

## PRIVACY POLICY

OpenLedgerApS headquartered in Denmark, is an online advertising and technology company. We provide this privacy policy so that we may inform you about how our technology (DSP) processes information on behalf of online advertisers, website owners and other businesses that use our services (our Clients). This policy also outlines our privacy practices on our corporate Website ([www.hubdsp.com](http://www.hubdsp.com)).

This privacy policy has been compiled to better serve those who are concerned with how their data is being used online. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle data you provide us.

We will use the information that we collect about you in accordance with the EU General Data Protection Regulation (Regulation EU 2016/679), (further — “GDPR”) which becomes effective from 25 May 2018.

We reserve the right, at any time, to modify or replace the Privacy Policy. The most recent version of the Privacy Policy is available at the Website.

If you have any questions about this privacy policy, please feel free to contact us at [hello@hubdsp.com](mailto:hello@hubdsp.com) or [michael@hubdsp.com](mailto:michael@hubdsp.com).

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## WHAT DOES HUBDSP DO?

HubDSP — platform that allows our Clients to buy or sell ad space on websites for online advertising. Our clients are businesses engaged in Internet advertising — advertisers, publishers, ad networks or ad agencies. Our clients buy and sell media by participating in online exchanges for ad space. Our technology powers this platform. When ad space on a website is bought or sold, usually to an advertiser, ad agency or ad network by a publisher, hubDSP, as an agent for its clients, fulfills the transaction by delivering the ad to the Internet user who visits that site.

## WHAT IS PERSONAL DATA?

Personal data means information relating to a living individual who can be directly or indirectly identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the “GDPR”).

## WHAT INFORMATION DO WE COLLECT FROM OUR WEBSITE?

We collect directly identifiable personal information through this website when you optionally provide it to us, for example through a “Contact Us” form. This information may include name, email address, or any other information provided to us by you. **This is your personal data.**

We also use cookies and similar technologies to analyze trends in site usage, administer the website, and track your movements around the website. We use cookies which are small text files stored on an Internet user’s computer. The cookies store information related to your navigation on our website.

## HOW IS INFORMATION SECURED AND PROTECTED?

All of the user data collected by OpenLedgerApS is stored only in anonymous form, meaning that **information about a specific user cannot be retrieved.** All transactions are processed through a gateway provider and are not stored or processed on our servers.

We maintain physical, electronic, and administrative safeguards to protect all our data from accidental, unauthorized or unlawful access, use, modification, disclosure, loss, or destruction. The data is kept on a secure server and we restrict access to the data solely to authorized users, who have special access rights to such systems, and are required to keep the information confidential. Unfortunately, no transmission or storage of information can be guaranteed to be completely secure. As a result, while we are committed to protecting your information and take all reasonable precautions to protect against security incidents, we cannot the complete ensure or warrant the security of any information you provide to us.

## WHEN DO WE COLLECT INFORMATION?

### USER COMMUNICATIONS

When you indicate your name and email address in the contact form on the Website or when you reach to us via email, telephone, post, live chat or contact forms we may retain your personal details and those communications in order to process your inquiries, advertise you our services, provide you personal access to the Website and improve the Website.

### INFORMATION COLLECTED THROUGH TECHNOLOGY

Our website may use cookie information to personalise your viewing experience. Cookies are small files that a site or its service provider transfers to your computer’s hard drive through your Web browser (if you allow) that enables the site’s or service provider’s systems to recognize your browser and capture and remember

certain information. Cookies are placed on your device only if you consent, unless cookies are required for strictly technical functioning of the website. However, note that if you do not consent to the use of cookies, certain functions of the website may not function properly or may not function at all. Learn more about how this tool works at [https://support.google.com/analytics/answer/1012034?hl=en&ref\\_topic=6157800](https://support.google.com/analytics/answer/1012034?hl=en&ref_topic=6157800)

We use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. These cookies are placed and used by the Google Analytics tool. You can control and/or delete cookies as you wish — for details, see <http://www.youronlinechoices.com/>. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed.

## HOW DO WE USE YOUR INFORMATION?

- To personalize your navigation and to allow us to deliver the type of content and product offerings in which you are most interested. This makes your visit on our website easier as we don't ask you the same information several times during your navigation.
- Sometimes, we use Digital Identifier Information to advertise our business on other sites.
- To quickly process your transactions.
- To monitor your use of our website and improve the user experience.
- To analyze trends and traffic, track purchases, and track usage data
- To send you emails regarding your order or other products and services.
- To communicate with you when you reach out to us.

If we need to use your personal data for another purpose or for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing. Please note that the Company will obtain your express consent (by verbal, written or electronic agreement) to collect, use or disclose your Personal Information. We also require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## HOW LONG DO WE RETAIN YOUR INFORMATION?

We retain your personal data as long as reasonably necessary unless otherwise specified, or until we delete the information pursuant to a request from you. We store information collected through technology for up to 30 (thirty) days.

## YOUR RIGHTS

By contacting us via email at [hello@hubdsp.com](mailto:hello@hubdsp.com) or [michael@hubdsp.com](mailto:michael@hubdsp.com), you may exercise your right:

- to require access to your personal data;
- to require rectification of your personal data;
- to require erasure of your personal data;
- to withdraw consent to processing of your personal data, where applicable.

In some cases you may have a right to request a restriction on processing your personal data or to object to processing of your personal data. You may exercise your rights in line with the requirements of applicable EU and local laws. If you want to learn more about your rights please visit [https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights_en)

## THIRD-PARTY DISCLOSURE

We do not sell, trade, or otherwise transfer to outside parties your information for their own promotional purposes unless we obtain your freely-given informed consent. This does not include information that we share with our subsidiaries, affiliates, and third party service providers working at our instruction, such as an email service provider, hosting provider or data center. We may disclose your information to third parties when we reasonably believe we are obligated to do so by law, and in order to investigate, prevent, or take action regarding suspected or actual prohibited activities, including but not limited to fraud and situations involving potential threats to the physical safety of any person.

## THIRD-PARTY LINKS

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies. We are not responsible for the privacy practices or the content of such websites or services, and you should review the privacy policy of each such website or service to make sure you are comfortable with it before providing any personal information.

## YOUR ACCEPTANCE OF THIS PRIVACY POLICY

By using this Website, you signify your acceptance of this policy. If you do not agree to this policy, please do not use this Website. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

## CHANGES IN PRIVACY POLICY

We may change this privacy statement at any time. If there are any material changes to how we handle personal information, we will send you a notice email and/or place a temporary notice on our website.

## CONTACTING US

If there are any questions regarding this privacy policy, you may contact us using the information below.

<http://www.hubdsp.com/>

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