

# Pixalate Privacy Policy

Effective and last updated as of 10 February 2025

Pixalate Europe Limited and its affiliates (“**Pixalate**,” “**we**,” “**us**” or “**our**”) are committed to protecting your privacy. As used in this Pixalate Privacy Policy (“**Privacy Policy**”), “personal data ” means any information relating to a living individual by which they can be identified or be identifiable.

Please review this Privacy Policy thoroughly as it explains how we process (e.g., collect, use, retain, safeguard, share and disclose) personal data. This Privacy Policy also informs you of your privacy rights under applicable law and how to exercise them.

For any questions or queries regarding this Privacy Policy, please contact us using the details set forth in the “**Contact Information**” section below.

To provide efficient functionality, enhanced user experiences, insights and trend reporting regarding fraud discoveries and privacy compliance globally, and ease of access to our offered online services (collectively, the “**services**”) and website, [www.pixalate.com](http://www.pixalate.com) (“**website**”), we may process your personal data for the purposes set out herein. Because we may process the same personal data for multiple purposes, we provide a detailed breakdown in the “**Purposes and Legal Bases**” section below.

## 1. Information you provide to us:

When you access or visit our website, we may collect your personal data for various purposes, such as to register to download and receive our published reports, sign up to receive alerts or notifications concerning any of our published reports or services, communicate or interact with us on social media platforms, share your contact information in order for Pixalate to respond to feedback received from you, or make a complaint or register with your information to receive responses and other communications from our team. We may also collect your personal data for recruitment of personnel (including with respect to employment opportunities published on our website), billing and payment transactions pursuant to contractual agreements (including with respect to transmission of invoices triggered by service orders), communications by email and/or via telephone or mobile phone number(s) that you provide to us, or when our staff members are managing client accounts on our secure servers and databases.

## **2. Information automatically collected:**

When you visit our website, we use automated data collection technologies, including third party technologies such as Google Analytics, to process information about your visits to and activities on our website. We also use this information to provide you with a better user experience by offering enhanced website performance and functionality. The personal data we process for such purposes includes the IP address of the system or device you are using to connect to the internet, online cookie or device identifiers (IDs), your general (i.e., non-precise) location (which may be derived from your IP address), your internet service provider (ISP) information, and details regarding the internet browser you are using on your system or device.

We also collect information related to your interactions with our website and/or services, including online usage data concerning the time you spend on specific pages and sections of our website or service, the operating system used, access credentials, dates and times, referring and exit pages and URLs, search query content, and number of links clicked on our website. We use this information to operate, maintain, manage, and improve our Website and Services. Specific to our Services, we also use this information for subscription and utilisation billing purposes. This type of processing may also be performed by our third party business partners and vendors for the above-referenced purposes, and for our and our business partners' cross-context behavioural advertising (which may include collecting and creating audience data segments).

## **3. Information we collect from other sources/third parties:**

We use third-party technologies that offer features such as social media widgets (e.g., 'LinkedIn' Like button, 'X' Share button), online advertising platforms, and job applicant tracking services that also collect IP addresses, cookie or device IDs, usage data, website and page visits, including time and date of visit, web or device browser information, and/or operating system information.

Please note that third-party service providers may combine personal data that you consent to provide with information collected from other sites and/or apps. As we do not host or control these third-party services, your interactions with such services will not be governed by this Privacy Policy; instead, such interactions will be governed by the privacy policy of the applicable third-party service provider. Our third-party service providers include: Google LLC, Hubspot, Inc., Salesforce, Inc., Hireku, Inc., and LinkedIn Corporation.

You may opt out of providing such information at any time by selecting the 'opt out' or 'reject' button in the consent capture banner when you visit our website. Alternatively, to opt out of sharing such personal data, you may withdraw your consent by contacting us using the 'Contact Information' below or following the instructions to opt-out on our website when prompted.

As part of our advertising fraud prevention, invalid traffic ("IVT") detection and data intelligence services, Pixalate receives information that is fully encrypted in transit from (or on behalf of) clients that are directly involved in the digital programmatic advertising ecosystem. Pixalate's clients enable our fraud and IVT detection processes by placing pixels or JavaScript tags on digital advertisements being rendered in desktop or mobile web browsers and/or mobile or connected television (CTV) applications, and we receive encrypted transmissions of information in return. To render our fraud and IVT detection assessments, Pixalate's proprietary systems process such information, which includes personal data of users, and render fraud and IVT detection-related assessments that incorporate insights gleaned from such information, including personal data, derived from network-level communications with the relevant associated systems or devices to confirm whether such information presents indicia of fraud and/or IVT.

The information that we utilise to render our fraud- and IVT-related opinions may include internet domains or app IDs, cookie or device IDs, operating system information, desktop, mobile or CTV platform IDs, advertiser campaign attributes, IP addresses, coarse geographic location information, ISP information and/or mobile carrier IDs.

With respect to information reasonably associated with our fraud and IVT detection, and to comply with the [Media Ratings Council \("MRC"\)](#) guidelines, we retain such information for a period of thirteen (13) months unless circumstances arise that require certain information to be retained for a longer period (e.g., for Pixalate to defend ourselves in a legal proceeding, or in response to validly-issued subpoenas or similar instruments in governmental proceedings).

Pixalate does not combine, analyse, add additional information, or enrich any information with an aim of identifying a user as part of our advertising fraud and IVT detection and prevention, and data intelligence solutions. We never create digital advertising profiles or audience groups to target individuals.

For more information on our advertising fraud and IVT detection solutions, please visit:  
<https://www.pixalate.com/products/analytics>

#### 4. Children's Privacy

Our website and services are not directed at individuals under the age of thirteen (13) . If you are under the age of 13, please do not provide us with any personal data. As part of our advertising fraud prevention and invalid traffic ("IVT") detection services, Pixalate receives information, including personal data of users that may constitute children under the age of thirteen (13), via fully encrypted transmissions from clients that are directly involved in the digital programmatic advertising ecosystem. This data enables our fraud and IVT detection processes. As with all personal data that we process, we reduce purportedly precise geolocation information that may relate to any human data subject—including children under the age of thirteen (13)—to coarse geolocation immediately. Although coarse geolocation information is necessary and legitimate to use such personal data for IVT detection, if we learn that we have received personal data from a user under the age of thirteen (13), we endeavour to remove such personal data from our systems as soon as reasonably practicable.

#### 5. Purposes and Legal Bases:

Pixalate is required under certain privacy laws and regulations to disclose the legal bases and purposes upon which we rely to process your personal data. The following table outlines detailed categories of personal data that we process, the applicable legal bases as well as the key purposes for processing such personal data.

Personal Data Categories:	Legal Bases:	Purpose(s):
<b>Contact Information:</b> Personal identifiers such as your name, email address, postal address, telephone number, mobile phone number.	Our lawful basis to process such data is for fulfilling our contractual obligations, our legitimate interest, and/or your consent.	We may use your personal identifiers to identify you when you contact us, for any communications related to the website and our services, for transactions and bill payments that you are a client for, when creating an account or registering on our website to

		download published reports, when creating an account or registering to submit your personal data concerning any vacancies or for recruitment purposes, in order for us to keep you informed on our latest published reports or services, or respond to any queries we receive from you.
<p><b>Online Identifiers Used in Connection with Operation of our Website:</b>  Device ID, IP address, ISP information, internet browser details, operating system information for the system or device you are using; time you spend on specific pages and sections of our website or services, access dates and times, referring and exit pages and URLs, search query content, and number of links clicked on our website or services.</p>	Our legitimate interest, and/or your consent.	<p>We may use this personal data, at times with support of third-party technologies, to monitor and improve our website performance and activity, provide enhanced functionality, including the ability to 'share' content from our website onto social media platforms, for tracking to improve your user experience when you visit our website, and to provide opportunities to download and read our reports. Whilst we may derive and aggregate some information regarding our website visitors for the purposes of creating data insights for enhancing user experience, data processed to derive such insights is free from any personal data and does not</p>

		<p>identify any particular individual user or visitor of our website.</p> <p>Our website does not require, or utilise, any precise geographic location information.</p>
<p><b>Personal Data Processed in Connection with Our Advertising fraud and IVT detection and prevention services:</b> Cookies and/or device IDs, system or platform IDs, advertiser campaign attributes, system and/or device IP addresses (ipv4, ipv6), domain or app ID, internet browser information for systems and/or devices, coarse (i.e., non-precise) geographic location information and/or mobile device carrier.</p>	<p>Contractual obligations, and/or our legitimate interests</p>	<p>As part of Pixalate’s advertising fraud and IVT detection and prevention, and data intelligence relating thereto, we receive information in the advertising bid request streams from our clients, as well as information from direct, network-level communications with systems and/or devices purportedly associated with digital programmatic advertising transactions, and our proprietary systems process such information to generate our fraud and IVT assessments, which our clients use to prevent fraudulent transactions and improve the quality of the digital programmatic advertising supply chain.</p> <p>At times and upon request from contesting parties, Pixalate may create and share video logs (‘vlogs’) to display and substantiate our findings for the</p>

		<p>purposes of providing evidence, such as log data, on video streaming platforms (i.e. YouTube). We perform this activity on the basis of our business interests of providing accurate information regarding our findings concerning advertising fraud and IVT impressions. Other than as reasonably required to substantiate schemes that we deem to likely represent fraud or other similarly-suspicious activity, we redact or obscure personal data that would otherwise be visible in such log-level data.</p> <p>Pixalate does not combine, analyse, add additional information, or enrich any information with an aim of identifying a user as part of our advertising fraud and IVT detection and prevention, and our associated data intelligence solutions. We never create digital advertising profiles or audience groups to target individuals.</p>
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Transaction records related to service orders or contractual agreements, including contact information such as your name, email address, postal address, telephone or mobile number(s), invoices, email communications relating to bill or payment transactions.	Compliance with legal obligations	Your personal data may be used by Pixalate to comply with any legal obligations that are binding or accepted by us. For instance, we may retain transaction data, invoices or receipts for a specific period of time to comply with tax, competition or accounting laws. We may also need to carry out verification checks to meet our obligations under anti-money laundering (AML) laws.
Personal identifiers such as your name, email address, postal address, telephone number. Online identifiers such as IP address of the device you are using to connect to the internet, your internet service provider, device browser you are using, time spent on specific pages and sections of our website, the operating system and language, access dates and times, referring and exit pages and URLs, search query content, and number of links clicked on our website.	Our legitimate interests	We may process your personal data to defend our legal rights and protect the integrity of our business, including our website and online services in general.

## 6. Data protection/ Data Subject rights:

If you are a resident of the European Economic Area (“**EEA**”), United Kingdom (“**UK**”), Switzerland, or other countries, provinces, states and regions that have adopted privacy



regulations aligned with the EU's General Data Protection Regulation ("GDPR"), among others, you have the following rights concerning your personal data processing:

- I. **Right to Access:** you have a right to access your personal data by requesting a copy of any personal data that we hold and process about you. Once a request is received, we will share this personal data, if any, with you in an electronic format. As we are committed to protecting your personal data and implementing security measures when handling any such information, we may, at our discretion and in accordance with applicable law, require you to provide proof of your identity before proceeding to comply with your data subject access request. If you request for more than one (1) copy of your personal data during any calendar year, we may charge a reasonable fee as and when authorised to do so under the European Union's General Data Protection Regulations ("GDPR") or any other applicable data privacy laws and regulations.
- II. **Right to Withdraw Your Consent:** For any of your personal data that we process based on your consent, you have a right to withdraw such consent to stop processing of your personal data at any time, including your right to opt-out of receiving marketing related messages and communications from us. You can also opt-out of targeted advertising based on personal data collected via our third party vendors by emailing [privacy@pixalate.com](mailto:privacy@pixalate.com), or via the contact details specified in the "Contact Information" section below. Please note that you are able to unsubscribe from receiving marketing communications at any time by following the given instructions in our email communications.
- III. **Right to Rectification:** You have the right to update and/or correct incomplete, outdated or inaccurate personal data that we process about you. Pixalate is committed to ensuring all personal data that we process about you is correct and we shall rectify any information that requires correction as and when notified by you.
- IV. **Right to Restriction:** You retain the right to ask us to restrict any personal data processing about you. For example, if you believe that such data is undergoing unlawful processing or wish to better understand our reasoning as to why we are processing your personal data, please refer to the "**Contact Information**" section to submit such a request. (You may utilise this approach to exercise each of your applicable rights enumerated herein.)

- V. **Right to Deletion:** You have a right to request deletion of your personal data that we process about you. Please note that we may not delete certain personal data that needs to be retained by us to comply with any legal obligations or to defend any legal claims, in accordance with applicable law.
- VI. **Right to Data Portability:** You have a right to request for your personal data that we process about you to be transmitted directly to another data controller that you have identified.
- VII. **Right to Object:** You have a right to object to our data processing of your personal data where the legal justification for our processing is legitimate interests. Pixalate will honour your request unless there are compelling and overriding legal grounds under applicable law, including establishing or defending a legal claim, that supersede this right and permit us to continue processing such personal data.
- VIII. **Right to lodge a complaint:** You have a right to lodge a complaint with the local data protection authority (“**DPA**”) if you believe that our processing practices are non-compliant with data protection laws. Pixalate has further committed to cooperate with the panel established by the EU data protection authorities (DPAs), UK Information Commissioner’s Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) regarding unresolved Privacy Shield complaints concerning data transferred from the EU and Switzerland. For the United Kingdom, the DPA is the ICO, reachable using the following details: ICO, Water Lane, Wycliffe House, Wilmslow, Cheshire, SK9 5AF, +44 303 123 1113, [www.ico.org.uk](http://www.ico.org.uk),

To exercise any of your data protection rights, please refer to the “**Contact Information**” section below.

## 7. Disclosures to Third Parties:

We only share your personal data with third parties in the following ways, to the extent permitted by the applicable laws and as per the purposes identified below:

Third Party	Legal Bases
Third party service providers that we contracted for	Our lawful basis to process such

services inclusive of processing payments and transactions, hosting and email distribution services, research and analysis. We enter into agreements with our service providers to ensure that appropriate physical, technical and organisational measures are implemented to protect your personal data.	data is for fulfilling our contractual obligations, our legitimate interest, or your consent.
Our affiliates, for the purposes described in our “Legal Bases and Purposes” section above.	Our lawful basis to process such data is for fulfilling our contractual obligations, our legitimate interest, or your consent, depending on the purposes we process such personal data, as specified in the Legal Bases and Purposes” section above.
Third party marketing, analytics and advertising companies that provide Pixalate with advertising, statistical marketing insights and other similar services. We use these third parties to collect information via cookies and other similar technologies that you consent to at the forefront when you visit our website. We also share your personal data with contracted third parties for the purposes of contextual advertising.	Your consent.
Government bodies and official authorities to the extent necessary to (i) comply with an official government request, including court orders, subpoenas, information request by local law enforcement agencies, as required by law, or otherwise to protect the rights and safety of our organisation (ii) prevent illegal uses of our products and online services (iii) defend our rights against potential or existing third party claims and (iv) share	Our legitimate interest, compliance with a legal obligation.

information with official government authorities for the purposes of assisting with fraud or cybersecurity related investigations.	
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## 8. Cookies:

Pixalate's website uses cookies, which are small text files that can be stored on your computer or device to provide you with different types of functionality, such as making the website function and operate properly ("**essential cookies**") or to optimise the website by tracking website visitors to enhance their user experience ("**functional cookies**"). We also use third party cookies for advertising ("**advertising cookies**"), analytics and other purposes as described in this Privacy Policy. If at any time you do not want cookies to be used, you can disable these by configuring your web browser settings or by following the instructions in the cookie banner on our website. Please be advised that if you disable, restrict, or block cookies, or similarly opt out of or otherwise limit the performance of our website, you may not be able to use the full functionality of our website. Please review our [Cookie Policy](#) for more information on how Pixalate uses cookies, pixels and other tags. Lastly, with respect to third party analytics, we use Google Analytics as our third-party analytics vendor, and you may opt-out of such personal data processing (and associated cookies) by visiting <https://www.google.com/analytics>.

## 9. How do we protect your personal data?

Pixalate utilises technical, physical and administrative measures designed to protect the privacy of personal data, including ensuring that any decrypted information is processed in a secure environment by authorised personnel only, providing such personnel with the minimum data rights and privileges sufficient to perform their responsibilities, and using other security measures recognized in the industry as prudent to ensure data security and integrity. Once our fraud and IVT detection processes are complete, Pixalate purges all information, including personal data, that is not deemed related to fraud or IVT within fourteen (14) days. Pixalate's information security safeguards are designed to protect the personal data you provide to us against unauthorised access, use or disclosure, unlawful or accidental loss, destruction, alteration and other unlawful methods of processing.

## 10. How long do we store personal data?

Pixalate and/or its service providers process your personal data only for the period necessary for the identified purposes for which your personal data was initially collected. For example, if you choose to delete your account with us, Pixalate will remove all associated personal data with that account upon closure. As noted previously, personal data that is processed as part of our advertising fraud prevention, IVT and data intelligence services, and is not deemed by our proprietary systems to be associated with fraud or IVT, is purged within fourteen (14) days.

Notwithstanding the foregoing, there may be circumstances where Pixalate is required to comply with legal or regulatory obligations to which it is subject, by retaining your personal data for a longer period to abide by the applicable laws and regulations. For personal data that we process based on your consent, we will retain such personal data until you withdraw your consent. Once your consent is withdrawn, Pixalate will remove your personal data from its systems and records or conduct an anonymisation process to ensure that you can no longer be identified.

## 11. International Data Transfers & Appropriate Safeguards

Pixalate may store or transfer your personal data to secure servers and databases located outside of the European Economic Area (“**EEA**”) or United Kingdom (“**UK**”). As a global company with our teams located across London, United States, Canada and Singapore, personal data needs to be accessed by staff members to ensure appropriate support and efficiency for our customers is maintained. Before transferring your personal data outside of the EEA or UK, and unless a legally applicable exemption applies, Pixalate ensures that the data recipient has an appropriate level of data protection in place, either through confirming that an adequacy decision by the European Commission or the UK applies, or through other appropriate guarantees, such as putting in place the European Union’s (“**EU**”) Standard Contractual Clauses and any additional requirements under applicable laws with the data recipient.

Pixalate has self-certified to the U.S. Department of Commerce that it adheres to and complies with the EU-U.S. Data Privacy Framework (“**DPF**”), the UK Extension to the EU-U.S.DPF and the Swiss-U.S. DPF mechanism and Principles (“**DPF Principles**”). Pixalate relies on the EU-U.S, UK Extension to EU-U.S. and the Swiss-U.S DPF for any personal data processing where such personal data is transferred from the EU/EEA and UK to the United States. To view

our self-certification and learn more about the Data Privacy Framework as well as the associated adequacy decision issued by the European Commission, please visit <https://www.dataprivacyframework.gov/>.

**Liability for Onward Transfers.** We acknowledge our responsibility for the processing of personal data and any onward transfers to third parties, agents or service providers, under the DPF Principles. Pixalate remains liable under the DPF if an associated third party, affiliate or service provider processes personal data pursuant to this Privacy Policy in a way that is inconsistent with the DPF Principles, except where Pixalate can prove that we are not responsible for the event giving rise to any such damages.

We can share a summary of our data recipients in non-EEA/UK locations with information on what measures are relied on to ensure adequate level of data protection is applied at all times. Please refer to the “**Contact Information**” section to submit such a request.

Pixalate has further committed to cooperate with the panel established by the EU data protection authorities (DPAs), UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved DPF-related or DPF UK Extension-related complaints concerning data transferred from the EU, UK and/or Switzerland.

Pixalate is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

It is also possible, under certain conditions, for individuals to invoke binding arbitration to resolve disputes relating to this Privacy Policy and applicable law. To address privacy-related complaints not resolved by other means, Pixalate offers a binding arbitration option in such circumstances. Any such arbitration shall be conducted in accordance with the UK Arbitration Act 1996 by the International Chamber of Commerce (“ICC”) under its 2021 Arbitration Rules and Expedited Procedure Provisions. These rules and provisions are available on the ICC website or by sending an email to [info@iccwbo.uk](mailto:info@iccwbo.uk).

## **12. For Non-EEA/UK residents:**

### **I. Information for California residents:**

This section supplements the description of our information collection and sharing practices elsewhere in this Privacy Policy to provide certain disclosures specific to California residents whose personal data we process pursuant to the then-current rules implementing the California Consumer Privacy Act (“**CCPA**”).

**Collection, Use and Disclosure of Personal Data.** During the preceding 12 months, we have collected, used, and/or disclosed the categories of personal data described above. For example, depending on the Services you use, this may include your system's or device's identifiers (e.g., IP addresses), your online contact information (e.g., email addresses), commercial information (e.g., records of Services purchased), internet or other electronic network activity information, geolocation data (e.g., your country and postal address), and records of requests and interactions to our customer support service. This may also include inferences we draw from the other information we collect.

**Use of Personal Data.** The business purposes for which we collect and handle personal data is described above.

**Disclosure of Personal Data.** We disclose or share personal data in the ways described above, including by allowing third parties that provide us analytics and advertising services to collect information through cookies and other similar technologies. We believe that third party cookies we permit to be associated with our Website and Services restrict their third party data processing to what is permitted by service providers under the CCPA. You can opt out of future sales of personal data, if any, by using the information specified in the “**Contact Information**” section below.

Each of the categories of personal data listed above may be shared with the following categories of third parties for the purpose of cross-context behavioural advertising:

- Advertising publishers that place advertisements on our behalf, such as Google; and
- Parties that provide statistical and analytic information regarding the effectiveness of our marketing.

Our Website and Services are not directed to children, and we do not knowingly collect personal data from children under the age of 16; accordingly, we don't knowingly share the personal data from children under the age of 16 for cross-context behavioural advertising nor do we sell such information. If we find out that a child under 16 years of age has given us personal data, we will take steps to delete that information. If you believe that a child under the age of 16 has given us

personal data, please contact us at [privacy@pixalate.com](mailto:privacy@pixalate.com), or via using the details specified in the “**Contact Information**” section below.

***Sensitive Personal Data.*** Pixalate does not use or disclose sensitive personal data, and will not do so other than in compliance with applicable law. Pixalate does not sell or share sensitive personal data for the purpose of cross-context behavioural advertising, and will not do so other than in compliance with applicable law.

***Deidentified Information.*** Personal data does not include information that is deidentified. When we receive or use deidentified information, we maintain it in deidentified form and do not attempt to reidentify the information.

***Retention of Personal Data.*** We retain your information for as long as necessary to provide you and our other users with the website and/or our products and services, as applicable. This means we keep your profile information for as long as you maintain an account. We may retain certain transactional information for more than seven (7) years to ensure we can perform legitimate business functions, such as accounting for tax obligations. We also retain your information as necessary to comply with our legal obligations, resolve disputes and enforce our terms and policies.

***Your California Rights Regarding Your Personal Data.*** California law provides some California residents with the rights listed below. To exercise these rights, please contact us at [privacy@pixalate.com](mailto:privacy@pixalate.com), or via the details specified in the “**Contact Information**” section below.

***Right to Know.*** You have the right to know and see what personal data we have collected about you, including:

- The categories of personal data we have collected about you;
- The categories of sources from which the personal data is collected;
- The business or commercial purpose for collecting or sharing your personal data;
- The categories of third parties with whom we have disclosed your personal data; and
- The specific pieces of personal data we have collected about you.

***Right to Delete.*** You have the right to request that we delete the personal data we have collected from you (and direct our service providers to do the same).



**Right to Correct.** You have the right to request that we correct inaccurate personal data.

**Right to Opt Out of Sharing.** You have the right to opt out of the sharing of your personal data to a third party for cross-context behavioural advertising.

**Other Rights.** You can request certain information about our disclosure of personal data to third parties for their own direct marketing purposes during the preceding calendar year. This request is free and may be made once a year. You also have the right not to be discriminated against for exercising any of the rights listed above.

**Exercising Your California Privacy Rights.** To request access to or deletion of your personal data, or to exercise any other privacy rights under California law, please contact us at [privacy@pixalate.com](mailto:privacy@pixalate.com), or via the details specified in the “**Contact Information**” section below.

**Authentication and Verification.** To respond to certain rights exercise-related communications, we may need to verify your request either by asking you to log in and authenticate your account or otherwise verify your identity by providing information about yourself or your account. Authorized agents can make a request on your behalf if you have given them legal power of attorney or we are provided proof of signed permission, verification of your identity, and, in some cases, confirmation that you provided the agent permission to submit the request.

**Response Timing and Format.** We aim to respond to a consumer request in relation to these rights within forty-five (45) days of receiving that request. If we require more time, we will inform you of the reason and extension period in writing.

**California Shine the Light Law.** Since 2005, California Civil Code Section 1798.83 permits our clients who are California residents to request certain information regarding any disclosure of personal data that we may make to third parties for their direct marketing purposes. Presently, we do not share our clients’ personal data with third parties for their own direct marketing purposes, and we will not do so without obtaining express consent. For inquiries regarding our disclosure policy, please use the details specified in the “**Contact Information**” section below.

**Do Not Track.** California Business and Professions Code Section 22575(b) (as amended effective January 1, 2014) permits our customers who are California residents to be informed as to how we respond to Web browser "Do Not Track" settings. We do not currently take actions to respond to 'Do Not Track' settings. Instead, we adhere to the standards set out in this Privacy

Policy, as well as the specific requirements of applicable law. If you would like to find out more about Do Not Track you may find the following link useful: <http://www.allaboutdnt.com/>.

## **II. Information for Colorado residents:**

***Your Colorado Rights Regarding Your Personal Data.*** Colorado law provides some Colorado residents with the rights listed below. To exercise these rights, see the “Exercising Your Colorado Privacy Rights” section below.

- ***Right to Know.*** You have the right to know and see what personal data we have collected about you in a portable format.
- ***Right to Correct.*** You have the right to request that we correct inaccurate personal data.
- ***Right to Delete.*** You have the right to request that we delete the personal data we have collected about you.
- ***Right to Opt Out.*** You have the right to opt out of targeted advertising and the sale of your data (as defined under Colorado law).

***Exercising Your Colorado Privacy Rights.*** To request access to or deletion of your personal data, to exercise any other privacy rights under Colorado law, or to appeal our decision regarding a request related to these rights, please contact us at [privacy@pixalate.com](mailto:privacy@pixalate.com), or via using the details specified in the “**Contact Information**” section below.

***Authentication and Verification.*** To respond to certain rights exercise-related communications, we may need to verify your request either by asking you to log in and authenticate your account or otherwise verify your identity by providing information about yourself or your account. Authorized agents can make a request on your behalf if you have given them legal power of attorney or we are provided proof of signed permission, verification of your identity, and, in some cases, confirmation that you provided the agent permission to submit the request.

## **III. Information for Connecticut residents:**

***Your Connecticut Rights Regarding Your Personal Data.*** Connecticut law provides some Connecticut residents with the rights listed below. To exercise these rights, see the “Exercising Your Connecticut Privacy Rights” section below.

- **Right to Know.** You have the right to know and see what personal data we have collected about you in a portable format.
- **Right to Correct.** You have the right to request that we correct inaccurate personal data.
- **Right to Delete.** You have the right to request that we delete the personal data we have collected about you.
- **Right to Opt Out.** You have the right to opt out of targeted advertising and the sale of your data (as defined under Connecticut law).

**Exercising Your Connecticut Privacy Rights.** To request access to or deletion of your personal data, to exercise any other privacy rights under Connecticut law, or to appeal our decision regarding a request related to these rights, please contact us at [privacy@pixalate.com](mailto:privacy@pixalate.com), or via using the details specified in the “**Contact Information**” section below.

#### **IV. Information for Utah residents:**

**Your Utah Rights Regarding Your Personal Data.** Utah law provides some Utah residents with the rights listed below. To exercise these rights, see the “Exercising Your Utah Privacy Rights” section below.

- **Right to Know.** You have the right to know and see what personal data we have collected about you in a portable format.
- **Right to Delete.** You have the right to request that we delete the personal data we have collected about you.
- **Right to Opt Out.** You have the right to opt out of targeted advertising (as defined under Utah law).

**Exercising Your Utah Privacy Rights.** To request access to or deletion of your personal data, or to exercise any other privacy rights under Utah law, or to appeal our decision regarding a request related to these rights, please contact us at [privacy@pixalate.com](mailto:privacy@pixalate.com), or via the details specified in the “**Contact Information**” section below.

## **V. Information for Virginia residents:**

***Your Virginia Rights Regarding Your Personal Data.*** Virginia law provides some Virginia residents with the rights listed below. To exercise these rights, see the “Exercising Your Virginia Privacy Rights” section below.

- ***Right to Know.*** You have the right to know and see what personal data we have collected about you.
- ***Right to Correct.*** You have the right to request that we correct inaccurate personal data.
- ***Right to Delete.*** You have the right to request that we delete the personal data we have collected about you.
- ***Right to Opt Out.*** You have the right to opt out of targeted advertising and the sale of your data (as defined under Virginia law).

***Exercising Your Virginia Privacy Rights.*** To request access to or deletion of your personal data, to exercise any other privacy rights under Virginia law, or to appeal our decision regarding a request related to these rights, please contact us at [privacy@pixalate.com](mailto:privacy@pixalate.com), or via the details specified in the “**Contact Information**” section below.

## **VI. Information for Nevada residents.**

***Your Nevada Rights Regarding Your Personal Data.*** Under Nevada law, Nevada residents who have purchased goods or services from us may opt out of the “sale” of “covered information” (as such terms are defined under Nevada law) for monetary consideration to a person for that person to licence or sell such information to additional persons. “Covered information” includes first and last name, address, email address, and phone number, or an identifier that allows a specific person to be contacted either physically or online. We do not believe that we engage in any sharing that would qualify as a sale under Nevada law. Nonetheless, if you are a Nevada resident who has purchased goods or services from us, you may submit a request to record your preference to opt out by using the contact details provided in the “**Contact Information**” section below.

***Authentication and Verification.*** To respond to certain rights exercise-related communications, we may need to verify your request either by asking you to log in and authenticate your account or otherwise verify your identity by providing information about yourself or your account.

Authorised agents can make a request on your behalf if you have given them legal power of attorney or we are provided proof of signed permission, verification of your identity, and, in some cases, confirmation that you provided the agent permission to submit the request.

### **13. Updates to this Privacy Policy**

As a result of our evolving business and commercial needs and/or in response to changes in applicable law, Pixalate may sometimes need to make changes in our processing activities and handling of personal data. Accordingly, we may—and likely will—update this Privacy Policy from time to time. Whenever material changes are incorporated into our Privacy Policy, and to keep all users informed of such changes, we will update the “effective date” set forth in the first paragraph of this Privacy Policy. We may also notify you of these changes by email and/or by posting alerts on our website’s home page and/or via notification functionality in certain of our Services.

### **14. Contact Information**

If you have questions about this Privacy Policy or wish to exercise your rights, please contact us in one of the following ways:

- E-mail us at [privacy@pixalate.com](mailto:privacy@pixalate.com);
- Call us at +44 (0)800 011 2050; or
- Write to us at:

Pixalate Europe Limited  
20 North Audley Street  
London, W1K 6WE, United Kingdom  
Attn: Legal Affairs Department

### **15. Prior versions of our Privacy Policy**

To review the version of our Privacy Policy that was effective prior to 10 February 2025, please visit: <http://www.pixalate.com/privacy-policy>