

# Blis Media Limited

## Privacy and Cookies Policy

Blis Media Limited (“we”, “our” or “us”) is committed to protecting and respecting your privacy.

This policy sets out the basis on which we process any personal data that we receive as part of the provision of our services, that we collect from you, or that you provide to us.

Blis Media Limited is registered under the Data Protection Act 1998 (“the Act”) under number ZA113120.

Please read this policy carefully to understand how we will treat personal data. By providing personal data to us, you are accepting and consenting to the practices described in this policy.

### **1. Use of data we receive from third parties for programmatic advertising purposes**

We provide services to media agencies and their clients, global advertisers, purchasing media by using our technology platform and real-time bidding algorithms for the programmatic purchase of digital inventory across various Sell-Side Platforms (SSPs).

We use the data which we receive from SSPs or (occasionally) from internet service providers (ISPs) that Blis has a non-exclusive data partnership with, or which we collect ourselves in the course of the provision of our services, to deliver targeted location-based advertising for our advertising clients.

The overall result is that the consumer receives advertising which is more specifically tailored to his or her interests, and the advertiser reaches an audience which is most interested in its products or services. Accurate targeted advertising is, therefore, a win-win situation for advertiser and consumer.

We handle various data in the provision of our services, including the following data:

- Information relating to consumers which we receive from SSPs or publishers, which may include (depending upon the privacy settings of the device) the device ID of the mobile device being used to access an App (which is a random string of letters and numbers which is generated by the software of the device and which does not include any personal details of the user of the device), location data, the name of the App in use and the category of the App (e.g. news, entertainment, shopping). Blis does not receive device ID’s from web browsers – device ID’s are received in respect of App traffic only.
- Information relating to a particular device ID, including historic location data, ads clicked on, frequency of exposure to ads served and apps used.
- (In a small percentage of cases) information which we receive from ISPs, which includes anonymised age and gender data of users of the ISP’s wireless network. We only receive this information where the user has accepted the ISP’s privacy policy and opted in to the data being provided to us and used for targeted demographic and location-based advertising.
- On a website, data regarding the general nature of the content being viewed.

Our algorithm determines which ad to serve to a particular device based on multiple factors including the real time location of the user, whether we have a history of location data for the same device ID and the ads previously served to that device ID.

Whilst we do not receive or collect information which directly identifies individuals (such as names, addresses, email addresses) some of the data which we process (such as device ID numbers coupled with location data) could be considered as “personal data” for the purposes of data protection legislation. It is, therefore, our policy to treat the data which we process in the provision of our services as “personal data” in accordance with the requirements of the Act.

As we do not have a relationship with the consumers whose data we process, we rely on our partners to ensure that the data that is passed to us has been lawfully obtained, that the consumers have been given notice as to how their personal data will be processed and that it may be passed to intermediaries such as Blis Media for the purposes of targeted location-based advertising and that the consumer has consented to such processing.

To find out more about Online Behavioural Advertising, please go to: <http://www.youronlinechoices.com/uk>

## **2. Use of data collected by us from users of our services, users of this website or recipients of one of our newsletters**

We also collect and use data about users of this website and our clients who provide data to us in order for us to provide services to them.

This data can be broken down into the following categories:

- **Information you give us.** You may give us information about you by filling in forms on this website, by signing up to receive our newsletters or by corresponding with us by phone, email or otherwise.
- **Information we collect about you.** We may automatically collect the following information from each of your visits to this website:
  - Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
  - Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from this website (including date and time), page response times, download errors, and length of visits to certain pages.
  - If you receive the HTML-formatted version of our newsletters, we will collect and save notifications that you have opened the email sending out a particular Newsletter, in addition to information in respect of your clicks on links in each Newsletter.

- **Information we receive from other sources.** We may receive information about you if you use the services we provide. We also work with third parties (including, for example, business partners, analytics providers, search information providers) and may receive information about you from them.

Where you access this website through a third party social networking site, such as Facebook or Twitter, we may receive information about you (such as your name and email address) directly from the account that you have with them. The information that we receive may depend on the privacy settings you have with the third party site.

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
  - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;
  - to notify you about changes to our services;
  - to ensure that content from this website is presented in the most effective manner for your device; and
  - (on occasion) to contact you to evaluate and improve the content and format of our newsletters.
- **Information we collect about you.** We will use this information:
  - to improve this website to ensure that content is presented in the most effective manner for you and for your device;
  - as part of our efforts to keep this website safe and secure; and
  - (in respect of information we collect from distribution of the HTML-formatted version of our newsletters), to evaluate and improve the content and format of our newsletters.
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

### 3. Marketing

We may contact you by email or text you with information about other services we offer, news, promotions, events and other information we think may be of interest to you.

You have the right at any time to ask us not to process your personal data for marketing purposes. You can exercise the right at any time by contacting us at:

Privacy Team

Blismedia Ltd  
5th Floor, Mappin House  
4 Winsley Street  
London W1W 8HF

#### **4. Disclosure of your information**

We may share your personal information with selected third parties, including:

- Business partners for the performance of any contract which we enter into with you, or to allow us or them to provide a service you have requested, or fulfil a request for information.
- Analytics and search engine providers that assist us in the improvement and optimisation of this website.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Blis Media Limited or substantially all of its assets are acquired by a third party, in which case personal data held by Blis Media Limited about its clients will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or exercise or protect any legal right.

#### **5. Where we store your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of this website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to this website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 6. Cookies

When we provide services, we want to make them easy, useful and reliable. When you use this website, we may place small files (which often include a unique identifier) in the hard drive of your device with your agreement. These small files are known as cookies.

These pieces of information are used to improve services for you through, for example:

- enabling this website to recognise your device so you don't have to give the same information several times during one task.
- recognising that you may already have given a username and password so you don't need to do it for every web page requested.
- measuring how many people are using this website, so it can be made easier to use and that there is sufficient capacity to ensure this website operates effectively. Information may include the date and time of browsing activity and browser type.

A cookie records on your device information relating to your internet activity (such as whether you have visited this website before). Whilst this website uses cookies to distinguish you from other users of this website, we won't disclose information stored in cookies that we place on your device to third parties.

If you don't want us to use cookies when you use this website, you can adjust your internet browser settings not to accept cookies. Your web browser's help function should tell you how to do this. Alternatively, to find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit this website: <http://www.youronlinechoices.com/uk/>. This website will also explain how you can disable cookies which are already stored on your device.

We currently use the following types of cookies:

- First party cookies: these are our own cookies, controlled by us and used to provide information about usage of this website.
- Third party cookies: these are cookies found in other companies' internet tools which we are using to enhance our site. For example Facebook or Twitter have their own cookies, which are controlled by them.

**First party cookies** - set by us:

Name	Purpose	Typical content	Expires
ci_session	Authentication session to prevent having to login multiple times in one browser session.	Hashed data of username and authentication status [only at blismedia.com]	Expires on exit

**Third party cookies:**

We do not control the dissemination of the third party cookies set out below. You should check the third party websites for more information about their privacy policies.

	Name	Purpose	More info
Google Analytics	_utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	<a href="#">Google Privacy policy</a>
Share This	__uset __stid	Tracks what is being shared and by whom	<a href="#">Share This privacy</a>
Storify	_chartbeat2 storify-session mp_super_properties		
Cover It Live	sessionid_XXXXXX	Session cookie for the Cover It Live events page	<a href="#">Cover It Live Privacy policy</a>
YouTube	VISITOR_INFO1_LIVE		<a href="#">Google Policies and Principles</a>
Facebook	datr lu	Facebook Social Plugin ? embedding Facebook content	<b>Error! Hyperlink reference not valid.</b>
Silverpop	SESSION SP_PAGE_VISIT.236775 VIEW	Identify subscription to the newsletter	<a href="#">Silverpop privacy policy</a>
ImageFlickr	uvc uuid clid ipinfo acs		<a href="#">ImageFlickr privacy policy</a>

	Name	Purpose	More info
Google Map	NNID PREF		<a href="#">Silverpop privacy policy</a>

## 7. Third party links

This website may, from time to time, contain links to and from this websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 8. Access to information

The Data Protection Act gives you the right to access information held about you by us at any time. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

If you become aware that the personal information we hold about you is inaccurate, you may request that we amend it.

Any requests should be made in writing to us at the following address:

Privacy Team  
Blismedia Ltd  
5th Floor  
85 Tottenham Court Road  
London W1T 4TQ

## 9. Changes to this Privacy and Cookies policy

If this policy changes in any way, we will place an updated version on this page. Regularly reviewing this page ensures that you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

This Privacy and Cookies Policy was last updated on 7 July 2015.