

## PRIVACY POLICY

Last updated: November 13th, 2023

### 1. Who we are

1.1. Adprofex Limited company incorporated under the law of the Republic of Cyprus, with registered number 435565, registered office located at Vasilis Michailidis 24, 3026, Limassol, Cyprus ("Adprofex").

1.2. This privacy policy:

provides an overview of how Adprofex Ltd collects and processes your personal data, and informs you about your rights under the EU General Data Protection Regulation ("GDPR") and any national law supplementing or implementing the GDPR.

Contains important information about, among others, the collection and use of personal data; the legal grounds for the processing of that data; disclosures of that personal data to third parties and the use of cookies on the Website.

1.3. The Adprofex website (or Service) is owned and operated by Adprofex (referred to in this Policy as "Adprofex", "we", "our", or "us").

1.4. By using the Adprofex Service, you agree to observe and be bound by this Privacy Policy and you consent to the processing, collection, use, and disclosure of your information and data in accordance with the terms of this Privacy Policy. Please do not use the Adprofex website if you do not agree to this Privacy Policy.

1.5. The use we make of the Information, including Personal Information, collected through the website and Services may vary depending on whether you are (i) a customer ("Customer"), i.e., a advertiser, partner, with whom we have a contractual relationship; (ii) a visitor of our Customers' websites who interacts with our Services ("User"); or (iii) or a visitor of our own website ("Site Visitor"), which may include Customers as well as prospective customers.

This Privacy Policy should be read alongside, accessible online at [https://adprofex-ltd.com/doc/privacy\\_policy.pdf](https://adprofex-ltd.com/doc/privacy_policy.pdf).

1.6. For the purposes of this privacy policy:

1.6.1 when we refer to "personal data" we mean data which identifies or may identify you and which may include, for example, your name, address, identification number, telephone number, date of birth, occupation and family status;

1.6.2. when we refer to "processing" we mean the handling of your personal data by us, including collecting, protecting and storing your personal data;

1.6.3. when we refer to our “Website” or our “Service” we mean <https://adprofex-ltd.com/>

## **2. Our Data Protection Principles:**

2.2.1. We adhere to the principles relating to processing of personal data set out in the GDPR which require personal data to be:

2.2.2. Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency).

2.2.3. Collected only for specified, explicit and legitimate purposes (Purpose Limitation).

2.2.4. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation).

2.2.5. Accurate and where necessary kept up to date (Accuracy).

2.2.6. Not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation).

2.2.7. Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).

2.2.8. Not transferred to another country without appropriate safeguards being in place (Transfer Limitation).

2.2.9. Made available to data subjects and data subjects allowed to exercise certain rights in relation to their Personal Data (Data Subject's Rights and Requests).

2.2.10. We are responsible for and must be able to demonstrate compliance with the data protection principles listed above (Accountability).

3.2.1 We obtain your personal data mainly through any information you provide directly to us or through information provided by third parties. Below is a list of ways in which we collect your personal data.

Personal data collected directly from you, including:

- when you complete our Partner or Advertiser registration forms, which are available on our Website,
- when you enter and use our Website, and/or performing contractual obligations, and
- when you contact us for any enquiries, complaints or for any other reason.

## **3. Cookie Policy**

3.1. We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this website. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

3.2. You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this website. Therefore it is recommended that you do not disable cookies.

### 3.3. The Cookies we set

- Login related cookies  
We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.
- Orders processing related cookies  
This site offers e-commerce or payment facilities and some cookies are essential to ensure that your order is remembered between pages so that we can process it properly.

### 3.4. Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

- Third party analytics are used to track and measure usage of this site so that we can continue to produce engaging content. These cookies may track things such as how long you spend on the site or pages you visit which helps us to understand how we can improve the site for you.

## 4. Information we collect about you

4.1. We set out in more detail the information we collect when you use our Services, why we collect and process it and the legal bases below.

About Customers	Purpose	Legal Basis
Additional data received when you access the Services, including information regarding technical devices, technical interaction with the Service such as your IP-address, time of registration in the Service, device ids, country and language settings, device model and operating system used, type of browser and your browsing behavior	We use your data for internal review in order to constantly improve the content of our Services and web pages, optimizing your user experience, to understand any errors you may encounter when using the Services, to notify you of changes to the Services and to personalise the use of our Services.	Legitimate Interests

Information that is automatically received at the time of access to the Services with the use of cookies.	Please refer to paragraph 3 which sets out the types of cookies we use and what we use these cookies for.	Consent
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Email address and contents of a message that you may submit through our website.	We use this information to communicate with Customers, including via email, about the Customer's account; to respond to Customer inquiries or complaints; to provide Customers with news, best practices or other information we think may interest them; to provide Customers with newsletters, special offers, and promotions, including via email; to contact Customers about products or services we think may interest them; and for other marketing, advertising, and promotional purposes.	Legitimate interests  Performance of our contract with you
Information that is created by you while placing requests to our Service support	We use this information in order to verify your identity and to fulfil your support request.  We may also use this data in order to investigate any complaints on your behalf and to provide you with a more efficient service	Legitimate interests  Performance of our contract with you
Information that is received as the result of your using payment functionality on the Site (e.g. first and last four digits of your card number that are needed for the option of matching these details with user's id number).	We use this information in order to manage and administer the Site including providing our Site Services to you.  We may also use this data in order to investigate any complaints on your behalf and to provide you with a more efficient service.	Legitimate interests  Performance of our contract with you

About Users	Purpose	Legal Basis
Information automatically collected through User's interaction with our Services through cookies and other. This Information may include, without limitation, information about a User's operating system, IP address, the webpages accessed by Users within our Customers' websites, the link that led a User to a Customers' website, the dates and times a User accesses a Customers' website and general location information (e.g., country, city).	<p>We use this information to provide our Services to Users and our Customers.</p> <p>We also use this information to tailor the content and information that we may send or display to Users; to retarget content to Users through our Services and elsewhere; and to otherwise personalize your experiences while using our Services.</p>	Legitimate interests
Information that is automatically received at the time of access the Services with the use of cookies	Please refer to paragraph 3 which sets out the types of cookies we use and what we use these cookies for	Consent

About Site Visitors	Purpose	Legal Basis
Information collected directly from you, when you send us an email asking a question, or submit a form on our website. We will also collect any other Information that you choose to provide to us, such as the contents of a message that you submit through our website.	<p>We use this information to provide and manage our website and Services.</p> <p>We also use this information to communicate with you, including via email, about our Services; to respond to your inquiries or complaints; to provide you with news, best practices or other information we think may interest you; to provide you with newsletters, special offers, and promotions, including via email; to contact you about products or services we think may interest you; and for other marketing, advertising, and promotional purposes.</p>	Legitimate interests

4.2. Our legitimate interests include (1) maintaining and administrating the Services; (2) providing the Services to you; (3) improving the content of the Services; (4) processing of the information that you choose to provide to us via email or submitting on our website or Service; (5) ensuring your account is adequately protected; and (6) compliance with any contractual, legal or regulatory obligations under any applicable law.

4.3. As part of maintaining and administrating the Services we may use the information to analyze user activity and ensure that rules for the Services are not violate.

#### **4.4. Information We May Provide to Third Parties:**

4.4.1. We may disclose your personal data to the third parties listed below. When we do so, we require those third parties to have appropriate technical and organisational measures in place to protect your personal data. We will not share any of your personal data for any purpose other than the purposes described in this privacy policy, nor will we sell your personal data to anyone.

4.4.2. To our insurers and/or professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4.4.3. Payment services providers we have chosen to support us with financial transactions relating to our Service. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

4.4.4. Governmental and regulatory bodies, including law enforcement authorities, in connection with enquiries, proceedings or investigations by such parties or in order to enable Propeller to comply with its legal and regulatory requirements.

4.4.5. Partners, contractors and/or vendors in order to perform contract we have with you.

#### **4.5. Your data protection rights:**

4.5.1. You have the following rights in terms of the personal data we hold about you:

<b>The right to be informed</b>	Adprofex Ltd is publishing this privacy policy to keep you informed as to what we do with your personal data. You can ask us for information regarding any data of yours that we keep at any time. This information concerns, among other things, the data categories we process, for what purposes we process them, the origin of the data if we did not acquire them directly from you and, if applicable, the recipients to whom we have sent your data.
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<b>The right to correction (rectification)</b>	You can request that we correct your data. We will initiate appropriate measures to keep the data of yours that we continuously process correct, complete, and up to date, based the latest information available to us.
<b>The right to erasure</b>	You can request that we delete your data provided the legal requirements have been met. In accordance with Article 17 the GDPR, this can be the case if:
<b>The right to erasure (The right to be forgotten)</b>	<p>You can request that we delete your data provided the legal requirements have been met. In accordance with Article 17 the GDPR, this can be the case if:</p> <ul style="list-style-type: none"> <li>• the data are no longer required for the purposes they were acquired or otherwise processed;</li> <li>• you revoke your consent, which is the basis of the data processing, and there is no other legal basis for the processing;</li> <li>• you object to the processing of your data and there are no legitimate reasons for the processing or you object to data processing for the purposes of direct advertising;</li> <li>• the data have been processed illegally.</li> </ul> <p>Where the processing is not necessary:</p> <ul style="list-style-type: none"> <li>• To ensure adherence to a legal obligation that requires us to process your data</li> <li>• In particular with regard to legal retention periods</li> <li>• To assert, exercise or defend against legal claims</li> </ul>
<b>The right to object</b>	You can object to the processing of your data at any time for reasons that arise from your special situation provided the data processing is based on your consent or our legitimate interest or that of a third party. In this case, we will no longer process your data. The latter does not apply if we are able to prove there are compelling, defensible reasons for the processing that outweigh your interests or we require your data to assert, exercise or defend against legal claims.

<b>The right to complain</b>	Adprofex Ltd takes your rights very seriously. However, if you are of the opinion that we have not dealt with your complaints adequately, you have the right to submit a complaint to the data privacy protection authorities responsible.

## **5. International Transfers of Your Personal Data**

5.1. We don't envisage that any of your personal data will be transferred to countries outside the European Economic Area (EEA) as our office, facilities, subcontractors and other third parties with which we work are all located within the EEA.

5.2. In the event that this changes in the future and one or more recipients of your personal data are located outside the EEA, where data protection laws may be of a lower standard than in the EEA, we will impose the same data protection safeguards that we deploy inside the EEA to ensure that your personal data are always protected.

## **6. Retaining and Deleting Personal Data**

6.1. We will keep your personal data for as long as is necessary for the purpose for which we initially collected them. Once such period has ended, we will keep your personal data for the longest of the following periods: a) any retention period set out in our retention policy which is in line with regulatory requirements relating to retention; or (b) the end of the period in which legal action or investigations might arise in respect of the services provided.

6.2. Once the retention period of your personal data lapses, we will ensure that your personal data are either irreversibly anonymised or securely destroyed.

## **7. Collection and Processing of End Users Data**

7.1. We obtain your personal data through your browsing information archive files, as informed via the cookies policies of the websites of each of our Publishers (websites which show our advertising banners or other ad formats). We obtain data as such: URL of the website displaying our ads, referral URL, IP, country, geographical area, browser and operating system, etc.



7.2. We may collect and process your data depending on the service we provide to each partner. We may use your personal data to show ads relevant to you in the context of the partner's website you are visiting at any time and with the legitimate interest to identify any possible fraud of our clients.

7.3. We will only process your personal data when the law allows us to and when expressly authorized through an agreement with our partners, who have informed you of our collection of your personal data, with the aim of showing ads relevant to you.

## **8. Confidentiality and Security**

8.1 We deploy various security measures such as encryption and authentication tools in line with the current state of the art to protect and maintain the security, integrity and availability of your personal data.

8.2 100% protection against unauthorised access in the case of data transfers across the internet or a website cannot be guaranteed, but we and our service providers and business partners do our utmost to protect your personal data in line with the prevailing data protection legislation by means of physical and electronic physical precautions. Among other things, we use the following measures:

- Strict criteria for authorisation to access your personal data on a “need-to-know” basis only and exclusively for the specified purpose;
- Transfer of acquired data in secured form;
- Storage of confidential data in our secure servers;
- Firewall safeguarding of IT systems to provide protection against unauthorised access, and
- Continuous monitoring of access to IT systems to detect and prevent the misuse of personal data.

## **9. Changes to this Policy**

9.1. We may update this privacy policy from time to time by publishing a new version on our Website.

9.2. We will notify you appropriately when we make changes to the privacy policy and we will amend its revision date so that you know when we last amended it. We do however encourage you to review this statement periodically so as to always be informed about how we are processing and protecting your personal information.

## **10. Contact Us**

10.1. If you have any questions, please send your inquiries to us, in writing to Vasilis Michailidis 24, 3026, Limassol, Cyprus or to [lawyer@adprofex-ltd.com](mailto:lawyer@adprofex-ltd.com). So we can deal with your enquiry effectively, please quote this Privacy Policy. We will aim to respond to you within 30 days from receipt of request.

10.2. All correspondence received by us from you (written or electronic inquiries) is classified as restricted-access information and may not be disclosed without your written consent. The personal data and other information about you may not be used without your consent for any purpose other than for response to the inquiry, except as expressly provided by law.

10.3. The e-mail address of our DPO is [lawyer@adprofex-ltd.com](mailto:lawyer@adprofex-ltd.com).