

Privacy Policy

The purpose of this Privacy Policy (hereinafter referred as “**Policy**”) is to inform you as to what information may be collected by Adnow LLP [11] [A2] (Las Suite, 5 Percy Street, Fitzrovia, London, W1T 1DG) (hereinafter referred as “**the Company**”, “**we**”, “**us**”, “**our**”) from you when you visit our Website <https://push.adnow.com/> (hereinafter referred as “**this Website**” or “**our Website**”), which is an online platform for advertisers. By this Policy we would like to inform you how your information will be used by us, with whom such information may be shared, your choices regarding the collection, use, and distribution of such information, your ability to edit, update, correct, or delete such information and the security procedures that we have implemented to protect your privacy.

If you do not agree to all the terms and conditions of this Policy, please do not use our Website.

Collection of Information

1) If you however decide to request any information via the contact form provided on our Website, we will ask for your e-mail address in order to handle your personal request or to provide the services you requested from us.

2) Our Website is a platform for advertisers. To join our Website and using our services you shall create an account.

As a part of registration process, we may ask you to provide us with the following information, which may include your personal data:

- e-mail address for your authorization in registration purposes, for information and notification purposes during using our Website, for technical support issues;
- phone number and skype details for communication and technical support (optionally);
- password for your account on our Website (please, select for your own safety a secret and secure password in order to ensure the confidentiality of your data; in the event that you forget your password, please use the “Forgot password” function provided on the website to create a new, secure password).

Please, note if you would like to terminate using services, we have to ask your payment requisites to make a return the remaining funds on your balance to you.

All mandatory information required in order to register is marked accordingly. All further information is provided voluntarily; this data is used for the purposes stated, or to improve our online services.

We hope that you will provide us with this information. By registering on our Website you agree with our Terms of Use and the use of your abovementioned personal information in accordance with this Policy. However, if you do not want to disclose your personal data to us, please, do not submit it. This means that we will not be able to provide you the service you have requested.

3) Providing Internet advertising services our Company may collect anonymous data of users regarding the IP address of the user's equipment, the Internet service provider, device type, browser language in use, and his version of the operating system installed on user's equipment, information about user's visited sites where our advertising placed such as the URL address, the date and time of visits, the pages viewed, time spent.

We may expand the list of personal data requested from you by amending this Policy.

Use of Information

We use information provided by you for a variety of purposes.

If you would like to register an account on our Website and accept our Terms of Use, than we need information about you for the following purposes:

- to fulfill your request/claim from contact form on our Website;
- to provide you an opportunity to use services of our Website, including, but not limited to creating an account, billing purposes: receiving payments from you or refund to you if you would like to terminate use of our services, providing you with technical support, etc.;
- understand and meet your needs and preferences;
- develop new and enhance existing service and product offerings;
- monitoring and analyzing trends, statistics, usage and activities in connection with our Website;
- marketing purposes (add you to our email subscription list, send you promotional materials, our partner's information, to implement targeted display ads, etc.); you will only receive advertising if you have given your explicit consent;
- meet legal and regulatory requirements.

Non-personally identifiable information may be used to analyze trends and statistics, enhance the Website's operation, and serve content and advertisements.

We will process your personal data legally and fairly and not use it outside the purposes of which we have informed you.

Storage of personal data

Data provided to us is stored in accordance with applicable laws, at secure locations. We take reasonable steps to ensure that the personal information we collect about you remains accurate, timely, and secure. In order to avoid loss or misuse of data stored by us, we take necessary technical and organizational safety measures, which are regularly checked and updated.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure and while we strive to protect your personal information, we cannot guarantee or warrant its complete security. We shall not be responsible for losses that you or any person may suffer as a result of a breach of confidentiality in respect to your use of the Website or any information you transmit to the Website. Also, we do not assume any responsibility for the data you submit to or receive from us through the Internet or for any unauthorized access or use of that information

and we cannot and do not guarantee that information communicated by you to us or sent to you by us will be received or that it will not be altered before or after its transmission to us.

We have no technical influence on third parties, which are beyond our control.

We are going to store your personal data until your request to terminate Terms of Use between us and delete your personal account. If you do not want to use services of our Website anymore and delete your account, please, notify us in your account or by e-mail.

Transfer of personal data

We shall not pass by any means or/ and under any circumstances your information to third parties, except for the provision of this information to such third parties, which operates on our behalf and solely for the provision of Internet advertising services. You agree that we instruct third parties to process payment transactions. Please, note we do not receive your payment requisites. When you are going to top up your account balance, you will be directed to the payment service provider page and provide them your payment requisites. We are using certified payment service providers in order to process your payments.

Please, note that you can find information about how these service providers process your personal data by following their policy on their website.

Disclosure of personal data

We may disclose information that we collect about you should we have reason to believe that:

- it is necessary to identify, contact, or bring legal action against persons or entities who may be causing harm to you, us, or others;
- it is necessary because of official inquiry of governmental authorities;
- it is necessary securing compliance with law's provision or with requirements of judicial proceedings concerning us;
- we may also disclose information when we believe the law requires it.

Access or corrections to your information

You are able to rectify, update or change your personal data provided to us in your account, except e-mail address. E-mail address is a unique identifier in our system and it can not be changed. Unfortunately, if you want to use our Website with another e-mail you need to register again on our Website. If you did not register an account on our Website, but you have reasons to believe that we have your personal data, please, contact us in our by e-mail.

You may also opt out of receiving promotional communications from us at any time by following the instructions in those communications. If you opt out, we may still send you non-promotional communications, such as technical notices, support or administrative notifications or information about changes to this Policy and using services on our Website.

You also has other rights, which are provided to you by data protection law, including but not limited to: to request access and have free access to your personal data that have been provided to you and that have been subject to processing; to restrict processing of your personal data; right to revoke any consent given to the processing of personal data at any time; object to processing based on the balancing of legitimate interests; right of appeal to the competent data protection

supervisory authority; to be aware of the amendments made to the terms of this Policy in an efficient manner before the implementation of new amendments or, otherwise, of the new information processing policy; to have easy access to the text of this Policy and its amendments and etc.

If you have any request, complaint or claim to us in relation to processing of your personal data by us, please, send us a message in your account or in our contact form on Website (if you have registered account on our Website, you can do it there). Your message must contain:

- your e-mail address;
- description of the facts that give rise to the request, claim or complaint and the purpose sought (update, correction or deletion, or fulfillment of duties).

We consider all requests from you within 15 days. Before answering the claim, we shall verify your identity and find your personal data in our database. If the claim or information provided is incomplete, we will request additional information for your identification, which shall be provided by you within 5 days of receipt of the claim to remedy the failures. If you fail to submit the required documentation or information within 5 days of the date of the initial claim, you shall be deemed to have waived the claim. Once your request has been received with complete information, the 15 days' term will start again. When it is not possible to answer your request within such term, we will inform you about the reasons for the delay and of the date when your request will be dealt with, which in no case may exceed 30 days following the expiration of the first term.

If you want to delete your account, please contact us at your account. If deletion is not possible for legal reasons, access to the data in question shall instead be blocked. Please note, however, that we may be unable to continue offering some or all of the services provided on our websites requiring registration in the event that your data is deleted or blocked.

Cookies files

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular site.

Most web browsers are set to accept cookies as a default. You may wish to opt out by turning off cookies (please refer to the help menu on your browser), however, please, note, that if you do so, you may not be able to use the full functionalities of this website.

You can find more information in our Cookie Policy at https://push.adnow.com/assets/COOKIES_POLICY.pdf

Third-Party Links

The Website may contain links to web sites operated and maintained by third parties over which we have no control. Any information you provide to third party websites will be governed under the terms of each website's privacy policy and we encourage you to investigate and ask questions before disclosing any information to the operators of third party websites. We bear no responsibility or liability whatsoever for the content, actions, or policies of third party websites. The inclusion of third party websites on our Website in no way constitutes an endorsement of such websites' content, actions, or policies. Please, check third-party's policies before you submit any personal data to these websites.

Protection of minors

Persons under 18 years are excluded from our services and from providing any personal information without the consent of their parents or guardians. We do not request personal information from children and adolescents. We do not knowingly gather or collect such data and do not disclose it to third parties. If, however, we become aware that personal data regarding a child under the age of 18 has been collected on the Website we will make reasonable efforts to delete it from our records immediately.

Modifications to Policy

This Policy may be amended from time to time. We reserves the right to change this Privacy Policy at any time. Any changes to this Policy will be effective immediately upon posting the latest version on our Website. We will inform you by e-mail about changes, which may be related to purposes of personal data processing, storage terms, personal data receipts and any other essential changes to this Policy. If you disagree with the changes in our Policy, please do not use the Website after the posting of such changes online and ask us to terminate the processing of your personal data. By using the Website following the posting of changes to this Policy, you agree to all such changes.

Questions or comments or how to contact us

If you have any questions about this Policy, please, by e-mail address: push.adnow@gmail.com. This Privacy Policy is effective as of December, 5, 2018.