

AdSpeq Privacy Policy

Effective: August 1st, 2023

AdSpeq LLC, herein referred to as "AdSpeq," "us," "we," or "our," operates as a mobile advertising network, providing software application publishers with the requisite resources to expand their operations. Our method involves the automation and optimization of the marketing and monetization strategies of these applications. The primary method of consumer interaction with us is through advertisements that AdSpeq disseminates on behalf of various advertisers via the publishers' mobile applications.

This document serves as the AdSpeq Privacy Policy (hereafter referred to as the "Privacy Policy") and it elucidates the mechanisms we utilize to gather, process, and distribute information across our advertising platform (termed our "Advertising Services") as well as through our official corporate website, www.adspeq.com (henceforth, the "Website"). This Privacy Policy also outlines your rights and options pertaining to the aforementioned information.

Information Collection and Utilization

In the event you are a consumer who has downloaded and utilizes an application embedded with the AdSpeq Software Development Kit (SDK), or alternatively interacts with our Services via advertisements presented on behalf of application publishers, we may accrue specific device-related information, which includes but is not limited to the following:

Device Information:

- Make, model, and operating system
- Properties related to screen size, orientation, audio, battery, device memory usage, settings, and boot time
- Accessibility features, font size, theme
- Carrier
- Vendor IDs (IDFV)
- App Set IDs

Mobile Application Information:

- Name and properties of mobile application through which a consumer interacts with the Services
- Advertising and tracking preferences and restrictions

Location and Time Settings:

- Country, time zone, and locale settings (country and preferred language)
- City- and/or country-level or other coarse geolocation data

Network Information:

- Network connection type and speed
- IP Address

Browser Information:

- Internet browser user-agent used to access the Services
- HTTP header information

Advertising IDs:

- IDFA/GAID/Amazon FOSAI

The information related to your device may be accumulated over time across various mobile applications. This data, in conjunction with other findings gathered through our analytical methodologies, can be integrated and used to provide our Services. This collection may comprise transactional or "event" data derived from a consumer's engagement with an application, encapsulating details about actions performed within the application, such as making purchases or installing applications.

Publishers of applications may opt to provide us with additional data (via our SDK), including details like your age or birth year, gender, email, telephone number, and areas of interest. We recommend referring to the corresponding publisher's privacy policy for a more comprehensive understanding of their handling of first-party data.

Advertisers, either directly or via a third-party acting on their behalf, may disclose your advertiser ID and IP address to us. By utilizing the information we gather, we are in a position to offer our Services, improve upon them, and conduct research towards the development of new services.

Information Sharing

We may share information we collect or derive with third parties in the following contexts.

Service Providers.

- We transfer information to service providers, and other partners who support our business, such as providing technical infrastructure services, analyzing how our Services are used, measuring the effectiveness of ads and services, providing customer service, or facilitating payments. These partners must adhere to strict confidentiality obligations in a way that is consistent with this Privacy Policy and the agreements we enter into with them. Affiliates. We may share information within the AdSpeq family of companies for purposes consistent with this Privacy Policy.

Advertising Partners.

- We share information with our third-party advertising partners, including advertisers, ad networks, exchanges, demand side platforms, and ad optimization and measurement/attribution partners (e.g., mobile measurement partners or "MMPs") to provide our clients with Advertising Services. This information may be used by such third-party partners to measure how effective ads are, showing advertisements to end users for products and services that are more likely to appeal to them (a practice known

as interest-based advertising or behavioral advertising), and to undertake web analytics to analyze traffic and other ad activity to improve the advertising experience. Unless otherwise noted in our partner list, each AdSpeq advertising partner is an independent controller of your data. Please note that the practices of our third-party advertising partners delivering advertisements through our Services are subject to those partners' own privacy policies.

Regulatory or Legal Requirements.

- We may disclose information to governmental regulatory authorities as required by law, including for tax or accounting purposes, in response to their requests for such information or to assist in investigations. We may also disclose personal information to third parties in connection with claims, disputes or litigation, when otherwise required by law or court order.

Safety and Terms Enforcement.

- We may disclose information if we determine, in our sole discretion, that its disclosure is necessary to protect the health, safety, or rights of you or any other person, protect against fraud, or enforce our legal rights, including contractual commitments made to us by third parties.

Business Transfers.

- We may disclose personal information as part of an organizational business transaction, such as a merger, acquisition, joint venture, financing, or sale of organizational assets and may transfer personal information to a third party as one of the business assets in such a transaction. We may also disclose personal information in the event of insolvency, bankruptcy, or receivership.

Manage Your Privacy Choices:

To limit collection of information from mobile devices, including location data, please visit your device's settings to set the "Limit Ad Track", "Location Based Services," or other similar feature on your device. Additionally, you may opt-out of interest-based advertising within ads served by AdSpeq. You can also make choices about data collection for certain companies by visiting an industry consumer choice platform such as the NAI (<https://optout.networkadvertising.org/>) or DAA (<https://optout.aboutads.info/>). You may still receive ads after limiting processing of information for interest-based advertising, but those ads may be less relevant to your interests.

Children's Online Privacy Protection

We do not knowingly collect personal information from, or serve advertisements to, children as defined and required by applicable laws. If you believe we have served an advertisement to a child or might have any personal information from or about a child, or if you believe a mobile application may be exclusively designed for, directed to, or pass personal information knowingly from, children, please contact us via email at dataprotection@adspeq.com.

We may collect certain types of information (e.g., IDFV, publisher age-related flags) from general audience apps for activities that fit within the “support for internal operations” exception from the notice and consent requirements in the Children’s Online Privacy Protection Rule.

Data Security and Retention

We implement reasonable measures to help secure the information we collect through the Services. We retain the data we collect through the Services for up to 2 years. Information is automatically purged from our system if the Services do not receive any updated information for a device in the last 2 years. Note that we will retain information in our systems for as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Our Website

This section describes the information we collect, use, and share through our Website.

Information Collection

We may collect various types of information through the Website. For example, when you register with AdSpeq LLC to use our Services, you may provide us with personal information such as your name, email address, phone number, mailing address, user name, and password. You may also provide us with payment information when you submit or receive a payment, or other information when you complete the online forms available on the Website.

We may also collect certain types of technical and usage information automatically, including through cookies and other similar tracking technologies. These tracking technologies allow AdSpeq LLC to personalize or optimize your experience on the Website. This information may include your IP address, device identifier, browser type, device type, the date and time of your visit, and the areas of the Website you visit. We may also acquire information from other trusted sources to update or supplement the information that you voluntarily provide to us or that we collect automatically.

Information Use

We may use the information we collect or you provide to us through the Website for various purposes, including:

- To communicate with you, for example through newsletters or with other information about our products and services;
- To operate and improve the Website and our Services;
- To customize the Website;
- For analytics and research;
- For marketing purposes; and
- For purposes disclosed at the time of collection.

Information Sharing

We may share information collected through the Website for purposes including: With your consent;

- For advertising and marketing purposes;

- In response to a subpoena, court order, or other legal process;
- To protect our rights and the rights of others;
- With our affiliates;
- With service providers that help us operate the Website and Services;
- As part of a sale, merger, or acquisition, including at bankruptcy; and
- For purposes disclosed at the time of collection.

Links to Other Websites

The Website may provide links to other websites or other digital properties that we do not control. We encourage you to review the privacy policy of those digital properties that you may visit.

Updating Information

You can update the personal information you provide to us by correcting, updating, or deleting the information associated with you via your AdSpeq LLC account. To add, modify, remove, or request access to the personal information about you that we hold, please see the “Contact Us” section below.

Our Advertising/Marketing Choices

From time to time, third parties will collect information from you via the Website and other non-affiliated websites and mobile applications over time in order to deliver relevant advertising to your browser or device, as well as other browsers or devices associated with you. This type of advertising is called “interest-based advertising.”

You may limit the collection of information from mobile apps on your device for interest-based advertising by adjusting the settings on your mobile device (such as by turning off the feature to “Allow Apps to Request to Track”).

Please note that if you exercise that choice, you may still receive ads, but those ads may be less relevant to your interests. Additionally, data may still be collected from your browser or device for purposes other than interest-based advertising. If you erase your cookies, reset your device identifier, or use different browsers or devices, you may need to make your choices again.

If you no longer wish to receive marketing-related emails from us on a going-forward basis, you may opt out of receiving these emails by clicking “Unsubscribe” at the bottom of any marketing email you receive from us.

Children

Our Website is not intended for use by children as defined and required by applicable law. We do not knowingly collect personal information from children through the Website. If you believe we might have any personal information from or about a child, please contact us via email at dataprotection@adspeq.com.

Data Security and Retention

We have implemented reasonable physical, technical, and administrative security measures for the Website to help protect information we collect and store.

For detailed information regarding retention associated with cookies on the adspeq.com domain, please click “Cookie Settings” in our Website footer to learn more.

We retain other information such as customer contact and payment information in our systems for as long as necessary as permitted by law to comply with our legal obligations, resolve disputes, and enforce our agreements.

Additional Provisions for EU/UK Individuals

If you are located in the European Union, Switzerland, or the United Kingdom, the following additional provisions apply to you.

Privacy Shield Framework

In light of the judgment of the Court of Justice of the European Union in Case C-311/18 and the similar announcement from the Swiss Federal Data Protection and Information Commissioner, we do not rely on the EU-U.S. or Swiss-U.S. Privacy Shield Framework as a legal basis for transfers of personal data under the General Data Protection Regulation. However, we continue to adhere to these principles and, where appropriate, we rely on EU Standard Contractual Clauses and other safeguards to enable such transfers.

Notwithstanding the foregoing, AdSpeq has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. AdSpeq is committed to subjecting all personal data received from European Union (EU) member countries, the United Kingdom, and Switzerland, respectively, in reliance on each Privacy Shield Framework, to the Framework’s applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce’s Privacy Shield List, available at: <https://www.privacyshield.gov/list>.

AdSpeq is responsible for the processing of personal data it receives under each Privacy Shield Framework and subsequently transfers to a third party acting as an agent on its behalf. AdSpeq complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, the United Kingdom, and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, AdSpeq is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, AdSpeq may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Under certain conditions, more fully described on the Privacy Shield website here: <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

In compliance with the Privacy Shield Principles, AdSpeq commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact AdSpeq at the address/email below. AdSpeq has further committed to refer unresolved Privacy Shield complaints to an alternative dispute resolution provider.

If you have an unresolved privacy or data use concerns that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Lawful Basis for Processing

On certain occasions, we process your personal data when it is necessary for the performance of a contract to which you are a party, such as to provide services to you. We may also process your personal data to respond to your inquiries concerning our products and services.

On other occasions, we process your personal data where required by law. We may also process your personal data if necessary to protect your interests or the interests of a third party.

Additionally, we process your personal data when necessary to do so for fraud prevention, improving our network and services, and marketing our services to advertisers and publishers, where these interests are not overridden by your data protection rights.

If the processing of your personal data is necessary, we will generally ensure that consent has been obtained from you if there is no other lawful basis for such processing. You have the right to withdraw your consent to processing of personal data at any time.

For questions about data processing, please contact our Data Protection Officer. Visit the “Contact” section below for contact information.

Children

We do not knowingly collect personal information from, or serve advertising to, children under the age of 16 through the Advertising Services and the Website. If you believe we have served an advertisement to a child or might have any personal information from or about a child, or if you believe a mobile application may be exclusively designed for, directed to, or pass personal information knowingly from, children, please contact us via email at dataprotection@adspeq.com.

Your Rights

If you are an individual in the EU or UK, you are able:

- To request access to the personal data we hold about you;
- To request that we rectify or erase your personal data;
- To request that we restrict or block the processing of your personal data;
- Under certain circumstances, to receive personal data about you that we store and transmit to another without hindrance from us, including requesting that we provide your personal data directly to another, i.e., a right to data portability; and
- Where we previously obtained your consent, to withdraw consent to processing your personal data.
- To exercise these rights, please contact us at the email address set forth in the “Contact Us” section below. Our Data Protection Officer can also be reached at this email address. Please be aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.

Additionally, you have the right to lodge a complaint against us. To do so, contact the supervisory authority in your country of residence.

Policy Changes

We may, in our sole discretion, make changes to this Privacy Policy from time to time in order to accommodate new technologies, industry practices, regulatory requirements, or for other purposes. If we make any changes, we will update the “Effective Date” posted at the top of this Privacy Policy. If we make any material changes, we may notify you by email (sent to the email address specified in your account) or by means of a notice on the Website prior to the change becoming effective. We encourage you to review this Privacy Policy periodically to ensure that you understand how we collect, use, and share information.

Any changes to this Privacy Policy will become effective when the revised Privacy Policy is posted on the Website. By continuing to use the Website or Advertising Services following such changes, you are agreeing to accept the terms of the revised Privacy Policy.

Contact Us

If you have any questions or comments about this Privacy Policy, please write to us at:

AdSpeq LLC
1152 Delaney Ave
Orlando, FL 32806

You can also contact us or our Data Protection Officer via email at dataprotection@adspeq.com.

Please be sure to include your relevant account information in any correspondence to us. This will help ensure that we can respond to your inquiry in a timely manner.