

Summary of Data Processing Roles – GDPR and Key US Privacy Laws

Updated as of October 2023

Type of Relationship	Representative Processing Activities	Representative Lotame Products and Services	Privacy Framework	Lotame Role(s)	Customer Role(s)
Processing of Customer's First Party Data by Lotame	<ul style="list-style-type: none"> Collection of Customer's First Party Data Onboarding Customer's First Party Data from an offline source to an online format (via a contractor) Selling Customer's First Party Data to third party buyers using Lotame's services Syncing Customer's First Party IDs with Lotame IDs 	<ul style="list-style-type: none"> Spherical Audience Management Platform Lightning Tag.js 	GDPR Countries	Processor Data Importer	Controller Data Exporter
			US - California	Third Party	Business
			US - Colorado and Virginia	Third Party	Controller
Processing of Lotame Data and IDs by Customer	<ul style="list-style-type: none"> Licensing data from our Lotame Data Exchange (e.g., for extension and enrichment of your First Party Customer audiences) Using Lotame's Panorama ID Using Third Party IDs provided by Lotame (e.g., for activation on third party platforms) 	<ul style="list-style-type: none"> Lotame Data Exchange Lotame Audience Optimizer Lotame Data Marketplace Buyer 	GDPR Countries	Controller Data Exporter	Controller Data Importer
			US - California	Business	Third Party
			US - Colorado and Virginia	Controller	Third Party
Processing of Sightings Data	<ul style="list-style-type: none"> Receiving identity-resolution services from Lotame 	<ul style="list-style-type: none"> Spherical Audience Management Platform 	GDPR Countries	Controller Data Importer	Controller Data Exporter
			US - California	Third Party	Business
			US - Colorado and Virginia	Third Party	Controller