

Privacy Policy

Date of last revision: 03 June 2023

At 24metrics, we are committed to respect the privacy choices of our clients and Website visitors. This Privacy Policy (the “Policy”) describes how we use and to whom we disclose personal data that is collected by us or provided by you when you visit our website located at www.24metrics.com (the “Website”) or use our services (the «Services» or the “Software”).

You will also find below the important information about your rights in relation to your personal data, so please read the policy carefully.

24metrics or 24metrics GmbH (“24metrics”, “us”, or “we”) acts as a controller of your personal data. 24metrics GmbH is incorporated and existent in Germany with the address Erich-Weinerstr. 13 / 10439 Berlin, Germany. 24metrics GmbH Contact email for bot entities: privacy@24metrics.com.

By accessing the Website or using our Services, you become subject to this Policy. Your acceptance of the terms of this Policy, in their entirety, shall be effective to your employees, if any.

24metrics offers Fraud Detection software as a service solution through the Website. It allows to upload and download the data to and from the Software, to customize the built-in features and tools of the Software in order to retrieve, gather, process and analyze the clients’/customers’ data as well as to review and analyze data processing results via the Software or by downloading the reports and data. In the framework of these activities the processing of the personal data occurs upon the customers’ instructions. The data processed on the clients’/customers’ behalf relates to their

partners with which the clients/customers conduct business and end-users who use or interact with the clients'/customers' websites, products, services, advertisements and/or mobile application services. In relation to processing of such personal data, 24metrics is a data processor. This processing within the free trial of the Software and the subsequent use of the Software, if the client/customer chooses to continue access and use of the Software, is governed by the data processing agreement executed between 24metrics and the client/customer.

1. What information we collect and how we use it

“Personal Data” is any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly.

We collect the following Personal Data about you:

1.1. Information we use to provide services

Contact Information. When you register / sign up for the Services, we may collect certain contact information from you, such as your first and last name, organisation name, city, state and zip code, email address, and phone number or other similar contact details to process your registration request, to contact you regarding it and help you with your experience.

Billing Information. When purchasing Services, you will be required to provide additional information that may include a credit card number or other banking or payment information. This information is required by us to verify your identity, to establish your company's account, to set up your Services and to enable payments for the Services to be made or to invoice you for them.

Service Information. In order to provide our Services to you, to improve them and to enhance your experience, we may collect information that is created or provided by you in connection with your use of the Services, including order information, chat logs, email logs and information about your actions in various client areas on the Website.

Third Party Information. We may obtain information about you from third party or public sources and add it to your account Contact Information. This combined information may be used by us to enhance our ability to provide Services to you, to ensure that we are paid for Services.

We will use your Contact Information and Billing Information to provide Services and to provide you with access to the Services you have ordered, as well as support services, technical updates or updates on changes in our usage policies. The legal basis for us to use your Contact Information, Billing Information and Service Information is the agreements you enter into with us in connection with the Services (the "Services Terms") and performance of these agreements as well as taking steps at your request prior to entering into them.

We may also use any information collected from you: (i) to personalize user's experience; (ii) to improve our Services in order to better serve you and/or to provide Services more effectively; (iii) to allow us to better service you in responding to your customer service requests, (iv) to ensure continuous improvement and development of the Services; (v) to administer the Website and to diagnose possible problems; (vi) to administer a contest, promotion, survey or other Website feature; (vii) to send periodic emails regarding your order, your use of Services or similar Services you might be interested in.

1.2. Use of information for direct marketing

We may use your Personal Data (full name, contact email address and country) to send you company updates and marketing offers about Services you use (used) or similar services which we provide (provided) to you. You may object to such processing and may refuse from receiving such communications (1) by contacting us pursuant to Section 8 when we first collect your details or (2) by pressing unsubscribe at the end of the message or sending an email to us (see Section 8). In case you use the first option to opt out, we will respond to your request within a reasonable time period. If you opt out, we will still send you non-marketing communication regarding your account or our ongoing business relations (if you are our customer/client).

We may use your Personal Data (full name, contact email address and country) to carry out marketing of 24metrics products and Services, in which you have actively indicated an interest through our Website contact/request form, by way of periodic direct marketing communication email messages, provided that our legitimate interests in carrying out these marketing activities are not outweighed by any prejudice or harm to your rights and freedoms. You may object to such processing and may refuse from receiving such communications (1) by contacting us pursuant to Section 8 when we first collect your details or (2) by pressing unsubscribe at the end of the message or sending an email to us (see Section 8). In case you use the first option to opt out, we will respond to your request within a reasonable time period.

We use Service Information to market our Services to you in a more personalized manner and to allow us to deliver the type of content and product offerings in which you are most interested, to advertise or market our business, and to tailor offers, promotions, etc.

Legal basis for processing described in sub-section 1.2 is our legitimate interests to increase our sales and grow our business.

1.3. Browsing Information and Cookies

“Cookies” are small files that the Website or its service provider transfers (if you allow) to your computer’s hard drive through your Web browser that enables the Website’s or service provider’s systems to recognize your browser and capture and remember certain information.

We may use Cookies, web beacons and other technical means to collect and analyze certain information about how you and other visitors use the Website. This technical information includes Internet Protocol (IP) addresses, browser information, and the preceding and succeeding websites you have visited, among other things. We may also keep a record of which pages of the Website you visit, and how long you spend on each page. Cookies can also be used to help us understand your preferences based on previous or current Website activity, which enables us to provide you with improved Services. We also use Cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better Website experiences and tools in the future. We use Google Analytics for collecting website browsing statistics. You can opt-out from analytics by disabling cookies through your browser settings or by visiting <https://tools.google.com/dlpage/gaoptout/> . If you want to disable other cookies, you can learn how to do it by visiting <http://www.allaboutcookies.org> (overview of process of disabling the cookies in internet browsers).

We use Local Storage (HTML5), and our third party utility partner uses Local Shared Objects (Flash cookies) and Local Storage (HTML5) to store content information and preferences, and to display advertising based on your web browsing activity. Various browsers may offer their own management tools for removing HTML5. If you want to manage Flash cookies, please visit at

https://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html .

You may set your browser to notify you or decline the receipt of Cookies; however, certain features of our Website or Services may not function properly or be available if your browser is configured to disable Cookies. Such cookies are essential for our Website to function properly. Other cookies are not particularly necessary for the Website to function and are used specifically to collect your personal data via analytics.

Legal basis for use of cookies and other information stored on your devices is your consent, unless cookies are necessary for strictly technical functionality of the Website. You may freely refuse to give consent. We may use cookies to record your consents or refusals on this Website.

1.4. Third Party Tracking Technologies on our Website

You can learn more about how to control your data and exercise your rights in our third party partners' relevant privacy documentation (links and relevant information can be found below).

Google Analytics

In order to optimize this website, we use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how you use this website. The information generated by the cookie about your use of this website (including your IP address) will be transmitted to and stored by Google on servers in the United States. If the IP anonymization is activated on this website, your IP address will previously be

truncated by Google within the EU member states or EEA member states. Only in exceptional cases will the IP address be transferred to Google on a server in the United States and thereafter be truncated. On behalf of the website operator, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. The IP address that was transmitted by your browser will not be combined by Google with any other data. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You may also prevent the collection of the data that was generated by the cookie and that is related to the use of the website (including your IP address) as well as its processing by Google by downloading and installing a browser plugin that is available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=de>. Additional information thereto is available at <https://tools.google.com/dlpage/gaoptout?hl=de> and <https://www.google.com/intl/de/analytics/privacyoverview.html> (general information to Google Analytics and privacy). This Website uses Google Analytics with its extension code "gat._anonymizeIp()" so that IP addresses will therefore only be processed in a shortened form to prevent persons from being identified.

Google GDPR Compliance

Google AdWords

We as a Google AdWords customer also use Google Conversion Tracking, a web analytics service provided by Google, Inc. ("Google"). Google AdWords places a cookie in your browser ("Conversion Cookie") if you have accessed our website via a Google ad. These cookies are valid for 30 days. If you access some of our sites and the cookie is still valid, we and Google can recognize that somebody has clicked on the ad and

thereafter was transferred to our website. Every AdWords customer uses a different cookie, and therefore it is not possible to track cookies via the websites of AdWords customers. The information obtained via the Conversion Cookie is used in order to assemble conversion reports for AdWords customers. The AdWords customers receive the number of users that have clicked on their ad and have been transferred to a site that includes the Conversion Tracking Tag but they do not receive any information that would allow them to identify the user. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

Google GDPR compliance

Bing

Bing is a web search engine owned and operated by Microsoft which we use in advertising purposes to drive traffic to our website, raise brand awareness, and increase our online sales as a part of our marketing plan. Microsoft collects data to operate effectively and provide you with the best experiences while using their products. You provide some of this data directly, such as when you create a Microsoft account, administer your organization's licensing account, submit a search query to Bing, register for a Microsoft event, speak a voice command to Cortana, upload a document to OneDrive, purchase an MSDN subscription, sign up for Office 365, or contact them for support. They get some of it by recording how you interact with their products by using technologies like cookies, and receiving error reports or usage data from software running on your device. The data collected can be stored in Bing products and used by us in order to optimize advertising campaigns and increase their effectiveness. Find out more here <https://privacy.microsoft.com/en-us/privacystatement>

Microsoft GDPR Compliance

LinkedIn

Our website includes social media features, such as LinkedIn button. This Feature may collect your IP address, which page you are visiting on our website, and may set Cookies to enable the Feature to function properly. Your interactions with this feature are governed by the privacy policy of the company providing it. See the LinkedIn Privacy Policy here <https://www.linkedin.com/legal/privacy-policy>.

LinkedIn GDPR Compliance

Facebook Social Plugins

This website uses social plugins (“plugins”) from the social network facebook.com which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA (“Facebook”). The plugins are identified by one of the Facebook logos or the amendment “Facebook social plugin”. The list and the look of the Facebook social plugins can be viewed here: <https://developers.facebook.com/docs/plugins/>.

If you access a page on our website that includes such a social plugin, your browser sets up a direct connection to the Facebook servers. Facebook transfers the social plugin’s content directly to your browser which will then integrate it into the website. Therefore we have no influence on the extent of the data that Facebook collects via its social plugins, and thus, can only inform you based on our state of knowledge: Through integration of the plugin, Facebook obtains the information that you have accessed the respective page on our website, even if you are not a registered user of Facebook or are not logged into Facebook. This information as well as your browser’s IP address is

transferred to Facebook's server in the United States and is being stored there.

According to Facebook, only anonymized IP addresses are stored from non-registered users in Germany. If you are logged in to Facebook, Facebook can allocate the visit to our website to your Facebook account. Facebook receives such information irrespective of whether you interact with the social plugins or not. If you do interact with the social plugins, e.g. by using the «Like-it-Button» or by posting a commentary, your browser will transfer such information directly to Facebook where it is being stored. Such information will also be published on Facebook and be displayed to your Facebook friends. For information on the purpose and extent of data collection, the further processing and use of such data by Facebook, as well as your rights in this regard and your setting options for the protection of your privacy, please refer to Facebook's privacy policy:

<https://www.facebook.com/about/privacy>

If you are a Facebook member and do not want Facebook to collect data on you via our website and to combine such data with your Facebook membership data, you need to log off from Facebook before accessing our website. Furthermore, you may also block social plugins by downloading and installing add-ons for your browser.

Facebook GDPR Compliance

Twitter Plugins

This website uses social plugins that are provided by Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA, and can be identified by the Twitter logo or e.g. the words "Tweet" or "Twitter". The plugins enable the user, inter alia, to share an article or a page of this website on Twitter. If you access a website that includes this plugin, your browser sets up a direct connection to Twitter's servers. Twitter transfers the plugin's content directly to your browser which will then integrate it into the website. Therefore,

we have no influence on the extent or content of the data that Twitter collects via its plugin, and thus, can only inform you based on our state of knowledge.

According to our knowledge, log information such as the user's IP address, the URL of the referring website, etc, is transmitted to Twitter. Additional information is available in Twitter's privacy policy: <https://twitter.com/privacy>

Twitter GDPR Compliance

Intercom

We use Intercom widget as a mean of communication between our clients and support team. Intercom online privacy policy located at <https://www.intercom.com/privacy> describes the categories of personal data they may receive, as well as the purposes for which they use that personal data. According to that policy they collect information about you when you (a) register to use their services and (b) otherwise provide contact information to them via email, mail, or through Offerings. This information you provide may include your username, first and last name, email address, mailing address or phone number.

They also automatically collect information on how you interact with the Offerings, such as the IP address from which you access the Offerings, date and time, information about your browser, operating system and computer or device, pages viewed and items clicked. They may also collect location information, including location information automatically provided by your computer or device. Intercom uses cookies and similar technologies to collect some of this information. For more information, please see Intercom's [Cookie Policy](#).

Intercom GDPR Compliance

Zendesk

We use Zendesk with the goal to improve communication with our clients and make sense of massive amounts of data and documentations for 24metrics platform.

Zendesk uses cookies and other information gathering technologies for a variety of purposes. These technologies may collect personal information, information about devices and networks you utilize to access their website. The data collected is stored inside Intercom product and can be used by us to optimize communication experience with clients. For detailed information about the use of cookies in their website, please read and review Zendesk Cookie Policy found [here](#).

Zendesk GDPR Compliance

1.5. Rights of end-users with whom 24metrics does not have a direct relationship

When 24metrics operates as a data processor on the data controllers' (clients'/customers') instructions, it is not an end-user facing company. Direct relationship is formed between end-users and our clients/customers. For this reason, such end-users must reach out to the data controllers in order to exercise their end-user (data subject) rights. In the majority of cases, the data controllers are advertisers of products advertised to the end-users via mobile applications, mobile or desktop web. In some cases, it can also be publishers, agencies or ad networks. In case the end-user wishes to delete, access, correct or export its personal data, he/she needs to contact the data controllers providing explicit information in his/her request.

If the data controllers receive requests from end-users wishing to exercise their rights (e.g. erasure) with regard to the personal data the data controllers share with 24metrics, the data controllers must communicate that obligation to 24metrics with all information necessary to fulfil such requests.

Disabling cookies. Those end-users whose personal data is collected and processed through our Software on the data controllers' behalf/instructions can disable cookies in their internet browsers (as described in sub-section 1.3 of this Privacy Policy) or use browsers in an "incognito" mode which ignores cookies. It might not, however, stop receipt of all advertisements. If the end-user wishes to opt out of a particular ad network, publisher or advertiser's ads, he/she will have to contact them directly regarding an opt-out option. In order to stop collection of Ad Identifiers for targeted advertising, the end-user can enable the Limit Ad Tracking setting on his/her mobile device or reset the Ad Identifier altogether using the mobile device's privacy settings. Enabling the Limit Ad Tracking will not disable advertising on your smartphone, it will disable targeting (which means that the end-user will continue seeing ads, but they will not be targeted to him/her). Resetting the Ad Identifier allows the end-user to reset the data being used to target ads to him/her (e.g. if the end-user is shown ads based on his/her past activities which do not coincide with the end-user's interest anymore).

2. To whom we disclose your personal data

We may disclose your Personal Data to (1) our employees who are in contact with you or who are responsible for marketing, customer success, customer support and/or employees from IT departments, (2) our affiliated companies, (3) third-party suppliers/vendors.

2.1. We use third party suppliers/vendors to perform the following business-related functions: data storage services, data analysis, Website hosting, database maintenance services and payment processing. External legal consultants/advisors or debt collection agencies can be used by us in order to protect our or third parties' interests and/or recover a debt caused by your failure to pay for our Services. These suppliers and vendors may receive or have access to your personal data. When we employ such third party suppliers/vendors to perform services on our behalf, we will only provide them with access to Personal Data that they need to perform their specific function. We will put our reasonable efforts that each third party supplier/vendor will be required by a contract to keep such Personal Data confidential and secured and not to use it for any purpose other than providing services to us.

Personal data processed through our Software on the data controllers' behalf/instructions is disclosed only to our affiliated company located within the EU and other subprocessors providing cloud providing services to us. More detailed information can be found in data processing agreements which govern processing of the personal data by 24metrics on the data controllers' behalf.

2.2. We may share Personal Data with the owner of intellectual property rights to the Website and software used on it to the extent needed to perform certain business-related functions (e.g. updates, maintenance, support, etc.) for the purpose of providing Services to you.

2.3. We may share Personal Data with entities that are controlling, controlled by or under common control with 24metrics (each, an "Affiliate") for the purpose of promoting Services of 24metrics and assisting 24metrics in providing its Services to you, ensuring functionality of and authorization to use the Software/Site, protection Owner's/Provider/s rights as well as for the purpose of assisting 24metrics in

performance of End-User Agreement, Terms and Conditions and Privacy Policy. In that event, any such Affiliate will use Personal Data solely as permitted under this Policy.

2.4. We may disclose Personal Data to public authorities if required to do so by law or to comply with a legal obligation. If we are requested by law to disclose any of your Personal Data, we will use reasonable efforts to provide you with notice of that disclosure requirement, unless we are prohibited from doing so by statute, court or administrative order.

2.5. We reserve the right to sell, assign or transfer our business or assets. In any such event or similar event, including but not limiting to corporate sale, merger, reorganization, dissolution, etc., Personal Data may be part of the transferred assets. You acknowledge that such transfers may occur, and that any acquirer or successor of 24metrics may continue to use your Personal Data as set forth in this Policy.

2.6. Our employees have access to your Personal Data only to the extent their functions are required to provide our services or otherwise act on our behalf as set forth in this Policy.

2.7. Statistical/analytical data about our Website's visitors/users may be accessed by (1) our employees in marketing, customer support, customer success and/or IT departments who are responsible for analyzing such data and for improving our Website and Services, (2) Affiliates, (3) third-party service suppliers/vendors.

3. Data storage period

Personal Data will be stored for as long as the Personal Data is required to provide Services or requested Website functionality.

In some cases, Personal Data may be stored for a period longer than indicated or despite withdrawal of consent or request to erase Personal Data, if storage of Personal Data is required in order to comply with our legal obligations, protect our or third parties' legitimate interests/resolve disputes, maintain accurate financial and other records and/or in order to enforce our agreements.

When we use your Personal Data for statistical purposes (country), we will retain your data within 12 months.

When we use your Personal Data for direct marketing purposes (full name, contact email address and country), we will retain your data within 2 years from the moment when we received your data through the contact form on the Website (for those who are interested in use of our Software) or from the end of the free trial period (if you do not wish to continue access and use of the Software) or from the termination of the end-user agreement (as well as during the free trial period and the term of the agreement). This is the term during which we consider your data effective for us in terms of direct marketing unless you opt-out from receiving the marketing materials or exercise other data subject's rights earlier; provided that we will need to retain certain information to maintain a record of your request.

4. Disclosure of client data / information to third parties

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect

ours or others rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

California Online Privacy Protection Act Compliance

Because we value your privacy we have taken the necessary precautions to be in compliance with the California Online Privacy Protection Act. We therefore will not distribute your personal information to outside parties without your consent.

Childrens Online Privacy Protection Act Compliance

We are in compliance with the requirements of COPPA (Childrens Online Privacy Protection Act), we do not collect any information from anyone under 13 years of age. Our website, products and services are all directed to people who are at least 13 years old or older.

5. Security

No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we have implemented appropriate technical and organizational security measures designed to protect data in our possession from accidental loss, misuse, alteration, disclosure, destruction and unauthorized access. In addition, we limit access to your Personal Data to only authorized staff and to those who have business need to know (and they will only process your Personal Data on our instructions and subject to a duty of confidentiality). We have put in place procedures to deal with any suspected or actual data security breach and will notify you and to the supervisory authority of a suspected breach where we are legally required to do so.

6. Links to Other Sites

For the convenience of our visitors, users and clients, the Website may contain links to other sites, such as those of our partners or vendors, which are subject to different privacy policies. The Policy will not apply to your use of other websites. While we generally try to link only to sites that share similar high standards and respect for privacy, we have no responsibility or liability for the content, products or services offered, independent actions, or the privacy and security practices employed by these other independent sites. We encourage you to ask questions and review the applicable privacy policies found on such other websites, services and applications to understand how your information may be collected and used on these independent sites before disclosing information to third parties.

7. Social Media & Widgets

Our Website includes and/or may include social media features and widgets, such as the Facebook, Twitter or LinkedIn button (the "Features"). These Features may collect your IP address, which page you are visiting on our Website, and may set Cookies to enable the Features to function properly. Features are either hosted by a third party or hosted directly on our Website. Your interactions with these Features are governed by the privacy policy of the company providing it. We undertake no responsibility and shall have no liability with respect to these Features.

8. Minors

We will never knowingly collect any Personal Data and personal information about individuals under eighteen (18) years of age. If 24metrics obtains actual knowledge that

it has collected personal information about an individual under eighteen (18) years of age, that information will be immediately deleted from our platform.

9. Your Rights, Questions and Complaints

9.1. You have a right to request rectification of Personal Data in our database (including Contact and Billing Information that you have provided to us) by contacting us at support@24metrics.com. If you delete Personal Data or it is erased under your request (pursuant to your right to request erasure of your Personal Data), we will only retain such copies of the information as are necessary for us to protect our or third parties' legitimate interests, comply with governmental orders, resolve disputes, troubleshoot problems, or enforce any agreement you have entered into with us.

9.2. In certain cases, you may have a right to restrict processing of your Personal Data (so we only process your Personal Data in limited circumstances, including with your consent) or to object to processing of your Personal Data (so we no longer process your Personal Data). These rights can be exercised by contacting us at support@24metrics.com.

9.3. In cases where processing of Personal Data is based on your consent, you have the right to refuse and revoke consent to the processing of your Personal Data by contacting us at support@24metrics.com. Upon termination of processing of your Personal Data it can be difficult or impossible to provide Services to you.

9.4. You can request information about all Personal Data we have stored about you by contacting us at support@24metrics.com. By contacting us at the aforementioned address, you may also exercise your right to data portability. The right to data portability entitles you to receive a copy of your Personal Data which you have provided to us in

structured, common and machine-readable format insofar as it has not already been deleted.

9.5. You can use the right to lodge a complaint with your supervisory authority if, despite our commitment and efforts to protect your Personal Data, you believe your data protection rights have been infringed. The complaint can be lodged in the Member State where you live, work or where you assume the alleged violation took place.

9.6. If you have any questions, concerns or complaints regarding the way we collect and handle your information, please contact us by email at support@24metrics.com (or privacy@24metrics.com) or 24metrics GmbH / Erich-Weinerstr. 13 / 10439 Berlin, Germany.

9.7. Our data protection officer can be contacted by email at privacy@24metrics.com.