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Adform - Data Collection and Privacy Policy

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MAKING DISPLAY ADVERTISING SIMPLE, RELEVANT, REWARDING

About

Adform is a privately owned Scandinavian company which since 2002 has provided a digital marketing platform for most Nordic media agencies and large advertisers. Adform has clients in all major industries worldwide and is serving campaigns for many thousands of clients across over twenty thousand web publishers across the globe.

Adform is used mainly as a leading and comprehensive end-to-end solution for media planning, ad serving, real time ad buying, rich media execution, search tracking, web analytics and reporting.
By using Adform's platform for execution and tracking online marketing activities, agencies and advertisers achieve a number of significant advantages.
These include
- Ad-serving with real-time control, rotation, targeting, customization and optimization of ads to each individual user providing significant lifts in campaign performance
- Ad-buying using real-time control and pricing of each ad impression according each individual user/browser
- Consistent control and comparison of purchased delivery from media partners on an "apples to apples" basis including de-duplication of CPA and affiliate leads
- State-of-the art reporting showing the complete paths for each customers interaction with all online marketing activities such as search, ads, email and site visits.

This document describes what data Adform collects, what purposes it serves, who has access to the data and what policies Adform has.

Collected Data and Usage

The following data is collected in the Adform ad-serving and web analytics platform.

User Identification

1. **User identification number**
   In order to link each single interaction to an individual user, Adform generates a unique user ID for every new user that interacts with any form of Adform tracking. The User ID is fully anonymized and is stored locally by using a cookie in the user's browser.
   The cookie expires 60 days after the last interaction.
   The user ID is either generated as a truly random number or in some cases based on a device recognition technology invented by a partner company called Adtruth. The Adtruth ID is fully anonymized, but not random. Instead it is based on a set of variables that are is related to the browser and device such as operating system, screen format and similar. It does not contain any unique IDs such as UDID, Apple ID, the IP number or any sort of personally identifiable information (PII).

2. **User Choice**

   Adform provide internet users the choice to opt-out from all device recognition based activities including targeted advertisements, and tracking of visits across media sites including that of third-parties technologies deployed through Adform.

   The opt-out choice erases all previously collected data and places an Adform cookie into the internet user's browser with special indication of "opt-out" choice. Due to the nature of cookies it will apply to the specific computer and browser only; if users wish to opt-out for other browsers or computers, they must repeat the same process using these browsers or computers. If users erase all cookies they will inherently also erase the opt-out cookie and will need to repeat the process again.

3. **Adform Partner ID Exchange**

   Adform is connected to a large number of partners such as Google, AppNexus, Adobe and many others. Adform automatically exchange anonymous user IDs with these partners as a vital part of the infrastructure to how tracking and buying of online advertising works. The exchange of IDs is mainly initiated by the partners when they register a user for which they do not hold the Adform ID, but the reverse exchange is also quite common with partners such as e.g. AppNexus who currently do not support initiation on their side.

Interaction Types

Adform stores each interaction users have with ads and site-tracking scripts. These include impressions, clicks or interactions with ads and visits to the advertiser website. The interactions stored in the user profile can subsequently be used to deliver targeted and personalized ads as well as generating advanced user-behavior statistics.

1. **Historical Ad Impressions, Ad Interactions and Frequencies**
   - Historical ad impressions and interactions are stored per user – Making it possible to e.g.:
     o Report the number of times a user has seen a specific ad and in what context
     o Mark the users conversion paths
     o Fire post-impression publisher pixels from Adform container tags also known as *piggy-backing/Floodlight tags.*
     o Optimize Ad buying based on correlation between sales conversions and site visits
     o Target the user with different ads
   - The rotation based frequency is stored per user – Making it possible to:
     o Rotate ads for a user based on e.g. how many times the ads was shown
     o Target or stop targeting the user based on the total frequency

2. **Historical Clicks**
   - Historical ad clicks are stored per user - Making it possible to:
     o Report the number of times the user has clicked a specific ad
     o Mark the users conversion paths
     o Target the user with different ads based on click activity

- Fire post-click publisher pixels from Adform container tags also known as *piggy-backing/Floodlight tags.*
- Historical keywords are stored per user - If the click was made on a search engine, keywords are retrieved.

3. **Site Visits**
   - Historical site visits are stored per user - Making it possible to:
     - Report the number of times the user has visited certain pages or sections
     - Perform real-time retargeting
     - Mark the users conversion paths and basically analyze and report on any interesting aspect of user behaviors leading to visits or specific site action
   - Historical keywords are stored per user - If the user was redirected from a search engine, keywords are retrieved.

Interaction Attributes

Each interaction stored has several attributes, which is stored along with the transaction data whenever a user is clicking through an ad or visiting web page containing an ad or web analytics tracking tag.

1. **Time of the interaction**
   The exact time of the user interaction is stored.

2. **URLs of the interaction**
   The URL of the page where the interactions occurred and the referring URL are stored.
   For search engines this can include the searched keywords.
   The URL can be applied for brand safety filtering in which case non-desirable URLs can result in a blank ad being displayed instead of the intended brand advertisement. The URL can also be translated into contextual classifications which can be used for reporting the context of the displayed ads or creating user profile groups for subsequent targeting.

3. **IP number**
   The user's IP number is stored depending on account configurations. In many cases the last three digits in the IP is truncated when received and before storing in order to comply with local privacy laws, such as Germany where IP numbers are PII (Personal Identifiable Information).

4. **Location data**
   Adform use an internally hosted database for prediction of the estimated geographical location (city, region and country) based on the transmitted IP number. This happens before IP numbers are truncated and stored so it does not affect the storage or privacy issued related to IP numbers.

5. **Terminal data**
   Terminal data such as operating system type and version, browser type and version, screen-size etc. is stored.

6. **Sales transaction data**

   Transaction data variables (e.g. order id, product name or sales value) can be passed from advertiser's CRM and CMS systems through tracking pixels to Adform.

   Passing user identifiable data to Adform (e.g. phone or e-mail) are not restricted but must always comply with the Adform privacy policy and any local applicable privacy laws. Since the implementation of transaction data variable passing is done on the advertiser site, it is up to the advertisers' web masters to enforce these restrictions.

   Passing sensitive user identifiable data to Adform (e.g. credit card numbers or social security number) is under no circumstances allowed. Should this be breached, Adform will after detection of such delete such data immediately after notifying all involved parties.

7. **Transaction details**

   On certain transactions such as advertising impression Adform will measure the number of mouse-overs, visibility % of the ads and the total visibility time. In the event of clicks Adform will detect and store the coordinates at which the clicks happened on the ad.

Web Analytics Disclaimer

Inserting Adform web analytics scripts and redirect links on advertiser's web pages may influence page rendering and it is recommended to always verify implementation before publishing any Adform web analytics tags.

Ad-serving Disclaimer

Adform ad-serving tags load creative content from Adform's ad-serving cluster, but in some cases also from other external sources such as ad-servers, streaming providers, data-sources or tracking systems for which Adform cannot be held liable. It is the publisher's responsibility to check that the content in these tags is in accordance with the agreement entered between the publisher and the Advertiser, agency or other third party using the Adform system. Adform do not control or accept any responsibility if ads or other content contains libelous, indecent or defamatory messages

Please read the full Adform usage disclaimer (http://www.adform.com/site/adform-ad-serving-disclaimer/) before using these tags on your website.

Prohibited Usage

Adform has certain restrictions regarding how advertisers and agencies can utilize the platform.

- All usage must comply with all corresponding laws
- Adform does not allow the system to be used for certain profiling or tracking which can be considered sensitive personal information. This is e.g. information of racial, sexual preference, political or similar nature as defined in most national, US or EU level as being of personal sensitive character
- Tracking of personal identifiable information (PII) is not permitted without explicit consent from Adform. This especially applies to directly identifiable information such as addresses, emails or phone numbers

Data Protection

The Adform ad-serving system conforms to the Scandinavian data protection laws as well as the regulations of the Privacy Preferences Projects (P3P) (originating from the World Wide Web group). Data is currently stored in three locations in Denmark:

1) Data-warehouse platform *

2) Data-warehouse backup system *

3) Sandbox test environment **

* Part of the Adform online platform which is protected according to some of the recommendation and standards set by the Payment Card Industry for securing Credit Card storage, including firewalls, monitoring, scans and physical access restrictions protected by eye-scanners and security guards day and night.

** Located in Adform's development center and contains only old statistical data. It is stored behind similar layers of firewalls and in a constantly locked location, with 24 hour security personnel protection.

No data is stored or routed out of Europe.

Access to Data

The media agency and advertiser can be given access to all the data mentioned in this document through Adform's reporting modules, API's and manual data extraction requests.

Access to the reporting module can be given to support staff at Adform, the media agency and the advertiser. Non-Adform employees, including partner companies will never be granted access unless written instructions are received by the advertiser or the media agency.

Access to the data-warehouse data is only given to a part of Adform's development team and IT system administrators.

Access to the physical servers is only granted to Adform IT system administrators with clearance.

The Adform ad serving and web analytics platform allows for using third party pixels. An example is adding affiliate network 1x1 pixels in Adform web analytics container tags, which can be triggered based on certain rules. In various cases this can also be used by internal media agency performance departments, external tools and partners. Media agencies or Adform can implement such usage through the system when instructed by either the media agencies or the advertiser.

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Adform will never share, sell, rent or otherwise disclose any online campaign statistics to third party companies without explicit consent from the advertiser or agency unless in aggregate form not revealing data about individual advertisers.

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