

Privacy Policy

Effective as of April 13, 2018

Introduction

Groundhog Technologies (“GT”) is a global provider of digital advertising platform. Our proprietary Demand Side Platform (the “Platform”) optimizes advertising interactions across addressable media — delivering greater performance, transparency, and control to marketers and a better experience to consumers.

This Privacy Policy (“Policy”) sets out how Groundhog Technologies processes information collected via our Platform. It also sets out our practices regarding our use of such information, the steps we take to protect it, as well as the choices and rights that consumers (“users”, “you”, “your”) have regarding how we collect and process information about them.

In this Policy, we use the terms “GT”, “our”, “us” and “we” to refer to Groundhog Technologies and our affiliates. Groundhog Technologies always places a high value on the benefit of users (“you”), for the operation of advertisement business.

Privacy Policy

Groundhog Technologies is committed to protecting the privacy of consumers when we process information about them via our Platform. We adhere to applicable industry guidelines, and will continue to review and update our Policy and procedures to ensure the safety and protection of personal information.

Data Collection and Use

In the course of delivering an ad to you via the Platform, Groundhog Technologies does not intentionally collect information that reveals your real-world identity, such as your name, address, phone number, or Social Security Number. Groundhog Technologies collects data about your computer or device through the use of cookies, web-beacons and other similar technologies, as explained below. This information is pseudonymous and is not considered to be personal information in many jurisdictions in which we operate. In some other jurisdictions in which we operate, in certain contexts, such information, including Internet Protocol (IP) addresses and other pseudonymous information, may be considered personal information.

The information Groundhog Technologies collects includes common information found in every communication sent over the Internet, from which we infer such things as: browser type (e.g., Chrome or Internet Explorer); operating system (e.g., Mac OS or Windows); browser language (e.g., English or Spanish); Internet Protocol (IP) address; Internet Service Provider (e.g., Comcast or Verizon); and mobile advertising identifier, for mobile devices such as smartphones and tablets.

We may also receive other information including online browsing history and location data generated from your use of your mobile device, such as the websites that you visit, the mobile applications that you use and the latitude/longitude coordinates provided by a mobile app publisher or other media supply source in conjunction with the opportunity to purchase advertising inventory. When we process the data, the mobile app publisher or other media supply source is responsible for enabling you to provide or withdraw consent with respect to the collection and use of your data.

We use the information that we collect directly and the information that we obtain from third parties to run analytics, target ads, and measure the effectiveness of ads on behalf of Groundhog Technologies' advertiser clients. We also use it to improve our Platform and the products and services that we provide to our clients, and to create new products and services. For these purposes we may share information with our clients, partners and service providers.

Cookies, Web Beacons, and Other Ad Targeting Technologies

Like most digital advertising platforms, Groundhog Technologies uses "cookies", mobile advertising identifiers, and other technologies to enhance users' experiences on the web, to deliver more relevant ads, and for ad delivery and reporting via the Platform.

We use these technologies to help recognize a computer or device so that we and our clients are able to deliver relevant advertising to you, measure the impact of that advertising and better understand and recognize digital media usage patterns.

The types of technologies used via the Platform include:

- **Cookies** – Cookies are small text files that contain a string of characters. Groundhog Technologies uses cookies to uniquely identify an Internet browser. Certain browsers or browser settings sometimes block cookies, and cookies may not work effectively on some mobile devices.
- **Mobile Advertising Identifiers** – Mobile advertising IDs (e.g., Apple's IDFA or Google's AAID) are unique IDs that are associated with individual mobile devices and that do not reveal your real world identity. They usually are user-resettable.

- Pixel Tags – Pixel tags (also commonly known as web beacons) are transparent images, iFrames, or JavaScript that our clients and partners use to understand how consumers interact with them online, including on websites and in mobile apps.

These technologies are used to identify a computer or device within a certain level of confidence that enables the Platform to function and serve more relevant ads.

Data Retention on the Platform

We retain the data we collect for as long as this is necessary for our legitimate business purposes.

Opt-Out

You may opt out from Groundhog Technologies interest-based advertising at any time through instructions described below.

In general, “opting out” means that you want Groundhog Technologies to limit the information it collects and stores about your computer or device and to not target ads that are based on your interests to your browser or device. Your opt-out is only applicable to the Groundhog Technologies’ Platform and does not opt you out from platforms provided by third-party companies.

If you use multiple browsers, computers or mobile devices and wish to limit the information Groundhog Technologies collects and stores or do not wish to receive Groundhog Technologies interest-based advertising on any of them, you must opt out from each browser, computer, and mobile device individually. Please note that if cookies are not enabled in your browser, or if you use certain ad-blocking tools, our opt-out mechanism may not work properly. Please also note that deleting your cookies does not opt you out.

Please note that you will still see ads if you opt out. The ads delivered via Groundhog Technologies will just not be as relevant to you. When you opt out, Groundhog Technologies will collect and store information from your device only as needed to honor your opt-out.

i. Opting Out of Online Interest-Based Advertising

If you do not intend to receive any Interest-Based personalized advertising provided by Groundhog Technologies, please click the link below. Once you've completed this action, the ads you receive will not be personalized.



ii. Opting Out of Cross-App Advertising on Mobile Devices

You can opt out of having your mobile advertising identifiers used for certain types of interest-based mobile advertising (also called “cross-app advertising”), by accessing the settings on your Apple or Android mobile device, as follows:

- Apple Devices: If you have an Apple device, you can opt out of most cross-app advertising by updating to iOS 6.0 or higher and enabling “Limit Ad Tracking”.
 - iOS 7 and Higher: Go to Settings -> Privacy -> Advertising, and toggle “Limit Ad Tracking” to ‘ON’.
 - iOS 6: Go to Settings -> General -> About -> Advertising, and toggle “Limit Ad Tracking” to ‘ON’.
- Android Devices: If you have an Android device, you can opt out of most cross-app advertising by going to Google Settings -> Ads, and selecting the option to opt out of interest-based ads.

Please note that these platforms control how these settings work, so the above instructions may change. Likewise, if your device uses other platforms not described above, please check the settings for those devices.

iii. Reset Mobile Advertising Identifiers on Mobile Devices

- Apple Devices: If you have an Apple device, you can reset the advertising identifier by updating to iOS 6.1 or higher versions.
 - iOS 7 and Higher: Go to Settings -> Privacy -> Advertising, and tap “Reset Advertising Identifier”.
 - iOS 6: Go to Settings -> General -> About -> Advertising, and tap “Reset Advertising Identifier”.
- Android Devices: If you have an Android device, you can reset the advertising ID by going to Google Settings -> Ads, and tap on "Reset advertising ID".

Information Pertaining to Children

Groundhog Technologies’ products and services are designed for those 13 years of age and older. We do not knowingly collect personal information from anyone under the age of 13. If we are made aware that we have received personal information from someone under 13, we will use reasonable efforts to remove that information from our records.

Data Sharing and Disclosure

We may publish or otherwise make public anonymous, aggregate, or summary information regarding campaigns run on behalf of our advertiser clients.

We may share information (including personal information):

- With our group companies.
- With advertiser clients and partners, where this is necessary in order to operate the Platform, to provide our products and services, to improve our Platform, products and services and to create new products and services.
- With third parties when we consider this to be necessary: to establish or protect the legal rights of Groundhog Technologies or its employees, agents and contractors, as well as the legal rights of its clients or other third parties; to protect the safety and security of users and visitors to our Website; to protect against fraud; or to comply with the law or legal process.
- When we are required to or allowed to do so by law (for example in response to subpoenas, to comply with a binding court order, legal process, or government requests, including in response to a public authority to meet national security or law enforcement requirements).
- If Groundhog Technologies sells all or part of its business or makes a sale or transfer of assets or is otherwise involved in a merger or business transfer, we may transfer or assign the information to a third party as part of that transaction.

Your Rights

Groundhog Technologies acknowledges the individual's right to access their personal data and will provide you access to the personal information we hold about you to the extent it is reasonably available and allow you to correct, amend, or delete inaccurate information, as required and permitted by applicable law. If you'd like us to correct, amend, or delete any other personal information Groundhog Technologies holds about you, please send your request to us at privacy@ghtinc.com.

Contact

If you have any questions about this Policy, please contact us at privacy@ghtinc.com