

Privacy Shield Policy

This Privacy Shield Policy ("Policy") describes how IPONWEB Inc. and its subsidiaries and affiliates in the United States ("US") ("Company," "we," "us" or "our") collect, use, and disclose certain personally identifiable information that we receive in the US from the European Economic Area ("EEA"), the United Kingdom ("UK") and Switzerland ("Personal Data"). In addition to IPONWEB Inc., this policy applies to the following US affiliated entities: BIDSWITCH Inc. and The MediaGrid Inc.. This policy supplements our website privacy notices located at www.iponweb.com, www.bidswitch.com and www.themediagrid.com ("Our Websites") respectively ("Our Privacy Notices" and individually, "Our Privacy Notice") and unless specifically defined in this Policy, the terms in this Policy have the same meaning as the Privacy Notice on Our Websites.

IPONWEB recognizes that the EEA, the UK, and Switzerland have established strict protections regarding the handling of Personal Data, including requirements to provide adequate protection for Personal Data transferred outside of the EEA, the UK, and Switzerland. To provide adequate protection for certain personal data about consumers, corporate customers, clients, suppliers, business partners, job applicants, and employees received in the US from the EEA, the UK, and Switzerland, IPONWEB has elected to self-certify to the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework administered by the US Department of Commerce ("Privacy Shield"). IPONWEB 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.

For purposes of enforcing compliance with the Privacy Shield, IPONWEB is subject to the investigatory and enforcement authority of the US Federal Trade Commission/US Department of Transportation. For more information about the Privacy Shield, see the US Department of Commerce's Privacy Shield website located at: <https://www.privacyshield.gov>. To review IPONWEB's representation on the Privacy Shield list, see the US Department of Commerce's Privacy Shield self-certification list located at: <https://www.privacyshield.gov/list>.

Personal data collection and use

Our Privacy Notices located at our Websites describe the categories of Personal Data that we may receive in the US as well as the purposes for which we use that Personal Data. We may receive the following categories of Personal Data in the US: (i) data relating to the request for and fulfilment of digital media inventory and advertising and the display of advertising in such inventory such as IP addresses, geolocation data, cookie ID's, mobile advertising ID's, technical information relating to end user devices such as referral URL's, timestamps and segment information such as interest data; (ii) contact data for current and future clients; and (iii) HR data relating to current and prospective future employees and contractors. We process Personal Data for the following purposes: (i) enabling customers to buy and/or sell advertising inventory and/or display advertising in such inventory; (ii) contact customers and prospective customers and in relation to the provision of our services; and (iii) HR related matters. IPONWEB will only process Personal Data in ways that are compatible with the purpose that IPONWEB collected it for, or for purposes that you later authorize. Before we use your Personal Data for a purpose that is materially different than the purpose we collected it for or that you later authorized, we will provide you with the opportunity to opt out. IPONWEB maintains reasonable procedures to help ensure that Personal Data is reliable for its intended use, accurate, complete, and current.

Data transfers to third parties, third-party agents or service providers

We may transfer Personal Data to our third-party agents or service providers who perform functions on our behalf as described in our Privacy Notices. Where required by the Privacy Shield, we enter into written agreements with those third-party agents and service providers requiring them to provide the same level of protection the Privacy Shield requires and limiting their use of the data to the specified services provided on our behalf. We take reasonable and appropriate steps to ensure that third-party agents and service providers process Personal Data in accordance with our Privacy Shield obligations and to stop and remediate any unauthorized processing. Under certain circumstances, we may remain liable for the acts of our third-party agents or service providers who perform services on our behalf for their handling of Personal Data that we transfer to them.

Third-party data controllers

In some cases, we may transfer Personal Data to unaffiliated third-party data controllers. These third parties do not act as agents or service providers and are not performing functions on our behalf. We

may transfer your Personal Data to third-party data controllers for the purposes described in our relevant Privacy Notice. We will only provide your Personal Data to third-party data controllers where you have not opted-out of such disclosures. We enter into written contracts with any unaffiliated third-party data controllers requiring them to provide the same level of protection for Personal Data the Privacy Shield requires. We also limit their use of your Personal Data so that it is consistent with any consent you have provided and with the notices you have received. If we transfer your Personal Data to one of our affiliated entities within our corporate group, we will take steps to ensure that your Personal Data is protected with the same level of protection the Privacy Shield requires.

Disclosures for national security or law enforcement

Under certain circumstances, we may be required to disclose your Personal Data in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

Security

IPONWEB maintains reasonable and appropriate security measures to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration, or destruction in accordance with the Privacy Shield.

Access rights

You may have the right to access the Personal Data that we hold about you and to request that we correct, amend, or delete it if it is inaccurate or processed in violation of the Privacy Shield. These access rights may not apply in some cases, including where providing access is unreasonably burdensome or expensive under the circumstances or where it would violate the rights of someone other than the individual requesting access. If you would like to request access to, correction, amendment, or deletion of your Personal Data, you can submit a written request to the contact information provided below. We may request specific information from you to confirm your identity. In some circumstances we may charge a reasonable fee for access to your information.

Questions or complaints

You can direct any questions or complaints about the use or disclosure of your Personal Data to us at privacy@iponweb.net. You may also contact our affiliates at privacy@bidswitch.net and privacy@themediagrid.net with any questions or concerns. We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of your Personal Data within 45 days of receiving your complaint. For any unresolved complaints, we have agreed to cooperate with JAMS for EU-U.S Privacy Shield and Swiss-EU-U.S. Privacy Shield matters at <https://www.jamsadr.com/file-an-eu-us-privacy-shield-claim> if you are a customer or at <https://www.jamsadr.com/file-an-eu-us-privacy-shield-claim> if you are an individual.

If you are unsatisfied with the resolution of your complaint, you may contact the EU data protection authorities, the UK Information Commissioner, or the Swiss Federal Data Protection and Information Commissioner for further information and assistance.

Binding arbitration

You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances, provided you have taken the following steps: (1) raised your complaint directly with IPONWEB and provided us the opportunity to resolve the issue; (2) made use of the independent dispute resolution mechanism identified above; and (3) raised the issue through the relevant data protection authority and allowed the US Department of Commerce an opportunity to resolve the complaint at no cost to you. For more information on binding arbitration, see <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

Contact us

If you have any questions about this Policy or would like to request access to your Personal Data, please contact us as follows: privacy@iponweb.net.

Changes to this policy

We reserve the right to amend this Policy from time to time consistent with the Privacy Shield's requirements.

Effective Date: September 10, 2019

Last modified: September 10, 2019