

Privacy policy

Last modified: May 22nd, 2018

Adjust GmbH, adjust Inc. and adjust KK (collectively, “adjust” or “We”) respect your privacy and are committed to protecting it through our compliance with this policy. With this privacy policy, We would like to inform you how we process your personal data whilst using this website.

The responsible body according to art. 4 European General Data Protection Regulation (“GDPR”) is Adjust GmbH, Saarbrücker Str. 37a, 10405 Berlin, managing directors are Christian Henschel and Paul Müller.

In case of any questions relating to data protection, please get in touch with us at privacy@adjust.com or contact our Data Protection Officer Prof. Dr. Christoph Bauer directly at Große Bleichen 21, 20354 Hamburg, Germany or via e-mail at c.bauer@eprivacy.eu.

This policy describes the types of information we may collect from you or that you may provide when you visit the website www.adjust.com (our “Website”) and our practices for collecting, using, maintaining, protecting and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In e-mail, text and other electronic messages between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- us offline or through any other means, including on any other website operated by adjust or any third party; or
- any third party, including through any application or content (including advertising) that may link to or be accessible from the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see Changes to our Privacy Policy). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

1. Collection and Use of Data on the Website

Content

Personal data is all information relating to personal and objective circumstances through which a person may be personally identified. This may for example entail

information such as your name, address or other contact details such as phone number or e-mail address.

Intended Use

Legal basis for the processing of this personal data is Art. 6 para. 1 (f) GDPR, as this data is necessary for the following purposes:

- to present and improve our website.
- to estimate the size of our target group and their user pattern.
- to save information about your preferences so that we may adapt our website to your individual interests.
- to speed up your search.
- to recognize you when you return to our website.

Furthermore, with this information we will be able to ensure the stability and security of our website.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it and to help us understand how the Website is being used.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about goods and services that may be of interest to you. If you do not want us to use your information in this way, you may elect to unsubscribe and we will cease using your information in that manner.

Children Under the Age of 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at Adjust GmbH, Saarbrücker Str. 37a, 10405 Berlin, Germany or via email at privacy@adjust.com.

Information We Collect About You When You Visit Our Website

We collect several types of information from and about users who visit our Website via internet connection or through your device which you use to access our website, including certain user details. Such information includes:

- traffic data,
- location,
- logs and communication data,
- resources on our website which you access and use,
- IP address, operating system and browser type,
- and information which is collected through cookies, web-beacons and other tracking technologies.

Furthermore, we are tracking data with which you may be personally identified such as your name, postal address, e-mail address, phone number and any other identifier with which you may be contacted online or offline ('personal data') insofar as you provide us with this data in our online form.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). We, and businesses we work with, require for some features of our website. Cookies are small files that your browser places on your device in a designated directory. These cookies can be used to determine, for example, whether you have visited a website before. Most browsers accept cookies automatically. However, you can set your browser so that no cookies are stored or an explicit consent is required before saving a cookie. In addition, you can delete previously set cookies at any time. Please note that disabling cookies may result in restrictions when using our website.
- Web Beacons. Pages of our the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit adjust, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- Log files. Every time you access our Internet pages, your usage data is transmitted through the respective internet browser and stored in log files, the so-called server log files. The records stored in this case contain the following data: domain and location from which the user is accessing the website

Additionally, we can receive information from third parties, for example business partners.

Information You Provide to Us

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of subscribing to our newsletter, subscribing to our service, or requesting further services. We may also ask you for information when you report a problem with our Website or the adjust technology.

- Records and copies of your correspondence (including e-mail addresses), if you contact us.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.
- Details of Website searches and button clicks are also recorded.

You also may provide information to be published or displayed (hereinafter, “posted”) on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, “User Contributions”). Your User Contributions are posted on and transmitted to others at your own risk. Although you may set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Third-party Use of Cookies and Other Tracking Technologies

Some third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see [Choices About How We Use and Disclose Your Information](#).

Duration of Retention of Data

We store your data:

- if you have consented to the processing at the latest until you revoke your consent,
- if we need the data to carry out a contract at most as long as the contractual relationship with you or statutory retention periods are running,
- if we use the data on the basis of a legitimate interest at most as long as your interest in deletion or anonymization does not prevail.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates for the sole purpose of providing our services.
- To contractors, service providers and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of adjust's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by adjust about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply our [terms of use](#) and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of adjust, our customers or others.

There is a transfer of data to third countries outside the European Union. This is done on the basis of statutory contractual provisions that are intended to ensure an adequate protection level of your data.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this Website may then be inaccessible or not function properly.
- Opt-out. You may "opt out" of receiving marketing or promotional emails from us by following the instructions in those emails. If you opt out, we may still send you non-promotional emails, such as emails about your accounts or our ongoing business relations.
- We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's *website*.

How we protect Your Data

- We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us is stored on our secure servers

behind firewalls. All transactions, regardless of their nature, are encrypted using SSL technology.

- The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.
- Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.
- Transfer between subsidiaries: We may transfer user and customer information to our affiliates and to third party providers for the sole purpose of providing our services.

Newsletter

If you subscribe to our newsletter, we will process your e-mail address and data to verify your subscription. You can cancel your subscription at any time by sending a message to us or by clicking the 'unsubscribe' button.

Your rights according to the GDPR

As the data subject, you have the right of access (Art 15 GDPR), the right to rectification (Art 16 GDPR), the right to erasure of your personal data (Art 17 GDPR), the right to restriction of processing of your personal data (Art 18 GDPR) as well as the right to data portability (Art 20 GDPR). Furthermore, you have the option to file a complaint against the processing of your personal data with the competent supervisory authority (in this case Berliner Beauftragte für Datenschutz und Informationsfreiheit at <https://www.datenschutz-berlin.de/>).

If you have given your consent to the processing of your data, you can revoke the given consent at any time. Such revocation affects the admissibility of the processing of your personal data after you make such revocation.

You can object to the processing of your personal data insofar as we base the processing of your personal data on the balance of interests. This is the case in particular if the processing is not necessary for the fulfilment of a contractual obligation to you, which we in each case present in the description of the functions which follow. In case of such objection, we kindly ask for an explanation of the reasons for the objection against the processing of your personal data. In the case of your justified objection, we will examine the situation and will either discontinue or adapt the data processing or point out to you our compelling legitimate reasons based on which we continue the processing your personal data.

You may, of course, object to the processing of your personal data for advertising and data analysis purposes at any time.

In this case, please send an e-mail to privacy@adjust.com.

Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to privacy@adjust.com or write us at: Adjust GmbH, Saarbrücker Str. 37a, 10405 Berlin, Germany.

Commitment to the EU-US Privacy Shield

Adjust Inc. complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Adjust has certified to the Department of Commerce that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

In compliance with the Privacy Shield Principles, Adjust commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Adjust at:

Adjust GmbH, Saarbrücker Str. 37A, 10405 Berlin, Germany

or by sending an email to privacy@adjust.com at any time.

We comply with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions. Adjust has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU.

The Federal Trade Commission (FTC) has jurisdiction over our compliance with the Privacy Shield. Under certain conditions, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

2. Tracking Technologies on our Website

Google Analytics

In order to optimize this website, we use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how you use this website. The information generated by the cookie about your use of this website (including your IP address) will be transmitted to and stored by Google on servers in the United States. If the IP anonymization is activated on this website, your IP address will previously be truncated by Google within the EU member states or EEA member states. Only in exceptional cases will the IP address be transferred to Google on a server in the United

States and thereafter be truncated. On behalf of the website operator, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. The IP address that was transmitted by your browser will not be combined by Google with any other data. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You may also prevent the collection of the data that was generated by the cookie and that is related to the use of the website (including your IP address) as well as its processing by Google by downloading and installing a browser plugin that is available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>. Additional information thereto is available at <http://www.google.com/intl/de/analytics/privacyoverview.html> (general information to Google Analytics and privacy). This Website uses Google Analytics with its extension code “gat._anonymizeIp()” so that IP addresses will therefore only be processed in a shortened form to prevent persons from being identified.

Google AdWords

We as a Google AdWords customer also use Google Conversion Tracking, a web analytics service provided by Google, Inc. (“Google”). Google AdWords places a cookie in your browser (“Conversion Cookie”) if you have accessed our website via a Google ad. These cookies are valid for 30 days. If you access some of our sites and the cookie is still valid, we and Google can recognize that somebody has clicked on the ad and thereafter was transferred to our website. Every AdWords customer uses a different cookie, and therefore it is not possible to track cookies via the websites of AdWords customers. The information obtained via the Conversion Cookie is used in order to assemble conversion reports for AdWords customers. The AdWords customers receive the number of users that have clicked on their ad and have been transferred to a site that includes the Conversion Tracking Tag but they do not receive any information that would allow them to identify the user. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

Facebook Pixel

We use the “visitor action pixels” from Facebook Inc. on our website. This allows user behavior to be tracked after they have been redirected to our website by clicking on a Facebook ad. This enables us to measure the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us, i.e. we do not see the personal data of individual users. However, this data is stored and processed by Facebook, which is why we are informing you, based on our knowledge of the situation. Facebook may link this information to your Facebook account and also use it for its own promotional purposes, in accordance with [Facebook’s Data Usage Policy](#). You can allow Facebook and its partners to place ads on and off Facebook. A cookie may also be stored on your computer for these purposes. You can object to the collection of your data by Facebook pixel, or to the use of your data for the purpose of displaying Facebook ads in your account-settings. Facebook is certified under the [US-EU Privacy Shield Agreement](#) and thus guarantees compliance with European data protection legislation.

LinkedIn Insight Tag

The LinkedIn Insight Tag is a piece of lightweight JavaScript code that we have added to our websites to enable in-depth campaign reporting and to help us unlock valuable insights about our website visitors. We use the LinkedIn Insight Tag to track conversions, retarget website visitors, and unlock additional insights about members interacting with our LinkedIn adverts. The LinkedIn Insight Tag enables the collection of metadata such as IP address information, timestamp, and events such as page views. All data is encrypted. The LinkedIn browser cookie is stored in a visitor's browser until they delete the cookie or the cookie expires. You can opt out of cookies from LinkedIn on your [LinkedIn settings page](#) and recommend you read their [Cookie Policy](#) for more information.

Marketo

Marketo Inc. is a marketing automation platform focused on account-based marketing, including e-mail, mobile devices, social media, digital ads, web management and analytics. On this platform, cookies are used in order to recognize you as a customer when you visit the website again; to track different data when using the website and to provide better content. The cookies placed by Marketo Inc. are read only by Marketo Inc. For more information about Marketo Cookies and Marketo's privacy policy, please click [here](#).

Bizible

Bizible offers an integrated marketing analysis platform for marketers in order to optimize their advertising campaigns. Bizible collects your name, e-mail address and (if applicable) your address (only if you have explicitly provided us with this), as well as IP address, browser type and marketing source. You can do a Bizible Cookie-Opt-Out [here](#). For more information, please click [here](#).

Clearbit

Clearbit is operated by APIHub Inc. Clearbit has developed a business intelligence API to aid businesses in acquiring more information about their clients in order to increase turnover and reduce fraud. Clearbit collects your IP address so that we may improve our website. For more information and to have yourself removed from the Clearbit database, please click [here](#).

Hotjar

Hotjar Ltd. provides a service which analyses the online behavior of website users by combining analytics and feedback tools. Hotjar will collect and process your IP address when you navigate through and interact with the contents of our website. The sole purpose for passively collecting this information is to improve your experience when using our website. You may opt-out from having Hotjar collect your information when visiting our website at any time by visiting their [Opt-out](#) page and clicking 'Disable Hotjar'.

VWO

VWO is operated by Wingify Software Private Limited. VWO is a test and optimization tool with which businesses can conduct A/B Tests and develop behavioral targeted campaigns. This helps us to optimize and personalize our website. For this,

VWO collects your IP address when you visit our website. Your IP address, however, is anonymized instantly. For more information, please click [here](#). If you no longer want VWO to track your IP address when you visit our website, please use this [opt-out link](#).

Drift

Drift.com Inc. is a conversation-driven marketing platform. With its rapidly evolving tools, Drift unlocks the hidden insights to accelerate business success. Drift records the email address you enter in our forms. For more information on how drift data is collected and processed please click [here](#). To unsubscribe from drift tracking, please email privacy@drift.com.

3. Processing of data through the Adjust Technology

Adjust GmbH, Adjust Inc. and Adjust KK (collectively, “Adjust” or “We”) provide mobile analytics and attribution services to mobile app providers (our “Customers”). In connection with these services, we may process certain data from the users of these mobile apps (collectively the “End User” or “You”), as further described hereafter. We process the data upon instructions from our Customers and do not have any kind of direct relationship with the You as the End User.

Customers who have [child-directed apps](#) must choose the appropriate product settings and must not share any personal data with Partners or any third parties. Customers must agree to the section in our Terms and Conditions accordingly.

Our SDK and APIs (collectively the “adjust technology”) may process some of the following data from You as the End User:

- Anonymized (hashed) IP address
- Mobile identifiers such as the ID for Advertising for iOS (IDFA), Google Advertising ID or similar mobile identifiers
- Installation and first opening of an app on Your mobile device
- Your interactions within an app (e.g. in-app purchases, registration)
- Information regarding which advertisements You have seen or clicked on

We use the aforementioned data for providing mobile analytics and attribution services to our Customers, and thereby allow our customers to track their marketing performance, to match You to their campaigns and to understand how You engage with our Customer’s app. Furthermore, we enable our Customers to track Your interactions in their apps in real time in order to see how You engage over their full lifetime. The aforementioned data is therefore processed in order to analyze the performance of marketing campaigns and to provide performance reports to our Customers. We do not combine the data with any other data that would enable us to personally identify You. Any information processed via the adjust technology is owned and controlled by our Customer who has implemented the adjust technology into their mobile app.

We do not share or disclose the user data with anyone else except in response to lawful requests by public authorities, including national security or law enforcement requirements. We store the data as long as our Customers are using the adjust

technology because we need it to provide our services to our Customers, if not requested otherwise by our Customers.

Right to be Forgotten

We fully endorse Your rights to privacy as the data subject and support your own choice on deciding about the collection, processing, usage and deletion of your data that we receive throughout the adjust technology and services.

If you want to enforce your right to be forgotten and opt-out of tracking by the adjust technology, please [click here](#), select the device You wish to opt-out and provide us Your device identifier. We will then remove usage tracking from apps that use our technology immediately as well as completely delete all your stored personal data. If you have questions regarding this opt-out please email us at privacy@adjust.com and we will get back to You as soon as possible.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our website and this privacy policy to check for any changes.

Cookie Preferences

You can edit your cookie preferences by clicking [here](#). Alternatively, you can remove all non-functional cookies by clicking [here](#).

Privacy

What does this privacy policy cover?

Criteo takes your privacy very seriously. This Privacy Policy governs and details the main privacy principles Criteo (“we,” “us,” “our”) applies to the data we collect and process through our services. This Privacy Policy describes how Criteo collects, uses, shares and secures personal information through our services, and also describes your choices regarding our use and your access to your personal information.

To read the privacy policy governing our corporate website only, please [click here](#).

User Choices

Please note that browser and mobile application environments are separate. If your intent is to disable Criteo services in both environments you need to read and follow instructions of both sections.

Please also note that if you are using a Safari browser, our opt-out feature will not work properly due to Apple Intelligent Tracking Prevention feature. If you are using a Safari version higher than 11.2, please refer to the last part of this section.

1/ Criteo Dynamic Retargeting



current browser and browsers we have linked to your technical identifier you can disable the display of Criteo ads [here](#).

If you only want to opt out from your current browser uncheck the box.

2/ Criteo Sponsored Products

Online web environment

If you do not want to receive Criteo Sponsored Products ads on your current browser, you can [click here](#).

Criteo Dynamic Retargeting

Opt-out OFF

Opt-out of all linked browsers

Criteo Sponsored Products

Opt-out OFF

1/ Criteo Dynamic Retargeting

Linked browsers:

If you would like to opt out of our service for all browsers we have been able to link to the cookie ID of your current browser, please see the opt out module included in the “User Choices” section [here](#). If you only want to opt out from your current browser uncheck the box.

If you choose to opt out for linked browsers, the opt out for the current browser is effective immediately. Note that for technical reasons, the opt out for other browsers linked to the cookie ID of your current browser should be effective as soon as you browse on the website of one of our Partners if it happens within 6 weeks following your opt-out.



that you disable our services from all your browsers separately.

Whatever option you choose, please note that opting-out from Criteo services on any browser or environment will trigger the deletion of your linking information and will prevent the future linking of the opted-out browser(s)/environment to any other browser(s)/environment(s).

Online web environment:

When you opt out as instructed in this section, a cookie will be set on your browser. We have to maintain the cookie on your browser and all potential linked browsers in order to recognize you as having opted out from our service. You must opt out again if you clear that cookie from a browser, use a non-linked browser, or use a new device to access the internet. Please note that on certain browsers such as Safari, clearing web site data can also erase opt out information and will therefore require you to opt out again from our services.

You can also opt out of Criteo’s service by visiting the following links. Please note that these platforms allow you to opt out of interest-based advertising delivered by registered members on the current browser you are using.

For US:

- [Network Advertising Initiative opt-out platform](#)
- [DAA Opt-Out Platform](#)

For EU:

- [IAB Europe opt-out platform](#)

Please note that if your browser settings prevent the use of certain cookies for cross-site personalization purpose or third party cookies in general, the choice mechanisms offered by the platforms above will not operate properly.



platforms and do not respond to web browser do not track signals.

Please note that if you are using an ad-blocker you may have to pause blocking or whitelist our website.

In-app environment:

Web browser environment and in-app environment are separate. If you do not want to receive Criteo ads whatever environment browsed you must disable our services for both the online web (as indicated above) and mobile app environments.

If you want to disable Criteo services, please refer to your operating system settings, or follow instructions below:

Android Users (version 2.3 and above)

To use the “opt-out of interest-based advertising” option, follow the instructions provided by Google here: [Google Play Help](#). If you don’t have the Google Play Services installed on your device, you won’t receive Criteo services.

Please note that this is a device setting and will disable interest-based ads from all providers, and not just for Criteo

iOS users (version 6 and above)

To use the “Limit Ad-Tracking” option, follow the instructions provided by Apple here: [Apple Support Center](#)

Please note that this is a device setting and will disable interest-based ads from all providers, and not just for Criteo

Please also note that some mobile applications may use or rely on a technical feature called “webview” that allows app developer’s to display web applications or web pages directly in their application without leaving the application to open your usual browser. A webview can be independent both of your usual browser and the mobile application environment. Therefore we would recommend to opt out also from this specific environment if you do not want to be served with Criteo advertisements.



showing ads on the Criteo network. However, as Facebook is a different environment, it may take up to 5 weeks to take your request into account.

In order to stop displaying our ads on your Facebook account, please manage your Facebook settings by clicking here:

[Facebook Settings](#)

2/ Criteo Sponsored Products

Please note that you may continue to see product ads that will be based on the context of the webpage only.

When you opt out as instructed in this section, a cookie will be set on your browser. You must opt out again if you clear that cookie from your browser, or use a new device to access the internet.

3/ Safari 11.2 and above

If you do not want to receive ads displayed by Criteo on a Safari browser above 11.2, you can enable the “Limit Ad Tracking” **and** “Ask websites not to track me” options on your device settings to disable our services (for Safari versions 11.1 and below, you can opt-out of Criteo services as indicated above in this section).

- **To enable the “Limit Ad Tracking” option**, you can go to the Advertising section of the Privacy settings of your device and turn on the “Limit Ad Tracking” option.
- **To enable the “ask websites not to track me” option**, you can go to the Safari section of your device’s general settings and turn on the “ask websites not to track me” option.

Enabling these options will disable Criteo ads and data collection both in the web and in mobile application environments as long as these options remain enabled. Your choice will be effective as soon as we recognize your device on our partners network.



“ask websites not to track me” options, we may no longer be able to know that you have opted out.

About Criteo’s services

Criteo specializes in creating personalized advertisements through “**Criteo Dynamic Retargeting**” and “**Criteo Sponsored Products**”. We work with online partners to build advertisements for users who visit their websites or mobile applications and with publishers to display personalized advertisements.

Our aim is to deliver advertisements by displaying products that you might be interested in, based on your recent browsing behavior or search.

Example of a “**Criteo Dynamic Retargeting**” Product ad: if you visit and browse on Website/mobile application A, on a subsequent online visit to Website/mobile application B, you will see ads personalized by your browsing history on Website/mobile application A.

Example of a “**Criteo Sponsored Products**” Product ad: if you make search on our partners’ website (“Criteo Sponsored Products”), you will see ads personalized by your search on that website.

With our service, you should receive personalized ads that are more relevant for you than the standard advertising you would receive without Criteo. [Click here for more information on Interest Based Advertising.](#)

Our Technology

We collect information via tracking cookies and similar technologies placed on a user’s browser or advertising IDs in environments that do not support cookies like mobile applications. These technologies allow us to analyze trends, and identify users’ interests around websites and mobile



your use of certain features or functions on a website.

Thanks to these technologies, Criteo “tags” visitors to its partners’ websites and mobile applications. Users tagged by Criteo are given a technical identifier. At no point does Criteo collect identifying personal data such as your name or address. Criteo only analyses the products viewed or the search made by the visitor and pages visited of the partner for whom Criteo is delivering ads.

Our partners’ advertisements are displayed on many websites, also known as “publishers.” These publishers may also place cookies on your browser. These cookies are there so that the publishers recognize that Criteo has a personalized advertisement available for your browser. Their use is governed by the specific privacy policies of the publishers which can be accessed directly from their websites. To manage Flash cookies, please click [here](#).

Criteo Dynamic Retargeting

Cross-device Linking

To serve you our personalized advertisements and provide users with a seamless online experience, we may link your identifiers on the different browsers and environments you are using (“ID syncing”). Thanks to its ID-syncing technology, Criteo is able to serve you the most relevant ads on whichever device or browser you are currently using without collecting or processing any identifying personal data such as your name or address to operate the linking. For this purpose, Criteo uses exact linking methods by leveraging the technical data collected through our technology such as our advertising partner’s identifiers or email hash that they may pass to us. We may also receive ID-syncing information from trusted partners using diverse linking methods for the same purpose and with the same level of guarantees in terms of Privacy and Data Protection. See the following “data collection and use” section to learn more.

the by-default settings of your browser aim to prevent the use of cookies for cross-site personalization and only if you have unambiguously accepted our services after being asked to do so (and offered the possibility to refuse subsequently). The purposes of these technologies are similar to the purposes of cookies and allow Criteo to tailor the ads served on its network. Please keep in mind that most web browsers may not permit you to block the use of non-cookie technologies. If you want to, you can always block the use of such technology by Criteo for advertising purpose simply by referring to the indications provided in the “User Choices” section of this page.

Data Collection and Use

We do not know who you are. We only collect and use technical pseudonymous data relating to your browsing navigation to display personalized advertisements.

The collection of your personal data is based on your consent: Criteo acts as a joint controller together with its clients and partners who have, when required by law, informed you and collected your consent to cookie (or other tracking technologies) dropping for the purpose of serving targeted advertising, for instance through a dedicated banner on their website. You may withdraw any consent to personal data processing at any time.

We collect browsing information

Data collected on Criteo network

To serve relevant ads, we have to be able to single out patterns but we never willingly store data that would allow identification of a person (such as name, surname, phone number, address, etc.). We collect data related to your browsing activity through cookies or advertising IDs that record:

- events related to your activity on our advertising partner’s website (such as the number of pages viewed, the products



- information related to your device (device type, operating system, version)
- non-precise information related to your geography and derived from the truncated IP address of your connection (in order to serve you ads only for products and services available in your country, region or city)
- and events related to the Criteo ad serving activity such as the number of ads displayed to you.

We also gather certain information automatically. This information may include browser type, referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends and optimize our services.

We do not use or store full IP address for targeting purposes. Your full IP addresses may only be used by Criteo for the following purposes:

- Fraud detection purposes to help alert us to situations which could not have been caused by human behavior, such as a massive amount of clicking in a limited period of time;
- Sales attribution
- Marketing reports with aggregated data.

We also collect technical user identifiers from our advertising partners for the purpose of linking the different browsers and mobile apps you use and serve you relevant ads based on your behaviour across environments ("ID syncing"). For that purpose we may process and store:

- **Criteo Dynamic Retargeting:**
 - Technical IDs of our advertising partners, and/or a of your CRM ID or of your email address – we use a double hashing method based on state-of-the art technologies to ensure the non-reversibility of your



identification. For example, a hash of `name@mail.com` would be
98307a5ba02fa1072b8792f743bd8b5151360556b8e5a6120fa9a04ae02c88c0.

- Mobile advertising IDs (such as Apple IDFA or Google AAID) which are specific technical data created by mobile manufacturers to allow personalization and customer analytics in a secure and non-identifying way for users.
- **Criteo Sponsored Products**
 - Technical IDs of our advertising partners, and/or your CRM ID

Data collected from trusted partners

We can collect technical identifiers from third parties for the purpose of improving our ID syncing and offering you a seamless online experience. These trusted partners commit to only sharing ID syncing information that allows us to link users' cookies and/or mobile identifiers and to provide an efficient choice mechanism to end-users (opt-out).

For example, the linking information sourced from our partners could be Cookie ID ABC = Apple IDFA 123 = MD5 hashed value. Our partners may use probabilistic or deterministic methods but in all cases please note that besides the ID syncing information, no other data (whether personally identifying information or non-personal identifying information) that could be collected by our partners in the course of their services are shared with us. Moreover, we require that all our partners provide users with a simple way to opt out from the collection and use of their data.

We do not collect any identifying information

We do not know who you are. We do not know your address, your place of work, your date of birth, your email address, your phone number.



We do not collect sensitive information (such as religion, political opinion, health...).

We do not create segments to specifically target children under 16 years old.

We do not process any information which could be used by Criteo directly to determine the personal identity of users.

We collect information in order to increase the relevancy of the ads being displayed to you. The data we collect is also used for reporting purposes, to give our clients and partners more information about the performance of their advertising campaigns, and to improve performance over time.

We may share aggregated data

We may share aggregated data on the performance of our customers' campaigns with our subsidiaries or affiliated companies, and we may share aggregated data with our partners. Aggregated data does not permit identification of a partner and does not permit you to be directly identified. We share non-aggregated data only upon approval of our partners and in compliance with our commercial agreements. Non-aggregated data may be stored by third parties such as data-centers and hosting providers who provide their services on our behalf. These companies are authorized to use the information we provide only as necessary to provide these services to us.

We partner with [Ad exchanges platforms](#) to buy ad placements through auctions for Criteo Dynamic Retargeting. Before the auction we link our ID with the ad exchange platform and then participate to the auction by sending the bid price and the banner code to display.

Criteo commitments and adherence

Criteo supports initiatives of greater transparency and control for users and in particular has been an early adopter to the following initiatives:



The Digital Advertising Alliance

Criteo adheres to the Digital Advertising Alliance Self-Regulatory Principles for Online Behavioral Advertising. Criteo subscribes to the [DAA opt-out platform](#) which offers the consumer a choice page to opt out from advertising services, and general information related to privacy.



The Network Advertising Initiative

Criteo adheres to the Network Advertising Initiative Standards ([NAI Code of Conduct](#), [Mobile Application Code](#)). NAI offers an online web [opt-out platform](#) to allow consumers to express their choices, and provides general information related to privacy and [Interest Based Advertising](#).



The IAB Europe

Criteo belongs to the IAB Europe and Criteo conforms to the [OBA Framework](#). The IAB Europe offers consumers an online web [opt-out platform](#) and provides general information to consumers about privacy tools.



EDAA

Criteo is a member of the European Digital Advertising Alliance (“EDAA”) and is in compliance the EDAA’s Self-Regulatory Principles. Criteo Dynamic Retargeting received independent data protection EDAA certification.

sector, the advertising network sector and the media sector.

EDAA offers consumers an online web [opt-out platform](#) and provides general information to consumers about privacy tools.



Criteo is also a member of the [Digital Advertising Alliance of Canada](#) (“DAAC”) and Criteo is in compliance the DAAC’s Self-Regulatory Principles.



Transfers of data outside EU

When it comes to data protection and privacy, we impose an high level of requirements to all our partners across the world. Thus, should the relationship with one of our partners involve cross-border data flows outside the European Union, our partner shall formally undertake to comply with the best data protection standards by adhering without any restrictions or limitations to the [Standard Contractual Clauses adopted by the European Commission](#).

Criteo uses Amazon Web Services for storing the Criteo Sponsored Product data. Amazon Web Services participates in the EU-US Privacy Shield framework.

Data security and retention

We retain the technical data that we collect for up to 13 months from the date of collection. Our cookies expire 13 months after they are last updated.

Legal Notice



meet national security or law enforcement requirements.

We may also disclose your information as required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request. If Criteo is involved in a merger, acquisition, dissolution or sale of all or a portion of its assets, Criteo reserves the right to disclose or transfer your information, and you will be notified via email and/or a prominent notice on our website of any change in ownership, uses of your personal information, and choices you may have regarding your personal information.

We do not share your information with third parties for their promotional purposes. We may share your information with our subsidiaries, affiliated companies, and trusted third party service providers working under the instruction of Criteo, such as a hosting provider or data center, exclusively for storage purposes. Such third parties who provide services on our behalf are authorized to process your personal information only as strictly necessary to provide these services to us. We of course remain responsible for making sure they commit themselves to adhere to this privacy policy and applicable data protection legislation by signing a data processing agreement.

Changes to our privacy policy

Please note that we may update or change this privacy policy. If we revise our privacy policy, we will post those changes to this privacy statement, and to other places we deem appropriate, so that you are aware of what information we collect, how we use it, and under what circumstances, if any we disclose it. If we make any material changes we will notify you by means of a notice on this site prior to the change becoming effective. Please click [here](#) for the latest version of the privacy policy.



Contact Us

Company: Criteo
Capital: € 1,652,127.43
Registration No: 484 786 249 RCS Paris
Address: 32 Rue Blanche, 75009 Paris, France
Tel: +33 (0) 1 40 40 22 90
Email address: contact@criteo.com

Criteo is the data controller.

Upon request, Criteo will provide you with information about whether we hold any of your personal information. You may access or request deletion of your personal information by contacting us as described below. We will respond to your request within a reasonable timeframe.

Rectification and erasure. You may request Criteo the rectification of inaccurate personal data concerning you, as well as the completion of incomplete personal data. You may also request Criteo to erase without undue delay your personal data when it is no longer necessary for Criteo to retain such data.

Portability. Upon request, Criteo will provide you with the personal data you that provided to us and, if possible, will communicate this information directly to another data controller of your choice in a portable format when the processing is based on consent or contract

For any questions on this Privacy Policy or our data practices, you can contact our Data Protection Officer:

By email: dpo@criteo.com, or,

By mail: DPO-CRITEO – 32 Rue Blanche -75009 Paris – France

If you have an unresolved privacy or data use concern related to Criteo Dynamic Retargeting 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>.



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Get in Touch



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75009 Paris, France

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Fax: +33 1 40 40 22 30

[View All Locations](#)

Last Updated: Tuesday, August 21, 2018

This privacy policy (this “Policy”) describes the collection of personal information by Leanplum, Inc., a Delaware corporation (“Leanplum,” “we,” or “us”) from users of our website at www.leanplum.com (the “Website”), as well as all software and other services provided by us via the Website or third party distributors (collectively, together with the Website, our “Service”). This Policy also describes our use and disclosure of that information. By using our Service, you consent to the collection, use, and disclosure of personal information in accordance with this Policy.

Personal Information

“Personal Information,” as used in this Policy, is information that specifically identifies an individual end user of the Service, such as an individual’s name, address, telephone number, or e-mail address. Personal Information also includes information about an individual’s activities, such as information about his or her activity on our Service, and demographic information, such as date of birth, gender, geographic area, and preferences, when any of this information is linked to Personal Information that identifies that individual. Personal Information does not include “aggregate” or other non-personally identifiable information. Aggregate information is information that we collect about a group or category of products, services, or users that is not personally identifiable or from which individual identities are removed. We may use and disclose aggregate information, and other non-personally identifiable information, for various purposes.

Collection of Information

Collection of Voluntarily-Provided Information

We collect Personal Information that our users provide to us in a variety of ways on our Service, including:

E-mail Newsletters. We may offer e-mail newsletters with announcements and information about Leanplum from time to time on our Service. If you sign up to receive a newsletter from us, we collect your e-mail address.

Downloads, User Accounts and Profiles. Our Service or third parties may give you the ability to download Leanplum software, register for a Leanplum account or to create and update a user profile on the Service. If we offer such functionality on the Service, we will collect the Personal Information that you provide to us in the course of using that functionality. This information may include, for example, your name, contact information, and system information, as well as information about your interests, preferences and future needs. We may indicate that some personal information is required for you to download our software, register for the account or to create the profile, while some is optional. To the extent that your user profile is public, we will share your Personal Information in your user profile with others in your organization.

Integrated Service. You may be given the option to access or register for the Service through the use of your user name

your Facebook credentials through Facebook Connect. By doing this, you authorize us to access and store the credentials you provide, your name, email address(es), date of birth, gender, current city, profile picture URL, and other information that the Integrated Service makes available to us, and to use and disclose it in accordance with this Policy. You should check your Facebook or other Integrated Service privacy settings to understand and change the information sent to us through Facebook Connect or other Integrated Service. Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting to our Service.

Interactive Features and Public Areas. Our Service may contain interactive functionality that allows you to engage with other users on the Service, post comments to forums, to upload photographs and other content (the "User Content"), participate in surveys, and otherwise to interact with the Service and with other users. If you use any interactive functionality on our Service that requests or permits you to provide us with personal information (including, for example, any services that allow you to post User Content on any of our Service), we collect the Personal Information that you provide to us in the course of using these interactive features. You should be aware that any information you provide in chat sessions, message boards, email exchanges, newsgroups or similarly non-private areas of the Service may be read, collected, and used by others who access these areas, and this information is not Personal Information for the purposes of this Policy. To request removal of your Personal Information from these areas, please contact us. In some cases, we may not be able to remove your Personal Information, in which case we will let you know if we are unable to do so and why.

Correspondence. If you contact us by e-mail, using a contact form on the Service, or by mail, fax, or other means, we collect the Personal Information contained within, and associated with, your correspondence. We use this Personal Information to respond to your correspondence. We may also use your correspondence to improve the Service.

Promotions. We or our advertisers and other business partners may conduct or sponsor special contests, sweepstakes, and other promotions that users may enter or otherwise participate in on our Service. Certain of these promotions may be co-branded with one of our advertisers or other business partners. In these instances, the collection of your Personal Information may occur directly by the third-party partner on its website or other online service and may be shared with us. The promotion will state the privacy policy or policies governing the collection of such personal information.

Passive Information Collection

When you visit our Service, some information is collected automatically. For example, when you access our Service, we automatically collect certain information, which may include your browser's Internet Protocol (IP) address, your browser type, the nature of the device from which you are visiting the Service (e.g., a personal computer or a mobile device), the identifier for any handheld or mobile device that you may be using, the Web site that you visited immediately prior to accessing any Web-based Service, the actions you take on our Service, and the content, features, and activities that you access and participate in on our Service. We also may collect information regarding your interaction with e-mail messages, such as whether you opened, clicked on, or forwarded a message.

We may collect this information passively using technologies such as standard server logs, cookies, and clear GIFs (also

our other services and systems, to improve the effectiveness of advertising on our Service, and to provide advertisements and other content that is tailored to you. If we link or associate any information gathered through passive means with Personal Information, or if applicable laws require us to treat any information gathered through passive means as Personal Information, we treat the combined information as Personal Information under this Policy. Otherwise, we use and disclose information collected by passive means in aggregate form or otherwise in a non-personally identifiable form.

Also, please be aware that third parties, such as companies displaying advertisements on the Service, or sites or services provided by third parties (“Third-Party Sites”) that may be linked to or from the Service, may set cookies on your hard drive or use other means of passively collecting information about your use of their services, Third-Party Sites or content. We do not have access to, or control over, these third-party means of passive data collection.

Information from Other Sources

We may receive information about you, including Personal Information, from third parties (e.g., opt-in lists where you have requested information about Leanplum or the Service while visiting a Third-Party Site). We may combine this information with other Personal Information we maintain about you. If we do so, this Policy governs any combined information that we maintain in personally identifiable format.

Use of Personal Information

We use Personal Information to provide the services and information that you request. We also use your Personal Information to enhance, improve, operate, analyze and maintain our Service and other systems (e.g., to troubleshoot problems); to prevent fraudulent use of our Service and other systems; to prevent or take action against activities that are, or may be, in violation of our Terms of Service or applicable law; to tailor advertisements, content, and other aspects of your experience on and in connection with the Service; to maintain a record of our dealings with you; for other administrative purposes (e.g., contacting you regarding administrative information or notices); to resolve disputes and enforce our agreements with you; and for any other purposes that we may disclose to you at the point at which we request your Personal Information, and pursuant to your consent.

We may also use Personal Information you provide to contact you regarding products, services, and offers, both from ourselves and from third parties, that we believe you may find of interest. We allow you to opt-out from receiving marketing communications from us as described in the “Choice” section below.

Disclosure of Personal Information

Except as described in this Policy, we will not disclose your Personal Information that we collect on the Service to third parties without your consent. We may disclose your Personal Information to third parties if you consent to us doing so, as well as in the following circumstances:

We may disclose Personal Information to third-party service providers (e.g., value-added resellers, payment processors, data storage and processing facility vendors) that assist us in our work. We limit the Personal Information provided to these service providers to that which is reasonably necessary for them to perform their functions, and we require them to agree to maintain the confidentiality of such Personal Information and to provide at least the same level of privacy protection as we do. Public Areas Some features on our Service may allow you to upload, post, or otherwise transmit User Content to public areas of the Service, such as comments that you post on a blog entry on the Service. Please be aware that any Personal Information that you include within any User Content will be made available to other users of the Service. You include Personal Information in User Content at your sole risk. We may allow you to select privacy options that limit access to some types of Personal Information in User Content, but no security measures are impenetrable or perfect. Additionally, even after information posted on the Website is removed, caching and archiving services may have saved that information, and other users or third parties may have copied or stored the information available on the Service. We cannot warrant or guarantee that any Personal Information that you provide on and in connection with the Service will not be accessed, viewed, or used by unauthorized persons.

Business Transfers

Information about our users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of company assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which Personal Information is transferred to one or more third parties as one of our business assets.

To Protect Our Interests

We also disclose Personal Information if we believe that doing so is legally required, or is in our interest to protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights or property of others, or otherwise to help protect the safety or security of our Service and other users of the Service.

Public Authorities

Leanplum may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements Event and Conference Sponsors. We may share your Personal Information with third parties that sponsor Leanplum events or conferences that you attend. Otherwise, Leanplum does not offer or allow the sale of any of your Personal Information to third parties.

Leanplum Inc. is liable for appropriate onward transfers of personal data to third parties.

Choice

third party or to be used for a purpose that is incompatible with the purpose(s) for which it was originally collected or subsequently authorized. You may exercise your choice by contacting Leanplum at: privacy@leanplum.com.

If you receive commercial e-mail from us, you may unsubscribe at any time by following the instructions contained within the e-mail. You may also opt-out from receiving commercial e-mail from us, and any other promotional communications that we may send to you from time to time (e.g., by postal mail) by sending your request to us by e-mail at info@leanplum.com or by writing to us at the address given at the end of this policy. Additionally, we may allow you to view and modify settings relating to the nature and frequency of promotional communications that you receive from us.

Please be aware that if you opt-out of receiving commercial e-mail from us, it may take up to ten business days for us to process your optout request, and you may receive commercial e-mail from us during that period. Additionally, even after you opt-out from receiving commercial messages from us, you will continue to receive administrative messages from us regarding our Service.

Access

If we offer the ability to create user accounts or profiles on our Service, you have the right to access and update many categories of Personal Information that you provide to us by logging in to your account and accessing your account settings. If you wish to access or amend any other Personal Information we hold about you, you may contact us at privacy@leanplum.com, or visit our [Data Subject Access Request Portal](#), or the other methods described under “Contacting Us” below.

If you request that we delete your account on any of our Service (via a user settings page, by e-mail, or otherwise), we will do so within a reasonable period of time, but we may need to retain some of your Personal Information in order to satisfy our legal obligations, or where we reasonably believe that we have a legitimate reason to do so.

Links

The Service may contain links to other Web sites, products, or services that we do not own or operate. For example, the Service may contain links to Third-Party Sites such as social networking services. If you choose to visit or use any Third-Party Sites or products or services available on or through such Third-Party Sites, please be aware that this Policy will not apply to your activities or any information you disclose while using those Third-Party Sites or any products or services available on or through such Third-Party Sites. We are not responsible for the privacy practices of these Third-Party Sites or any products or services on or through them. Additionally, please be aware that the Service may contain links to Web sites and services that we operate but that are governed by different privacy policies. We encourage you to carefully review the privacy policies applicable to any Web site or service you visit other than the Service before providing any Personal Information on them.

Children

Children's safety is important to us, and we encourage parents and guardians to take an active interest in the online activities of their children. Our Service is not directed to children under the age of 13, and we do not knowingly collect Personal Information from children under the age of 13 without obtaining parental consent. If we learn that we have collected Personal Information from a child under the age of 13 on our Service, we will delete that information as quickly as possible. If you believe that we may have collected any such Personal Information on our Service, please notify us at info@leanplum.com.

International Visitors

Our servers and data centers are located in the United States. If you choose to use the Service from outside the U.S., then you should know that you are transferring your Personal Information outside of your region and into the U.S. for storage and processing. By providing your Personal Information to us through your use of the Service, you agree to that transfer, storage, and processing in the U.S. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Service. You should know that each region can have its own privacy and data security laws, some of which may be less stringent as compared to those of your own region.

EU-U.S. Privacy Shield Framework Compliance

Leanplum complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union and Switzerland to the United States. Leanplum has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

Leanplum is also subject to the investigatory and enforcement powers of the Federal Trade Commission (the "FTC") that will effectively ensure compliance with the EU-U.S. Privacy Shield Principles.

EU-U.S. Privacy Shield Independent Recourse Mechanism

In compliance with the EU-U.S. Privacy Shield Principles, Leanplum commits to resolve complaints about your privacy and our collection or use of your personal information. European Union citizens with inquiries or complaints regarding this privacy policy should first contact Leanplum at privacy@leanplum.com.

Leanplum has further committed to refer unresolved privacy complaints under the EU-U.S. Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.bbb.org/EU-privacy-shield/for-eu-consumers/> for more

Swiss-U.S. Privacy Shield Independent Recourse Mechanism

In compliance with the Swiss – US Privacy Shield Principles, Leanplum commits to resolve complaints about your privacy and our collection or use of your personal information. Swiss citizens with inquiries or complaints regarding this privacy policy should first contact Leanplum at privacy@leanplum.com.

Leanplum has further committed to refer unresolved privacy complaints under the Swiss-US Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.bbb.org/EU-privacy-shield/for-eu-consumers/> for more information and to file a complaint.

EU-U.S. Privacy Shield Arbitration Mechanism

As a last resort, for complaints left unresolved by all other available mechanisms, EU individuals may invoke binding arbitration before the Privacy Shield Panel. The Privacy Shield Panel is an “arbitration mechanism” made up of three neutral arbitrators, meaning that it settles disputes without going to court. Its decisions, however, are binding and enforceable in U.S. courts. EU individuals can invoke arbitration through the Privacy Shield Panel, under limited conditions (in particular the prior exhaustion of certain other redress possibilities).

Swiss-US Privacy Shield Arbitration Mechanism

As a last resort, for complaints left unresolved by all other available mechanisms, Swiss individuals may invoke binding arbitration before the Privacy Shield Panel. The Privacy Shield Panel is an “arbitration mechanism” made up of three neutral arbitrators, meaning that it settles disputes without going to court. Its decisions, however, are binding and enforceable in U.S. courts. Swiss individuals can invoke arbitration through the Privacy Shield Panel, under limited conditions (in particular the prior exhaustion of certain other redress possibilities).

Security

We use reasonable security measures that are designed to protect personal information from accidental loss, disclosure, misuse, and destruction. Please be aware, however, that no data security measures can be guaranteed to be completely effective. Consequently, we cannot ensure or warrant the security of any information that you provide to us. You transmit information to us at your own risk. Always select a password that is unlikely to be available or discovered by others, and never disclose your password to any third parties. You are responsible for all Personal Information submitted through your account or user profile and all actions taken through your account and user profile. Therefore, if your password has been compromised for any reason, you should immediately change your password.

We may occasionally update this Policy. When we do, we will also revise the “last updated” date at the beginning of the Policy. Your continued use of our Service after such changes will be subject to the then-current policy. If we change this Policy in a manner that is materially less restrictive of our use or disclosure of your Personal Information, we will use reasonable efforts to notify you of the change and to obtain your consent prior to applying the change to any Personal

Information that we collected from you prior to the date the change becomes effective. We encourage you to periodically review this Policy to stay informed about how we collect, use, and disclose Personal Information. Contacting Us If you have any questions or comments about this Policy, please contact us using the contact information available on our Website, www.leanplum.com.

Terms of Service

Privacy Policy

Contact

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