

# Ready, Set... GDPR!

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dataxu has always placed the highest value on transparency, quality, and privacy. From the inception of the GDPR, dataxu assembled a cross-functional task force to oversee the implementation of GDPR compliance in every aspect of our operation, and we will be ready and compliant when it comes into effect. We are committed to providing the best quality and transparency to not only our customers, but to all digital consumers.

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## Privacy principles at dataxu

- Privacy is a requirement at dataxu, not an afterthought.
- Our Legal and Privacy team attends all product meetings, allowing them to be involved in the review and approval of all new products and features and to incorporate privacy at every step of the product life cycle.
- dataxu is an active member of self regulatory organizations such as the Network Advertising Initiative (NAI), Digital Advertising Alliance (DAA), and European Digital Advertising Alliance (EDAA)
- dataxu is committed to providing clear notice to consumers and accessible opt-out choices
- dataxu is Privacy Shield certified

## GDPR compliance: dataxu is heightening its commitment to privacy

dataxu will be ready for GDPR. Listed below are the actions we have taken to ensure our timely compliance:

- Data mapping, to ensure a full picture of the life cycle of data in our system
- Appointment of a Data Protection Officer
- Privacy Impact Assessments of our applicable products
- Ensuring that data processing agreements (DPAs) and necessary contractual clauses are in place with all relevant customers and strategic partners.
- Implementation of technical processes to fulfill data subject requests
- Ensuring technical safeguards are in place for all data processing

## Is dataxu a data controller or processor?

Both, dataxu is a controller and processor of data in different contexts. For example, when we process personal data on behalf of a customer, we are acting as a data processor. As operator of our own website, or with respect to our employee personal data, we are a data controller.

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## **What is dataxu's legal basis for processing data in the EU Economic Area?**

dataxu will be relying on Consent as legal basis for data processing, as provided by its publishers, and we are encouraging all relevant partners and customers to work with a consent management platform (CMP) that is registered with the IAB Europe in order to ensure both compliance and scale. We are also closely monitoring the development of legitimate interest as a legal basis for data processing for the purpose of digital advertising.

## **How is dataxu honoring the rights of data subjects?**

We will have a technical process in place to ensure we are able to honor all requests from Data Subjects wishing to exercise their rights under GDPR. An EU Data Subject may initiate such a request via the dataxu website.

## **Will you be able to provide the same types of data and volumes of data after GDPR comes into force?**

There will not be a change to the types of data we provide. With respect to volume, there is no accurate indicator of the full effect on data scale post GDPR. Rest assured that dataxu is doing everything within our control to ensure scale is not affected post-GDPR, but any drop-off will be industry-wide and we will be best placed to handle it.

## **Are there any countries where you are implementing additional or alternative processes to GDPR in respect of data protection and what are they?**

No. Our GDPR compliance program encompasses data from subjects in all countries located in the EEA.

## **How are you ensuring consent is gained for customer and supplier data you process when GDPR comes into effect?**

We are putting in place the appropriate data agreements with all of our suppliers and customers, either Data Processing Agreements or Data Sharing Agreements depending on the relationship and flow of data.

## **What warranties will you offer your customers about GDPR?**

dataxu always represents and warrants that we will comply with all applicable laws and self-regulatory guidelines. In addition, we represent and warrant that we will not contract with any third-party service or data providers who do not represent and warrant the same.

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## **Please explain what personal data you collect and how?**

We collect and process technology-based data such as mobile device IDs, obfuscated IP addresses, and cookie data within the TouchPoint platform. Other consumer and first-party data can be added to TouchPoint by our customers (like customer IDs, first party cookie data etc.) which we process on behalf of our customers. Under GDPR, we will rely on Consent as our legal basis for this activity.

## **Do you transfer any personal data to any countries outside of the EU?**

Yes. In addition to our servers in the Netherlands, dataxu also has servers in Singapore and the United States. All data is transferred to the US where it is processed. We are Privacy Shield certified and also have put in place intra-company model clauses to ensure that there are proper and lawful safeguards for data transfer.