

Millwood Creative Privacy Policy

Last Revised: 27 September 2021

Millwood Creative Ltd. (“**Millwood Creative**”, “**we**”, “**our**”, or “**Company**”) welcomes you, a visitor of our website at www.MillwoodCreative.co (“**Website**” or “**Site**”) and third party advertisers (“**Advertisers**”) and third-party publishers (“**Publishers**”) using our service as detailed below.

Millwood Creative is an online platform enabling our Advertisers to display advertisements and marketing materials to end users who use or otherwise interact with certain mobile webpages and desktop websites (“**Digital Assets**”) owned by our Publishers (collectively, the “**Services**”).

For the purposes of this privacy policy (“**Privacy Policy**”) a “User” shall refer to a visitor of the site, an Advertiser or Publishers as well as their applicable end users.

We have included below information about which data is collected, how we process and use your data, but before we would like to explain the basis on which we do so:

- 1) Where you sign up for any of our Services, we process your personal data in order to perform our contract with you;
- 2) If we have a legitimate interest in processing data, such as for direct marketing, online advertising or online identifiers when you access our Site or use our Services; or
- 3) We will also process your personal data where you have provided us with consent to do so.

INFORMATION WE MAY COLLECT

We may collect two types of data and information from our Users. The first type of information is non-identifiable and anonymous information (“**Non-Personal Information**”). We are not aware of the identity of the User from which we have collected the Non-Personal Information. Non-Personal Information is any unconcealed information which is available to us while Users are using the Services. Non-Personal Information which is being gathered consists of technical information and behavioral information, and may contain, among other things, the activity of the User on the Services, type of operating system and type of browser, type of device, User’s connection to the Site, or approximate geo-location.

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual (“**Personal Information**”). Personal Information includes either: (i) contact information such as your name, email address, etc., which you have submitted voluntarily; or (ii) your Internet Protocol (“**IP**”) addresses (the addresses of computers on the Internet), advertising ID, IDFA (collectively, “**Identifiers**”). Note that, while Identifiers are considered Personal Information in many jurisdictions (such as the EEA), there are some jurisdictions in which such data is not considered as Personal Information. Therefore, we treat such information as Personal Information, in accordance with applicable laws, however we do not attempt to analyze or determine your identity based on such information or otherwise combine it with any Personal Information such as your name or email address. The IP may be collected by our third-party analytic partners that offer ways to opt-out, all as detailed below.

For avoidance of doubt, any Non-Personal Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists.

You are not required by law to provide us with any information. You can always avoid providing us certain Personal Information; however, you acknowledge that it may prevent you from engaging in certain Services.

HOW WE COLLECT INFORMATION

Depending on the nature of your interaction with the Services, we may collect information as follows:

(i) **Automatically** – we may use Cookies (as elaborated in the section below) to gather some information automatically.

(ii) **Provided by you voluntarily** – we will collect information if and when you choose to provide us with the information, such as through a physical agreement, contact us communications, etc. all as detailed in this Privacy Policy.

SHARING INFORMATION WITH THIRD PARTIES

Millwood Creative will not share any Personal Information it collects with any third party. Notwithstanding, Millwood Creative may disclose Personal Information in the following cases: (i) **Compelled Disclosures**. To satisfy any applicable law, regulation, legal process, subpoena or governmental request; (ii) **Enforcement of our Rights**. To enforce this Privacy Policy and/or the Terms of Use, including investigation of potential violations thereof; (iii) **Fraud Detection**. To detect, prevent, or otherwise address fraud, security or technical issues; (iv) **Business Transfers**. When Millwood Creative is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of its assets; (v) **Service Providers**. To collect, hold and/or manage your Personal Information through Millwood Creative's authorized third party service providers, as reasonable for business purposes; (vi) **Explicit Consent**. Pursuant to your explicit approval prior to the disclosure; or (v) **Identifiers**. We may share identifiers collected by us (as detailed above), for the purpose of operating our business and providing the Services, as well as to calculate payments in connection with the Services.

For avoidance of doubt, Millwood Creative may transfer and disclose or otherwise use Non-Personal Information or information which is linked to anonymous random identifiers or information that is aggregated in a non-identifiable way, at its own discretion.

DATA RETENTION

We retain the information we collect as long as it remains necessary for the purposes set forth above, all in accordance with applicable laws, or until an individual expresses a preference to opt-out. We may at our sole discretion, delete or amend information from our systems, without notice to you, once we deem it is no longer necessary for such purposes.

USER RIGHTS

Individuals have the right to know what information we hold about them and, in some cases, to have such information communicated to them. Individuals may also ask for our confirmation as to whether or not we process their Personal Information. Subject to the limitations in applicable law, individuals may also be entitled to obtain from us the Personal Information they have provided to us in a structured, commonly-used, and machine-readable format, and may have the right to transmit such Personal Information to another party.

The principal rights under applicable data protection law in relation to Personal Information are as follows: the right to access any information which is provided to us; the right to rectification; the right to erasure; the right to restrict processing; the right to object to processing; the right to data portability; the right to complain to a supervisory authority; and the right to withdraw consent (to the extent applicable).

We provide you with the ability to exercise certain choices and controls in connection with our treatment of your Personal Information, depending on your relationship with us. Where we are not able to provide you with the information for which you have asked, we will endeavor to explain the reasoning for this and inform you of your rights, including the right to complain to the supervisor authority. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any such information in accordance with applicable law. In addition, the process of locating and deleting the data may take up to one (1) month (following the receipt of the validation proof we require) in accordance with applicable law. Data privacy and related laws in your jurisdiction may provide you with different or additional rights related to the data we collect from you, which may also apply.

THIRD PARTY SOFTWARE/SERVICE

While using the Millwood Creative Services we may be using third party software and/or service for various needs, inter alia, in order to collect and/or process the information detailed herein (“**Third Party Service Provider**”).

Note that these are independent software and/or service providers and Millwood Creative does not take any liability about the information collection policies of these providers relating thereto. Currently, our Third-Party Service Providers are the following (we will update this section from time to time if we add or remove Third Party Service Providers).

- **Google Analytics** this cookie is placed in order to track and analyze the use of our Services, for internal purposes. To learn more about how Google uses data from our use of Google Analytics Cookies, we recommend you review Google’s policies located at: www.google.com/policies/privacy/partners. We also encourage you to review the Google Analytics’ currently available opt-outs for the web tool available at: <https://tools.google.com/dlpage/gaoptout>.

USE OF COOKIES

When you access or use our Site, the Millwood Creative may use industry-wide technologies such as “cookies” (or similar technologies), which store certain information on your computer (“**Local Storage**”) and which will allow us to enable automatic activation of certain features, and make your service experience much more convenient and effortless. The cookies used by the Site are created per session, which does not include any information about you, other than your session key and are removed as your session ends. It is easy to prohibit the Local Storage. Most browsers will allow you to erase cookies from your computer’s hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you block or erase cookies your online experience may be limited.

In this regard, following are some links which you may find useful:

Browser Opt-out:

- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>;
- Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>;
- Internet Explorer:
<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-Manage-cookies>;
- Safari: <https://support.apple.com/kb/PH21411>;

- Edge: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>;
- Opera: <http://www.opera.com/help/tutorials/security/cookies/> ;

Mobile Opt-out:

- Learn how to opt-out from **Android**-<https://support.google.com/ads/answer/2662922>
- Learn how to opt-out from **iOS**– <https://support.apple.com/en-il/HT205223>.

You may control how your browser responds to cookies by adjusting the privacy and security settings of your web browser.

Self-Regulation Opt-out:

You may opt-out directly from third party retargeting cookies or other ad-technology trackers through self-regulator services such as **(1)** the Network Advertising Initiative’s (“**NAI**”) website – NAI consumer opt-out page or **(2)** the Digital Advertising Alliance’s (“**DAA**”) website – DAA opt-out page or **(3)** If you wish to opt out of interest-based advertising, you may click here. Please note you will continue to receive generic non targeted ads.

In the event that you have any additional complaints about your privacy rights, please initially contact the Data Protection Officer at: dpo@millwoodcreative.com and we will be happy to assist you. Note that once you opt out, part of the Services provided by us might no longer be available and some features may not work if you revoke the data transfer. Please note that you have the right at any time to contact your local data protection authority.

SECURITY

We take great care in implementing and maintaining the security of Company’s Website, Millwood Creative Services and your information. We employ industry standard procedures and policies to ensure the safety of our users’ information and prevent unauthorized use of any such. We have implemented technical, physical and administrative security measures to protect the Personal Information, including without limitation by using industry standard encryption (SSL). In addition, we limit access to your information on our servers. The data collected by us is stored in the AWS data servers, for more information regarding the data security provided by AWS, please see: <https://aws.amazon.com/security/>.

Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse Company’s Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

PROTECTING CHILDREN

The Millwood Creative Services are not directed to children and we do not knowingly collect information from children. If you have any information regarding a use of a minor under the age of eighteen (18) please let us know at: dpo@millwoodcreative.com. You must be at least eighteen (18) years of age to use the Millwood Creative Services. By agreeing to these Terms, you represent and warrant to us: (i) that you are at least eighteen (18) years of age; (ii) that you have not previously been suspended or removed from the Millwood Creative Services; and (iii) that your registration and your use of the Millwood Creative Services is in compliance with any and all applicable laws and regulations.

CHANGES TO THE PRIVACY POLICY

The terms of this Privacy Policy will govern the use of the Millwood Creative Services and any information collected therein. Millwood Creative reserves the right to change this policy at any time, so please re-visit this page frequently. In the event of any substantial change of this policy, we will make reasonable efforts

to post a clear notice on the Site. Such substantial changes will take effect seven (7) days after such notice was provided on the Millwood Creative Services or sent by email. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" date and your continued use of the Millwood Creative Services after the Last Updated date will constitute acceptance of, and agreement to be bound by, those changes.

DATA TRANSFER

We may store or process your Personal Information in the United States or in other countries. If you visit our Websites or use our Services from locations outside of the United States, please note that any information you provide to us through your use of our Websites or Service may be transferred to and processed in countries other than the country from which you accessed our Websites or Service, including the United States where our central database is operated. If you are a resident of the European Economic Area ("EEA") we will take appropriate measures to ensure that your personal data receives an adequate level of data protection upon its transfer outside of the EEA.

If you are a resident of a jurisdiction where transfer of your personal data requires your consent, then your consent to this Privacy Policy includes your express consent for such transfer of your data.

DO NOT TRACK DISCLOSURE

The Service does not respond to Do Not Track signals. For more information about Do Not Track signals, please see: <http://www.allaboutdnt.com/>.

ADDITIONAL INFORMATION AND CONTACT US

If you have any questions (or comments) concerning this Privacy Policy, you are welcome to send us an email at: dpo@millwoodcreative.com, and we will make an effort to reply within a reasonable timeframe.

By contacting Millwood Creative you warrant and agree that you are free to do so, and that you do not provide Millwood Creative with information, which violate any third party intellectual rights ("**Information**"). Without degrading from the aforesaid, all rights, including intellectual property, arising from the communication will be owned by Millwood Creative and will be considered as Millwood Creative's confidential material. It is clarified that any use of the Information, will be done in Millwood Creative's sole discretion, and Millwood Creative is not obligated to use all or part of this Information.

DATA PROTECTION OFFICER

If you have any requests regarding the data collected under this Policy, including without limitation, requests to remove, delete, amend, modify or transfer the data, please contact our Data Protection Officer at: dpo@millwoodcreative.com. Please include your name, address and email address in any correspondence so that we can respond to your inquiry or request.