EXPLANATORY NOTES

TO FYBER’S CCPA ADDENDUM FOR DEMAND PARTNERS

Fyber has created these explanatory notes to help its demand partners get oriented with the provisions of the Fyber CCPA Addendum. These explanatory notes were created solely for the purpose of explaining the dataflow via each Fyber service and provide insights about Fyber’s CCPA position in relation to the respective dataflow. If you have any questions, please contact Fyber’s legal team at: legal@fyber.com.

1. Fyber Offer Wall Edge; Fyber Direct Sales

1.1. The Service. The Fyber Offer Wall Edge or Direct Sales allows Fyber’s advertisers (“Demand Partners”) to run their ad campaigns with the intention of having end-users complete a transaction or an action on Demand Partners’ or their advertisers-customers’ websites or mobile applications (“Action” and “App” respectively).

1.2. Dataflow from Fyber to Demand Partner. Fyber is making data, that may include personal information related to publishers’ end-users, available to Demand Partner, to facilitate Demand Partner’s buying of ad inventory from Fyber’s customers-publishers via the Fyber service. For the purposes of the dataflow from Fyber to Demand Partner, Fyber performs as the publishers’ service provider. Therefore, Demand partner may only use the publisher’s personal information via the Fyber service. This restriction does not preclude Demand Partner from using personal information collected independently by Demand Partner or by anyone on Demand Partner’s behalf, for other purposes subject to the applicable provisions of the CCPA.

1.3. Dataflow from Demand Partner to Fyber. Demand Partner sends Fyber, either directly or via an attribution provider, the same personal information that Fyber has made available to Demand Partner, together with an indication that the end-user downloaded the App or has made a purchase on or via the App. Fyber performs as Demand Partner’s service provider and uses such data only to provide the service to Demand Partner, for the purposes of the additional data that Demand Partner sends Fyber.

2. Fyber Marketplace Service
2.1. **The Service.** Fyber transmits bid requests to Demand Partner. Winning a programmatic auction allows Demand Partner to purchase the ad inventory on Fyber’s publisher-customer’s Apps and deliver an advertisement to the App’s end-users.

2.2. **Dataflow from Fyber to Demand Partner.** Fyber is sharing data, that may include personal information related to publishers’ end-users, with Demand Partner, to facilitate Demand Partner’s placement of bids and the purchase of ad inventory of such publishers via the Fyber Marketplace. For the purposes of the dataflow from Fyber to Demand Partner, Fyber performs as the publishers’ service provider. Therefore, Demand partner may only use the publisher’s personal information via the Fyber service only. This restriction does not preclude the Demand Partner from using personal information collected independently by the Demand Partner or by anyone on Demand Partner’s behalf for other purposes, subject to the applicable provisions of the CCPA.

3. **Fyber Programmatic Mediation**

3.1. **The Service.** The mediation service allows the mediated ad network to buy ad inventory programmatically. Winning a programmatic auction allows the mediated ad network to purchase ad inventory on Fyber’s publisher-customer’s Apps and deliver an advertisement to the App’s end-users.

3.2. **Dataflow from Fyber to Demand Partner.** Data, which may include personal information, flows via Fyber’s programmatic mediation service to the mediated ad network, as part of the bid request. Concurrently, the same data flows directly from the publisher’s App to the mediated ad network, via the mediated ad network’s SDK that is integrated with the App. In other words, Fyber and the mediated ad network collect personal information from the publisher, each via its respective SDK, under a separate commercial and data protection agreement. Any dataflow from the publishers directly to the mediated ad network, is not governed by the Fyber CCPA addendum. For the purposes of the dataflow from Fyber to the mediated ad network, Fyber performs as the publishers’ service provider. Therefore, the mediated ad network may only use the publisher’s personal information via the Fyber service only. The above restriction does not preclude the mediated ad network from using personal information collected independently by the mediated ad network or by anyone on the mediated ad network’s behalf for other purposes, subject to the applicable provisions of the CCPA.