

Privacy Policy

Smart Tech Group Inc. is a company providing advertising technology solutions including mobile advertising exchange via the computer program "Ad Exchange Smart Tech Group Inc.", its SDKs and APIs ("Services"). Services allow publishers and developers of mobile applications ("apps") and websites to show ads on their sites and apps, and advertisers to reach audiences that may be interested in their products or services. Publishers, developers and advertisers, as well as advertising networks and other platforms connecting publishers and advertisers, which We provide Services to, are collectively named "Clients".

1. INFORMATION CONCERNING END-USERS

1. What information may We collect?

We collect only information that our Clients have instructed Us to collect, prior to such collection, and subject to your permissions inside Clients' sites and mobile applications and/or your device.

As an example, Our software that may be installed on the Clients' sites and mobile applications you are using will not collect your location data unless you affirmatively allowed/enabled the Client to collect it. Other information may be received by embedding tags on websites you visit.

We avoid collecting information that identifies you personally, such as your name, address, or email address, but the information We collect does enable us to recognize your device over time and your user experience. When you interact with any website or app of our Client that uses our Services, We may automatically collect/receive the following information:

2. information about your device, such as device type and model, network provider, browser type, language;
3. log information, including the app or website visited, session start/stop time, time zone, referrer URL, network connection type and cookie information;
4. information about Clients' sites and mobile applications, such as ad placement data, key words, version;
5. information about your mobile advertising identifiers, such as your Advertising ID (Apple IDFA or Google Advertising ID);
6. information provided by your device (computer, mobile phone, etc.), such as device IP address, network connection type and device geo-location information (country, region, city, DMA, GPS location: latitude, longitude), user-agent strings;
7. other information that our Clients and other third parties have collected and share with Us, such as information about activity in their services. This may include the content you view or searches you made, the language you prefer, or other non-personally identifying demographic or interest information, to help make the ads served to you more relevant.
8. How do We use information We collect? We collect information from you in order to provide Services and for other specific purposes, as described in this Privacy Policy. Please note that you are not required by law to provide Us with any personal information.

We use the information We collect and receive:

1. to provide Services;

2. to help Us personalize and improve your user experience;
3. to enable and optimize Services' tools and features;
4. to study and analyze the functionality of Services, end-users' activities;
5. to provide support;
6. to measure Services' activity for pricing purposes;
7. to maintain Services;
8. to improve Services and to continue developing Services.

We may also create an interest profile about you in order to help our Clients improve your user experience and serve more relevant ads to you.

We will not combine the non-personally identifiable information with your personally-identifying information without your express consent.

2. How may We share information We collect?

We may share the information collected from you for the following purposes:

1. share it with Clients:
 1. for the purpose of serving you with contextual and/or targeted ads that are relevant to you and may interest you;
 2. for ad reporting purposes and to have information about the performance of their ad campaigns and improve their ads performance over time;
 3. to help them understand how end-users are engaging with ads, what kind of end-users are most engaging with certain types of ads on Clients' sites and apps, and what kind of ads are published on Clients' sites and apps;
2. share it with third parties:
 1. to receive additional data on you from sources other than Clients' sites and apps in order to help analyze and enrich the information collected on you, as well as serve you with more relevant and targeted ads on Clients' sites and apps and elsewhere;
 2. to receive third party's services, such as fraud protection, bot detection, rating, analytics, viewability, geo location services, ad security and verification services;
 3. share it with Our corporate affiliates in order to provide Services;
 4. share it in any other circumstances where We receive your written consent.
3. Your choice. You can opt out from collection of information We collect if you prefer us not to deliver personalized advertising. If you opt out, We won't use the information collected to serve ads based on your interests.

To opt-out from web personalized advertising, please follow this URL:

<https://rtb.pltfrm.cloud/users/sync/opt-out>

To opt-out from iOS in-app personalized advertising, please follow this URL:

<https://support.apple.com/en-us/HT202074>

To opt-out from Android in-app personalized advertising, please follow this URL:

<https://support.google.com/ads/answer/2662922?hl=en>

4. Controllers.

Please note that under the GDPR We process information collected in connection with Services as a processor and not as a controller. Under the GDPR controllers are our Clients. As a processor, We are committed to assist our Clients (controllers) to fulfill the GDPR requirements and data subjects' GDPR rights.

We require our Clients to comply with all applicable laws and regulations and to provide end-users with notice of the collection of personal information for advertising purposes as

outlined in this Privacy Policy, to obtain from end-users the consent on processing of the relevant personal data for the relevant purposes.

5. Children.

We do not permit Services to be used to collect information from sites and apps directed to children aged under 18 for purposes of creating interest-based profiles or serving ads based on users' inferred interests. We may collect information from sites and apps directed to children aged 18 or under for other purposes, such as serving advertisements based on contextual information, like the content or type of the site or app (for example, serving an ad for a video game to a gaming app).

6. Information retention

We store information collected for as long as you use the Clients' sites and apps and for a 365 days thereafter, for the purpose of internal reporting, analysis, invoicing, reporting, discrepancy reasons and to prevent fraud, or until We delete information collected from you pursuant to your written request. Please note that We may be required to retain certain information by law.

INFORMATION CONCERNING OUR CLIENTS

1. What information may We collect?

In order to be able to use of and access the Website, its services and tools and to become our Client, you may be requested to provide the following personal information:

1. information you provide to Us if you open a personal account on the Website:
 1. contact information: name, company name, physical address, phone number, email;
 2. financial information: full bank account numbers and/or credit card numbers;
 3. detailed personal information: date of birth, national ID number, country of company registration;
2. when you contact Us, by filling a form on the Website, contacting Our customer support team for technical and other issues or when We contact you regarding any of the above, We may receive and process any personal information that you provide Us.

2. How do We use information We collect?

We use information We collect in order to provide you with a secure, smooth, efficient, and customized Services. We may use information to:

1. provide Services, other products and Client support;
2. process transactions and send notices about your transactions;
3. collect fees for Services;
4. resolve disputes and troubleshoot problems;
5. prevent potentially prohibited or illegal activities;
6. customize, measure, and improve Our Website, its content, products, applications, services, etc.;
7. contact you by email messaging.

3. How may We share information We collect? We may disclose information about Clients:

1. to service providers under contract who help with Our business operations, such as fraud prevention, bill collection, marketing, and technology services;

2. to trusted advertisers for the purposes of account inquiries or verification, or to enable participation in certain features of our mobile advertising exchange;

3. within Our corporate affiliates to provide, understand, or improve their or our services.

4. Information retention We store information collected for as long as you are our Client or representative of our Client and for a 365 days thereafter, for the purpose of internal reporting, analysis, invoicing, reporting, discrepancy reasons and to prevent fraud, or until We delete information collected from you pursuant to your written request. Please note that We may be required to retain certain information by law.

GENERAL PROVISIONS

1. Transfer of information outside your territory

If you visit Website and/or use Services from outside the United States, please be aware that you are sending information (including personal data) to the United States where our servers are located. Information We have collected then may be transferred within the United States or back out of the United States to other countries outside of your country of residence, depending on the type of information and in what purposes it shall be used.

We may share and transfer the information We collect only subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that your information is used only on our behalf and pursuant to our instructions.

2. Cookies

When you visit Website and/or use Services, We may place small data files on your computer or other device. These data files may be cookies, beacons, pixel tags (collectively "Cookies"). We use these technologies to recognize you as a Client or Client's end-user; customize our Services, content, and advertising; measure promotional effectiveness; help ensure that your account security is not compromised; mitigate risk and prevent fraud; and to promote trust and safety across Website.

We may use Cookies in advertising services to help Clients serve and manage ads across the web.

You are free to decline Cookies if your browser or browser add-on permits, unless Cookies are required to prevent fraud or ensure the security of Website. However, declining Cookies may interfere with your use of Website and/or Services.

3. Information security

We are concerned about safeguarding the confidentiality of your personal information. We and Our hosting services implement systems, applications and procedures to secure your personal information, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information.

For example, We limit access to your personal information to employees who We believe reasonably need to come into contact with that information to provide Services to you or in order to fulfill their official duties. These employees are bound by confidentiality obligations and may be subject to liability, if they fail to meet these obligations.

We will take all other steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy.

We protect your personal information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration.

We will make efforts to guarantee that your personal information is kept for no longer than is necessary for the purposes for which the personal information is processed.

4. Accessing Your Personal Information

At any time, you may contact Us at: finance@smarttechgr.com and request to access the personal information that We keep on you. We may need to ask you to provide certain credentials to make sure that you are who you claim to be. If you find that the information on your personal account is not accurate, complete or updated, then please provide Us the necessary information to correct it.

At any time, you may contact Us via finance@smarttechgr.com to receive a copy of the personal information that We keep about you, and to verify the accuracy of the information.

5. Your Data Subject Rights under the GDPR In operating Website, We process your personal information as a controller (as such terms are defined in the GDPR). As a controller, We are committed to fulfill data subjects' GDPR rights.

As an EU resident, you may:

1. contact Us if you want to withdraw your consent to the processing of your personal information. Exercising this right will not affect the lawfulness of processing based on consent before its withdrawal;

2. request to delete or restrict access to your personal information. We may postpone or deny your request if your personal information is in current use for providing Services or due to other legitimate purposes, such as compliance with regulatory requirements associated with Us;

3. if you exercise one (or more) of the above-mentioned rights, in accordance with the provisions of applicable law, you may request to be informed that third parties that hold your personal information, in accordance with this Privacy Policy, will act accordingly;

4. you may ask to transfer your personal information in accordance with your right to data portability;

5. you may object to the processing of your personal information for direct marketing purposes;

6. you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affecting you;

7. you have a right to lodge a complaint with a data protection supervisory authority.

6. Changes in Corporate Structure

We may share information you provided to Us if We are involved in a merger, acquisition, or sale of all or a portion of its assets, as part of such transaction. You will be notified via a prominent notice on Website of any change in ownership or uses of this information. In any event, your information will remain protected under this Privacy Policy.

7. Changes to this Privacy Policy

From time to time, We may update this Privacy Policy. Updates take effect 7 days after We post a notice on Website.

Until the new privacy policy takes effect, you can choose not to accept it and terminate your use of Website and/or Services. Continuing using Services after the new privacy policy takes effect means that you agree to the new privacy policy.

Note that if We need to adapt the privacy policy to legal requirements, the new privacy policy will become effective immediately or as required.

8. Contact Us

If you have any requests concerning your personal information or any queries with regard to this Privacy Policy please feel free to contact Us through our Website or by finance@smarttechgr.com.