CITYADS PRIVACY POLICY

1. INTRODUCTION

Welcome to CityAds!

This Privacy policy (Policy) is intended to make visitors ("You") of our website www.cityads.com (Website) aware how CityAds Group companies (including Utheram Trading Limited, Cyprus and CITYADS MEDIA POLSKA SPÓŁKA z o.o, Poland, you may also request contacts of other CityAds offices at CityAds website at Contacts.page), hereinafter collectively and individually where appropriate – "CityAds", - collect, process, use, store, transfer, share personal and anonymous and personally non-identifiable data ("Personal information") when you are website user, publisher, advertiser and/or user of CityAds advertisers and publishers websites, applications or other means of communication.

We may update and amend this Privacy Policy from time to time in order to reflect any necessary changes in our business process, data protection policies or for any other regulatory reasons. We will inform you about changes by posting the new version of the Policy on the CityAds website www.cityads.com and, if appropriate, by other means. In case of material changes the date of the current version of the Policy. In case you continue to use this CityAds website after new version of privacy Policy comes in force, are agree with such new Policy. Before using website, please ensure that you have read and understood how we collect, store, use and disclose your personal information as described in this Privacy policy.

2. PERSONAL DATA REGULATIONS

We comply with personal data protection laws to ensure that users of our website have appropriate control over their personal data. This includes, but is not limited to, the EU General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and other national or regional laws.

If you are not subject to the provisions of the GDPR or CCPA, we will use best practices and, regardless of whether you are subject to the provisions of the GDPR and CCPA, we will in any case collect and process your personal data in accordance with the laws applicable to the relevant CityAds Group company.

3. PERSONAL INFORMATION WE COLLECT

We collect information you provide to us directly voluntarily, as well as we may also collect personal information from third parties, such as your employer, public databases or social media networks and we also collect some passively (automatically) collected information.

FOR ALL VISITORS OF CITYADS WEBSITE AND WEBSITES OF CITYADS ADVERTISERS AND PUBLISHERS

When you visit CityAds website, we automatically (passive collection) collect certain information about you, which in some circumstances and some jurisdictions may be considered

to be personal data, including information about your web browser, IP address, time zone, referring pages, the files and pages viewed on our side. We need this information for our legitimate interest, such as proper operation of our website, to prevent cyber-attacks to it, to ensure security of advertises and publishers personal accounts.

We also use cookies and some tracking technologies for our legitimate interest, such as improving of the website operation and upgrading its usability, presenting you our website and possible cooperation as well as for prevention of . "Cookies" are data files that are placed on your device or computer and often include an anonymous unique identifier, cookies are not harmful for your device. For more information about cookies, and how to disable cookies, visit http://www.allaboutcookies.org.

For more information of what cookies and tracking technologies we use please refer to Annex 1, which we amend from time to time to keep the list of cookies and tracking technologies up to date.

You may use your browser settings to delete all cookies stored in your browser and stop tracking. You should see your browser documentation to find relevant options. Some of the options may be found at https://www.ixbt.com/live/diy/how-to-clean-cookie_2.html. Deleting or blocking cookies may not be effective for all types of tracking technologies, such as Local Storage Objects (LSOs) like Flash objects or HTML5. We are unable to respond to Do Not Track signals set by your browser at this time. Please note that if you choose to refuse cookies you may not be able to use the full functionality of our website

We also store cookies on devices of visitors of some websites which belong or are operated by CityAds advertisers and publishers. Such cookie are needed for our legitimate interest and to perform under our contracts with advertisers and publishers. Such cookie may store information on the advertiser and relevant affiliate program, on publisher for purposes of identification of your action as attributable to that publisher for purposes of attributing of target actions as requested by advertiser. In case our cookie are placed on third party website it is this third party responsibility to properly inform you about cookies used on the website. You should always consult relevant third party cookie policy and in any circumstances may delete cookies as explained above. We do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those websites.

IF YOU ARE PUBLISHER

Publisher personal data shall be collected and processed on the principles set forth in Article 5 and Article 6 of GDPR or in accordance with other personal data regulation which may be applicable and on the legal ground of performance of a contract.

In addition to the personal information collected for all visitors for publishers CityAds may collect the following categories of personal data (provided that publisher personal account settings may require only part of the below listed data):

- Name (including family name) of natural person being individual (entrepreneur) or company representative
- Title of the advertiser employee
- · Email address
- · telephone number

- other contact details (i.e. Facebook Messenger, WeChat, Viber, Line, Snapchat, Skype)
- Postal or other physical address
- · Credit/debit card information or other payment details based on the method of payment

CityAds collects and/or process publisher personal data for the following purposes:

- personal account registration in the CityAds website
- use by the publisher of the CityAds website
- responding to the requests by the Publisher of service and support and providing such support
- Invoicing, billing, arranging for payments to the Publisher
- Participating by the Publisher in forums or blogs or social network pages of CityAds Group
- · Sending newsletter and notifications
- · Contacting publisher for contract performance purposes

IF YOU ARE ADVERTISER

Advertiser personal data shall be collected and processed on the principles set forth in Article 5 and Article 6 of GDPR or in accordance with other personal data regulation which may be applicable and on the legal ground of performance of a contract.

In addition to the personal information collected for all visitors for advertisers CityAds may collect the following categories of personal data:

- Name (including family name) of natural person being individual (entrepreneur) or company representative
- Title of the advertiser employee
- · Email address
- telephone number
- other contact details (i.e.Facebook Messenger, WeChat, Viber, Line, Snapchat, Skype)
- Postal or other physical address
- · Credit/debit card information or other payment details based on the method of payment

CityAds collects and/or process advertiser personal data for the following purposes:

- personal account registration in the CityAds website
- · use by the advertiser of the CityAds website
- responding to the requests by the Publisher of service and support and providing such support
- Invoicing, billing, the advertiser
- Participating by the advertiser in forums or blogs or social network pages of CityAds Group
- · Sending newsletter and notifications
- Contacting advertiser for contract performance purposes

4. DATA CONTROLLER

For persons being advertiser/publisher or personal data administrator (data controller) shall be Utheram Trading Limited, Cyprus or CITYADS MEDIA POLSKA SPÓŁKA z o.o, Poland, respectively, based on who is advertiser/publisher counterparty under contract, unless you expressly agreed to have contract relations with other CityAds Group company.

In other cases the identity of data controller for your personal information will depend on which CityAds Group company you are engaging with. Please refer to the CityAds <u>Contacts list</u> at the website to determine relevant information.

5. MARKETING MESSAGES

From time to time we may send you some marketing materials, press-releases and newsletters in case you provided us with relevant contact information (usually email). We may Please note that if you are in the EEA and some other countries, we will only send you marketing messages if you have given us your consent to do so. If you do not want to receive newsletters and marketing messages from us, you will be able to unsubscribe by clicking on the unsubscribe link. But we may still need to send you non-marketing messages needed to perform our contract with you as publisher or advertiser.

6. STORAGE OF YOUR PERSONAL INFORMATION

Your personal data collected by CityAds shall be saved in a safe environment. We have expertise in data protection as explained below.

Cookies are stored for the time as stated in Annex 1.

Personal data is retained only as long as at least one legal basis under applicable data protection laws remains valid, or until you exercise your right to erasure (right to be forgotten).

User credentials are processed to fulfill contractual obligations and are stored until the account is deleted, after which backups are retained for an additional 12 months.

Accounting and tax documents are processed to comply with the controller's legal obligations under tax legislation and are retained for six full fiscal years.

Consents for marketing communications are stored based on the controller's legitimate interest in demonstrating compliance with applicable law, and are retained for three years from the date of the last marketing interaction.

Upon expiration of the specified retention periods, the relevant data is either irreversibly anonymized or securely destroyed.

7. SHARING YOUR PERSONAL INFORMATION

We do not transfer your personal information to third parties except for transfer to (i) CityAds Group entities and their employees on the need to know basis and provided that they are contractually bound to fulfill data protection obligations, (ii) if obliged so by applicable laws, (iii) advertisers and publishers to perform relevant contracts with them and only in case we have special data processing agreement with relevant person, provided we do not share payment information unless obliged so by laws.

8. POLICY TOWARDS CHILDREN

Our cooperation proposals are not directed at persons under 16 and we do not knowingly collect personal information from children under 16. If you become aware that your child has provided us with personal information, without your consent, then please contact us using the details below so that we can take steps to remove such information and terminate any account your child has created with us.

9. END OF PROCESSING

Your request to remove/erase information about you by the relevant CityAds Administrator (Data Controller) shall mean the end of cooperation with CityAds as cooperation is impossible without provision of the information as stated in this Policy. Withdrawal does not affect processing already carried out. Essential contractual data (e.g. payment records) may continue to be processed where required by law or to establish, exercise, or defend legal claims.

10. CONTACT US. DATA PROTECTION OFFICER

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, or request - please contact our Data Protection Officer at dpo@cityads.team.

Annex 1

Cookies

Cookie name	Description of cookie	Domain	lifetime
PHPSESSID	id of PHP-session	.cityads.com	Session
PHPSESSID	id of PHP-session	auth2.cityads.com	Session
storage_key_cityads	hash key, used by authorization client to store token data, redirect_uri	.cityads.com	5 days after last visiting the site
storage_key_manager	hash key, used by authorization client to store token data, redirect_uri	.cityads.com	5 days after last visiting the site
storage_key_stat	hash key, used by authorization client to store token data, redirect_uri	.cityads.com	5 days after last visiting the site
storage_key_firanotools	hash key, used by authorization client to store token data, redirect_uri	<u>firano.ru</u>	1 hour after last visiting the site
ca_lang	Identificator of language	.cityads.com	Session or 1 year
auth_session	Used by authorization (session of client)	.cityads.com	Session
auth_client_failed_attempts	Storage of unsuccessful attempts of authorization by the authorization client, is cleared after successful authorization	.cityads.com	without expiration
http_referer	Information about referrer	cityads.com	5 year
remember_***	Used by authorization	.cityads.com	5 year
promocode	Promotional code on landings with shares	.cityads.com	1 month
XSRF-TOKEN	Token for defense of CSRF attacks	auth2.cityads.com	2 hours
xentID	Hash of identificator of user profile	.cnt.my	1 year
xentU	A backup value for restoring the main cookie. The value is a hash of ID the profile of user in dmp	.cnt.my	1 year

cnt	MD5 hash from "time of first click + IP of user" for further identifying unique user	tdqqx.com nfemo.com jbojx.com deqph.com blkri.com	1 year
		elcjj.com rfhhd.com qdufr.com ayzvd.com bvsog.com	
		qbrfe.com tuhzc.com kfbif.com uwxtp.com gbupl.com	
		umllb.com adzrc.com pwieu.com stvkr.com yajgm.com	
		rmvin.com jejjn.com svuhl.com jlhaz.com eusyh.com	
		uygab.com aqofl.com hiqcb.com xxhzi.com	
		djxdi.com dmneh.com oenyl.com ljovi.com khpeo.com	
		ihxsa.com pqype.com jbvdo.com bowtk.com auihf.com	
		xrxhx.com agqrz.com pczxt.com gameleads.ru ytthn.com	
		mtfmi.com hskwq.com cityviplink.com cityadspix.com. br ghbps.com cityads.mobi	
skip_js_r	It is placed at HS redirect each time. The value of the cookie is 1. It is used	tdqqx.com nfemo.com jbojx.com	30 дней

in the system for, so as not to make

the JS redirect the next time.

deqph.com

blkri.com elcjj.com

rfhhd.com

qdufr.com

ayzvd.com

bvsog.com

qbrfe.com

tuhzc.com

kfbif.com

uwxtp.com

gbupl.com

umllb.com

adzrc.com

pwieu.com

stvkr.com

yajgm.com

rmvin.com

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gameleads.ru

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mtfmi.com

hskwq.com

cityviplink.com

cityadspix.com.br

ghbps.com

cityads.mobi

exid It is set if the exid parameter came in the request. The value of the cookie is "campaign id exid ". Used in system to get the xid.	is nfemo.com
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ayzvd.com bvsog.com qbrfe.com tuhzc.com kfbif.com uwxtp.com gbupl.com umllb.com adzrc.com pwieu.com stvkr.com yajgm.com rmvin.com jejjn.com svuhl.com jlhaz.com eusyh.com uygab.com aqofl.com hiqcb.com xxhzi.com djxdi.com dmneh.com oenyl.com ljovi.com khpeo.com ihxsa.com pqype.com jbvdo.com bowtk.com auihf.com xrxhx.com agqrz.com pczxt.com gameleads.ru ytthn.com mtfmi.com hskwq.com cityviplink.com city adspix.com.brghbps.com cityads.mobi

vk_uid	Set if the vk_uid parameter came in the query. The value of the cookie is "campaign id vk_uid ".	tdqqx.com nfemo.com jbojx.com deqph.com blkri.com elcjj.com rfhhd.com qdufr.com ayzvd.com bvsog.com qbrfe.com tuhzc.com kfbif.com	30 days
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uwxtp.com gbupl.com umllb.com adzrc.com pwieu.com stvkr.com yajgm.com rmvin.com jejjn.com svuhl.comjlhaz.com eusyh.com uygab.com aqofl.com hiqcb.com xxhzi.com djxdi.com dmneh.com oenyl.com ljovi.com khpeo.com ihxsa.com pqype.com jbvdo.com bowtk.com auihf.com xrxhx.com agqrz.com pczxt.com gameleads.ru ytthn.com mtfmi.com hskwq.com cityviplink.com cityadspix.com.br ghbps.com cityads.mobi

init_referer It is placed in the case of the redistrict's HS. The value of the cookie is the coded address of the page the user came from It is placed in the case of the redistrict's HS. The value of the cookie is the coded address of the page the user came from deqph.com blkri.com elcjj.com rfhhd.com qdufr.com ayzvd.com bvsog.com qbrfe.com tuhzc.com kfbif.com uwxtp.com gbupl.com umllb.com adzrc.com pwieu.com	
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stvkr.com yajgm.com rmvin.com jejjn.com svuhl.comjlhaz.com eusyh.com uygab.com aqofl.com hiqcb.com xxhzi.com djxdi.com dmneh.comoenyl.com ljovi.com khpeo.com ihxsa.com pqype.com jbvdo.com bowtk.com auihf.com xrxhx.com agqrz.com pczxt.com gameleads.ru ytthn.com mtfmi.com hskwq.com cityviplink.com cityadspix.com.br ghbps.com cityads.mobi

sc	Set if there is a get parameter trc. It stores prx (some hard-coded string containing various data).	cityadsclick.co m cityadslink.co m cityadspix.com mcityadslink.co m cityadstrack.co m cityadstrack.co	1 year
timezone	The value of the cookie is the timezone of client	tdqqx.com nfemo.com jbojx.com deqph.com blkri.com elcjj.com rfhhd.com qdufr.com ayzvd.com bvsog.com qbrfe.com tuhzc.com kfbif.com uwxtp.com gbupl.com umllb.com	11 years

		adzrc.com pwieu.com stvkr.com yajgm.com rmvin.com jejjn.com svuhl.com jlhaz.com eusyh.com uygab.com aqofl.com hiqcb.com xxhzi.com djxdi.com dmneh.com oenyl.com ljovi.com khpeo.com jbvdo.com pqype.com jbvdo.com swith.com auihf.com xrxhx.com agqrz.com pczxt.com gameleads.ru ytthn.com mtfmi.com hskwq.com cityadspix.com.br ghbps.com cityads.mobi	
widht	The value of the cookie is the width of the client's screen.	tdqqx.com nfemo.com jbojx.com deqph.com blkri.com elcjj.com rfhhd.com qdufr.com ayzvd.com bvsog.com qbrfe.com tuhzc.com kfbif.com uwxtp.com gbupl.com umllb.com adzrc.com pwieu.com stvkr.com yajgm.com rmvin.com	11 years

jejjn.com svuhl.com jlhaz.com eusyh.com uygab.com aqofl.com hiqcb.com xxhzi.com djxdi.com dmneh.comoenyl.com ljovi.com khpeo.com ihxsa.compqype.com jbvdo.com bowtk.com auihf.com xrxhx.com agqrz.com pczxt.com gameleads.ru ytthn.com mtfmi.com hskwq.com cityviplink.com cityadspix.com.br ghbps.com cityads.mobi

height	The value of the cookie is the width of the client's screen.	tdqqx.com nfemo.com jbojx.com deqph.com blkri.com elcjj.com rfhhd.com qdufr.com ayzvd.com bvsog.com qbrfe.com tuhzc.com kfbif.com uwxtp.com gbupl.com umllb.com adzrc.com pwieu.com stvkr.com yajgm.com rmvin.com jejjn.com svuhl.com jlhaz.com	11 years
		eusyh.com uygab.com	
		aqofl.com hiqcb.com xxhzi.com djxdi.com dmneh.com oenyl.com ljovi.com khpeo.com ihxsa.com pqype.com jbvdo.com	

		dmneh.com
		oenyl.com
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		pqype.com
		jbvdo.com
		bowtk.com
		auihf.com
		xrxhx.com
		agqrz.com
		pczxt.com
		gameleads.ru
		ytthn.com
		mtfmi.com
		hskwq.com
		cityviplink.com
		cityadspix.com.br
		ghbps.com
		cityads.mobi
Third-party cookies		
JSESSIONID	Session for NewRelic	.nr-data.net

_ym***	Yandex Metrica	.cityads.com
_g***	Google Analytics	.cityads.com
Yabs-sid	Yandex Metrica	mc.yandex.ru
ур	Yandex Metrica	.ymetrica1.com
I	Yandex Metrica	.yandex.ru

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