

Technology Privacy Notice

This Technology Privacy Notice (“Technology Privacy Notice”) forms the applicable product data protection guideline for Dlulisa Holding BV, Herengracht 449A, 1017 BR Amsterdam, The Netherlands, Chamber of commerce registration number 69548374 (“Company”, “We”) and is to inform you about the functioning and processing of personal data when using our online advertising technology.

We ensure a targeted deployment of advertising in apps to draw users’ attention to other new apps. To this end, We use platforms to bring together providers of apps which have ad space and advertisers who wish to advertise their own apps. On the basis of pseudonymous data, We use technologies that are integrated into the apps to allow it to deploy advertising in a more targeted manner to those users who may be interested in the apps advertised and who fit the target groups of the respective advertising campaigns. The technologies that are integrated into the apps for this purpose and the associated data processing are monitored by the providers of the apps and they are responsible for this. Please therefore also note their individual privacy policies.

This Technology Privacy Notice can be accessed here as a PDF document.

1. Provider of the services

The services are provided by the Company with which you conclude an Insertion Order (“IO”).

2. Data processing in connection with Our services

We only use pseudonyms. Personal data means any information that can be attributed to a person, such as name, age, email address, telephone number or information about app use and interactions with advertising. In principle, Our services do not involve the recording of any information about users in clear text. We do not know the name, address or email address of the users of the apps in which advertising is displayed. All information processed by Us is recorded, stored and evaluated using temporary identifiers (pseudonyms) that We cannot decipher or re-identify. In particular, unique device identifiers and IDs (e.g. advertising IDs) may be used as identifiers.

3. Purposes of data processing at our Companies

In principle, the app providers who work with us to deploy advertising to the users of their apps by means of Our services are responsible for the associated data processing. We only process data on behalf of the app providers so that the latter can market ad space for targeted in-app advertising and targeting campaigns. In the case of app providers who display advertising to fund their work on those apps and the operation of the respective platforms, targeted advertising helps the app providers to achieve higher prices for ad space. In the best case, this also causes the use of advertising to become less extensive, less bothersome and more relevant for users. For Our customers, a targeted use of advertising as part of their campaigns leads to lower costs and they reach users who are actually interested in the new apps advertised.

Categories of data processed in connection with Our services:

In-app advertising is implemented using device identifiers and IDs or cookies and comparable technologies (hereinafter also referred to as “identifiers”). Displaying appropriate ads that are as interest-based as possible (e.g. banners, videos or interactive elements) is made possible by the app provider using its own technologies to record and, if necessary, evaluate the use of its app. The following usage data are collected and made available to Us:

- current IP address of the device
- date and time when the app was accessed
- information about the region or location where the app is currently being used
- unique device identifiers and IDs (e.g. advertising ID such as IDFA on iOS or the Google advertising ID on Android)
- technical data about the device and operating system used
- where appropriate, general information on their user groups (such as age, gender and interests)
- installed apps, if applicable
- other identifiers in encrypted form, if applicable
- This information is stored by each Company exclusively using identifiers which are unable to decode (pseudonyms).

Our customers then decide in advertising campaigns which ads (e.g. banners, videos or interactive elements) should be deployed to app users – users who should, ideally, correspond to certain criteria and target groups. If a user who corresponds to these target groups subsequently uses the app of an app provider in which free ad space is available, the usage data provided to Us facilitate the targeted deployment of an advertising message to that user. Technically, when the app is accessed, the app provider makes a request on a specially created platform, via which ad space is auctioned. If available ad space and the app in which it is located match an advertising campaign of a customer of a Company, and if the user matches the corresponding target group of that campaign, the ad space is acquired within a fraction of a second and the ad previously specified by Company's customer is shown to the user. For this purpose, the IP address of the user and the unique device identifiers and IDs are used so as to be able to display the ad in the app.

If the user clicks on the deployed advertising, for example to reach the advertised app in the respective app store, this is recorded by the Company. If the app is downloaded and installed or then opened, this is recorded by the respective app provider and Company is notified. Here Company does not know the identity of users, but by means of the identifiers can only recognize those users who have previously received one of the deployed ads. Company receives this data about interactions with ads and installations of the new apps and the IP addresses, so that it can use this data to bill for its own services with customers (e.g. campaign costs), to enable billing verification, to create statistical overviews for customers and to measure the reach and efficiency of ads for Company's customers.

The IP addresses are used to roughly determine the region or approximate location of the user or device on which the app is currently being used. In particular, this location determination is intended to ensure that advertising is only deployed for apps that are also available at the user's respective location, in their app store and in the national language. In their campaigns, customers of Company specify in which regions the respective ad should be deployed.

We also use the usage data and data about interactions with ads and installations of the new apps to troubleshoot and to improve its own services, e.g. in the context of anonymous evaluations.

4. Data recipients

We only disclose data to third parties if this is necessary for the deployment of ads and the implementation of campaigns or other purposes listed in this Technology Privacy Notice or if another legal basis for the disclosure of the data exists. The collection, storage and disclosure of usage data by the providers of apps in which the ad space is deployed, as well as the collection, storage and disclosure of data on interactions with ads and installations of the new apps, are controlled by and the exclusive responsibility of the respective providers of those apps. We process these data for and on behalf of the customers.

In the context of the deployment of advertising, data are exchanged between Us and the platforms via which ad space is auctioned. If We purchase available ad space for a customer by auction, We transmit the ad to the platform and indicates which users should be shown that ad. This involves using the unique device identifiers and IDs and, if necessary, matching IP addresses.

If We use external service providers and discloses data to them, they may only use the data to fulfil their task and in connection with specific instructions. The service providers are contractually bound to the data protection requirements. In cases where data are processed in countries outside the European Union, appropriate safeguards are in place to protect data subjects (e.g. EU Standard Contractual Clauses/SCC or We use a derogation under Art. 49 GDPR such as your explicit consent)

In principle, We only pass on pseudonymous data to third parties, and never names, email addresses or other contact data. We also use the encryption of communication across certain data centers.

5. Retention period

If an ad has been deployed or if an interaction with ads or an installation or interaction with a new app has occurred, We store information on the successful deployment, interaction or installation. This is used to monitor the type and number of deployments in order to process and check the billing of campaigns to Our customers, to detect and correct technical and other errors and conspicuous constellations in the context of the deployment of ads or the installation of and interaction with apps. The data are stored for as long as the usage data and data about interactions with ads and installations of the new apps are required for these purposes. After that the data are erased or completely anonymised.

6. Legal bases

The data processing described in this Technology Privacy Notice serves to implement and measure targeted in-app advertising campaigns for Our customers. As such, data are only processed as part of customer orders. Insofar as data from Us are processed for purposes of billing, abuse monitoring or fraud prevention, error correction and for optimising Company's services, this is done on the basis of Our legitimate interests. The legal basis in this respect is Art. 6 Para. 1 (f) GDPR. The interests of users are protected by the exclusively pseudonymous processing and the opt-out option described below.

7. Your rights

Users have the right to information about the processing of their personal data by Us at any time. In this regard, We will explain the data processing to you and provide you with an overview of the data stored about you. However, since We process data on behalf of customers, users should always contact the providers of the respective apps, who process their data in accordance with their own privacy policies. If data stored by Us are incorrect or no longer up to date, users have the right to have these data corrected. Users may also demand that their data be erased. Should the erasure not be possible in exceptional cases due to other legal regulations, the data will be blocked so that they are only available for that legal purpose. Users may also have the processing of their personal data restricted,

if for example there are doubts as to the accuracy of the data. In principle, users also have the right to data portability. Users also have the right to object to data processing, insofar as this is based on legitimate interests pursuant to Art. 6 Para. 1 Sentence 1 (f) GDPR. In particular, you can object to the processing of your data for advertising purposes at any time.

8. Changes to this Technology Privacy Notice

As We continue to develop Our services, changes to this Technology Privacy Notice may become necessary. This website always contains the latest version of the Technology Privacy Notice.

Version updated: Oct 2022