

Rise Code Ltd. Partner Ad Services Privacy Policy

Rise Code Ltd. (“Company,” “we,” “us,” or “our”) provides this privacy policy to describe how we collect, use, and share the information related to the partner ad services provided by us, including the video ad player offered for websites (the “Service”). This privacy policy does not govern Company’s other practices.

Please note that if you want to exercise any of your rights under this privacy policy or applicable law, we may need to request additional information from you to verify your identity or process your request, and to make sure we are not disclosing you any personal information related to others. Such additional information will be held by us for legal purposes (e.g., as proof that we did identify the person who sent us the request).

Information We Collect

We collect information about a device through the publisher’s website that uses the Service. Specifically, we collect

- a. cookie identifiers,
- b. IP address,
- c. general technical information about the browser and operating systems,
- d. time zone and the country from which a request is sent (based on the request IP address),
- e. the name of the website from which an ad is served, and

f. interactions with the ads shown through the Service, such as an indication of whether an ad was viewed or clicked on.

We may also collect information about a device from our advertising partners, such as a cookie identifier that may be associated with you and the total amount of revenues received as a result of advertising served to a specific cookie identifier.

How We Use the Information We Collect

We may use information about you for any lawful purpose, including the following business and commercial purposes:

- o To operate and improve our Service, including to enable the delivery of ads;
- o To maintain the security of our Service, including to detect and protect against security incidents, fraud, and illegal activity;
- o For legal compliance;
- o To resolve any dispute we may have with you or third parties, protect Companys rights, and to enforce our agreements with third parties; or
- o As otherwise disclosed at the time information is collected.

How We Share the Information We Collect

We may share the information we collect with other parties, including the following:

- o With advertising and marketing customers and partners for the purposes of receiving, or delivering, ads from such customers and partners, as well as for attribution purposes. The list of such third parties can be found here <https://risecodes.com/buyers.pdf>
- o With our affiliates; or

- o With our service providers for purposes such as analytics, reporting, and storage.

We may also share information with other parties in certain circumstances, including the following:

- o As part of a corporate sale, merger, or acquisition, or other transfer of all or part of our assets, including as part of a bankruptcy proceeding;
- o Pursuant to a subpoena, court order, governmental inquiry, or other legal process or as otherwise required by law or to protect our rights or the rights of third parties; or
- o With your consent.

We may share information that has been de-identified or aggregated without limitation.

Your Choices

Company's Service allows websites, apps, and other online properties to show video ads to their users. In connection with the Service, we may collect information across these nonaffiliated properties over time. While our partners and customers may engage in interest-based advertising, Company itself does not conduct interest-based advertising through the Service. Interest-based advertising is advertising that is tailored to be more relevant to you based on your Web browsing and/or app usage history across nonaffiliated properties over time.

You may wish to visit the Digital Advertising Alliance ("DAA") Webchoices tool at www.aboutads.info to learn more about this type of advertising and how to opt out of this advertising on websites by companies participating in the DAA self-regulatory program. If you delete your cookies or use a different browser or mobile device, you may need to renew your opt-out choices exercised through the DAA Webchoices tool. Note that

electing to opt out will not stop advertising from appearing in your browser or applications. It may make the ads you see less relevant to your interests.

Your browser may offer tools to limit the use of cookies or to delete cookies; however, if you use these tools, the websites you visit may not function as intended.

Third-Party Links

Advertisements delivered by our partners through the Service may link to third-party websites or mobile apps. Please be advised that we are not responsible for the privacy practices of such other websites or mobile apps and note that the privacy practices of such third parties are not covered by this privacy policy. We encourage you to review the privacy policies of other websites or apps that you use to learn about their privacy practices.

Data Retention

We will process and store information only for the period necessary to achieve the purpose of the storage, or as permitted by law. The criteria used to determine the period of storage of information is the respective statutory retention period. After expiration of that period, the corresponding information is routinely deleted, as long as it is no longer necessary for the fulfillment of a contract or the initiation of a contract.

International Privacy Rights

This section contains certain disclosures required by the EU General Data Protection Regulation (“GDPR”) and applies only to “personal data,” as defined by the GDPR, associated with individuals who we deem to be located in the European Economic Area, United Kingdom, or Switzerland.

Purpose and Basis of Processing – If we serve, or share information with advertising partners that use such information for serving personalized ads, we will process personal data for such purpose with your consent. On other occasions, we may process personal data where necessary to fulfill a contract or where required to do this by law. We may also process personal data when it is in our legitimate interests to do this, such as operating our Service and conducting research. We do so when our legitimate interests are not overridden by your data protection rights.

International Transfers – Please be aware that the personal data we collect may be transferred to and maintained on servers or databases located outside your state, province, country, or other jurisdiction, where the privacy laws may not be as protective as those in your location. If you are located in the European Economic Area, the United Kingdom, or Switzerland, we will transfer your information to the United States to our partners based on EU standard contractual clauses (“Model Contracts”) for transfers of personal data. If you wish to receive a copy of these clauses, please contact us at rise-engage-privacy@risecodes.com.

Data Subject Rights – Please note that you have the following rights, subject to certain exceptions and limitations:

- o The right to request access to the personal data we hold about you;
- o The right to request that we rectify or erase your personal data;
- o The right to request that we restrict or block the processing of your personal data;
- o Under certain circumstances, the right to data portability; and
- o Where we previously obtained your consent, the right to withdraw consent to processing your personal data.

To submit a request for exercising your rights, please send an email with your request to the following address: rise-engage-privacy@risecodes.com. Please note that we will process your request subject to verification of your identity. Please also be aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.

Complaint to Supervisory Authority – You also have the right to file a complaint with the relevant supervisory authority (e.g. of your country or domicile) where Company has not addressed your concerns.

California Privacy Rights

This section contains disclosures required by the California Consumer Privacy Act (“CCPA”) and applies only to “personal information” that is subject to the CCPA.

In many cases, we act as a service provider to collect personal information from, or on behalf of, customers who use our Service. These customers have their own privacy policies that describe how they use information. To the extent that we are processing personal information subject to the CCPA on behalf of a customer in our role as a service provider, you should reach out to that customer directly to exercise your rights under the CCPA.

The remainder of this section provides disclosures for cases where we process personal information about you and are not acting as a service provider to a customer.

Personal information We Collect, Disclose for a Business Purpose, and Sell – In the preceding 12 months, we collected the categories of personal information about California consumers identified in the chart below.

Categories of Personal Information	Disclosed for business purposes to the following categories of third parties:	Sold to the following categories of third parties:
Personal and online identifiers (such as first and last name, email address, or unique online identifiers)	All categories listed below.	All categories listed below.
Internet or other electronic network activity information (such as browsing history, search history, interactions with a website, email, application, or advertisement)	All categories listed below.	All categories listed below.
Geolocation information (at a general level, such as city and state)	All categories listed below.	All categories listed below.
Other information about you that is linked to the personal information above	All categories listed below.	All categories listed below.

Categories of Sources – We collect personal information from the following categories of sources:

- o Consumers;
- o Publishers;
- o Advertisers;
- o Advertising servers;
- o Analytics providers; and
- o Service providers.

Why We Collect, Use, and Share California Information – We use and disclose the personal information we collect for our commercial and business purposes, as further

described in the “How We Use the Information We Collect” and the “How We Share Your Information” sections of this privacy policy above.

Recipients of California Information – We may sell personal information to the following categories of third parties:

- o Advertising/marketing companies;
- o Publishers;
- o Advertising servers; and
- o Attribution companies.

We disclose the categories of personal information listed above to the categories of third parties listed below for business purposes:

- o Advertising/marketing partners;
- o Publishers;
- o Advertising servers;
- o Attribution companies; and
- o Service providers.

Your Rights Regarding Personal Information – California residents have certain rights with respect to the personal information collected by businesses. If you are a California resident, you may exercise the following rights regarding your personal information, subject to certain exceptions and limitations:

- o The **right to know** the categories and specific pieces of personal information we use, disclose, collect, and sell about you, the categories of sources from which we collected your personal information, our purposes for collecting or selling your personal information, the categories of your personal information that we have either disclosed or sold for a

business purpose, and the categories of third parties with whom we have shared such personal information;

- o The **right to request that we delete** the personal information we have collected from you.

- o The **right to opt out of our sale(s)** of personal information about you. Please note that if you opt out of certain types of sales, we will be unable to provide you with the services that rely on such sales.

- o The **right not to receive discriminatory treatment** for the exercise of the privacy rights conferred by the CCPA.

To exercise any of the above rights, please contact us by sending an email to rise-engage-privacy@risecodes.com.

Verification Process and Required Information – Note that we may need to request additional information from you to verify your identity or process your request, although you will not be required to create an account with us to submit a request or have it fulfilled. We will require you to provide, at a minimum, your name and email address.

Authorized Agent – You may designate an authorized agent to make a CCPA request on your behalf by verifying your identity and providing the agent with written permission to make the request on your behalf.

Minors' Right to Opt In – We do not have actual knowledge that we sell the personal information of minors under 16 years of age.

Changes to Our Privacy Policy

We may revise this privacy policy from time to time. If our information practices change materially, we will post these changes to the policy on this page. We encourage you to visit this page periodically to learn of any updates.