

# Privacy Policy Adram

## 1. Introduction

The proper handling of personal data is extremely important to us. We therefore take your privacy seriously when processing and protecting your personal data. This is done in accordance with provisions set out in the applicable privacy laws (including the General Data Protection Regulation). We want you (hereinafter: «user») to understand how and why Blockchain Programmatic Corporation Inc (hereinafter: «AdRam» «we» «our» or «us») collects, processes, uses, and shares information about you (hereinafter: «Personal Information», «PI», «PD») when you use our website <https://adram.media/> and other online products and services (collectively, the "Services") or when you otherwise interact with us or receive a communication from us.

We may revise this Privacy Policy from time to time. The most current version of the policy will govern our processing of your personal data and will always be at <https://adram.media/adram-privacy-policy-en.pdf>. If we make a change to this policy that, in our sole discretion, is material, we will notify you via an email to the email address associated with your account. If required by law, we will get your permission or give you the opportunity to opt out of any new uses of your Personal Information.

We take great care to limit the Personal Information we collect and use only for the purposes, which are necessary for providing our Services.

AdRam collects and processes personal information that is necessary for legitimate business purposes, which will be disclosed to the data subject. AdRam will use and process this information only for the purposes for which it was collected, retaining the personal information only for so long as it is required for specific purpose of collecting such information.

AdRam will not collect sensitive personal data except when permitted or required to do so by law and will do so only for legitimate business purposes. If in any other instance a need arises to collect sensitive personal data, AdRam will do so only with the data subject's express consent, which can be withdrawn at any time.

We retain your Personal Data for as long as required to satisfy the purpose for which they were collected and used, unless a longer period is necessary for our legal obligations or to defend a legal.

We do not transfer your Personal Data to third Parties, except cases, that are mentioned in this Privacy Policy.

This Privacy Notice is incorporated into and is subject to the AdRam Terms of Use. Your use of the Services and any personal information you provide on our Services remains subject to the terms of this Privacy Policy and our Terms of Use.

## 2. Personal Information

### Personal Information we collect and use

When you create an AdRam account, you provide us with personal information that includes your name and password. You can also choose to add a phone number, e-mail or payment information to your account.

When you use our services without creating an account we store the information that we collect with unique identifiers tied to the browser, application or device that you're using. This helps us to perform actions such as maintaining your language preferences across browsing sessions.

The Personal Information we collect about you when use our Services, include the following:

The information that we collect includes unique identifiers, browser type and settings, device type and settings, operating system, mobile network information including operator name and phone number and application version number. We also collect information about the interaction of your browsers and devices with our services, including OS, IP address, specifications and the date, time and referrer URL of your request.

*Actions you take.* We collect information about the actions you take while using our Services. This information includes:

- ✓ *Views and interactions with content and ads.* For example, we collect information about views and interactions with ads so that we can provide aggregated reports to advertisers, like telling them whether we served their ad on a page and whether the ad was likely to have been seen by a viewer.

- ✓ Activity on third-party sites that use our services.

*Information collected from cookies.* for example: IP, location, OS, browser, language of browser, site addresses, shows of ads to users and user's, clicks on ads, device specific identifiers and information such as IP address, cookie information, mobile device and advertising identifiers, browser version, operating system type and version, mobile network information, device settings, and software data. We may recognize your devices to provide you with personalized experiences and advertising across the devices you use.

*Location information.* We collect location information from a variety of sources, including your IP address and GPS data.

*Information from Others.* We collect information about you when we receive it from other users, third-parties, and affiliates, such as:

- ✓ From publicly-available sources.

- ✓ From advertisers about your experiences or interactions with their offerings.

When we obtain information from third-parties or other companies, such as those that use our Services. This may include your activity on other sites and apps as well as information those third-parties provide to you or us.

### **3. Purposes of Personal Information collection**

We are able to deliver, personalize, and improve our Services by combining and using the information we have about you (including information we receive on and off our Services) to understand how you use and interact with our Services and the people or things you're connected to and interested in. We also may use the information we have about you for the following purposes:

- ✓ Provide, maintain, improve, and develop relevant features, content, and Services;
- ✓ Fulfil your requests and when authorized by you;
- ✓ Help advertisers and publishers connect to offer relevant advertising in their apps and websites;
- ✓ Match and serve targeted advertising (across devices and both on and off of our Services) and provide targeted advertising based on your device activity, inferred interests and location information;
- ✓ Contact you with information about your account or with marketing messages;
- ✓ Carry out or support promotions;
- ✓ Conduct research and support innovation;
- ✓ Create analytics and reports for external parties, including partners, publishers, advertisers, apps, third-parties and the public regarding the use of and trends within our Services and ads, including showing trends to partners regarding general preferences, the effectiveness of ads and information on user experiences. These analytics and reports may include aggregate or pseudonymized information;
- ✓ Provide location-based Services, advertising, search results, and other content consistent with your location settings;
- ✓ Combine information we have about you with information we obtain from business partners or other companies, such as your activities on other sites and apps;

- ✓ Detect and defend against fraudulent, abusive, or unlawful activity;
- ✓ We use your location to personalize the content you provide and to serve targeted ads;
- ✓ Research and develop new services;
- ✓ Send you technical notices, updates, security alerts, invoices and other support and administrative messages;
- ✓ Provide customer service;
- ✓ Communicate with you about products, services, offers, promotions, and events, and provide other news and information we think will be of interest to you;
- ✓ Personalize the Services and provide advertisements, content and features that match user profiles or interests.

We provide you with controls to manage your experience with us. For example, you can review or edit your account information, manage your marketing preferences, or opt out of targeted ads. If you opt out, you will continue to see ads, but they may not be as relevant or useful to you.

#### **4. Your rights regarding collected PI**

You can access and change certain information through the Services.

You may delete your account information at any time using the feedback form.

If you initially consent to our collection of location information, you can subsequently stop the collection of this information at any time by changing the preferences on your browser.

You have the right to receive information regarding purposes of Personal information collection, regarding third parties, to which we disclose your personal information, information, regarding safeguards that are applicable for secure storage of your Personal information, period of time for which Personal information will be stored.

You also have the right to demand erasure of personal data concerning you sending us a request. AdRam shall fulfil your request in appropriate period of time. If there is no other lawful ground for storing and processing of your PI, as prescribed by applicable law, AdRam shall erase such information. If there is another legal ground for such processing, AdRam shall notify you in appropriate period of time.

You also have the right to demand restriction of the storing and processing of the PI, if legal grounds for such demands have arisen / as prescribed in applicable law.

You have the right to object processing of personal data concerning yourself under circumstances, that are prescribed in applicable law. In case of such objection, AdRam shall restrain from processing of your PI, if there will be no other legal grounds for continuing of processing.

AdRam takes your rights very seriously. However, if you are of the opinion that we have not dealt with your complaints adequately, you have the right to submit a complaint to the data privacy protection authorities responsible.

You have the right to ask AdRam to provide you with a structured, list of previously provided PI. You also can ask AdRam to transmit your PI to previously chosen third party.

To send a request for delete, rectification and submission of PD please use the feedback form.

## **5. Collection of Children's PI**

Children can only use our services under the supervision of their parents/legal guardians. Consent for processing of minor' PI shall be given by their holder of parental responsibility over the minor.

Personnel of AdRam does not knowingly collect or maintain personally identifiable information or non-personally-identifiable information on the AdRam Services from persons under 16 years old, and no part of our services is directed to persons under 16. If you are under 16 years old, then please do not use or access the AdRam Services at any time or in any manner. If AdRam learns that personally identifiable information of persons less than 13 years old has been collected on the AdRam Services without verified parental consent, then AdRam will take the appropriate steps to delete this information.

Additionally, if you are in the EEA, you must be over the age required by the laws of your country to create an account or otherwise use the Services, or we need to have obtained verifiable consent from your parent or legal guardian.

## **6. Cookies**

A cookie is a small piece of data that is stored on your computer or mobile device. Like many websites, we use cookies and similar technologies to collect additional website usage data and to operate our services. Cookies are required for many parts of our services. Although most web browsers automatically accept cookies, many browsers' settings can be set to decline cookies or alert you when a website is attempting to place a cookie on your computer. However, some of our services may not function properly if you disable cookies. When your browser or

device allows it, we use both session cookies and persistent cookies to better understand how you interact with our services, to monitor aggregate usage patterns, and to personalize and otherwise operate our services such as by providing account security, personalizing the content we show you including ads, and remembering your language preferences. We do not support the Do Not Track browser option.

When you visit the AdRam website, we may send one or more cookies. AdRam uses both session cookies and persistent cookies. A persistent cookie remains after you close your browser. your browser may use persistent cookies on subsequent visits to the Website. Persistent cookies can be removed by following the directions in your web browser's help file. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when it receives a cookie.

We show you the Cookie-banner for receiving of your appropriate consent for usage of Cookies. You are able to restrict our usage of Cookies anytime in your profile settings. It is impossible to maintain our Website without minimal usage of Cookies and this is why we show you the Cookie-banner. We use required Cookies even if you do not accept banner.

## **7. Usage, processing and disclosure of PI.**

Our privacy policy applies only to the AdRam Services. AdRam may contain links to other websites and file downloads from other websites. Other sites can use our services. We do not exercise control over any site that may be linked to from within content on this site. We are not responsible for the privacy practices or content of such websites.

We do not transfer your Personal Data to third Parties, except cases that are mentioned in this Privacy Policy.

*With your consent.* We will share information with companies, organizations or individuals outside of AdRam when we have your consent.

*To comply with the law.* We may share information in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation, legal process or governmental request, including, but not limited to, meeting national security or law enforcement requirements. To the extent the law allows it, we will attempt to provide you with prior notice before disclosing your information in response to such a request.

*In an emergency.* We may share information if we believe that it's necessary to prevent imminent and serious physical harm to a person.

*To enforce our policies and rights.* We may share information if we believe your actions are inconsistent with our user agreements, rules, or other AdRam policies, or to protect the rights, property, and safety of ourselves and others.

*With our affiliates.* We may share information between and among AdRam and any of our parents, affiliates, subsidiaries, and other companies under common control and ownership.

*With our partners.* We may share information with vendors, consultants, and other service providers (but not with advertisers and ad partners) who need access to such information to carry out work for us. The partner's use of personal data will be subject to appropriate confidentiality and security measures.

*We engage service providers* to perform functions and provide services to us. For example, we use a variety of third-party services to help operate our services and to help us understand the use of our services. We may share your private personal data with such service providers subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use your private personal data only on our behalf and pursuant to our instructions.

*Advertising, Analytics and Business Partners* (Limited to Non-Personally Identifiable Information). We may share aggregated or pseudonymous information (including demographic information) with partners, such as publishers, advertisers, measurement analytics, apps, or other companies. For example, we may tell an advertiser how its ads performed or report how many people installed an app after seeing a promotion. We do not share information that personally identifies you (personally identifiable information is information like name or email address) with these partners, such as publishers, advertisers, measurement analytics, apps, or other companies.

When you use third-party apps, websites or other products integrated with our Services, they may collect information about your activities subject to their own terms and privacy policies.

If you submit personally identifiable information to us through the AdRam Services, then we may use your personal information to operate, maintain, and provide features and functionality of the our website, app and another services.

Other information, that does not personally identify you as an individual is collected by AdRam (such as, by way of example, patterns of use) and is exclusively owned by AdRam. AdRam can use this information in such manner that AdRam, in its sole discretion, deems appropriate.

We may share specific aggregated, non-personal information with third parties, such as the number of users who have registered with us, the volume and pattern of traffic to and within the site, etc. That information will not identify you, the individual, in any way.

We shall not use your email or other contact information for sending of commercial proposal, other marketing needs, without your prior consent.

In the light of the above, when you send us messages, we can keep them for administering of your inquiries, for improving of our services. We shall not transfer information from such messages to third parties.

## **8. How we use information from sites that use our services**

Many websites use our Services to improve their content and keep it free. When they integrate our services, these sites and apps share information with AdRam.

For example, when you visit a website that uses our advertising services, your web browser automatically sends certain information to AdRam. This includes the URL of the page that you're visiting and your IP address. We may also set cookies on your browser or read cookies that are already there.

AdRam uses the information shared by sites and apps to deliver our services, maintain and improve them, develop new services, measure the effectiveness of advertising, protect against fraud and abuse and personalise content and ads that you see on our partners' sites.

*Ad personalisation.* If ad personalisation is turned on, AdRam will use your information to make your ads more useful for you.

If ad personalisation is off, AdRam will not collect or use your information to create an ad profile or personalise the ads that AdRam shows to you. You will still see ads, but they may not be as useful.

When you interact with a website or app that uses AdRam services, you may be asked to choose whether you want to see personalised ads from ad providers

## **9. Data transfers**

Remember, you are able to control your PI with help of privacy settings. Other information collected by us on sites that use our services is controlled by the privacy policy of these sites. However, you can always contact us through the feedback form.

When we transfer PI outside the European Union or EFTA, we ensure, that the adequate level of PI security is provided. During such transfer, we also ensure that adequate level of your rights protection is also applied, on the basis of adequacy analysis of the third country personal data protection legislation, on the basis of contractual obligations, assumed by the PI recipient.

If at any time in the future, we propose to use personal information for any purpose other than our internal use in maintaining the services, troubleshooting, improving our services, etc., then we will offer you an effective way to opt out of the use of personal information for those other purposes.

We do not use your email address or other personally identifiable information to send commercial or marketing messages without your consent or except as part of a specific program or feature for which you will have the ability to opt-in or opt-out. We may, however, use your email address without further consent for non-marketing or administrative purposes (such as notifying you of major AdRam site changes or for customer service purposes).

We restrict access to personal information to our employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

You may update or correct your personal profile information and email preferences at any time by visiting your account profile page. To request that we close your account and remove your information from the AdRam service, please send your request. Please send your request using an email account that you have registered with AdRam under your name.

## **10. Protection of the Personal Information**

We provide the following safety measures regarding protection of Your PI:

- evaluation of the effectiveness of used security measures, prior to the launch of the Website and its updates;
- establishing rules to access to personal data processed by the Website, as well as ensuring registration and recording of all actions performed with PI in the information systems of the Site;
- detection of the facts of unauthorized access to PI and the adoption of appropriate response measures;
- restoration of PI that was modified or destroyed due to unauthorized access to them (within the framework of technical capability of the Project).

We use, store and process your PI on AdRam servers in various jurisdictions, where our facilities and/or service providers are located. By filling a “consent application “You agree to this transfer, storing, or processing. AdRam will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Policy. AdRam protect your Personal Data under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards AdRam use are firewalls and data encryption, physical access controls to our data centres, and information access authorization controls. AdRam also authorize access to Personal Data only

for those employees or contractors who require it to fulfil their job or service responsibilities. All of our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations. Third parties may be located in other countries where the laws on processing of Personal Data may be less stringent than in your country. From time to time, the Personal Data may be also stored in other locations, and in such cases, AdRam will ensure that the Personal Data will be stored and processed with the reasonable level of care and security.

## **10. Notification**

**In the case of a Personal Data breach, AdRam shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal information breach to the supervisory competent authority, unless the personal information breach is unlikely to result in a risk to the rights and freedoms of natural persons.**

If AdRam becomes aware of security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. AdRam may post a notice on our website if the security breach occurs.

When the personal data breach is likely to result in a high risk to the rights and freedoms of users, the AdRam will inform you.

In the event that AdRam is acquired by or merged with a third party entity, we reserve the right, in any of these circumstances, to transfer or assign the information we have collected from our Users as part of such merger, acquisition, sale, or other change of control. If we become involved in a merger, acquisition, or any form of sale of some or all of its assets, we will notify Users before personal information is transferred and becomes subject to a different privacy policy. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your personal information is treated, transferred, or used.

## **11. Changes to This Privacy Policy**

We may revise this Privacy Policy from time to time. The most current version of the policy will govern our processing of your personal data and will always be at <https://adram.media/adram-privacy-policy-en.pdf>. If we make a change to this policy that, in our sole discretion, is material, we will notify you via an email to the email address associated with your account. If required by law, we will get your permission or give you the opportunity to opt out of any new uses of your Personal Information.

## **12. Contact us**

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

E-mail: [info@adram.media](mailto:info@adram.media)