



Adding value to TV ads

## CASTOOLA – PRIVACY POLICY

CASTOOLA is a provider of Addressable TV platform that is applicable for all types of TV environments such as IPTV, OTT, and DVB. The idea is to make Ads on TV user friendly and tailored to a specific user or household. How we do it? By using data, which helps to understand the contextual, geographic, and technical conditions in which we are serving Ads.

Our mission is to do it in a transparent way which gives you, as a user, or member of a household, all relevant and necessary information about how we deal with these data and how you can control it. With that reason, we attach great importance to the protection of privacy and your data, therefore a compliance with the regulation is a top priority for us.

We (CASTOOLA D.O.O.) ensure that all our activities comply with the applicable legislation on personal data protection in the Republic of Slovenia and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016. We also proudly present that CASTOOLA D.O.O. participates in the IAB Europe Transparency & Consent Framework and complies with its Specifications and Policies. 's identification number within the framework is <Vendor ID>.

This Privacy Policy applies to all of our products and services which include Castoola Addressable TV platform, Interactive TV applications, and our websites. Our Services also include our products and services that may be integrated into third-party environments such as TV apps.

Purpose of this document is to introduce you to:

1. What data do we collect?
2. How we use data?
3. Sharing of information
4. Data retention
5. Security measures
6. Your rights
7. Contact details

Please note that we might modify this policy from time to time. In such event we will revise the date at the bottom of the policy and update it on our website (castoola.com)

# 1 What data do we collect?

We collect and process your data based on the following legal bases:

- Individual consent
- Legitimate interest
- Legislation or contractual basis

Data is collected in 3 different ways as described below.

## **a) Information you provide to us directly**

We may collect information from you directly. For example, when you fill out and submit a form on our website, participate in an interactive advertising campaign that allows you to enter your contact details, or contact us via e-mail or telephone.

Types of information that we collect in such cases may include:

- Name
- E-mail address
- Phone number
- Geographic location
- Interests
- Other information you may provide to us directly

In the event when you provide us your data and your consent, you are authorising us to collect, process and use this information in accordance with this Privacy Policy.

## **b) Information we get when you are using our services**

We may collect information when you, or somebody from your household, are using our Products and/or Services. This can happen in case if you are browsing our website, use our Interactive TV applications or use services or devices such as TV,STB, Mobile, and Desktop devices which are integrated with our Addressable TV platform.

Types of information that we collect in such cases may include:

- Details about Ads and Content that you consume
- Technical information about your device such as type of a device, brand, browser information and operating system you use
- Your IP address
- Log information (we collect standard access logs including time of your access, page/service you requested, your IP address and browser information)

### **c) Information we get from other sources**

In some cases, we may also obtain information from other sources (Operator CRM system, Recommendation Engines, DMPs, Public Registries) and match them with information we collect from you directly, or from using our Products and/or services.

Types of information that we collect in such cases may include:

- Name
- Precise geolocation
- E-mail address
- Phone number
- Interests
- Past purchases
- Viewing history and habits

## **2 How we use data?**

The reason why we collect your information from different sources is to help us understand you, your household, and your habits better, so that we can serve you with Ads, Content and Services that may be more interesting to you.

We may use your information to:

- Provide, maintain, and improve our Products and Services (in example, we may use logs to prevent malfunctions, or to tailor our user interface and user experience)
- Deliver you personalized Ads, Content and Features that match with your interests (in example, advertisement promoting a local food market will only be served to users or households within the same location, or within some reasonable distance)
- Measure and analyse usage and performance (in example, we will measure how many times you saw a specific advertisement not to show it to you too often)
- Communicate with you about our Products, Services, Content, and other Offers
- Ensure security and prevent fraud (in example, we will analyse system logs to detect attacks on system)
- Link your devices, or devices within your household, to improve user experience or deliver the personalized Ads, Content and Features across all devices

## **3 Sharing of information**

In relation to our Products and Services, we may share the information we collect about you with third parties in the following circumstances:

- With your consent and at your direction we will share your information with companies, organisations, or individuals outside of Castoola. In example, if you submit your phone number in the interactive advertisement campaign so that an advertiser can reach out to you,

we will share your contact details with the advertiser. Or, if you submit an action that leads to the e-commerce site of the Advertiser, we might share what product you are interested in and what is the channel that you came from.

- We may share your information with trusted third parties who partner with us and support our Products and Services, such as Ad-tech partners, Recommendation Engine providers, DMPs and Auditors.
- Within our corporate family, we might share the information between and among Castoola's current and future parents, affiliates, subsidiaries and other companies under our common control and ownership.

Unless it is at your own direction to do it, we will not share any information to third parties that might disclose your personal data and directly identify you. In example, we might share technical information about your device with our Ad-tech partners, but we will not share your Name or IP address with them.

We may also share your information if we are required to do it by law. In example, to comply with legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect safety, investigate fraud, or respond to a government request.

## 4 Data retention

We will keep the information we hold for as long as it is necessary to realise the purpose for which the information have been collected. When there is no need for holding the data anymore, we will either delete it or anonymize it.

Cookies that we generate are set to expire in 12 months. Expiration dates are re set (prolonged) each time when you visit our site or use our Products and/or Services. In case if you are using our Products and/or Services in non-web environment where Cookies, or any other type of local storage are not supported, we will store your data using server-side technologies and approaches.

## 5 Security measures

Castoola uses technical and organizational security precautions to protect data from manipulation, loss, destruction, or access by unauthorized persons. To ensure the security and confidentiality of personal data that we collect on-line, we use data networks that are among other things protected also by industry standards. While handling personal data, we take measures reasonably designed to protect that information from loss, misuse, unauthorized access, disclosure, alteration, or destruction. While we cannot guarantee against any loss, misuse, unauthorized access, disclosure, alteration, or destruction of data, we endeavour to prevent such unfortunate occurrences.

## 6 Your rights

If you have any questions regarding your personal data and our way of handling it, you can contact us at our e-mail address. We will respond to your message within a reasonable timeframe.

Please note that you always have the right to:

- request information on using of your data,
- access copies of your data that we collected in different ways,
- request correction or update of your data,
- request deletion of all your data for which we don't have any legitimate basis to possess and use,
- request to stop or limit processing of part of all your data,
- request to stop or limit sharing your data with third parties.

In case if you are located in the EU, you have the right to appeal to the Data Protection Authority.

## 7 Contact details

In case if any questions, requests, or complaints, please do not hesitate to contact us at our email ([privacy@castoola.com](mailto:privacy@castoola.com)), or at:

CASTOOLA D.O.O.  
(ATTN: Privacy)  
Plese 9A  
9000 Murska Sobota  
Slovenia, EU

We will respond to all inquiries within a reasonable timeframe and in accordance with the applicable data privacy laws. In case if you are not satisfied with the way how we use your data, or with our response to your inquiry, please do not forget that you have the right to complain to a data protection authority ("DPA").

**CASTOOLA D.O.O.**

**Last update: 10/11/2021**