



## Privacy Policy

We at Fyber care about our users' and partners' privacy and are committed to disclose our data practices. This policy (“**Privacy Policy**”) explains how Fyber collects, uses and shares personal information about:

- visitors to Fyber`s website [www.fyber.com](http://www.fyber.com),
- end users of apps and sites operated by third parties using the Fyber Services (such visitors and end users collectively “**Users**”, each visitor and end user individually the “**User**”) and
- publisher and advertiser partners (“**Partners**”) that use our services (the “**Fyber Services**”).

If you have any questions around the contents of this Privacy Policy, please contact us at [pp.legal@fyber.com](mailto:pp.legal@fyber.com)

All personal information that Fyber collects through the use of our websites and Fyber Services or which Users submit voluntarily will of course be handled by Fyber in compliance with applicable data protection laws.

In the event that Users are forwarded – for instance via a link or an advertisement – to another website or service not operated by Fyber, this Privacy Policy does not apply to such other website or service. Fyber is not responsible for the way the operators of other websites and services handle data. Fyber recommends Users to always carefully read the Privacy Policy of third party websites and services.

Fyber GmbH is a German corporation, located in Berlin and with subsidiaries in Berlin and San Francisco, U.S. This Privacy Policy is governed by the laws of Germany.

This Privacy Policy contains the following sections:

### 1. What Personal Information Fyber Collects

Personal information (also “personal data”) includes individual information by which you as a natural person are or can be identified, e.g. your name, address, telephone number, email address or date of birth.

Non-personal data is information that cannot be connected to your identity, e.g. the number of Users visiting our website or any other kind of aggregated information.



## 1.1. When using our Website

When using our website, our webserver will collect information like your IP-address, the website from which you were referred to our website (e.g. if you followed a link), the webpages you are visiting on our website, the browser you are using and its display settings, your operating system as well as date and duration of your visit. Further personal data will only be stored and processed if you voluntarily provide it to us, e.g. through a contact form.

## 1.2. When using our Fyber Services

When interacting with a mobile application or website that uses the Fyber Services, we may collect information about your device, information provided by your device and the ads you view or click on and other information, such as:

- **Information about your device**, like device id; device type (e.g. mobile or desktop), operating system (e.g. Android or iOS), network provider, IP address, browser (e.g. Chrome, Firefox, Safari, etc.), Fyber SDK version, applications using the Fyber Services;
- **Information provided by your device**, such as:
  - **Location information** based on the geo-location of your device, if location services have been enabled for the mobile app or website that uses Fyber Services;
  - **Log information on your usage of Fyber Services**, including the application or website visited using the service, session start/stop time, time zone, network connection type and cookie information; and
  - **Cookies and other identifiers:** We, our Partners and third party service providers engaged by us and/or our Partners use various technologies to collect, store and use information when a User visits the Fyber Services; this may include sending cookies or other identifiers to your device. Please see our information below on the usage of cookies and your options to object the usage of such identifiers;
- **Information about ads served**, viewed or clicked on, such as the type of the ad, where the ad was displayed, certain information regarding your interaction with the ad;
- **Information from our Partners.** Our Partners may disclose to Fyber certain information they have collected separately about you, so that we can improve the relevance of the ads we serve on their behalf. They do this in accordance with their applicable legal requirements; and
- **Customer support.** If you recognize a problem with an integrated Fyber ad and submit a ticket to Fyber's support operations team or otherwise communicate with Fyber, we store the communication history as well as the information submitted by you in the course of the communication (e.g. your email address) in order to respond to inquiries and provide



support; we may engage third parties for the provision of our customer support services, which may be located in countries outside of the European Union / the European Economic Area. Except in the context of the provision of our customer support services, Fyber will not provide third parties with email addresses or information from the communication with Fyber's support operations team or other information provided voluntarily to Fyber.

## 2. How Fyber Uses the Collected Information

**2.1. Information from the use of our Website.** Fyber uses your personal data collected through our website for administrating our website and for statistical analysis of the usage of our website. We will use this information to improve the attractiveness and usability of our website and our content constantly and to identify technical issues in the provisioning of our web services.

**2.2. Information from the use of the Fyber Services.** We act as an intermediary between our Partners and the Fyber Services depend on the sharing of certain information relating to you with our Partners and/or third parties. We use the information we collect strictly to the extent necessary in order to provide, maintain, protect and improve Fyber Services and to protect our Partners and Users, in particular for the following specific purposes:

- **Serving Ads.** Allowing our publishers to offer advertising inventory in their applications and websites, and our advertisers to bid on and fill that inventory;
- **Optimization of our Fyber Services.** Fyber collects stores and uses User information on a pseudonymous, no-name basis in order to maintain, protect and improve the Fyber Services;
- **Quality and Fraud Control.** Fyber uses certain personal information to monitor the quality of the Fyber Services and to detect and prevent fraudulent use. Hereby, Fyber also uses contracted third party services;
- **Segmentation.** We may use the information collected to evaluate Users' interests and behavior on a pseudonymous, no-name basis in order to being able to deliver tailored content;
- **Geo-Targeting,** allowing Fyber and its Partners to serve ads based on Users' location; and
- **Frequency Capping,** restricting the number of times a User is shown a particular ad.



### 3. How we Share the Information we Collect

Personal data we collect through our Fyber Services, may sometimes be relayed to external third parties on behalf of Fyber's Partners, where it makes sense in the business of selling and delivering advertising. Such data is normally also included in reports provided to Fyber's Partners in order to enable everyday monitoring of their advertising business. Such data is normally provided in aggregated form. Fyber shares the information collected via our Fyber Services in the following ways and only in accordance with the applicable data protection laws:

- **Advertisers:** We may report certain information on User activity to our advertisers, in order to provide the Fyber Services;
- **Publishers.** We may share information with our publishers in order to help them understand how Users are engaging with ads, and which kind of ads are published in their apps or web service;
- **Fyber Affiliates.** We may share your information with Fyber affiliates in order to be able to provide the Fyber Services;
- **Auxiliary Service Providers.** We may share certain of your information with third parties to facilitate our Fyber Services; information may in particular be shared with service providers in the fields of fraud prevention, error detection and content delivery networks.
- **Changes in Corporate Structure.** In the event Fyber is involved in any merger, acquisition, reorganization, bankruptcy or sale of assets, your information may be transferred as part of the transaction. Nonetheless, your information remains protected under this Privacy Policy;
- **Legal Purpose.** We may share your information when such sharing is necessary in order to investigate, prevent, or take action regarding possible illegal activities or to comply with legal processes. We may also share your information in situations involving potential threats to the physical safety of any person, violations of this Privacy Policy or the Terms of Service or to respond to claims of violation of third party rights and/or to protect the rights, the property and the safety of Fyber, our employees, Users or the public. This may involve the sharing of your information with law enforcement and/or government agencies, courts, and/or other organizations;
- **Consent.** We may share your information in any other circumstances where we have your consent;
- **Aggregated Data.** Fyber strives to share only aggregated data collected through our platform so that the information normally cannot be associated with you or your specific device.



#### **4. Information on Cookies**

Our website and our Fyber Services use cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymized tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the help section of your browser or taking a look at a website about cookies which offers guidance for your browser or device.

Moreover, Fyber uses cookies to provide for the Fyber Services.

#### **5. Information on Data Analysis**

As described above, we collect certain information on a pseudonymous basis when you use our Fyber Services or visit our website to serve you with customized ads or to improve our Fyber Services for you. Therefore, we also utilize own and different partner systems that collect such information, such as Google Analytics or our own tracking mechanism. You may at any time elect to object the collection of your personal data by using the opt-out mechanisms as described below or contact Fyber at [pp@fyber.com](mailto:pp@fyber.com).

##### **Google Analytics:**

Our website and our Fyber Services use Google Analytics, a web analysis service operated by Google Inc. (“Google”). Google analytics uses cookies (text files) which are stored on your computer and which allow for analysis of your visit to be conducted. Information concerning your visit produced through cookies will be transferred to and stored on a server in the USA operated by Google. Google will analyze this information to produce a report for the operator on website usage and online usage of associated services. Google may also transfer this information to third parties either where this is required by law or where third parties are contracted by Google to process data. Google will not allow your IP address to be linked to any other personal data. You can prevent cookies being installed on your computer by changing your browser settings; however, if you choose to do this, your visit to our website and use of some functionalities may be impaired. By using this website, you are deemed to have expressly consented to the use and processing of your data collected by Google as described above. You can withdraw consent to your data been collected and processed at any time. This withdrawal concerns consent to future activities. Please be advised that to avoid personal data being collected through IP addresses, we use Google Analytics ad-on “\_anonymizeIp()”. As a result, a shortened (or anonymous) IP address is sent to Google.



## 6. Our General Data Protection and Data Security Commitments

- **Security.** Fyber attributes a great importance to the security of all personal information associated with its Users. We apply adequate security measures to protect against misuse, loss and alteration of personal information under our control. Though we cannot ensure or guarantee that misuse, loss or alteration of information will never occur, we use all reasonable efforts to prevent it.
- **Data Transfer Outside the EU.** Information collected from Users may only be transferred to countries outside the European Union / the European Economic Area (EEA) observing applicable privacy regulation and ensuring that the Users' privacy rights remain protected.
- **COPPA:** Fyber does not knowingly collect or use personal information from children under the age of thirteen. Fyber obtains from publishers some anonymous usage data, such as tracking ID numbers, device information or IP addresses. Fyber, however, does not know who these Users are or how old they are. Nor Fyber makes any efforts to find out the identity of Users or retarget them. If Fyber makes use of such data, it is only for purpose of its internal operations. In addition, Fyber does not disclose personal information if Fyber has actual knowledge that the information has been collected from children under the age of thirteen in the United States in contradiction with the Children's Online Privacy Protection Act of 1998 and the regulation thereunder. For all COPPA-related questions, please contact us at [coppa@fyber.com](mailto:coppa@fyber.com).

## 7. Changes to this Privacy Policy.

Fyber reserves the right to amend this Privacy Policy from time to time to reflect changes in the law, our data collection and data use practices, the features of the Fyber Services or advances in technology. Please check this page periodically for changes. If we make a change to this Privacy Policy that, in our sole discretion, is material, we will notify you by posting notice of this changes on our website and in this Privacy Policy.