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Rakuten Marketing LLC dba Rakuten Advertising is an online business-to-business performance marketing company that provides services to a network of publishers and advertising brands. Those services include personalized advertising, fraud detection, facilitation of advertising-related transactions between network participants and other online advertising tools and technologies (“Services”).

This privacy policy describes how Rakuten Marketing LLC dba Rakuten Advertising (“Supplier“, we”, or “us”) collects and uses personal information about you, with whom we share personal information, how we protect this information, and your rights in relation to this information as part of the performance marketing services that we provide. Note that this privacy policy applies to data to the extent that we collect such data on third party websites and applications in connection with the Services – including those websites and applications of our customers or those reached through third-party vendors such as advertising networks.

This privacy policy does not address information collected through Supplier’s corporate website, which is described here: <https://go.rakutenadvertising.com/hubfs/Website-Privacy-Policy-English.pdf>

When we refer to Supplier, our reference includes Rakuten Marketing LLC dba Rakuten Advertising, as well as our corporate affiliates, Rakuten Marketing Europe Ltd., Rakuten Marketing Brazil and Rakuten Marketing Australia Pty Ltd. Supplier is part of the [Rakuten Group](#), which includes the affiliates and subsidiaries of our parent company Rakuten Group, Inc., based in Tokyo, Japan.

With respect to the Services, we are active members of the [Network Advertising Initiative](#) (“NAI”). We are also active members of the Digital Advertising Alliance (“DAA”), as well as the European Interactive Digital Advertising Alliance (“EDAA”). We comply with DAA Self-Regulatory Principles for Online Behavioral Advertising (“OBA”), the NAI Code of Conduct, and the Interactive Advertising Bureau (IAB) Europe Framework for OBA. Click [here](#) if you would like further information regarding the DAA Self-Regulatory Principles, [here](#) if you would like more information regarding the NAI Code of Conduct or [here](#) if you would like further information about the IAB Europe’s OBA Framework.

If you have any questions or concerns about our use of your personal information, please contact us using the contact details provided in the CONTACT INFORMATION section of this Privacy Policy.

COLLECTION OF INFORMATION

We collect certain information from you when you visit the websites and applications that participate in or interact with our Services. We may also obtain information about you as further explained in this section from data providers which may include service providers and corporate affiliates and others (“Data Providers”).

Information we collect

In the course of providing Services to our customers, we use and deploy tracking technologies to automatically collect certain information about you and the devices you use. Some of this information (including, for example, unique identifiers stored in a cookie or mobile advertising IDs) may identify a particular computer or device.

More specifically, when you interact with a website or mobile application that participates in or interacts with our Services, we collect the following information about you:

- **Browser and device information** such as your device’s Internet protocol (“IP”) address; unique device identifiers as well as hardware or operating system device identifiers (e.g., IDFA for iOS and AAID for Android); and information about the type of Internet browser, browser language and operating system you use; connection type (wired or Wi-Fi); the region where your device is located; network to which your device is connected; geo-IP data; and the mobile carrier (if available).

- **Information about your behavior on the websites and applications or our business customers, publishers, and other third parties that participate in or interact with our Services** such as the website you came from before, and visited after you click on an ad; engagement data; SDK data; information related to the website you are viewing (e.g., in order to ascertain your interests), access dates and times; and geolocation (latitude and longitude coordinates, but only if the website or the application has enabled location services on your device and you have granted permission to collect this information);
- **Information about ad served, viewed or clicked on** such as information about the type of ad, the online location that the ad was served, whether you clicked on it, the products and offers viewed in advertisement browsing and searching; and any expressed interests in products within certain segments, and other such information.

Cookie Information

In connection with certain features of our Services to customers, we may set cookies on your web browser (or use other technologies like clear gifs, web beacons or similar devices, including devices that function in the mobile environment) when you interact with websites, applications or advertisements in our network. For detailed related to the cookies that we use as well as instructions for opting-out, click here: <https://go.rakutenadvertising.com/hubfs/Cookie-Policy.pdf>

Information we receive from Data Providers

Our customers may supply us with personal information about consumers that may visit their website, interact with their advertisements, or shop on their online stores. We may combine the information received from our customers with information from other third-party data providers, such as ad networks or our corporate affiliates (to the extent they have confirmed that they have the sufficient authority to provide this information to us) with information about how users interact with advertisements across devices to enhance or validate the accuracy of the information that we collect or receive from our customers.

For clarity, the collection and use of data from data providers, their websites and applications are subject to those data providers' privacy policies and legal terms.

USE OF INFORMATION

We use information, which may include personal information, held about you to perform our Services and for other purposes outlined below. You can find out more about our Services here: <https://rakutenadvertising.com/>

Specifically, we use the information we collect about you in combination with information we receive from data providers:

- to provide our Services to our customers – such as developing an understanding or profile of your buying or other preferences in order to provide you with more relevant content, offers or search results;
- to develop new services or features for our customers or those of our corporate affiliates and group companies;
- to create online advertising models through lookalike modeling or similar methodologies
- to determine whether you have seen a particular advertisement before to avoid sending users duplicate advertisements;
- to identify advertising fraud and similar misconduct;
- to understand trends in how users react to particular advertisements or offers;
- to providing insights and reporting back to customers and other partners, such as statistical reporting in connection with the activity on a website or mobile application, optimization of the

location of ad placement, ad performance, reach and frequency metrics, billing, and logging ads served on a particular day to a particular website or application; and to

- to conduct internal analysis in order to perform and improve the effectiveness of our Services and the services of our corporate affiliates and group companies;
- to respond to user inquiries and requests.

To the extent permitted by applicable law, we also collect, create, process and store information that is not personal information such as sets of aggregate data and other generalized information, including information about browsing, usage and interactions and de-identified personal information that does not reveal your identity. We retain the right to use and disclose information that is not personal information in any manner permitted by law.

SHARING OF INFORMATION

We do what we are able to limit the personal information that we share with third parties, however, we share information about you with third parties as follows:

- to customers and publishers or their designated third-party representatives as part of our Services;
- to agencies, agency trading desks, retargeting entities, ad servers, privacy verification entities, measurement and analytics entities, data suppliers, data aggregators, demand-side platforms and supply side platforms, ad networks, and others advertising and analytics service providers on our or our customers' behalf that assist us in providing the Services;
- to infrastructure, technology, operational and other service providers to help support the infrastructure necessary to provide the Services;
- to our group companies and other partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Services), or who otherwise process personal information for purposes that are described in this Privacy Policy, notified to you when we collect your personal information, or notified to you by the group company or partner.

We may also disclose information about you:

- if we are required to do so by law or legal process;
- to law enforcement authorities or other government officials;
- when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- if necessary to protect the vital interests or legal of another individual;
- in connection with a corporate reorganization or a sale or transfer of all or a portion of our business or asset; or
- to any other person with your consent to the disclosure.

YOUR RIGHTS

If you wish to **access, correct, update or request deletion** of your personal information, to the extent required by applicable laws, you can do so by filling out the form located here: <https://go.rakutenmarketing.com/hubfs/legal-notice/Data-Subject-Rights-Request-Confirmation-of-Identify.pdf> and providing the verification information as stated on the form. Alternatively, you can contact us using the contact details provided in the **Contact Information** section of this Privacy Policy. We will respond to all requests we receive from individuals wishing to exercise their rights in accordance with applicable data protection laws.

OPT-OUTS AND WITHDRAWAL OF CONSENT

Web Browser/Cookie-Based Opt-Out

You may stop or restrict the placement of cookies on your computer or remove them from your browser by adjusting your web browser preferences. There are also many programs that allow you to manually delete your cookies. For more information regarding this form of cookie-based opt-outs, click here: <https://go.rakutenadvertising.com/hubfs/Cookie-Policy.pdf>

Mobile Application-Based Opt-Outs

Cookie-based opt-outs are not effective on mobile applications. Users may opt out of certain advertisements on mobile applications or reset advertising identifiers via their device settings. To learn how to limit ad tracking or to reset the advertising identifier on your iOS and Android device, click here: <https://go.rakutenadvertising.com/hubfs/Cookie-Policy.pdf>

You may also download and set your preferences on the App Choices mobile application(s) available in Google Play or the Apple App stores.

RIGHTS OF INDIVIDUALS IN THE EEA

If you are located in the European Economic Area, you have the following additional data protection rights:

- You can **object to processing** of your personal data,
- You can ask us to **restrict processing** of your personal data,
- You can **request portability** of your personal data or
- You can **request deletion** of your personal data

You can exercise these rights by please filling out the form located here and providing the verification information as stated on the form, or by contacting us using the contact details provided in the **Contact Information** section of this Privacy Policy.

Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. You can withdraw your consent by using the go to the data subject access request page and submitting a request or by contacting us using the contact details provided in the **Contact Information** section of this Privacy Policy.

You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area are available [here](#).) We would, however, appreciate an opportunity to address your complaint before you approach the supervisory authority so please contact us in the first instance with any complaints you may have by sending an email to rm-subjectrequests@mail.rakuten.com

Legal basis for Using Personal Information of Individuals in the EEA

If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. Usually, we rely on the following legal bases to process your personal information:

- Legitimate interest: We may process your personal information for our legitimate interests and those of third parties such as our customers. This will normally be to provide or improve our Services, perform affiliate matching (e.g., for determining referral fees or commissions owed to customers), manage relationships with customers, or for security purposes and fraud prevention.

We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are. When we process personal information to meet our legitimate interests or those of third parties, we conduct a legitimate interest and put in place safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

- **Consent:** our customers and we rely on your consent to use your personal information (including, without limitation, technical data, cookie data, usage information, and geo-location data), for personalized or interest-based advertising purposes. This allows our customer and us to find other consumers with similar online behaviors to create lookalike modeling or to share your personal information with third parties for their marketing purposes. You may withdraw your consent at anytime by clicking here: <https://go.rakutenadvertising.com/hubfs/Privacy-Rights-Request-Process.pdf>
- **Legal obligation:** In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person. If we ask you to provide personal information to comply with a legal requirement, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided in the **Contact Information** section of this Privacy Policy.

Automated Decision Making and Processing.

We may automatically process your personal information to make decisions or create profiles on individual user preferences. We carry out this automatic processing, for example, for the purposes of user segmentation and pricing, and may involve decisions about you that relate to, for example, the types of advertising presented to you. The significance of our actions in this connection is that is that you would be more likely to be presented with advertisements, including promotions and offers, that correspond with the segmentation that we have derived from the profile information. The logic used by our systems is so correlate web pages that you have interacted with commercial or ecommerce segments.

We will only make these kinds of automated decisions about you where: such decisions are required or authorised by law, for example for fraud prevention purposes; or we have received consent to carrying out automated decision-making.

Subject to local legal requirements and limitations, you can contact us to request further information about automated decision-making, object to our use of automated decision-making, or request an automated decision to be reviewed by a human being.

TRANSFERS OF PERSONAL INFORMATION

Supplier and our customers or service providers may be located in various countries throughout the world. As a result, your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

However, we have taken appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure your data is adequately protected. Supplier relies on the Rakuten, Inc. Binding Corporate Rules (BCR) for legal data transfers outside of the EU within the Rakuten Group companies. The Luxembourg Data Protection Authority, acting as the lead authority for Rakuten, Inc., has approved the BCR. The BCR ensures your personal information is protected by requiring all Rakuten Group companies to follow the same rules when processing your personal information. For more information on the BCR's please visit us [here](#). For data transfers to entities outside of the Rakuten Group in countries that have not been deemed to provide an adequate level of protection

by the European Commission, we may use contracts promulgated by the European Commission, such as the Standard Contractual Clauses. Further details can be provided upon request.

RIGHTS OF CALIFORNIA RESIDENTS

This section contains disclosures required by the California Consumer Privacy Act (“CCPA”) and applies only to “personal information” that is subject to the CCPA.

Personal Information We Collect, Disclose for a Business Purpose, and Sell.

We collect the categories of personal information about California consumers identified in the chart below. As further set forth in the chart below, in the past 12 months, we have disclosed and sold California consumers’ personal information to third parties for business or commercial purposes.

Categories of Personal Information	Collected in the last 12 months:	Categories of sources from which information is collected:	Business or commercial purposes for collection, use, and sharing:	Disclosed for business purposes to the following categories of third parties:	Sold to the following categories of third parties:
Online identifiers (such as hashed email address or unique online identifiers)	Yes	Service Providers Consumers	Performing the Services for our Customers Internal Research Internal Operations Activities to improve services Auditing Facilitating transactions and fulfilling orders Develop and implement advertising services Legal compliance Detecting and protecting against security incidents, fraud, and illegal activity Product development Detecting and protecting against security incidents, fraud, and illegal activity Debugging	Service Providers Customers (advertisers and publishers) Affiliates	Customers Publishers that participate in our network Ad services companies Analytics companies

Categories of Personal Information	Collected in the last 12 months:	Categories of sources from which information is collected:	Business or commercial purposes for collection, use, and sharing:	Disclosed for business purposes to the following categories of third parties:	Sold to the following categories of third parties:
Internet or other electronic network activity information (such as browsing history, search history, interactions with a website, email, application, or advertisement)	Yes	Advertisers Service Providers Consumer Data Resellers	Performing Services Internal Research Internal Operations Activities to improve services Auditing Facilitating transactions and fulfilling orders Develop and implement advertising services Legal compliance Detecting and protecting against security incidents, fraud, and illegal activity Product development Debugging	Service Providers Customers (advertisers and publishers) Affiliates	Customers Publishers that participate in our network Ad services companies Analytics companies
Geolocation information)	Yes	Advertisers Service Providers Consumer Data Resellers	Performing Services Internal Research Internal Operations Activities to improve services Auditing Facilitating transactions and fulfilling orders Develop and implement advertising services Legal compliance Detecting and protecting against	Service Providers Customers (advertisers and publishers) Affiliates	Customers Publishers that participate in our network Ad services companies Analytics companies

Categories of Personal Information	Collected in the last 12 months:	Categories of sources from which information is collected:	Business or commercial purposes for collection, use, and sharing:	Disclosed for business purposes to the following categories of third parties:	Sold to the following categories of third parties:
Inferences drawn from the above information about your predicted characteristics and preferences	Yes	Advertisers Service Providers Consumer Data Resellers	security incidents, fraud, and illegal activity Product development Debugging Performing Services Internal Research Internal Operations Activities to improve services Auditing Facilitating transactions and fulfilling orders Develop and implement advertising services Legal compliance Detecting and protecting against security incidents, fraud, and illegal activity Product development Debugging	Service Providers Customers (advertisers and publishers) Affiliates	Customers Publishers that participate in our network Ad services companies Analytics companies
Other information about you that is linked to the personal information above	Yes	Advertisers Service Providers Consumer Data Resellers Consumers	Performing Services Internal Research Internal Operations Activities to improve services Auditing Facilitating transactions and fulfilling orders	Service Providers Customers (advertisers and publishers) Affiliates	Customers Publishers that participate in our network Ad services companies Analytics companies

Categories of Personal Information	Collected in the last 12 months:	Categories of sources from which information is collected:	Business or commercial purposes for collection, use, and sharing:	Disclosed for business purposes to the following categories of third parties:	Sold to the following categories of third parties:
			<ul style="list-style-type: none"> Develop and implement advertising services Legal compliance Detecting and protecting against security incidents, fraud, and illegal activity Product development Debugging 		

Your Rights Regarding Personal Information.

California residents have certain rights with respect to the personal information collected by businesses. If you are a California resident, you may exercise the following rights regarding your personal information, subject to certain exceptions and limitations:

- The **right to know** the categories and specific pieces of personal information we collect, use, disclose, and sell about you, the categories of sources from which we collected your personal information, our purposes for collecting or selling your personal information, the categories of your personal information that we have either sold or disclosed for a business purpose, and the categories of third parties with which we have shared personal information.
- The **right to request that we delete** the personal information we have collected from you or maintain about you.
- The right to **opt out of our sale(s)** of your personal information. Please note that if you opt out of certain types of sales, we will be unable to provide you with the services that rely on such sales.
- The **right not to receive discriminatory treatment** for the exercise of the privacy rights conferred by the CCPA.

To exercise any of the above rights, please contact us using the following information and submit the required verifying information, as further described below:

- By toll-free number at 1-855-807-7741
- Online: <https://go.rakutenadvertising.com/hubfs/Privacy-Rights-Request-Process.pdf>

Note that we may need to request additional information from you to verify your identity or understand the scope of your request, although you will not be required to create an account with us to submit a request or have it fulfilled. We will require you to provide, at a minimum the information indicated as required on the webform located here: <https://rakutenadvertising.com/legal-notices/services-privacy-rights-request-form/>. You may designate an authorized agent to make a request on your behalf by having the agent complete the webform located <https://rakutenadvertising.com/legal-notices/services-privacy-rights-request-form/>. We do not knowingly sell personal information of minors under 16 years of age.

DATA RETENTION

Supplier may actively process your personal information for one year from the time of your last interaction with our Services or the websites or applications of our customers. We may, however, store your information in a pseudonymized or anonymized form for up to seven (7) years after the date that you interact with our Services where we have an ongoing legitimate business need to do so (for example to respond to a query from you, provide you with a service you requested or to comply with applicable legal, tax or accounting requirements. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

SECURITY

We take appropriate technical and organizational measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of personal information. This includes the necessary physical, electronic and managerial procedures designed to protect data integrity, access and use. Please note that no method of transmission over the Internet or method of electronic storage is 100% secure. As a result, we strive to protect your personal information but cannot ensure or warrant the security of your information against any possible loss or unauthorized access.

CHILDREN'S INFORMATION

We believe it is important to provide added protection for children online. We encourage parents and guardians to spend time online with their children to participate in and monitor their online activity. Supplier Services are not intended to process personal information of children under the age of 16 does not knowingly collect any personal information from children under the age of 16. If a parent or guardian believes that Supplier has in its database the personal information of a child under the age of 16 please [contact](#) and we will use our best efforts to remove the information from our records.

CHANGES TO THIS PRIVACY POLICY

Supplier reserves the right to change or replace this Privacy Policy at any time to reflect any changes in our privacy practices. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws. Any changes or replacement will be posted on our website related to this Privacy Policy and located [here](#). You can see when this Privacy Policy was last updated by checking the "last updated" date displayed at the top of this Privacy Policy. We encourage you to review our Privacy Policy on a regular basis.

CONTACT INFORMATION

We use reasonable processes to ensure compliance with this Privacy Policy and periodically verify that the Privacy Policy is accurate. We encourage you to raise any concerns using the contact information provided below and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of information.

For any questions about our privacy practices, you may contact us by email here: rm-privacy@mail.rakuten.com

Our postal address is:
Rakuten Advertising
215 Park Ave. South, 2nd Floor
New York, NY 10003
USA

Rakuten
Advertising

If you are located within the European Economic Area, the data controller of your personal information is Rakuten Marketing LLC dba Rakuten Advertising (together with its subsidiaries).

The European establishment for purposes of this Policy is:
Rakuten Marketing Europe Limited
71 Queen Victoria Street, 7th Floor
London EC4V 4AY
United Kingdom

Rakuten Inc's Data Protection Officer and the Rakuten Advertising privacy team can be reached by email here: rm-privacy@mail.rakuten.com