

PRIVACY POLICY

At Mobsuccess, the protection of your personal data is a priority.

When browsing our websites

- <https://www.mobsuccess.com>
- <https://widely.mobsuccess.com>
- <https://farly.mobsuccess.com>
- <https://story.mobsuccess.com> (the "Websites")

or when exposed to our technology suite for the purchase of advertising space and the dissemination of advertising campaigns, we may collect your personal data.

The purpose of this policy is to inform you about how we process this data in accordance with Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "GDPR") and French Data Protection Law No. 78-17 of 6 January 1978 (together the "**Applicable Regulations**").

We use the legal basis of legitimate interest for some of our processing. You can find the **Legitimate interests assessment** by [clicking here](#).

1. Who is the data controller?

When you are exposed to our technology suite for the purchase of advertising space and the dissemination of advertising campaigns,

- Mobsuccess, a French simplified joint-stock company (SAS), registered with the Paris Trade and Companies Register under number 809 891 583, having its registered office at 25 rue du 4 Septembre, 75002 Paris ("**Mobsuccess**" or "**We**") and
- Vectaury, a single-member simplified joint-stock company, registered with the Paris Trade and Companies Register under number 799 256 730 having its registered office at 42, rue de Maubeuge, 75009 Paris ("**Vectaury**") act as joint controllers alongside
- our **client**, the company that wishes its advertising to be disseminated (the "**Advertiser**").

In practice, this means that we determine together the terms of the processing of your personal data in the context of these advertising campaigns. However, Mobsuccess remains your point of contact for any request relating to your data as well as for any request to exercise your rights (see below).

2. Data Protection Officer

We have appointed a Data Protection Officer (DPO), whose contact details are as follows:

Ms Viktorija Jankovskaja
Mobsuccess, 25 rue du 4 Septembre – 75002 Paris, France
dpo@mobsuccess.com

3. Collection of personal data

Personal data is data that makes it possible to identify an individual directly or by cross-checking with other data.

According to our various services, you will find below, on what legal basis, for what purposes and for how long we retain your personal data.

- **Advertising on applications**

As part of this processing, Internet users are exposed to advertisements when browsing on mobile applications. Advertisements may or may not be personalised, depending on the consent given via the mobile application. Advertisements may be incentivised, i.e. the Internet user exposed to the advertisement may receive a reward for watching the message in its entirety, answering a question or clicking on the advertising message.

In order to deliver these advertisements, we may either use mobile application broadcasters directly, or go through intermediaries that are themselves linked to broadcasters. These broadcasters and intermediaries then act as data processors of Mobsuccess when they collect your data.

As part of this data processing, the recipients of the data are: the Advertiser, the broadcasters /intermediaries and, where applicable, the Advertiser's Mobile Measurement Partner ("**MMP**").

Purposes	Legal bases
Dissemination of advertising (personalised or not)	Your consent
Measuring the performance of the advertising	
Checking the frequency of dissemination of advertising to the same user: the goal is not to expose the user to the same advertisement	
Defining the order in which the advertisements are displayed to a user	
Retargeted advertising (we record the fact that an Internet user has been interested in an advertisement in order to offer them similar advertisements)	
Crediting the Internet user according to the action taken (in the case of incentivised advertising)	Our legitimate interest
Remunerating broadcasters or broadcasting intermediaries (the media on which the advertisement is seen by the Internet user)	

Prevent and detect fraud: we pay attention not to credit an Internet user who has not respected the rules of incentivised advertising		
Processing complaints in the context of incentivized advertising (for example user claims that they did not receive the reward)		
Data processed	Retention period	
IP address	30 days from receipt for Internet users who have not converted (those who have not completed the action requested to benefit from the offer) 2 years from receipt for Internet users who have converted (completion of the requested action)	
MAID (Mobile Advertising ID)		
Browser features		
Actions relating to the advertising offer	2 years from data collection	
Data collected in the context of a complaint (name, user ID, offer ID, offer name, email address, country, name of the original website, terminal used, click date, information relating to claim)		
Age	Deletion as soon as the advertisement has been selected	
Sex/Gender (Male or Female)		
Geolocation		

- **Advertising via a Real Time Bidding (RTB) system**

As part of this processing, we use the programmatic advertising system known as "[RTB](#)" to deliver the advertisements of our Advertiser.

In this context, when an Internet user browses the internet and advertising space is available, we receive a call for tenders from the publisher who owns this available space ("**Bid Request**"). The Bid Request is accompanied by information about the Internet user (in particular if they have given their consent to be exposed to personalised advertising, see Article "How do we obtain the consent of data subjects?"). Based on this information, we choose whether to bid or not. If the bid is won, the advertisement of our Advertiser is displayed.

As part of this processing, the recipients of the data are: the Advertiser, the broadcasters (data processors in charge of data collection), the performance measurement providers (ADSQUARE, KAIROS) and the MMP.

Purposes	Legal bases
Determining if the Internet user matches an advertiser's target and bidding	Your consent
Measuring the performance of the advertising	
Creating a geolocated profile of the Internet user	
Checking the frequency of the delivering of advertising to the same user: the goal is not to expose the user to the same advertisement	
Defining the order in which the advertisements are displayed to a user	
Retargeted advertising (we record the fact that an Internet user has been interested in an advertisement in order to offer them similar advertisements)	
Prevent and detect fraud and debugging	Our legitimate interest

Data processed	Retention period
IP address	4 days from the Bid Request If an advertisement is displayed: 60 days from collection in active database and 90 days in archives
Browser features (in particular location data, internet service provider data)	
MAID	4 days from the Bid Request If an advertisement is displayed: 60 days from collection in active database and 90 days in archives If the advertiser indicates that he wants to do retargeted advertising : the data may be retained for up to 6 months and will in any case be retained for 90 days in archives

Actions related to the advertisement (for example: clicking on it)	By default: 30 days from the action If the advertiser indicates that he wants to do retargeted advertising : the data may be retained for up to 6 months and will in any case be retained for 90 days in archives
Geolocation (precise geolocation under 500m)	4 days from the Bid Request 60 days from collection after the display of the advertisement and 90 days in archives
Consent string (this data tells us if you have given your consent, see Article "How do we obtain consent from data subjects?")	4 days from the Bid Request 60 days from collection after the display of the advertisement and 90 days in archives

- **Profiling & Segmentation**

This processing consists of the creation of user profiles in order to best personalise the advertising according to the information collected on the user. Profiling is carried out using data from Bid Requests as well as data that we purchase from partners (Singlespot and Madvertise).

We also create audience segments, i.e. groups of people that have similar characteristics. Data about you may be used to determine which segment you belong to and to enable us to deliver tailored advertising to each segment.

We can also use a segmentation provider (Adsquare).

Purposes	Legal bases
Profiling	Your consent
Checking whether the Internet user corresponds to a set audience segment: Mobsuccess identifies whether the Internet user corresponds to a previously determined audience segment, in order, where appropriate, to deliver to them an advertisement tailored to their profile.	
Optimising campaigns	

Data processed	Retention period
MAID	1 year from collection
Information on the audience segment	
Mobile application / website visited	
Timestamp	
Geolocation	
Features of the phone / browser	

- **Dissemination of campaigns via advertising agencies**

As part of this processing, Mobsuccess uses third-party advertising agencies : Facebook, Google (which includes advertisements on Youtube and Waze) and TikTok to deliver advertising campaigns.

The recipients of the data are: the Advertiser, the advertising agencies (Facebook, Google, TikTok), as well as the performance measurement providers (integrated into the advertising agencies).

Purposes	Legal bases
Delivering personalised advertising	Your consent
Measuring the performance of the advertising	
Retargeted advertising (we record the fact that an Internet user has been interested in an advertisement in order to offer them similar advertisements)	

As part of this processing, we do not retain any personal data. The processing is carried out directly on the media of the advertising agencies.

- **Performance measurement**

As part of this processing, we use service providers (Kairos and Adsquare) as well as advertising agencies (Facebook, Google, TikTok), in order to measure the effectiveness of advertisements intended to encourage Internet users to go to the store (drive-to-store). The service providers will therefore make it possible to identify Internet users exposed to the advertising and who have visited the store or the identified points of sale and to derive performance statistics from this.

The purpose of this processing is therefore to measure the performance of advertising campaigns and the legal basis is the consent of the users concerned.

The recipients of the data are the Advertisers, the advertising agencies (Facebook, Google, TikTok), as well as our performance measurement partners (Kairos and Adsquare).

Data processed	Retention period
MAID exposed to the advertising campaign carried out by Mobsuccess, identified within the defined scope	Processing related to ADSQUARE: The data are stored by Mobsuccess for 60 days from their collection in active database. The data are then retained for a maximum of 90 days in archives. Processing related to KAIROS: the data are retained for the time necessary for the preparation of the statistical report sent to Mobsuccess.
MAID exposed to the advertising campaign carried out by Mobsuccess	Processing related to ADSQUARE: The data are stored by Mobsuccess for 60 days from their collection in active database. The data are then retained for a maximum of 90 days in archives.
MAIDs identified in the defined scope	Processing relating to KAIROS: the data are retained for the time required to recognize the MAIDs identified within the defined scope and having been exposed to the advertising campaign. Time required for downloading data on advertising agencies (Facebook or Google depending on the case).
Name of the clusters (only KAIROS)	Processing related to KAIROS: the data are retained for the time required to recognize the MAIDs identified in the defined perimeter and having been exposed to the advertising campaign.

- **Market intelligence**

As part of this processing, we analyse our clients' market using several criteria. In particular, we analyse the competition, draw up catchment area statistics, and measure location-based performance. Our goal here is to help our clients get a better perception of the market in which they operate. To do this, we purchase data from our partner Singlespot.

Purposes	Legal bases
Offering market analyses to clients enabling them to have a better understanding of local markets and to adapt their commercial and/or advertising strategy	Your consent
Optimising campaigns	

Data processed	Retention period
Geolocation	1 year from collection
Home and workplace GPS coordinates	
Data relating to consent	
Data relating to visits to points of interest (location of the visit, date and time of the visit, duration, accuracy, data relating to the establishment visited, driver's ID)	
MAID	
Features of the phone / browser	
Profile data	

We do not send any personal data to our clients, only aggregated data in the form of statistics.

- **Managing our Websites**

This processing corresponds to the personal data collected on the Websites of Mobsuccess and its commercial brands Widely and Farly on which we present our services and our business.

Purpose	Legal bases
Creation and management of user access	Execution of the contract signed with our clients or pre-contractual measures taken at their request
Drawing up statistics (browsing, the audience of the Websites) and improving the Site's features through the deposit of audience measurement cookies	Your consent
Measure the performance of our advertising campaigns	Your consent
Drawing up a Lead file	Our legitimate interest to develop our business activity
Sending newsletters, canvassing and promotional messages by email	Our legitimate interest in retaining and informing our customers and prospects of our latest news
Responding to your requests for information	Our legitimate interest in responding to your requests
Managing requests to exercise rights	Our legitimate interest in responding to and following up on your requests
Collect feedback from our clients	Our legitimate interest in collecting feedback from our clients to improve our services
Produce error reports and keep logs	Our legitimate interest in improving our services

Data processed	Retention period
Browsing data (IP address, pages viewed, date and time of connection, browser used, operating system, user ID, MAID)	Data from cookies and trackers on our websites : 2 years. Data concerning prospects : 3 years from the last

Identification data (surname, first name, email and postal address, telephone number)	contact with them (for example, a click in a newsletter).
Any information you wish to send us as part of your contact request.	

4. How do we obtain the consent of data subjects?

Mobsuccess is registered with the IAB Europe as a "Vendor" and participates in TCF v.2.2 (Transparency & Consent Framework) in order to obtain the consent of Internet users on the various media used to deliver advertising campaigns via consent collection banners.

Consent is given in the form of a character string in the format defined by the IAB called "consent string". We only process the personal data of Internet users who have consented to the purposes relevant to the processing carried out.

Mobsuccess thus ensures that it complies with its IAB Europe specifications and policies. The Mobsuccess identification number in this context is 663.

As part of the processing related to the dissemination of advertisements on applications and RTB, Mobsuccess relies on the legal basis of legitimate interest for the following purposes:

- Crediting the Internet user according to the action taken;
- Crediting the broadcaster or the broadcasting intermediary;
- Combating fraud and debugging.

The legitimate interests pursued by Mobsuccess are therefore those of (i) being able to carry out its activity and (ii) securing its activity and the services it offers to its clients. These interests are lawful, necessary and do not conflict with the reasonable expectations of the data subjects. Mobsuccess complies with IAB Europe's policies and for more intrusive purposes (such as targeted advertising), we chose consent as the legal basis. Mobsuccess has also taken care to document the legitimate interests pursued.

5. Hosting

Your data are stored on the servers of the following companies:

- OVH, 2 rue Kellermann - 59100 Roubaix - France
- Amazon Web Services, P.O. Box 81226, Seattle, WA, USA 98108-1226

In both cases, we have selected servers located in the European Union, in France and Germany.

6. Transfer outside the European Union

As part of our activity, your data may be transferred to processors or partners located outside the European Union. The transfer of your data in this context is secured in the following way:

either the data are transferred to a country or to a company that has been the subject of an adequacy decision by the European Commission, in accordance with Article 45 of the GDPR: in this case, the recipient of the data ensures a level of protection deemed sufficient and adequate under the provisions of the GDPR; or the data are transferred to a country or company whose level of data protection has not been recognised as adequate under the GDPR: in this case, these transfers

are based on appropriate guarantees set out in Article 46 of the GDPR, adapted to each service provider, including but not limited to the conclusion of standard contractual clauses approved by the European Commission, the application of binding corporate rules or under an approved certification mechanism; or the data are transferred on the basis of one of the appropriate guarantees described in Chapter V of the GDPR.

7. What are your rights guaranteed by the GDPR?

You have the following rights over your personal data:

- **Right to information:** this is the very purpose of this privacy policy. You have the right to be informed about how your personal data are processed. This right is provided for in Articles 13 and 14 of the GDPR.
- **Right of access:** you have the right to access all your personal data at any time, pursuant to Article 15 of the GDPR.
- **Right of rectification:** you have the right to rectify your inaccurate, incomplete or obsolete personal data at any time in accordance with Article 16 of the GDPR.
- **Right to restriction:** you have the right to obtain the restriction of the processing of your personal data in certain cases defined in Article 18 of the GDPR.
- **Right to erasure:** you have the right to demand that your personal data be erased, and to prohibit any future collection on the grounds set out in Article 17 of the GDPR.
- **Right to lodge a complaint with a competent supervisory authority** (in France, the CNIL), if you consider that the processing of your personal data constitutes a violation of the applicable laws, in accordance with Article 77 of the GDPR.
- **Right to set guidelines relating to the storage, erasure and communication of your personal data after your death.**
- **Right to withdraw your consent at any time:** for purposes based on consent, Article 7 of the GDPR states that you may withdraw your consent at any time. This withdrawal will not call into question the legality of the processing carried out before the withdrawal.
- **Right to portability:** under certain conditions specified in Article 20 of the GDPR, you have the right to receive the personal data you have provided to us in a standard machine-readable format and to require their transfer to the recipient of your choice.
- **Right to object:** under Article 21 of the GDPR, you have the right to object to the processing of your personal data. Note, however, that we continue to process them despite this objection, for legitimate reasons or the defence of legal claims.

You can exercise these rights by writing to our DPO at the contact details mentioned in Article 2 of this policy. We may ask you to provide us with additional information or documents to prove your identity.

8. Cookies

For more information on cookies, we refer you to our Cookie Policy.

9. Advertising ID

The personal data we collect are linked to the advertising identifier (MAID).
Each mobile phone has its own advertising identifier that allows advertisers to deliver targeted advertising.

Android and Apple allow mobile users, in the settings, to control their privacy which makes it impossible to link their advertising history to their future browsing activity. You can deactivate and reset your advertising identifier at any time if you no longer wish to receive targeted advertising:

On iOS: go to "Settings", then to "Privacy and security", then to "Tracking" then disable "Allow app tracking requests". Only applications authorised to follow you will be able to access your advertising identifier;
On Android: Go to "Google Settings" (or "Settings" then "Google"), then "Ads".

You will probably receive the same number of advertisements but they will be less relevant.

Instructions for limiting advertisement tracking on iOS: <https://support.apple.com/fr-fr/HT205223>

Instructions for disabling targeted advertising on Android:
<https://support.google.com/ads/answer/2662922?hl=fr>

10. Changes

We reserve the right to amend this charter, in whole or in part, at any time. These amendments will enter into force from the publication of the new charter. Your use of the Solution following the entry into force of these amendments will constitute recognition and acceptance of the new charter. You are therefore requested to regularly review the latest version of this policy. Nevertheless, we will keep you informed of any significant changes to this privacy policy.

11. Entry into force

This charter will enter into force on 01st of November 2023.

It was updated on 13th of March 2024.

Appendix – Cookie Policy

1. What is a Cookie ?

During your browsing on the internet (desktop or mobile), cookies, pixels and other tracers (hereinafter collectively referred to as "Cookies") are placed on your browser or your terminal.

Cookies are often encrypted small lines of text that are stored in your web browser. They are created when a user's browser is loading one website: this website sends information to the browser which creates a text file. Each time the user is visiting this website, the browser retrieves this file and sends it to the website's server. Thus, each time you visit the site or application, the browser is recognized.

The deposit of these Cookies is likely to allow us to access your navigation data and / or personal data concerning you.

2. Types of Cookies

Technical and functional Cookies

Technical and functional Cookies (Cookies that are strictly necessary) are Cookies needed for the proper performance of our websites, in order to facilitate your browsing and to carry out some of the functions.

For example, a technical Cookie can be used to check the quality of traffic and to ensure that it is not generated by a robot.

We use the following technical and functional Cookies:

Name | Function | Storage period

- CRAFT_CSRF_TOKEN functional 18 minutes (session duration)
- PHPSESSID functional 18 minutes (session duration)
- tarteaucitron technical (keep your choices regarding third-party cookies) 1 year
- email technical (remember your connection to our platform) 1 year
- password technical (remember your connection to our platform) 1 year
- log technical (check the traffic quality, detect fraud) 1 year

For our DLPO product (e-catalogue displayed on the ads), the following cookies are placed on our landing pages, however these cookies are located on the domain of our service provider and we therefore do not have access to them at Mobsuccess :

- favoritedPages: these are the pages that are added to the user's selection if the functionality is activated
- JSESSIONID: a mandatory session identifier
- __cf_bm: a technical cookie from cloudflare

Other Cookies

- **Advertising Cookies**

Advertising Cookies can be created not only by the website users are visiting, but also by other websites or applications which provide advertisements, announcements, widgets or any other element on the displayed page.

These Cookies can in particular be used to personalize and measure the performance of advertising or to carry out advertising targeting.

- **Social network Cookies**

Social network Cookies may be created by social networks for purposes of enabling web designers to share their website content on said networks. These Cookies may be used by social platforms for purposes of tracking net surfers' visit on the relevant website, whether they use or not these Cookies.

These Cookies allow users, for example, to share content from the websites concerned, their opinion or their use of these sites by clicking on links such as "like" and "share". These Cookies can also be used to track user navigation.

Furthermore, we invite you to check the privacy policies of the social networks that created these Cookies, in order to be acquainted of the purposes for which they use the browsing information they collect through these Cookies, as well as of the procedures for exercising your rights with these networks.

- **Analytical Cookies**

Analytical Cookies allow us to measure the number of visits, the number of page views and user activity. If necessary, they can collect your IP address to determine the city from which you are connecting. Analytical Cookies allow us to generate traffic and navigation statistics in order to improve our performance. These Cookies also identify navigation problems and ultimately resolve them.

We can use advertising, social network or analytical Cookies. You will be informed of this on your first visit to the web page using these Cookies. You will then be invited to accept or refuse them in accordance with the procedures described below.

3. Your Cookie preferences

- **Cookies that can be placed without consent**

Some Cookies do not require your consent, such as technical and functional Cookies which are strictly necessary for the operation of our Solution.

- **Accepting or refusing Cookies subject to your express consent**

All other Cookies require your consent. These are advertising, social network or analytical Cookies. You can freely choose to accept or refuse the use of these Cookies.

You can accept these Cookies, refuse them and, depending on the sites and applications, modify your preferences at any time while browsing by clicking on the link provided for this purpose.

- **Configuration of your browser**

It is also possible to configure your browser to accept or refuse certain Cookies. Each browser offers different configuration methods, some examples:

- Internet Explorer: go to the "Settings" menu, then "Internet Option". Click on "Confidentiality" then on "Advanced confidentiality settings";
- Chrome: go to the "Settings" menu then click on "Advanced Settings", then "Confidentiality and Security". Finally click on "Sites settings" and "Cookies and site data";
- Safari: go to the "Settings" application then go to Safari. Click the "Privacy and Security" tab. You can now choose to block all Cookies;
- iOS: go to the "Settings" menu, then "Safari", click on "Cookies". You can now choose to block all Cookies;
- Android: go to "Chrome", click on the three vertical dots " ... " at the top right of the screen, then "site setting" and then "Cookies". You can now choose to accept or block Cookies.