

EnContext Privacy Policy

The purpose of this Privacy Policy (this “Policy”) is to inform you of regarding the use of data within the EnContext as well as those affiliated with us, including data processors, sub-processors and third-party partners. This Policy shall also provide you information regarding how to manage certain data collected about you.

Definitions

Company - EnContext, an entity of Jean Touboul dba as EnContext

Platform - The services we provide to Clients

Clients – Our primary clients are Advertisers and Publisher who utilize the Platform to create, edit and maintain advertising campaigns or to sell advertising placements.

User - An individual who receives or otherwise interacts with an advertisement

Data Subject - The person about whom personal data relates. This could be Clients or a User.

Processor – Are the technology providers or sub processors who maintain a data processing agreement with the Company.

Personally Identifiable Information

Personally Identifiable Information (“PII”) is information about you that can be used to contact you or identify you as an individual. PII may include: your name, username, phone number, email address, and physical address. To the extent we obtain PII about you, such information shall be held for no more than one (1) year before it is deleted.

Personal Data

Personal Data is information that is associated with an individual and enables that individual User to be singled out. Through the use of ad tags and cookies we collect information about you. Typically, the information obtained does not identify you directly (i.e. by name or email address), however, the information may indirectly identify your device or geolocate you for purposes of delivering targeted advertisements. Under European privacy law, some information transmitted by Cookies and Tags including Log Data are considered personal information. To the extent we obtain Personal Data about you, such information shall be held for no more than one (1) year before it is deleted.

What Information We Collect for Client’s Accounts

- **Registration information** - Your first and last name, mailing address, phone number, email address, Skype contact and other similar contact details.

- **Technical / Access information** - Details including your IP (Internet Protocol) Address, User-Agent and activity including pages accessed, information entered are stored for fraud prevention and security auditing.

The information we collect and log, as outlined above, is necessary for secure account access and for securing the data systems of the platform. This information will not be sold or otherwise transmitted for commercial usage.

Information Collected Relating to Users and Advertising

- **Device and Connection Information** - Details including your IP (Internet Protocol) Address, User-Agent and activity including URLs of websites or names of applications accessed. The details of a User's device and the context of where it is seen, as it related to URLs and applications is important for general ad targeting. These elements of a User's browser or device are available for targeting, but are not made available to target a User individually.

Where ads may be targeted directly to a user - commonly called "retargeting", in service of an advertiser or merchant whose website or app a User may have interacted with previously, clear and informed consent will be collected before such retargeting techniques will be activated.

Your Rights as a Resident of the European Economic Area

If you are located in the European Economic Area ("EEA"), you have certain rights with respect to your personal data, including the right to request access to, correct, amend, delete, port to another service provider, or object to certain uses of your personal data.

Your data may be obtained to pursue the following legitimate interests, either for ourselves, our Clients, or other third parties.

- To provide Clients with services related to our Platform;
- To prevent risk and fraud on our Platform;
- To provide communications, marketing, and advertising via the Client's Platform;
- To provide reporting and analytics;
- To help Clients integrate with third party publishers and advertiser platforms via our Platform;
- To provide troubleshooting, support services, or to answer questions;
- To test out features or additional services; and
- To improve our services, applications, and websites.

When we process personal information to pursue these legitimate interests, we do so where we believe the nature of the processing, the information being processed, and the technical and organizational measures employed to protect that information can help mitigate the risks to the data subject.

Consent, Data Subject Requests, Opting-Out and Right of Access

If you are a Client, at any time, you may revoke our permission by visiting [Settings](#) inside your account, or request logs based on your personal access.

If you are a User and a resident of the EEA who believes they may have PII recorded, please use the Contact section, at the bottom of the document, to direct your inquiries or requests based on your rights outlined above.

Children's' Online Privacy Protection Act Compliance (COPPA)

The Platform and services are intended for general audiences and are not directed to children under the age of 13. We do not knowingly collect personal information from children under 13. If you become aware that a child has provided us with personal information without parental consent, please contact us here: contact@EnContext.com.

If we become aware that a child under 13 has provided us with personal information without parental consent, we take steps to remove such information and terminate any account linked to such underage minor.

Data Policies

Data Retention

If you are using the Platform as an advertiser or publisher, we will maintain your registration information for our records unless and until you ask the Client Platform to delete this information, or otherwise update said information.

Data Related to Advertisements

We may retain other data within our databases, related to your connection, advertisements served or other related information that we process on behalf of our Clients for a period of up to six (6) months unless otherwise required specific legal obligations, dispute settlements or contract enforcement.

After this period, The Company and its Processor may maintain and use such data in an aggregated format, as necessary for internal analytical purposes, to comply with its legal obligations, settle disputes and enforce contracts.

How do we protect your information?

The Company and its Processor(s) uses both physical and technical security measures to maintain an accepted industry security standard to protect all data on the Platform from misuse and/or unauthorized access.

Physical Measures of Data Security

The Company and its Processor maintains a private, physical “cloud” infrastructure of hardware to provide the Platform services.

Access to this hardware is secured by twenty-four (24) hour, seven (7) days a week on site guards. Building access is secured by keycard entry into the rooms that store the infrastructure.

Access to logs and other sensitive data is controlled and monitored to ensure employees of the Client and The Company and its Processor have a legitimate basis for accessing the data.

Technical Measures

The Company and its Processor encrypts the data sent to and from Client Platforms using the HTTPs protocol.

Access to this hardware is secured by twenty-four (24) hour, seven (7) days a week on site guards. Building access is secured by keycard entry into the rooms that store the infrastructure.

Data Breach

While we cannot guarantee misuse of data and or unauthorized access will not occur; we make good faith efforts to prevent such occurrences. We do not warrant or represent that your account or any of your information will be protected against, any misuse, by third parties.

In the case of a breach which we determine may have involved your personal information, there will be timely efforts to contact you and also alerts to the relevant local authorities.

Do we disclose any information to third parties?

We may also share your information in the following circumstances:

- To prevent, investigate, or take action regarding illegal activities, suspected fraud, violations of Client Terms of Service or any other agreement related to the Platform, or as otherwise required by law.
- To conform to legal requirements, or to respond to lawful court orders, subpoenas, warrants, or other requests by public authorities (including to meet national security or law enforcement requirements).
- Personal information may also be shared with a company that acquires our business, whether through merger, acquisition, bankruptcy, dissolution, reorganization, or other similar transaction or proceeding. If this happens, we will post a notice on our home page.

Cookies

We, and third parties with whom we partner, may use cookies, web beacons, tags, scripts, advertising identifiers (including mobile identifiers such as Apple’s IDFA or Google’s Advertising ID) and similar technology ("**Cookies**") in connection with your use of the Platform, third party websites, and mobile applications. Cookies may have unique identifiers, and reside, among other places, on your computer or mobile device, in emails we send to you, and on our web pages. Cookies may transmit information about you and your use of the Platform, such as your browser type, search preferences, IP address,

data relating to advertisements that have been displayed to you or that you have clicked on, and the date and time of your use. Cookies may be persistent or stored only during an individual session.

The purposes for which we use Cookies in the Service include:

Purpose	Explanation
Processes	Intended to make the service work in the way you expect. For example, we use a Cookie that tells us whether you have already signed up for an account.
Authentication, Security, and Compliance	Intended to prevent fraud, protect your data from unauthorized parties, and comply with legal requirements. For example, we use Cookies to determine if you are logged in.
Preferences	Intended to remember information about how you prefer the service over our Platform to behave and look. For example, we use a Cookie that tells us whether you have declined to allow us to send push notifications.
Advertising	Intended to make advertising more relevant to users and more valuable to advertisers. For example, we may use Cookies to serve you interest-based ads, such as ads that are displayed to you based on your visits to other websites, or to tell us if you have recently clicked on an ad.
Analytics	Intended to help us understand how visitors use the Platform. For example, we use a Cookie that tells us how our search suggestions correlate to your interactions with the search page.

You can set some Cookie preferences through your device or browser settings, but doing so may affect the functionality of the service over the Platform. The method for disabling Cookies may vary by device and browser, but can usually be found in your device or browser preferences or security settings. For example, iOS and Android devices each have settings which are designed to limit forms of ad tracking. Please note that changing any of these settings does not prevent the display of certain advertisements to you.

Changes to the Privacy Policy

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons. The most current version of our privacy policy shall govern how we collect, use and disclose information about you. By continuing to use our services after changes to the privacy policy become effective, you acknowledge any such revised privacy policy.

How to Contact Us

If you have any questions about this Privacy Policy, you may contact us by mail or email at the following address:

contact@EnContext.com