



# AdSparc Site and Platform Privacy Policy

Effective Date: June 2014.

Please read this Privacy Policy to learn about AdSparc's information collection practices and use for both the AdSparc.com site and for the AdSparc Platform.

The AdSparc Programmatic Rich Media Marketplace ("AdSparc Marketplace" or "AdSparc Platform") is provided by AdSparc Pty Ltd ("AdSparc" or "we") at its website located at <http://www.adsparc.com>. AdSparc offers this online platform as a part of a program (the "Program") under which publishers ("Publishers") make their inventory available through the AdSparc Marketplace and are compensated for the placement of advertisements on web and mobile properties such as websites, webpages, blogs, newsletters, widgets, applications, and other technologies or platforms ("Properties"). AdSparc also enables advertisers, advertising agencies and trading desks ("Advertisers") to build and deploy digital advertisements ("Ads" or "Advertisements") across a variety of Properties. Advertisers and Publishers who complete our registration process are Members who can manage their accounts on the AdSparc Platform and on this website (the "Site"). Please note that while we own and operate the AdSparc Site, we do not own or operate the Properties operated by any Publisher. AdSparc Advertisements do not generally market AdSparc products, but are created and deployed by Advertisers to support their advertising campaigns. To help you better understand the landscape and key concepts of digital advertising, take a look at the Interactive Advertising Bureau's [glossary](#).

## Personally Identifiable Information

AdSparc considers Personal Information to be information that can be used to contact or identify a natural person, including among other, your name, title, company, address and email. To the extent Personally Identifiable Information has been collected from you, you acknowledge such collection is done on a voluntary basis to enable AdSparc to provide you efficient access to features, functions, promotions, products and services.

In addition, we collect information from you for the purpose of opening an account, billing payment and payment instruments from you for products and services you order or purchase from AdSparc.

## Non-Personal Information

Non-Personal Information is any information other than Personal Information. For example, this may include information about how a user interacts with the Site, the user's IP address, or information about the user's browser, operating system, or device.

## 1. FOR VISITORS TO THE ADSPARC WEBSITE (THE "SITE")

**Collection on the Site.** AdSparc collects aggregate and Non-Personal Information that is generated automatically as a user navigates through the [www.adsparc.com](http://www.adsparc.com) site. For example, we collect information about how many times a particular page within our Site is visited and which features of the Site users interact with. This information does not identify an individual, but tells us how many users visited the Site and used its features. By collecting this information, we learn how to best tailor the Site to our visitors. AdSparc may collect Non-Personal Information of users through a variety of technologies and practices including AdSparc's browser cookies, web beacons or similar technologies, or a third party's browser cookies. A cookie is a small file that can be automatically stored on a computer when the computer's browser views an advertisements or a website.

**AdSparc's Cookies.** AdSparc uses several different cookies for different purposes on this Site. We use our own cookies, also known as "first party" cookies, for various purposes, including analyzing our servers' interactions with your browser and for our own marketing purposes in marketing AdSparc's ad development and serving services to our customers.

**Third Party Cookies.** In addition to our own cookies, we also use a limited number of third-party cookies, which we use for site analytics that allow us to improve this Site and to enable social media sharing, site bookmarking, video functionality, measurements, tracking and re-targeting. AdSparc does not create these cookies, which collect technical information about computers visiting this Site, and these third-party cookies

remain active for a period set by the third party entity with which they originate.

**Personally Identifiable User Information.** AdSparc may collect information (including Personal Information, such as email addresses) that users supply voluntarily on the Site, such as when a user signs up for membership, electronic newsletters or other email from AdSparc. If you do not consent to this collection of your Personal Information and its use as described in this policy, do not provide any Personal Information on this Site.

**Use of Information Collected on the Site.** AdSparc may use any information submitted on the Site by a user for the purpose for which the information was submitted and for its other purposes, including to understand how users interact with the Site, to contact the user for customer service purposes, to inform the user of important changes or additions to the Site or the services offered by the Site, and to send the user administrative notices and any other communications that AdSparc believes may be of interest to the user.

If you have subscribed to one or more of our email newsletters, you also may change your subscriber information, modify your subscriptions, and/or unsubscribe from these communications at any time by clicking the "unsubscribe" link in the email you receive.

**Third Party Links.** The Site may include links to other websites. Those websites will have their own privacy policies that you may wish to review. AdSparc has no responsibility for these linked websites.

**Sharing and Disclosing Information.** AdSparc may share and disclose information that AdSparc collects to service providers or Publishers for the purpose of providing services requested on the Site by a user. AdSparc also may release information that AdSparc collects in order to comply with law, or to protect the rights, property or safety of advertisers, publishers, users, the public or AdSparc. Also, in the event that AdSparc sells some or all of its assets, reorganizes, is liquidated, or is acquired by another company, information that AdSparc collects may be transferred in connection with that transaction.

**Security.** The security of your information is very important to us. All information we gather on the Site is stored on secure servers and our internal systems. However, as effective as the reasonable security measures implemented by us may be, no physical or electronic security system is impenetrable. We cannot guarantee the security of our Site's servers or databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet.

## 2. ADVERTISING SERVED THROUGH THE ADSPARC PLATFORM

AdSparc technology enables Advertisers and Publishers to better market to consumers with more relevant and engaging digital advertising so that consumers who view AdSparc Ads (“Viewers”) receive advertising that is of greater interest to them. The descriptions below explain our privacy practices with regard to advertising that AdSparc creates and delivers for our customers, and which appear on many different websites, applications and other digital platforms.

**Collection within AdSparc Ads.** AdSparc may collect and store Non-Personal Information that is generated automatically as a Viewer sees and interacts with AdSparc Ads. At the request of Advertisers or Publishers, AdSparc may also assist in the collection of Non-Personal Information of Viewers by third parties conducting research.

In certain cases, at the request of an Advertiser or Publisher, an AdSparc Ad may be designed to enable the collection of Personal Information from Viewers, such as a location (town of residence or zip/post code), gender, or email address, from within the AdSparc Ad. If you do not consent to collection of your PI, do not supply any Personal Information in an AdSparc Ad. Any Personal Information about a Viewer that is collected by an AdSparc Ad is provided to the Advertiser or Publisher or its authorized service provider and is not used by AdSparc for any other purpose. The Advertiser or Publisher’s collection and use of data, including the Personal Information of Viewers, is defined by the Advertiser or Publisher’s privacy policy. AdSparc does not control and is not responsible for Advertisers’ or Publishers’ privacy or information practices.

In some cases, a Viewer may choose to provide information about another person through an AdSparc Ad. For example, an AdSparc Ad may provide the functionality through which a Viewer may choose to provide a friend’s email address in order to forward an AdSparc Ad to a friend. As with any Personal Information that the Viewer supplies about him or herself, any Personal Information about another person that is collected by an AdSparc Ad is provided to the Advertiser or Publisher or its authorized service provider. The Advertiser or Publisher’s collection and use of the Personal Information of friends is defined by the Advertiser or Publisher’s privacy policy. AdSparc does not control and is not responsible for Advertisers’ or Publishers’ privacy or information practices.

In some cases, information that is voluntarily supplied by users within an AdSparc Ad in connection with certain third-party services is provided to the third party. The third party’s collection and use of the information of Viewers is defined by that third party’s privacy policy. AdSparc does not control and is not responsible for the third party’s privacy or information practices.

**Non-Personal Information Collected within AdSparc Ads and from Other Sources.** AdSparc may use Non-Personal Information of Viewers collected within AdSparc Ads to

better target advertisements, improve the user experience, including to better direct AdSparc Ads to specific types of visitors, and/or to measure AdSparc Ad effectiveness.

**AdSparc Cookies.** AdSparc may collect Non-Personal Information of Viewers through a variety of technologies and practices including AdSparc’s or other third party’s browser cookies, web beacons or similar technologies. A cookie is a small file that can be automatically stored on a computer when the computer’s browser views an advertisement or a website. AdSparc uses several different cookies within AdSparc Ads for a variety of purposes. We use our own cookies for purposes that include:

1. measuring the effectiveness of AdSparc Ads, such as measurements relating to the impressions, reach, frequency, advertisement interactions, and conversions relating to the display of an AdSparc Ad);
2. setting delivery specifications for AdSparc Ads; and
3. analyzing our servers’ interactions with your browser.

For example, AdSparc may use cookies in connection with AdSparc Ads to collect Non-Personal Information, such as the approximate geographic location of the Viewer based on their IP address, the most recent Publisher websites that the Viewer’s browser has visited, or any AdSparc Ads that the Viewer has viewed or on which the Viewer has clicked. These data points are used alone or in combination to enable inferences about a Viewer (e.g., based on websites visited and ads clicked, a Viewer is likely to be a woman), their preferences (e.g., based on websites visited and ads clicked, a Viewer appears to like travel), or already expressed or implied interests in a product (e.g., to serve an ad based on a viewer’s previous interest in the advertiser’s website or ads, also known as “re-targeting so that we can better direct our advertising.

In using our cookies in connection with serving online advertisements, AdSparc may also use web beacons, consistent with industry practices, to measure the effectiveness of AdSparc Ads. AdSparc Ads may also use cookies to ensure the appropriate delivery of our Ads. For example, cookies control the order or sequencing we may present AdSparc Ads to allow AdSparc to show dynamic advertisements that evolve and change each time you see an AdSparc Ad from a particular advertiser.

**Information from Third Parties.** In addition, AdSparc or the companies with which it does online business may use interest-based, retargeting and demographic data from third parties to help determine which AdSparc Ad is served to a particular Viewer. For example, geographic and purchase intent information passed from publishers via a cookie or other technologies to AdSparc may be used to deliver a geographically- or product-specific creative message to a consumer. For instance, a non-personally identifiable numeric code is shared via the data provider to the advertisement unit at run time via a cookie, which communicates a specific geographic area that is in turn read via the cookie by the

AdSparc platform that will then select and serve the appropriate creative or message element associated with that geography.

**Opt Out.** AdSparc utilizes AppNexus cookies for ad targeting. You can Opt Out of receiving cookies that enable the viewer's browser to receive targeted ads by clicking the AppNexus Opt-Out **link on their privacy page** (<http://appnexus.com/platform-policy>). All other AdSparc cookies can be blocked through your browser's settings.

**Note:** This Opt-Out process provides an AdSparc opt-out cookie to the user's browser. Therefore, if cookies are disabled, erased, or altered, or browser and/or machine software is changed, then the results of this opt-out process may be undone, and the Opt-Out will need to be performed again.

Alternatively, the Viewer's web browser may allow a user to disable cookies. To disable cookies using Internet Explorer, select "Internet Options" under the Tools menu and click on "Privacy." Select "High" or "Block All Cookies." To disable cookies using Mozilla Firefox, select "Options" under the "Tools" menu. To check your cookie setting on Safari, select "Preferences" from the Safari menu, and then select either "Privacy" (versions 5.1 and later) or "Security" (versions 5.0.x and earlier). AdSparc does not use Flash Cookies but Adobe's Flash Player Settings Manager allows you to customize the websites which you allow to use local storage ("Flash Cookies"). If a user chooses to disable cookies, a user may not be able to use or participate in some or all of the features offered through the AdSparc Ads.

Depending on the Viewer's individual browser settings, some anti-spyware software programs may erroneously flag AdSparc advertisements or cookies as computer threats. AdSparc does not knowingly distribute viruses or any computer code that monitors or causes changes to users' computer system registries as part of its advertisements or cookies.

**Sharing and Disclosing Information.** AdSparc may share the information collected in an AdSparc Ad with the Advertiser. For example, if a user has opted in to receive email marketing from the Advertiser, AdSparc will share information collected in the Advertiser's AdSparc Ad with that Advertiser. AdSparc may occasionally release information that AdSparc collects from AdSparc Ads in order to comply with law, or to protect the rights, property or safety of advertisers, publishers, users, the public or AdSparc. Also, in the event that AdSparc sells some or all of its assets, or AdSparc is acquired by another company, information that AdSparc collects may be among the transferred assets.

**Children's Privacy.** AdSparc does not knowingly collect the information of, track or target children under the age of 13. In the event that we learn that we have collected information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible.

### **Privacy Contact**

If you have any questions about this privacy policy data security practices, information collection or uses, or have any concerns or disputes regarding your information, please contact: Wout Van Damme, CEO, AdSparc, Suite 501-502, Lvl 5 Grafton Bond Building, 201 Kent St, Sydney, NSW 2000, Australia.

### **Policy Changes**

If AdSparc changes this Privacy Notice in the future, AdSparc will post the changes to the Privacy Policy on this website and update the Effective Date of the Privacy Policy to reflect the date of the changes.