#### Introduction

Scattered provides technology that allows effective monetization of digital media by payed promotion of product or brands while keeping control of the data. This Privacy Policy describes practices and policies with regard to the use and processing of data when providing the services by Scattered. Scattered complies with the EU General Data Protection Regulation (GDPR).

# **Data Collection and Usage**

Scattered collects and processes the data listed below either as administrator or processor in order to operate offered services: first party cookies assigned by the media owners, User agent (including browser, OS), IP, URL, GEO, other data from 3<sup>rd</sup> parties under permission. Scattered services use scripts, pixels, server-2-server communication to collect the information.

Scattered does not create individual user profiles and hence does not use cookies or other personal information on individual level. Data is used in aggregated form to create Al models predicting general user behavior on population level.

# Responsibility

Scattered provides technological tools for its clients, by which they can collect necessary data, transfer it to Scattered platform and use it to monetize their media. In particular partners use scripts or pixels to collect certain events. Individual events are then transferred to the Scattered platform for building Al models. Build models (free of personal information) are then utilized by the platform for optimization purposes.

Clients of Scattered are obliged to collect necessary consents for collecting and processing of the necessary data, which is further transferred to Scattered and applied accordingly.

### **Data sharing**

Clients have access to the Information they collect, upload or use within the Services, and may have access to Information generated through their use of the Service. Data is not transferred outside of the EU.

### **Data Retention**

Data is kept in Scattered services only as long as it is necessary to keep the services working.

### **Legal Basis**

We collect and process Information only where we have your consent (GDPR, art. 6, par.1) or in the case of a legitimate interest to do so.

# **Data Security and Protection**

Scattered implements high security standards to protect all data collected, used and processed on behalf of its clients.

# **Data Protection Rights**

The right to access, correct, update or request deletion of your personal information, you can do so at any time by sending an email to <a href="mailto:office@scattered.pl">office@scattered.pl</a>. If you are a resident of the European Union, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.

If you have given any website your consent to use Scattered, then you should withdraw your consent on the same website where you have given it. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

The user has the right to complain to a data protection authority about our collection and use of your personal information.

If you have any questions or believe your personal information has been used in a way that is not consistent with this policy or applicable legislation, or you have any other data protection related issues or queries, please contact us by e-mail sent to <a href="mailto:offce@scattered.pl">offce@scattered.pl</a> or in written to: Scattered sp. z o.o., ul. Żurawia 71, 15-540 Białystok.