



**I N F I N I A** ^

FROM AUDIENCES TO PEOPLE

# INFINIA

## COMPLIANCE REPORT ON DATA COLLECTION AND DATA PROCESSING

### LEGAL DEPARTMENT

One of the main goals of INFINIA is being a **transparent** company, with a consolidated **compliance** process, having in place **compliance plans** and a continuous legal analysis of the business model. Taking into consideration that we are a company mainly focused on the data processing in the mobile advertising market, we are very much committed with the **compliance in relation with data protection regulations**.

In this regard, from the INFINIA Legal Department we proceed hereto to issue this legal report on the **different operations designed to collect data in INFINIA**, for the purposes of valuating whether or not they are complying with the above-mentioned data protection regulations. For such purposes, we will summarize hereto the data collected and the way such data are collected, as well as the relationship with third parties.

This report is granted **for internal use only** and, in case it is shared with any third party, it would need to be considered as **confidential information**. This document shall not be considered binding for INFINIA vis-à-vis third parties.

# DATA COLLECTION THROUGH INFINIA SDK

## ¿WHAT DATA IS COLLECTED BY THE INFINIA SDK, AND HOW IS SUCH DATA COLLECTED?

The SDK is a technological development that can be initiated in Apps and webs for the purposes of obtaining data from such devices on which such Apps are set up or the webs are visited.

The data collected through the INFINIA SDK can be summarized in accordance with the following categories: data regarding the device itself, geo-localization data, data on the Apps set out in the referred device and the browsing information. Most of the data collected shall not be considered as a permanent identification of the user, and in case this was the case, such data would be collected and processed, as explained afterwards, in an anonymized way.

No data are collected in relation with a persona data of the user which shall be considered declarative.

## HOW IS THE DATA COLLECTED BY THE INFINIA SDK USED?

The data collected is aggregated for the purposes of obtaining inferred profiles of the mobile device users. Such data are made available to third parties, always in an aggregated manner, in a technological platform. These profiles are created in connection with the Ad ID that can be reset or neutralized by the user.

The profiles are segmented taking into consideration the following characteristics: gender; age; economic level; residence; workplace; influence area; interest. Once aggregated, it is not possible to check the individualized profiles of a specific user. On the other hand, several requirements are selected, and the platform will analyze how many of such user comply with the requirements mentioned above.

## WHAT ARE THE SECURITY MEASURES IN RELATION TO THE DATA?

The following security measures are being taken in relation to the data:

- » Storage of the data in AWS, with the maximum protection guarantee provided by such supplier.
- » Data access control, identification and authentication of users.
- » Control on the physical premises from where the data can be accessed.
- » Security copy of all the data.
- » The data is deleted one year after the date on which such data is collected.
- » Incidents administration procedure.
- » Monitorization in security networks.
- » Internal behavior regulations for employees with direct access to the data.
- » Procedures in administration of devices and users.
- » Specific procedures in case of security breach.
- » Appointment of security officer and data protection officer.





# GDPR COMPLIANCE IN RELATION TO THE DATA COLLECTION AND DATA PROCESSING

As far as INFINIA is incorporated in the European Union, it is obliged to comply with 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, and repealing Directive 95/46/EC (General Data Protection Regulation).

## WHAT MEASURES HAS BEEN IMPLEMENTED BY INFINIA FOR THE COMPLIANCE WITH THE GDPR?

### 1. PERSONAL DATA

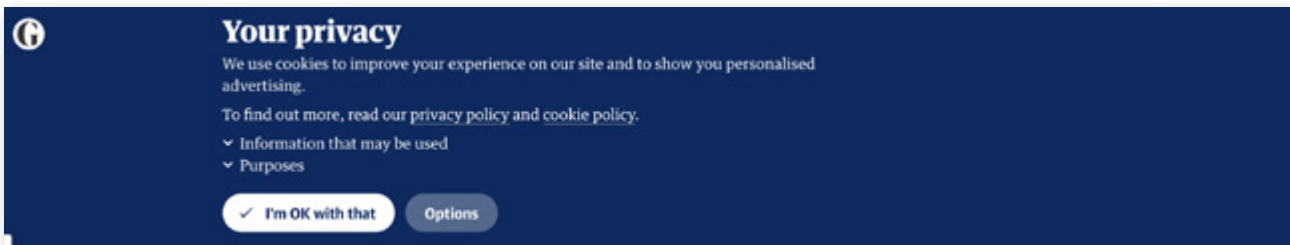
In INFINIA, the following personal data is collected: Ad ID, managed "hashed" for security reasons; device data, which are partially deleted in case those data can be used to identify an individual; geo-localization data, which is collected on an approximation basis in terms of accuracy, avoiding that such data is considered a personal data in all events.

### 2. INFORMATION

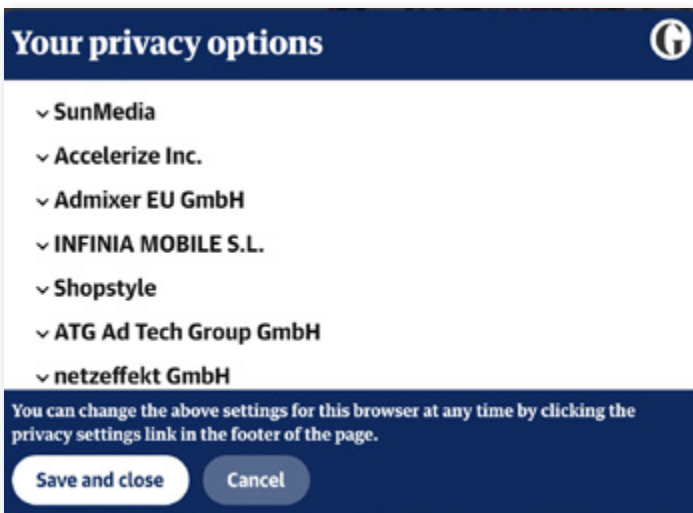
the data collection is performed through the so called "Publishers" (owners of the webs and apps that have set up the INFINIA application. Therefore, those "Publishers" are the ones that are compelled to comply with this obligation - INFINIA audits that they do so. Likewise, INFINIA has included in its web page, a privacy policy informing on the data management implemented.

### 3. CONSENT

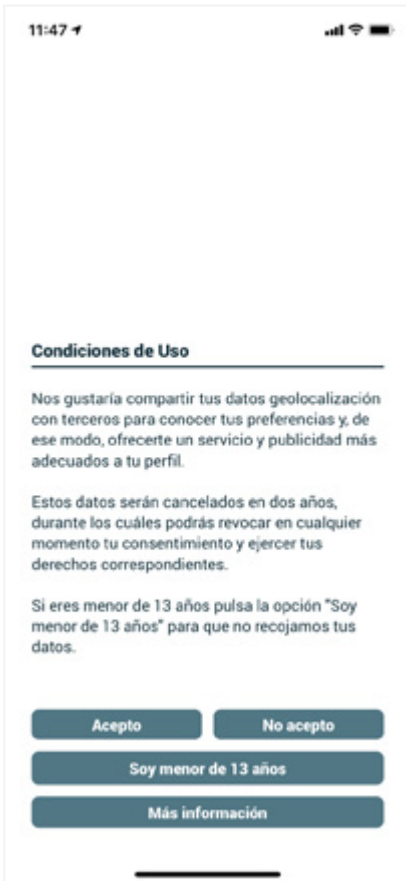
the lawfulness of INFINIA's data processing is based on the user consent. This can occur in three ways:  
 » Through the method chosen by the Publisher and audited by INFINIA.  
 » Through IAB consent framework. INFINIA is a participant entity of this framework and is certified by the IAB.



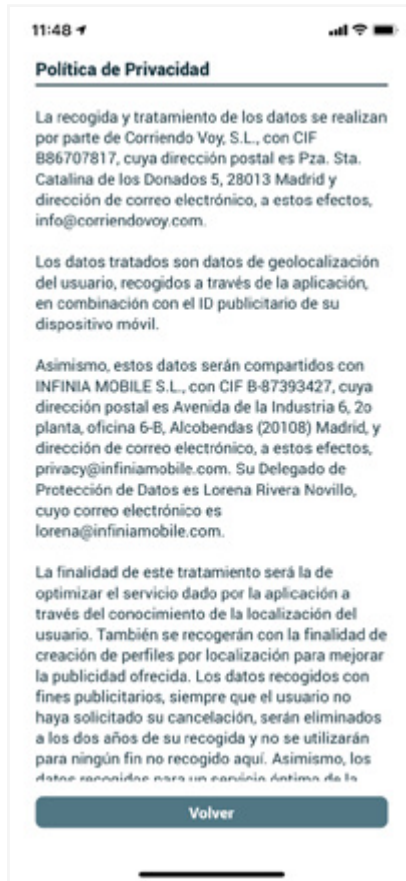
Please, find attached example screenshots



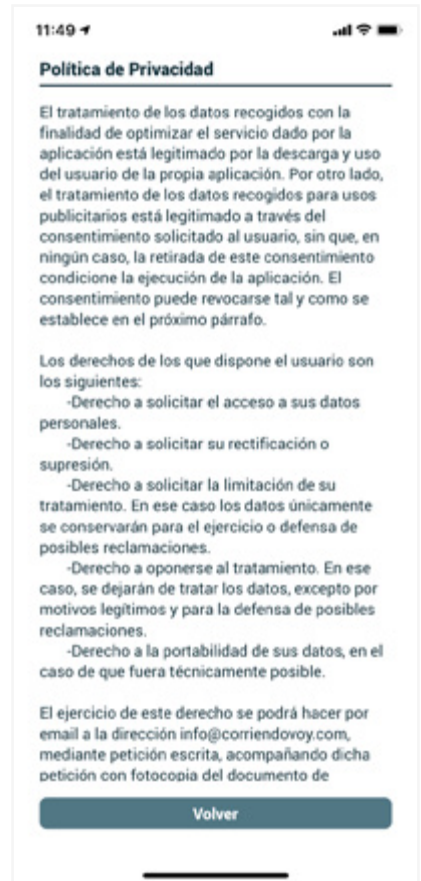
First layer information



INFINIA's SDK informed consent form – first layer



INFINIA's SDK informed consent form – second layer



INFINIA's SDK informed consent form – second layer

**4. GDPR RIGHTS**

although the main compelled to attend the users' rights are the Publishers, we have created an specific email address to attend the users' requests as well as an Android application has been developed in order to facilitate the exercise of these rights, called INFINIA AD ID. A procedure for attend properly these rights has been created.

**5. SECURITY MEASURES**

the aforementioned security measures have been implemented, which have been included in our Security Document.

**6. APPOINTMENT OF COMPLIANCE OFFICERS:**

a Security Officer and a Data Protection Officer have been appointed. The DPO has been being officially declared before the Spanish data protection regulatory authority.

**7. CONFIDENTIALITY:**

all our employees, as well as customers and suppliers, sign their corresponding confidentiality agreements.

**8. INTERNAL AUDIT:**

an internal compliance audit is carried out every two years.

**9. DATA TRANSFERS TO THIRD PARTIES:**

INFINIA does not transfer data to third parties. In the event that we had to provide personal data to service providers, this would be done with the sole purpose of the services performance and it would be regulated under a data protection agreement.



# CCPA COMPLIANCE REPORT ON DATA COLLECTION AND DATA PROCESSING

Since INFINIA is a company that operates in the United States, it is compelled to comply with the California Consumer Privacy Act.

## WHAT MEASURES HAS BEEN IMPLEMENTED BY INFINIA FOR THE COMPLIANCE WITH THE CCPA?

**1. PERSONAL DATA:** In INFINIA, the following personal data is collected: Ad ID, managed "hashed" for security reasons; device data, which are partially deleted in case those data can be used to identify an individual; geo-localization data, which is collected on an approximation basis in terms of accuracy, avoiding that such data is considered a personal data in all events.

**2. INFORMATION:** the data collection is performed through the so called "Publishers" (owners of the webs and apps that have set up the INFINIA application. Therefore, those "Publish-

ers" are the ones that are compelled to comply with this obligation – INFINIA audits that they do so. Likewise, INFINIA has included in its web page, a privacy policy informing on the data management implemented.

Find attached a link of one of our publishers' privacy policy, audited by INFINIA.  
<https://www.nbcuniversal.com/privacy>

Find attached a link of our Privacy Policy  
<https://www.infiniamobile.com/politica-de-privacidad/#english>

**3. RIGHT TO ACCESS, RIGHT TO OPT OUT, RIGHT TO DELETE:** although the main compelled to attend the users' rights are the Publishers, because they are who really collect data, we have created a specific email address to attend the users' requests as well as an Android application has been developed in order to facilitate the exercise of these rights, called INFINIA AD ID. A procedure for attend properly these rights has been created.

Please, find attached screenshots of one of our publisher's procedure to attends CCPA rights

California residents with rights under the CCPA, or their authorized agents, may [click here](#) for access or deletion requests or may call 1-800-447-0663.

*Please, find attached screenshots of one of our publisher's children policy*

*Please, find attached screenshots of one of our publisher's children policy*



**4. CHILDREN:** INFINIA does not process data of children under 13 on its platform and ensures that data of children under 16 are collected with their consent. For this, INFINIA audits the Publishers INFINIA works with. INFINIA does not collect data directly, so INFINIA cannot, by itself, implement systems of age discrimination.

Please, find attached screenshots of one of our publisher's children policy.

**5. SECURITY MEASURES AND DATA RETENTION:** INFINIA maintains the security measures indicated on page 2 of this report. Also, having established the storage period of one year from the collection of the data, we are in a position to comply with the obligation to retain this information in the event that the user wants to obtain it. Furthermore, we do not retain the data anymore time required for the purpose of the data processing.

#### 4. CHILDREN

Most of the NBCUniversal Services are intended for users of all ages. Information about the practices of NBCUniversal Services directed to children under the age of 13 in the United States or 16 in the European Union or where we have actual knowledge a child is under such ages can be found in our [Children's Privacy Policy](#). If you are a parent or guardian and believe your child under 13 in the United States or under 16 in the European Union has provided us with personal information without consent, please contact us at [privacy@nbcuni.com](mailto:privacy@nbcuni.com).



**CALIFORNIANS FOR  
CONSUMER PRIVACY**



# PWC CERTIFICATION

INFINIA was certified by the company PriceWaterhouseCoopers in May 2019, which certified that our SDK complies the specifications of the General European Data Protection Regulation.

Please, find attached screenshots of part of the report

- *Infinia has developed a proprietary SDK, which, when installed in the applications of the Publishers is able to collect information to complete profiles. The audit has been performed on Android version 2.6 and iOS version 2.6.0. The software design process has as quality objective to minimize the impact on devices performance.*
  - It is verified that the software can be configured to require end user consent, in line with current privacy legislation (GDPR). Data processing is not performed on users who have denied consent, nor on those who have exercised the right to be forgotten.

[CLICK TO OPEN THE PUBLIC REPORT](#)





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**Any doubts?**

PLEASE CONTACT US

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