# INTRODUCTION

The following describes the overall company privacy policy (the "Privacy Policy") of AdStart Media (hereinafter referred to as the "Company", "Affiliate Network", "we") in relation to use and disclosure of information you share via this Website (hereinafter referred to as "website").

Our privacy statement explains what personal data we collect from you, through our interactions with you and through our services, and how we use that data. The data will be well secured, and we will not share your personal data with third parties, unless we are legally obliged to do so.

Being transparent and providing accessible information to our users about how we use your personal data is a key element of the Data Protection Act 1998 (DPA) and the EU General Data Protection Regulation (GDPR).

## **GROUNDS FOR DATA COLLECTION**

The Company does not seek any personal information (meaning, any information which may potentially allow your identification with reasonable means; hereinafter "**Personal Information**") by illegal means. We collect only necessary information from you and other individuals who use the website by means of online or offline surveys, order forms, registration pages, telephone or cell phone communication, and other similar means.

Processing of your personal information is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests and for compliance with legal and financial regulatory obligations to which we are subject.

When you use our services, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Privacy Policy.

## WHEN DO WE COLLECT PERSONAL DATA?

We may collect personal data about you in the following cases:

- When you use our website, as well as our services.
- When you interact with us in person, through correspondence, live chat, by phone, on social media, or through our website and online platforms.

 We may also collect certain personal data if we consider that this is in our legitimate interest or that of a third party, but only if your interests or fundamental rights and freedoms do not override this legitimate interest. Before any data is collected we conduct an assessment to ensure this balance is appropriate.

# WHAT KIND OF DATA ARE WE COLLECTING?

- To create an account, you need to provide data including your name, e-mail address, birthdate, a password or other details to help you with your experience. If you choose not to provide information mentioned hereinabove, we will not be able to provide you products or services.
- We may ask for your contact information, including items such as name, birthdate, company name, address, email address, payment credentials, Company Name or other details to help you with your experience.
- If you contact us directly, we may receive additional information about you such as your name, email address, phone number, the contents of the message and/or attachments you may send us, and any other information you may choose to provide. We may also receive a confirmation when you open an email from us.

# THE PURPOSE OF COLLECTING DATA

- To carry out our obligations arising from any contracts entered into between us;
- To operate and maintain the Services, for example, to authenticate you when you log in, and to process your transactions;
- To communicate with you, directly or through one of our partners, including for customer support, to respond to your requests and for assistance and customer service, to provide you with updates and other information relating to the Service;
- To develop new functionality, new products, services or features;
- We analyze how you use our Services to improve and personalize our Services to ensure that content from our Website is presented in the most effective manner for you and for your computer;
- To provide you, or permit selected third parties to provide you, with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- To find and prevent fraud and anti-money laundering cases: to monitor suspicious to identify violations of Service policies;

For compliance purposes, including enforcing our Terms of Service, or other legal rights, or as
may be required by applicable laws and regulations or requested by any judicial process or
governmental agency.

## We do not:

Sell or trade personal data;

Transfer personal data to a third country or international organization;

Make decisions based solely on automated processing, including profiling.

#### **HOW LONG WILL WE STORE YOUR DATA?**

Your personal data is stored as long as your relationship with AdStart Media is ongoing and also once your relationship will have stopped, for whatever reason, unless you object to it.

Once the relationship has stopped, your data will be kept for a period of 10 years only to demonstrate compliance with the legal or contractual obligations of the Company.

## **COOKIES AND WEB BEACONS**

To enhance your experience with the Site, we use "cookies." You cannot register to the Subscription or log-in to the Affiliate Network without agreeing to accept the cookies that we use.

Cookies are small packets of data stored on your computer. Cookies are used by your computer's browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information. We use cookies to understand Site usage and to improve the content and offerings on the Site. You may set your browser to warn you that cookies are in use, or to block the use of cookies. Most browsers are set to accept cookies. If your browser is not set to accept cookies, certain uses of the Site may require you to go to your browser user preferences to enable cookies. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences. If you change computers, operating systems or browsers, or use multiple computers or browsers, you will need to repeat this process for each computer and each browser. To find out more about cookies, please visit www.cookiecentral.com

We may additionally collect information using Web beacons, which are commonly referred to in the industry as web bugs, pixel tags or Clear GIFs. Web beacons are electronic images that may be used on the Site, in your Account, or in our emails to deliver cookies, count visits and determine if an email has been opened and acted upon.

# YOUR RIGHTS (MODIFY, UNSUBSCRIBE OR TO BE FORGOTTEN)

You can see the data registered with us and request their correction, blocking or deletion at any time. To do so, please get in touch with us by using our contact details below.

If you wish to object to the seizure, the processing or total/partial use of your data by AdStart Media in accordance with this data protection policy, you may send your objection by mail, indicating your first name, last name, e-mail and address. In accordance with the regulations in force, your application must be signed and accompanied by a photocopy of an identity card bearing your signature and specify the address to which you'd like the reply to be sent. A reply will be sent to you within the following month from the reception of the request.

## **CHANGES TO OUR PRIVACY POLICY**

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

# **CONTACT US**

If you have any questions regarding this Privacy Policy, or would like more information on our privacy practices, please contact us at: operations@adstartmedia.com.

This privacy policy is subject to change without notice and was last updated in June 2021.