



GDPR Questionnaire

N°	Question	Answer
1	Is Adikteev working on becoming compliant with the GDPR on or before May 25 th , 2018?	<p>Adikteev complies with current EU data protection law and will comply with GDPR.</p> <p>Adikteev has reviewed its Privacy Policy, its Terms And Conditions for publisher partners and its Terms and Conditions for our customers.</p> <p>To be GDPR compliant, here are our current main missions we're going to achieve before the 25th of May.</p> <p>1/ Provide a way for a app/web user to access to the personal data we have collected, and provide him a right to erasure (to be forgotten). He can already opt-out via the Operating System of his phone because we identify him via his Advertising ID, and iOS and Android have an option to restrict the use of this ID.</p> <p>2/ Ensure that all our providers are GDPR compliant by sending them our Data Protection Addendum (DPA)</p> <p>3/ List and standardize the descriptions of all the activities that are processing personal data (from app/web users but also from employees and partners)</p>
2	Does Adikteev hold a position of a Data Controller, Joint-Controller or Data Processor when providing its services?	Data Processor
3	What personal information does Adikteev collect via its service on users who are using an app/site of a publisher who is using an Adikteev service?	<p>During the integration phase publishers decide on the type of personal data that will be shared with Adikteev. Most publishers share the following personal information: Internet protocol addresses and device identifiers (advertising ID) – these are potentially non-identifiable information; precise location data (latitude/longitude); user online behavioral data which is not identifiable for itself but may constitute identifiable information when connected with location data and identifiers. For more information please visit Adikteev's privacy policy here.</p>
4	What is the purpose of the processing such data?	To deliver interests-based adverts
5	Is any of the collected data transferred outside of the EU? If yes, which data, and are the necessary contractual safeguards in place to guarantee that personal data is processed in compliance with the GDPR?	Yes. Adikteev stores all data on Amazon Web Services (AWS) cloud which is Privacy Shield certified and have signed a Data Processing Addendum (including Standard Contractual Clauses) with Amazon.
6	Does Adikteev offer ad services without the processing of personal data if the data subject does not provide consent or objects to the processing of personal data?	<p>Adikteev won't bid on bid requests without Advertising ID, or with a null Advertising ID.</p> <p>To handle consent, Adikteev has joint the Interactive Advertising Bureau (IAB) GDPR Transparency & Consent Framework.</p> <p>Adikteev is registered as a Global Vendor (ID #15).</p>
7	How does Adikteev plan to handle data subject rights under the GDPR?	Adikteev as a Data Processor will cooperate with the Data Controller as necessary to meet data subject's right
8	Does Adikteev uses sub-processors to process user data?	Yes, Adikteev's sub-processor list is available here
9	Does Adikteev subject those sub-processors to the same requirements in regard to data protection as itself?	Yes
10	What technical and organizational measures does Adikteev has in place to secure user data?	Organizational and technical measures are available here

11	Will Adikteev provide us with a Data Processing Agreement?	Yes, Adikteev sent all its suppliers a data processing addendum that incorporates GDPR requirements so if you have not received it yet kindly contact dpo@adikteev.com
12	Does Adikteev has a Data Protection Officer?	Yes Frederic Leroy – dpo@adikteev.com
13	Does Adikteev have a record of processing activities and this record of processing activities regularly reviewed and updated?	Yes
14	What happens if the user does not consent?	Adikteev will not deliver an ad.
15	Is there a GDPR certification?	No, there is not currently a GDPR certification issued by the European Commission. Adikteev will be monitoring any certifications that come out after the GDPR goes into effect and will certify to them if it deems them to be appropriate.
16	What will change after the 25th of May for Adikteev ?	Adikteev will display targeted ads only for users who have given their consent. Consent will be sent via the new Open RTB Protocol , or from the GDPR Transparency & Consent Framework , or from any other technology implemented between the Supplier and Adikteev.
17	What categories of Personal Data are processed by Adikteev to provide its service ?	IP Address; Advertising ID (this is potentially non-identifiable information); Carrier; OS; Device model; Connection Type; Gender; Age; Country; City; Interests based on the IAB categories of the apps visited by the user

For more information about the GDPR you can visit the following website: <https://www.eugdpr.org/>