CITYADS PRIVACY POLICY

Version 25.05.2018

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. GDPR AND OTHER PERSONAL DATA REGULATIONS

We are GDPR friendly and constantly work to be GDPR compliant so that our website users have proper control on their personal data.

You may find official GDPR text in all official languages at http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.119.01.0001.01.ENG&toc=OJ:L:2016:119:TOC

In case you do not fall within GDPR regulations, we will use its best practices and irrespective whether you fall within GDPR regulation or not in any case will collect and process your personal data in accordance with the laws applicable to the relevant CityAds Group company.

We are stick to observe all major rights the personal data subject has under GDPR, namely:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

The above list is given in accordance with GDPR and relates to you if you are resident in the European Economic Area, but residents of other jurisdictions may also have similar rights to the above.

Some of your requests in regard to the foregoing rights may require that you provide us with some additional information so that we could properly identify you and verify your identity before we procced with your request. In any case we would respond you and let you know what we can need from you and our further decision.

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 DGPR 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.QQ, 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 DGPR 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.QQ, 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 EU 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 Contacts list 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 safe environment. For EU persons we store personal information within EU. We have expertise in data protection as explained below.

Cookies are stored for the time as stated in Annex 1. Publisher and advertiser personal data shall be stored for 5 years after termination of the relevant contract for CityAds accountability purposes.

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 end of cooperation with CityAds as cooperation is impossible without provision of the information as stated in this Policy

10. CONTACT US. DATA PROTECTION OFFICER

We have Data Protection Officer for GDPR purposes, you may find his contacts here.

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	firano.ru	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
xcntID	Hash of identificator of user profile	.cnt.my	1 year
xcntU	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

xcntUt	Cookie for bots test	.cnt.my	1 day
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 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	1 year
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 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	
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.	tdqqx.com nfemo.com jbojx.com deqph.com blkri.com elcjj.com rfhhd.com qdufr.com	30 days

		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	
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

		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	
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	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	1 minute

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sc	Set if there is a get parameter trc. It stores prx (some hard-coded string containing various data).	cityadsclick.com cityadslink.com cityadspix.com mcityadslink.com cityadstrack.com cityadstrc.com"	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

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		svuhl.com	
		jlhaz.com	
		eusyh.com	
		uygab.com	
		aqofl.com	
		hiqcb.com	
		xxhzi.com	
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		oenyl.com	
		ljovi.com	
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		pqype.com	
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		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	
widht	The value of the cookie is the width of the client's screen.	tdqqx.com	11 years
		nfemo.com	
		jbojx.com	
		deqph.com	
		blkri.com	
		elcjj.com	
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		qdufr.com	
		ayzvd.com	
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		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	
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 eusyh.com uygab.com	11 years

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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	
yp	Yandex Metrica	.ymetrica1.com	
I	Yandex Metrica	.yandex.ru	