



PRIVACY POLICY

Creative Clicks is an international digital marketing company providing advertisers, agencies, publishers and application developers (“Customers”) with a digital advertising solutions (“Service”).

Creative Clicks and its subsidiaries (“we”) consider proper use of personal data of the utmost importance. We therefore respect and thrive to honor all obligations arising from UK Data Protection Act 1988, the General Data Protection Regulation (Regulations (EU) 2016/679 and any other privacy regulations that might apply in other jurisdictions.

Creative Clicks does not have any direct interaction with visitors of your traffic channels (“Data Subjects”). However, as personal data from Data Subjects might be recorded and processed, an appropriate notice regarding this Privacy Policy must be provided.

This Privacy Policy aims to give information on how Creative Clicks and its subsidiaries collect and processes your personal data through your use of a this website, including any data you may provide through this website when you sign up or purchase products or services.

Personal Data Collected

The following personal data **might** be collected from Data Subjects:

- name, gender, date of birth, email and telephone number;
- demographic details, preferences and interests in relation to products, communication and media; and
- user agent, IP address, browser, operating system, click behavior and campaigns.

We do not collect any **special categories of personal data** (this includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How personal data is collected

We collect personal data from and about Data Subjects as follows:

- **Direct interactions.** You may give us your identity by filling in forms or by corresponding with us. This includes personal data you provide when you: (a) apply for products or services; (b) create an account on a partner website; (c) subscribe to services; (d) request marketing to be sent to you; or (e) give us some feedback.
- **Automated technologies or interactions.** As you interact with us we may automatically collect technical data about your equipment, browsing actions and patterns by using cookies, server logs and other similar technologies.

Purpose of collection

The purpose of collecting personal data is to provide the best possible (business) service and to study and analyze the functionality of the service provided.

We might share personal data with service providers and other third parties, if necessary to improve the level of the services provided, provided that any such third party will commit to protect your privacy as required under the applicable law and this policy.

We will also share personally identifiable information with companies or organizations connected, or affiliated with us, such as subsidiaries, sister-companies and parent companies, with the express provision that their use of such information must comply with this policy.

Additionally, a merger, acquisition or any other structural change will require us to transfer your personally identifiable information to another entity, as part of the structural change, provided that the receiving entity will comply with this policy.

Security and retention

We are committed to ensure security of personal data we hold and therefore implemented a range of technical measures to prevent misuse, interference, loss, unauthorized access, modification or disclosure

We will retain personal data for as long as needed to provide the (business) services. If Data Subjects wish to have their personal data deleted. We will always honor such request.

Rights

Data Subjects have the right to check which personal data we keep and whether this personal data is correct and up to date. In the event the personal data we keep is incorrect data subjects are entitled

to a correction. Data Subjects are also entitled to request us to delete personal data or to stop making it available to third parties. Finally, Data Subjects are entitled to have your personal data made available on a data carrier. Requests thereto requests will always be honored.

Queries

If there are any queries or complaints regarding the processing of personal data or our Data Protection Officer can be contacted at dpo@creativeclicks.com.

Our Privacy Policy is available at all times. It may be altered from time to time. Should you require further information, or should you have any objections or questions, please e-mail us at dpo@creativeclicks.com.