no longer associated with any Behaviors or Event Data.
Declared IDs	13 months measured from the time the Declared ID was last received.
Behaviors Campaign Data Non-Precise Geolocation Data	When provided by Business Customers , configurable by Business Customer: default is 9 months, maximum can be set to 13 months. When provided by Data Partners : 9 months. Retention period is measured from the time the Behavior/Non-Precise Geolocation was last received.
Event Data	No longer than 40 weeks. Retention period is measured from the time the Event Data was received.
Internet Log Data	No longer than 2 weeks.

6. Your Privacy Rights and Choices

You may have the right to obtain access, rectification, erasure, restriction of [Personal Data](#), portability of [Personal Data](#) and to object to the processing of [Personal Data](#) (“**Privacy Rights**”) under [Data Protection and Privacy Laws](#) in various countries and jurisdictions. 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.

If you are not a resident of a country or local jurisdiction that currently has an effective [Data Protection and Privacy Law](#) that offers you Privacy Rights, you may submit a request and we may process it as described in our [Privacy Manager](#), even though no [Data Protection and Privacy Law](#) requires us to do so. However, we reserve the right to change or stop the practice of accepting requests from individuals who are not resident of a country or local jurisdiction that does not have a [Data Protection and Privacy Law](#) in effect that provides for Privacy Rights.

7. Specific Country or U.S. State Privacy Notice Supplements

Certain countries or local jurisdictions have requirements for us to provide you with information specific to that country or local jurisdiction. Additionally, your Privacy Rights may vary within these areas based on the [Data Protection and Privacy Laws](#) in effect. Where required, we maintain the following privacy notice supplements for those countries and or local jurisdictions.

Brazil Privacy Notice Supplement

GDPR Countries

The United Kingdom Privacy Notice Supplement

U.S. Privacy Notice Supplement

8. 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