

NOATEL EUROPE ELECTRONIC PRIVACY POLICY

Last updated January 01, 2016

Electronic Privacy Policies makes Readers understand the practices of Data owners and processors of online sites Users' behavioural information.

This Privacy Policy (together with the [Cookie and Technological Note](#)) sets out the basis on which any behavioural (non-personal) information that Noatel Europe collects or Users provides will be used by Noatel Europe. This Policy is designed to help Reader (as User of on line sites) to learn about Noatel Europe's practices. It should be read carefully. If Reader has any questions or queries, He/She is asked to contact at the details set out at the end of this document.

1. REFERENCES

User or Visitor means the individual user of Sites, as the person that enter or displays any pages or content and that allows Noatel Europe – only under consent – to reach his own data.

Noatel Europe means Noatel Europe Limited who as an affiliate **Publisher** permits placing advertisements.

In order to manage its business, Noatel Europe **may establish agreements with third parties**: Advertisers, willing to make people enter or display their products advertisements; ADV Agencies that manage a Network and so are able to process the marketing activity; others Publishers.

This will be fully explained and stated on clause 3 below.

Publisher is an entity that owns Websites – also called verticals – who elects to include such Websites in a Network to make displayed to its Users third parties' published materials, such as advertising messages and links.

Advertisement(s) or Ad(s) means text-based, graphical, interactive, creative, rich media and video or other online and in-app commercials, including, without limitation, banners, buttons, towers, skyscrapers, pop-ups, pop-unders and videos.

Network is the Advertiser's or Agency's technological and marketing organization that process and permit the Ads are delivered in a suitable way for Visitors and in a convenient way for Advertising entities.

Website(s) also called Vertical(s), Publisher site(s) or Site(s) represent a Site of the Publisher who elects to include such web or mobile site or application in a Network to make Ads displayed to its Users.

Interest Matching is a process and means that Noatel Europe or the Network entity may collect information (behavioural) about a Visitor's interactions with the advertising placed on Website, which Noatel Europe itself or the Network entity may use to provide more relevant ads aligned with Users current interests.

This **Privacy Policy** explains seriously how Noatel Europe uses or permits to use information collected via each Site which is part of a Network, when User clicks on any Ads that have been served on Sites.

Noatel Europe occasionally modifies the Privacy Policy and post those changes on this page so that Visitor remains aware of what information are collected, how these are used and under what circumstances are disclosed. User should check the Privacy Policy frequently to ensure being aware of any changes.

COLLECTION AND USE OF NON-PERSONAL INFORMATION ON NOATEL EUROPE'S SITES THROUGH ADV TECHNOLOGY

2.1 Noatel Europe allows Advertisements on its Verticals WebSites. Other than publishing Ads, Noatel Europe does not let modify, control or influence any of content on its Sites.

2.2 Noatel Europe's technology is designed primarily to facilitate the publishing of contextual advertising. This is when relevant Ads are triggered from highlighted keywords within the text of web content. User decides to display by moving over the word or the phrase of interest with his/her mouse.

2.3 An illustration of how Noatel Europe, or third party, may carry out Interest Matching is set out below.

- *Interaction* with one of Ads (for example, by hovering mouse over one of the keywords that Noatel Europe has underscored). Information about each interaction is registered using cookies and other technologies and Noatel Europe draws inferences from User visit in order to provide him/her with an Ad that is more relevant, interesting, and useful.
- *Identification* of Visitor's interests by gathering web viewing data (pages visited, browser type, referring URL, Internet service provider, a device's operating system, and date and time of visits) using cookies and other tools.
- *Engagement* in behavioural retargeting that allows Noatel Europe and some advertising partners to display Advertising to Users when are on Noatel Europe Verticals, based on their browsing patterns and previous interactions with any other Site. So, this engagement produces the same displaying that Visitor were viewing before.

In any case the information collected and used is non-personal, which means that it does not include personally identifiable information such as name, street address, e-mail address or telephone number.

2.4 Aggregate and non-personal identifiable web viewing and computer data is also collected and used for other purposes including Ads delivery and reporting, measuring the effectiveness of a campaign, optimizing a campaign, and for operational purposes. Third parties may also combine web viewing Data with information (e.g. demographics) provided by other entities to help make Advertiser message and communication more relevant.

2.5 All Verticals easily consent to any person to opt-out (or revoke) from having Noatel Europe collect non-personal information for Interest Matching advertising (described in section 2.3 of this Privacy Policy), as stated in the fully abiding with Data Protection European Regulations Noatel Europe's Cookie Policy. When this option is selected, Noatel Europe will place an opt-out cookie on visitor's browser, which tells Noatel Europe not to collect information to tailor Networks' online Advertisement campaigns. However, Noatel Europe may continue to collect certain data for basic advertising serving (such as counting the number of times a keyword has been clicked).

3. USE OF BEHAVIOURAL INFORMATION: CIRCUMSTANCES AND ENTITIES

3.1 Noatel Europe, may share the information described in this Privacy Policy with third parties, or transfer such information to a third party, in the following circumstances:

- to Noatel Europe's group companies, other partners and service providers (for example people who provide technical services to Sites) for the purpose of managing or administering Network aspects, or to help Noatel Europe develop new services;
- to a successor entity in connection with a corporate merger, consolidation, sale of all or substantially all of Noatel Europe's assets or other corporate change;
- if Noatel Europe is under a duty to disclose or share information in order to comply with any legal obligation.

3.2 In addition to the information that Noatel Europe collects, a number of entities may collect non-personal data when Visitor visits Sites. These third parties are Noatel Europe clients and include:

- ADV Agencies that are integrated within their Network, and that may use their own cookies and other technologies to collect information about contents of the sites that Visitors visit and the advertising that appears on those Sites;
- Advertisers that use Network services and who may use cookies and other technologies within their advertising content to collect information about individual use of the relevant Sites and advertising;
- other Publishers whenever there are other entities that in partnership with Noatel Europe are willing to make spaces on their Sites available for advertisement use.

4. COOKIES AND OTHER TECHNOLOGIES

4.1 Cookies are small pieces of information that are stored by Visitors' computers and devices browsers. Most web browsers automatically accept cookies, but any User can usually change browser's settings to prevent that activity. Noatel Europe uses cookies and other technologies on its verticals, but only analytics cookies on its company website.

4.2 Noatel Europe has created a Cookie Policy (**Cookie and Technological Note**):

- in order to give more information on how third parties use cookies in Noatel Europe's Sites;
- to explain how Noatel Europe uses cookies and how User may manage the use made of cookies and other tracking devices.

5. SECURITY

Unfortunately, the transmission of information via the internet is not completely secure and does not exist way to guarantee the security of data transmitted to, or stored on, Noatel Europe's Sites. Although any transmission is at Visitor's own risk, Noatel Europe will do the best to protect information also because It is on its economic and strategic interest.

6. PARTICIPATION IN SELF-REGULATORY PROGRAMS

Is supported the cross industry, Self-Regulatory Principles for Online Behavioral Advertising as managed by the Digital Advertising Alliance "DAA" (for more information <http://www.aboutads.info/>) as well as the DAA's Self-Regulatory Principles for Multi-Site Data, and, in particular, the use of the Ad Choices icon. In support of the DAA and to guarantee consumers with enhanced transparency, Noatel's Networks providers assure that is displayed the Ad Choices Icon on Advertisements delivered. The Ad Choices icon is customarily displayed within the frame of Noatel Europe's Ads. The Ad Choices icon provides information (and links to other information) on online Ads, who may be collecting and using online data, and how User can exercise choice with respect to those companies participating in

the DAA program. Noatel Europe makes all effort to publish only those materials delivered by members of the Internet Advertising Bureau and who abide by IAB's Codes of Conduct. Readers should also visit the following sites: www.aboutcookies.org or www.youronlinechoices.eu.

7. INFORMATION ACCESS

7.1 Noatel Europe activity is compliant with The Data Protection Act 1998 (DPA) that also provides a framework to ensure that data are collected and handled properly and gives individuals certain rights to know what information is held about them. Noatel Europe activity is compliant with the EPrivacy Directive that is a piece of European legislation, also implemented into UK law in May 2011 (known as the revised Privacy and Electronic Communications Regulations 2011). The new law replaces the "*notice and opt out*" requirements for cookies and other technologies for "*the storing of information or the gaining of access to information stored in the terminal equipment of a subscriber or user*" with a requirement to obtain informed consent. There is an exemption for when uses are "*strictly necessary*" for the service explicitly requested by the user (eg. shopping baskets).

7.2 Individuals have certain rights to access data held about it-self and anybody can do this by contacting Noatel Europe at the details set out below. Any access request may be subject to an administration fee to meet costs in providing the inquirer with details of the information held. Every individual can also request to correct any factual inaccuracies in information held or delete any of that information from Noatel Europe's records.

7.3 Noatel Europe aims to keep any behavioural data held up to date, accurate and error free. User can edit information at any time and Noatel Europe is pleased to be helped with keeping information accurate and up to date by being notified of any relevant changes in the non-personal data held. User can do it by contacting Noatel Europe.

8. CONTACT DETAILS FOR ADDITIONAL QUESTIONS AND/OR TO ISSUE A COMPLAINT

For any questions or comments, or complaints about Noatel Europe's Sites/Network or about this privacy policy, contact methods are given below:

Via email:

info@noateleurope.co.uk

help@noateleurope.co.uk