



## OGURY WEBSITE AND CUSTOMER PRIVACY AND COOKIE NOTICE

Ogury (“**Ogury**”, “**we**”, or “**us**”) provides digital advertising and related services to publishers, agencies and brands (together the “**Services**”).

We also operate the websites [www.ogury.com](http://www.ogury.com) and [www.ogury.co](http://www.ogury.co) (the “**Websites**”). This Privacy Notice is intended to inform you about how Ogury collects, uses, shares and stores your personal data when you:

- interact or use our Websites, including downloading materials from our resources page or requesting a demo; and
- if you use any of our Services.

Specific additional terms for California residents Privacy Notice are listed [here](#).

If you are an end-user of an app or website that uses the digital advertising and related services we provide to our corporate customers, please click [here](#).

### 1. WHAT PERSONAL DATA OGURY COLLECTS ABOUT YOU

#### 1.1. Type of personal data collected

Personal data, means any information we hold which we can link to an identified person or a person that may be able to be identified.

As such, the following personal data may be collected by Ogury:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, your interests, preferences, feedback, and survey responses.
- **Usage Data** includes information about how you use our Websites and Services.
- **Marketing and Communications Data** includes our preferences in receiving marketing from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.



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

### 1.2. Failure to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, you may not be able to use the Services or complete other have or are trying to enter into with you (for example, to provide you with goods or services).

In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

If you fail to provide your personal data from our contact form, we may not be able to reach out and answer to your queries.

### 1.3. How do we collect personal data?

We collect personal data when you enter it on the Websites through contact forms or when you create an account for the use of the Services.

## 2. DATA USE

We will use your personal data in the following circumstances:

### 2.1. Websites

With regard to our Websites

- To administer the Websites, for internal operations, including troubleshooting, data analysis, testing, statistical and survey purposes;
- To improve our Website to ensure that content is presented in the most effective manner for you and for your device;
- For trend monitoring, marketing and advertising;
- For purposes made clear to you at the time you submit your personal data – for example, to fulfil a request for a product demonstration or call back, to provide you with access to one of our webinars or a copy of a whitepaper, or to provide you with information you have requested about our Services; and
- As part of our efforts to keep our Website secure.

Our use of your personal data for the above is based on our legitimate interest in ensuring the security of the Websites and for our direct marketing purposes, or



your consent (e.g. when you request a demo or consent to the use of non-essential cookies on the Websites).

## 2.2. Services

We may use the personal data we collect from our customers (employees and contractors) their users in connection with the Services for a range of reasons, including to:

- Set up a user account;
- Provide, operate and maintain the Services;
- Process and complete transactions and send related information, including transaction confirmations and invoices;
- Manage our customers' use of the Services, respond to enquiries and comments and provide customer service and support;
- Send customers technical alerts, updates, security notifications and administrative communications;
- Investigate and prevent fraudulent activities, unauthorized access to the Services and other illegal activities; and
- For any other purposes about which we notify customers and users.

We use your personal data for the above purposes based on the commercial agreement that we have with you, or our legitimate interests for security purposes (e.g. the prevention and investigation of fraudulent activities). Personal data will be deleted based on the terms of the agreement relating to the provision of the Services.

## 3. SHARING PERSONAL DATA WITH THIRD-PARTIES

We may share your personal data with third parties in the following limited circumstances:

### 3.1. Vendors

We may share your personal data with third party service providers, consultants and other vendors that we engage to perform tasks as data processors on our behalf. We have contracts in place with them. This means that they can only use your personal data the as instructed by us and they will not share your personal data with any organisation apart from us or that we instruct them to share it with.

### 3.2. Ogury Group Companies

We may also share your personal data with the Ogury Group from time to time (including companies acquired by Ogury) for purposes consistent with this Privacy Notice.



### 3.3. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 4. COOKIES

Our Websites use cookies to distinguish you from other users of our Websites. This helps us to provide you with a good experience when you browse our Websites and also allows us to improve them.

The cookies store non-personally identifiable information related to your navigation on our website. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website.

We use the following cookies:

- **Essential cookies:** These cookies are necessary for our website to function cannot be switched off. They are usually only set in response to activity which we consider a request for services, such as setting your privacy preferences, logging in or completing contact forms.
- **Preference cookies:** These cookies enable Ogury to recognize you when you visit our website and remember your preferences (for example, your choice of language or region).
- **Marketing cookies:** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.
- **Statistics cookies:** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Cookies can remain on your computer or mobile device for different periods of time. Some cookies are 'session cookies' and expire automatically within 20 minutes. Other cookies are 'persistent cookies', meaning that they survive after your browser is closed and are used by websites to recognize your computer or device at a later time.



We may also place third parties' cookies when you interact with our website. We use the following third parties' cookies for the purpose defined below:

- **Analytics:** we use Google Analytics to count visits and traffic sources to help us measure the performance of our website. They help us know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous.
- **Marketing :** We also have one Marketo cookie (munchkin cookie) to track website visitors and react to their visits with automated marketing campaigns based on their interests. **Search Engine:** we use Google AdWords to advertise on our products and services on the Google search page results. For more information on how to opt-out, please refer to Google specific Privacy Notice and settings for Google ads.
- **Videos:** we use Vimeo to illustrate our product and services through videos that are embedded on our website.
- **Social Media:** we use LinkedIn to advertise Ogury and our Services. For more information on how to opt-out, please refer to LinkedIn specific Privacy policy.

## 5. INTERNATIONAL TRANSFERS

We share your personal data within the Ogury Group and with certain third parties noted above. This may involve transferring your data outside the European Economic Area (**EEA**).

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use service providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).
- We may rely on other valid legal bases for such transfers such transferring to a country, for example where the European Commission has found that such country provides an adequate level of protection for personal data.

## 6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition,



we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. CHILDREN

The Websites are not intended for use by children and we do not knowingly collect personal data relating to children under the age of 16. If you believe a child under 16 may have provided us with personal data please contact us on [privacy@ogury.co](mailto:privacy@ogury.co).

## 8. DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, contractual or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal, regulatory, tax, accounting or other requirements.

## 9. YOUR LEGAL RIGHTS

Under EU General Data Protection Regulation (GDPR), you have the right to access, modify or erase your personal data. You can exercise this right by contacting us at [privacy@ogury.co](mailto:privacy@ogury.co).

California residents have specific rights under the California Consumer Privacy Act ('CCPA'). For more information and to exercise your rights, please see the [Section 10](#) below.

Please note that we may still use any aggregated and de-identified personal data that does not identify any individual and may also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes and enforce contracts.

### 9.1. Marketing Communications

You can ask us to stop sending you marketing messages at any time [by logging into the website and checking or unchecking relevant boxes to adjust your marketing



preferences **OR** by following the opt-out links on any marketing message sent to you **OR** by contacting us at any time at [privacy@ogury.co](mailto:privacy@ogury.co)

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase or product/service experience or other transactions.

### 9.2. Cookies

You can accept or reject cookies for our Websites through via the Edit my privacy settings link at the bottom of every page. You can also do so by adjusting your web browser controls.

### 9.3. Contact

If you want to exercise your rights relating your personal data we may have collected or have any queries relating the our use of your personal data, please contact our Data Protection Officer at [DPO@ogury.co](mailto:DPO@ogury.co).

If you have any questions about our Privacy Notice, please contact us at [privacy@ogury.co](mailto:privacy@ogury.co)

You can also reach us by mail at the following address:

Ogury Ltd  
Attention to DPO  
3<sup>rd</sup> Floor, Classic House,  
174-180 Old Street  
London EC1V 9BP  
UK

## 10. CALIFORNIA RESIDENTS

Under the California Consumer Privacy Act ("**CCPA**"), California residents have certain rights regarding the personal information that businesses hold about them. This includes the rights to request access or deletion to this personal information, as well as the right to direct a business to stop selling your personal information.

- *Personal Information we collect*

We collect identifiers (such as name, address, email address, phone number and job title), commercial information (such as a record of the Services used or product demonstrations) and Internet or other electronic network activity information (such as usage information, IP address, cookie information and customer feedback).

- *Why we collect your Personal Information*

We use your Personal Information to provide the services requested, such as to fulfil a request for demos or otherwise provide you with information about our services.

We use identifiers and commercial information for general website administration, which includes record keeping, troubleshooting, data analysis, testing and surveys.



We use identifiers, commercial information and Internet or other electronic network activity for trend monitoring, marketing and advertising, as well as to ensure website security.

- *How we Collect your Personal Information*

We collect identifiers and commercial information directly from you.

We collect Internet or other electronic network activity from your usage of the Websites and Services.

- *Share and Sale of your Personal Information*

We share personal information as necessary for certain “business purposes,” as defined by the CCPA (Cal. Civ. Code 1798.140(d)). This includes sharing identifiers, commercial information and internet or other electronic network activity with providers of customer relationship management, consulting, email, product feedback and helpdesk services.

We do not ‘sell’ your personal information as defined by the CCPA.

- *The Right to Opt-out of Sale*

As Ogury does not your personal information we do not offer a right to opt-out of such sale.

With respect to cookies and the use of our Websites, you can always customize your settings at any time.

- *Right to Know*

You have the right to know what categories of personal information Ogury has sold or disclosed for a business purpose about you and the categories of third parties to whom the personal information was sold or disclosed. Additionally, you have the right to request disclosure of the personal information Ogury holds about you.

- *Right to Request Deletion*

You have the right to request that Ogury delete any personal information that it has collected about you. This is subject to exceptions such as when the deletion of the personal information would create problems with the completion of a transaction or compliance with a legal obligation.

- *The Right to Non-Discrimination*

Ogury will not discriminate against you (e.g., through denying goods or services, or providing a different level or quality of goods or services) for exercising any of your rights under CCPA.

You can exercise any of the above rights by contacting us at [privacy@ogury.co](mailto:privacy@ogury.co).

## 11. UPDATES TO THE PRIVACY NOTICE

We may revise this Privacy Notice from time to time.



We are constantly improving our Websites and Services, so we may need to change this Privacy Notice from time to time as a result. We will notify you to material changes by, for example, placing a notice on our Websites and/or by sending you an email (if you have provided us with your e-mail address) when we are required to do so by applicable law.

Please check our website regularly to ensure that you are aware of the latest applicable Privacy Notice.

You can see when this Privacy Notice was last updated by checking the date at the bottom of this page.