

Privacy Policy

Last updated 13/06/2023

1. Introduction

MADINAD (hereinafter referred to as “**MADINAD**”, “**Company**”, “**we**”, “**us**” and “**our**”) is an advertising agency offering technologies that enable advertisers (hereinafter referred to as “**Customers**”) to deliver targeted digital ads (hereinafter referred to as “**Services**”).

MADINAD is committed to protecting the End Users' (hereinafter also referred to as “**you**”, “**your**”) personal data by respecting and complying with the applicable data protection and privacy laws. In this Policy, you will find transparent information about our services and the associated processing of personal data. We encourage you to carefully read this Policy which we have written in a clear and comprehensible manner to facilitate its understanding.

2. Data controller

The Data Controller responsible for the data processing within the meaning of the General Data Protection Regulation (EU) 2016/679 (“GDPR”) is **MADINAD**, a company registered in Athens, Greece, Eleutheriou Venizelou 56, 10678.

Contact Details:

Tel: (+30) 210 38 02064

Email: info@madinad.com

3. Information relating to the processing of data

3.1 Our Services

MADINAD operates as an Ad agency between Publishers and Advertisers. We enable our Customers (Advertisers) wishing to advertise their products and services to display targeted and user-oriented advertising on websites. Our Customers determine which ads are delivered to End Users based on their preferences and interests. For this purpose, we use technologies where data processing activities are involved.

3.2 What data we collect

3.2.1 We collect the following data:

-*Internet Protocol address (IP address)* which is considered personal data, even if we cannot identify End Users on our own on the basis of this information directly. We only use your IP address to deliver ads to your device.

-*User agent* (any software that retrieves, renders and facilitates end user interaction with web content)

-*End User actions/behavior* (e.g., content viewed, clicks, etc.) in connection with our Customer's campaign content.

-User session duration.

3.2.2 Cookies

We also use Cookies. Cookies are little text files/data files which are sent to your browsers and are stored on your devices (e.g., laptop, mobile phone, tablet and other devices) when you visit a website. The term “Cookies” also refers to other similar technologies used to install and/or collect information on or from the user's terminal equipment (for instance, pixels). By using cookies, we recognize your device when you visit websites we cooperate with. We do not use third party cookies.

We use the following cookies:

Cookie	Purpose	Duration	Provider
viewed_<campaign id>	Tracking of viewed campaigns	Max 7d	Madinad

3.2.2.1 Clear All Cookies

You can clear all cookies from your browser

Important: If you delete cookies, you might get signed out of sites that remember you, and your saved preferences could be deleted. This applies any time a cookie is deleted.

On your computer, open your browser.

- At the top right, click More and then Settings.
- Click Privacy and security and then Cookies and other site data.
- Click See all site data and permissions and then Clear all data.
- To confirm, click Clear.

3.2.2.2 Clear Specific Cookies

Delete cookies from a site

On your computer, open your browser.

- At the top right, click More and then Settings.
- Click Privacy and security and then Cookies and other site data.
- Click See all site data and permissions.
- At the top right, search for the website's name.
- To the right of the site, click Remove.
- To confirm, click Clear.

3.2.2.3 Delete cookies from a period of time

On your computer, open your browser.

- At the top right, click More and then More tools and then Clear browsing data.
- At the top, next to "Time range," click the dropdown.
- Choose a time period, such as the past hour or the past day.
- Check Cookies and other site data.
- Uncheck all the other items.
- Click Clear data.

3.3 Purposes of data processing

We collect and use the above data (see section 3.2) for the following purposes:

-to identify your devices

-to display ads to you based on the content you are viewing, the website you are using, your location, your device type, etc.

-to create a profile about you and your interests to deliver personalized advertising. Profiling means assigning you to groups that allow potential conclusions about your interests and other characteristics (e.g., estimated age range, interest in sports, etc.).

-to measure the effectiveness of ad campaigns. To this end, we track whether you have seen the ad, how long it has been displayed to you, your clicks on the ad content.

-to improve our technologies and systems.

-to ensure security and prevent fraud (by distinguishing your device from other devices)

We do not store or use special categories of data, such as data concerning health, revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, or concerning a natural person's sex life or sexual orientation.

3.5 Legal basis for data processing

We only process personal data under the appropriate legal bases laid down in the GDPR. For our processing operations concerning the selection and delivery of targeting advertising to End Users as well as to the profiling procedure, the legal basis is your consent (Article 6 (1) (a) GDPR), which you provide by a clear and affirmative action after getting informed about the personal data processing through this Policy. For other processing operations (e.g., to improve our technologies and systems, to ensure security and prevent fraud), the legal basis is our legitimate interest (Article 6 (1) (f) GDPR).

4. Joint responsibility with publishers

With some of our partners (Publishers), we are joint controllers within the meaning of the GDPR (Article 26 GDPR) for some parts of the data processing circle (publishers facilitate the collection and transmission of data to us). The joint responsibility with our partners is governed by an arrangement, determining tasks, activities, and responsibilities. The essence of this arrangement is the following:

-Our partners are responsible for providing you with all relevant information regarding the data processing and obtaining informed consent by making available on their Websites (and/or on their Consent Management Platforms, if applicable) a link to this Privacy Policy.

-MADINAD is responsible for the technical implementation of the ad delivery and the subsequent processing of data.

However, you may exercise the rights regarding your personal data described below (see section 11) both towards us and towards our partners.

5. Recipients of personal data

Your data shall not be disclosed to any third party, apart from the following:

(a) *Vendors (service providers)* who may need to have access to personal data to provide their services (e.g., IT services, hosting, data storage services). All vendors are bound by non-disclosure and confidentiality agreements.

(b) *Authorized employees* who have access to personal data only when this is necessary to provide their services to the Company. All such employees are bound by non-disclosure and confidentiality agreements.

(d) *Public or independent authorities* such as Public Prosecutor's Office, Cybercrime Division, Data Protection Authority (DPA), etc. when that disclosure is necessary to comply with a law or to prevent unlawful acts against us or users of the Website.

6. Data security - International data transfers

We have adopted measures of a technical and organizational nature required to guarantee the security of your data and prevent it from being lost, processed, or accessed illegally. We regularly monitor our systems for possible vulnerabilities and attacks and review all processing practices to update security measures.

Company's servers are located within the European Economic Area (EEA). For service efficiency purposes, some of our partners are located outside the EEA. With these Partners, we either have signed Data Processing Agreements incorporating the Standard Contractual Clauses (Article 46 (2) (c) GDPR) issued by the European Commission (Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to GDPR) or make use of the adequacy decision by the European Commission (Article 46 (1) GDPR). We inform you that this data is transferred with adequate safeguards and processed with an appropriate level of protection.

7. IAB Transparency and consent Framework (IAB TFC)

MADINAD is also registered as a vendor under the IAB Transparency and consent Framework (IAB TCF), which is a common standard for dealing with transparency obligations and obtaining consent in connection with online advertising. For more information about the IAB TFC, please visit the following link <https://iabeurope.eu/tcf-2-0/>.

8. Consent Management Platform (CMP)

It is of utmost importance to us to enable you to decide freely whether you allow us to use your data. For this reason, the websites we cooperate with and participate in the IAB TCF use a Consent Management Platform (CMP), which clearly shows you your options regarding your privacy, allowing you to agree to or reject data processing. In this CMP you will find this Privacy Policy, which we encourage you to carefully read before you provide your consent.

9. How long we retain your data

We will retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless: a) a longer retention period is required or permitted by law; b) we must keep it to keep evidence for our compliance with applicable laws; (c) there is a dispute or claim and we need to retain all relevant information until it is resolved; or (d) we must keep the information for our legitimate business interests, such as fraud prevention.

The information associated with your Cookie ID can be stored for up to 12 months in agreement with our Customers. Third Party Cookies are generally valid for up to 7 days.

10. What this Policy does not cover

This Privacy Policy only applies to the processing carried out by MADINAD and does not cover any other processing activities carried out by website operators (Publishers). We kindly recommend that you review the privacy policy of each website you visit and get informed about how they use your personal data. Company shall not be held responsible for processing activities carried out by Publishers.

11. Rights of data subjects

We want to ensure that you can exercise your rights enshrined under the applicable laws. To this end, for as long as we retain your data you may exercise your rights free of charge. However, we may charge a reasonable fee in case of manifestly unfounded, disproportionate or repeated requests. In particular, you have the following rights:

- to request access to the personal data that we hold;
- to request rectification of inaccurate or incomplete data;
- to request erasure of your personal data to the extent that they are no longer necessary for the purpose for which we need to keep processing them, as we have explained above, or when we are no longer legally permitted to process them;
- to request that we limit the processing of your personal data;
- if you have given us your consent to process your data, you also have the right to withdraw such consent at any time. In the event that you withdraw your consent, this will not affect the legality of the processing carried out previously.
- When we process your data based on your consent for the purposes of a contract, you can also request portability of your personal data.
- When the processing of your data is based on our legitimate interest, you are entitled to object to the processing.

Please note that we may ask for additional information to identify you and respond to your requests since all information we hold is not related to a name or other data allowing us to identify you directly.

You may exercise the above-mentioned rights by sending us an email message at info@madinad.com

Finally, we inform you that you have the right to lodge a complaint with the competent Data Protection Authority if you have concerns that we have violated your rights.

12. Changes to the Privacy Policy

We may amend the information contained in this Privacy Policy when we consider this appropriate having regard to the applicable laws. In case of an amendment, we will change the “*Last Updated*” date at the beginning of this Privacy Policy.

13. Contact us

In case you need any clarification about the processing of personal data, please do not hesitate to contact us via email at info@madinad.com