

Privacy Notice Supplement for GDPR Countries and the United Kingdom

Last modified on ~~July 1~~ October 13, 2023.

This Privacy Notice Supplement for GDPR Countries ~~and the United Kingdom~~ supplements Lotame's Services Privacy Notice.

Lotame has responsibilities as both a controller and a processor under the ~~European Union's (EU/EEA), Switzerland's, and the United Kingdom's General Data Protection Regulation ("GDPR").~~ When the GDPR is applicable, Lotame will process your Personal Data in accordance with the GDPR and the agreements with our Business Customers and Data Partners from which we obtained your Personal Data. For capitalized, undefined terms used in this Notice, please see our Definitions page.

In the sections below we describe:

1. Our Legal Basis for Processing Personal Data under the GDPR
2. Trans-Atlantic Data Privacy Framework (DPF) Program
3. Government Requests for Personal Data
4. EU Representative
5. Data Subject Access Requests
6. Contact Us
7. Definitions

1. Our Legal Basis for Processing Personal Data under the GDPR

Lotame's legal basis for processing your Personal Data is consent, which is given by you to our Business Customers and Data Partners and provided to Lotame via the IAB Europe Transparency and Consent Framework (TCF) or directly to Lotame using Lotame's Consent API. Lotame recommends that all our Business Customers and contractually requires that all of our Data Partners implement the latest TCF version, which is TCF 2.2, for the transmission of legal bases for processing Personal Data.

Lotame participates in the TCF as a vendor and complies with its Policies and Specifications. Lotame's identification number within the TCF is 95.

2. Trans-Atlantic Data Privacy Framework (DPF) Program

Lotame participates in and has certified its compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. Data Privacy Framework (UK Extension to the EU-U.S. DPF), and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) (collectively referred to as the "DPF"). The DPF was developed in furtherance of transatlantic commerce by the U.S. Department of Commerce and the European Commission, the UK Government, and the Swiss Federal Administration to provide U.S. companies with reliable mechanisms for Personal Data transfers to the United States from the EU/EEA, the UK (and Gibraltar), and Switzerland while ensuring data protection that is consistent with EU, UK, and Swiss law. You can learn more about the DPF on the U.S. Department of Commerce site to facilitate the Data Privacy Framework program in the United States. You can view Lotame's certification by visiting the DPF participant pageFor the transmission of legal bases for processing in the EU/EEA and the UK Lotame primarily supports and recommends that all our Business Customers and implement the latest version of , which is TCF 2.2. Lotame is registered as a TCF vendor (Vendor ID 95).

1. International Transfers of Personal Data

Lotame transfers all to the United States for processing and uses the applicable Standard Contractual Clauses for such transfers. For information about data transfers to the United States pursuant to Article 46 of the GDPR following the Schrems II decision, please review the information.

2. Privacy Shield

While Lotame no longer relies on EU-U.S. and Swiss-U.S. Privacy Shield as a lawful basis for international transfers of from EU/EEA and Switzerland to the U.S., Lotame remains certified under both EU-U.S. and the Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use and retention of transferred from the EU/EEA and Switzerland to the United States. To learn more about the Privacy Shield program please visit <https://www.privacyshield.gov/>. Lotame's certification can be viewed.

In compliance with the,

Lotame commits to operate and process Personal Data in compliance with the DPF and the DPF Principles resolving, and to refer unresolved complaints about our collection or use of, EU and Swiss individuals with inquiries or complaints should first contact Lotame at:

Lotame Privacy Team

8890 McGaw Road, Suite 250

Columbia, MD 21045

Email: privacy@lotame.com

concerning our handling of Personal Data received in reliance on the DPF to ANA DPF Dispute Resolution, an alternative dispute resolution provider based in the United States. If you do not receive a timely acknowledgment of your DPF Principles-related complaint from us, or if we have not resolved/addressed your DPF Principles-related complaint to your satisfaction, please visit ANA's [ANA DPF Dispute Resolution for more information or to file a complaint](#). The services of ANA [DPF Dispute Resolution](#) are provided at no cost to you.



[ANA DPF Dispute Resolution](#)
[2020 K Street NW, Suite 660](#)
[Washington, DC 20006](#)
<https://ana.net/dpf-consumers>

Lotame is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission, the U.S. Department of Transportation, and other U.S. authorized statutory bodies that are authorized to ensure compliance with the DPF Principles (FTC). Under certain conditions, more fully described on the [DPF website Privacy Shield website](#), you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

3. Government Requests for Personal Data

Lotame is committed to protecting the privacy of your Personal Data in accordance with Data Protection and Privacy Laws. But national security and law enforcement needs should not come at the expense of individual privacy. Lotame requires government and private entities to follow applicable laws and statutes when requesting Personal Data that we process. We contractually require our service providers to follow the same standards we apply to government information requests for Personal Data. Our legal team reviews requests to ensure that the requests have a valid legal basis. If they do, we comply by providing data responsive to the request. If a request

does not have a valid legal basis, or if we consider it to be unclear, inappropriate, or overly broad, we challenge or reject the request.

4. EU Representative

Pursuant to Article 27 of the GDPR, we have appointed European Data Protection Office (EDPO) as our GDPR Representative in the EU/EEA. You can contact EDPO regarding matters relating to the GDPR, you can contact EDPO using one of the following methods.

- By using EDPO's online form: <https://edpo.com/gdpr-data-request/>.
- By writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium. Please ensure to include our company name (Lotame Solutions, Inc.) in any correspondence you send to our GDPR Representative.

2.5. Data Subject Access Requests

As a resident of a GDPR Country ~~or the United Kingdom~~, you have the right to request certain information from Lotame or the right to request Lotame to take certain actions related to your Personal Data that Lotame is processing ("Privacy Rights").

How to exercise your Privacy Rights. You can make a request to exercise your Privacy Rights by submitting your request using our Privacy Manager. You can also make a request to exercise your Privacy Rights by contacting us at privacy@lotame.com; however, due to the nature of the Personal Data we process and the need to verify certain types of Privacy Rights requests, use of our Privacy Manager is the best way to submit your request. You may also opt-out of our use of Cookies ~~for~~ at: www.youronlinechoices.eu.

Please note that with respect to Personal Data we receive from our Business Customers that those Business Customers use for their own business or commercial purposes, Lotame will not be able to take action regarding your Personal Data without providing the name of the Business Customers for which we process such Personal Data.

Using Authorized Agents. If you want to use an authorized agent to submit your Privacy Rights request, please have the authorize agent follow the instructions below:

- *Using an authorized agent without power of attorney to submit a Privacy Rights request.* An authorized agent without power of attorney must submit a signed permission from the individual authorizing the agent to submit the Privacy Rights request(s) on their behalf by using ~~the~~this form located here.
- *Using an authorized agent with power of attorney to submit a Privacy Rights request.* An authorized agent with a valid power of attorney, must submit the valid power of attorney executed lawfully under the appropriate law by using the form located ~~her~~ethis form.

3.6. Contact Us

You can contact us via email at privacy@lotame.com or regular mail to the address below:

Lotame Solutions, Inc.
c/o Lotame Privacy Team
8890 McGaw Road, Suite 250
Columbia, MD 21045
8890 McGaw Road, Suite 250
Columbia, MD 21045

7. Definitions

“the GDPR” includes (1) the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“EU GDPR”) and (2) the EU GDPR as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 (“UK GDPR”), and Switzerland’s Federal Act of 25 September 2020 on Data Protection (“FADP”).

“GDPR Countries” includes all countries in the European Union/European Economic Area that have implemented the GDPR, Switzerland, and the United Kingdom of Great Britain and Northern Ireland.