

PRIVACY POLICY

Effective Date: 29.06.2026

AD MARKET LIMITED, a company incorporated in Cyprus, and ADMEDIA LLC FZ, a company incorporated in the United Arab Emirates (together referred to as “Adsterra”, the “Company”, “we”, “us”, “our”, etc.), provide online advertising services and are committed to compliance with applicable data protection laws, including the General Data Protection Regulation (“GDPR”) enacted by the European Union.

This Privacy Policy explains how we collect and process personal information in connection with the services we provide to advertisers and publishers (“You”, “Your”, “Customer”, etc.). It also describes the data protection practices applicable to www.adsterra.com (the “Website” or the “Platform”).

Key Definitions

“Data Subject” refers to the individual whose personal information is being handled and processed.

“Personal Data” refers to any information that is linked to a real, recognizable person. This could encompass details like names, addresses, phone numbers, email addresses, and more. However, it's not limited to just those pieces of information – it also covers any other data associated with that person or a combination of data that, when combined, can be used to identify the person. Personal Data might also encompass other types of data collected through technology, including Technical Data, log files, and cookies.

"Non-Personal Data" refers to information that we collect for internal system-related and statistical reasons. This information cannot be linked directly to you. It includes details like the name of the file you accessed, when you accessed it, how much data was transferred, whether the access was successful, and what web browser and domain you used.

We will not make public any data that reveals who you are. However, we might use the data we gather in a way that does not identify you, particularly for statistical analyses. We might also remove any personal information you have given us so that it is not connected to you anymore.

"Processing": refers to all the actions an organization takes relating to the use of personal data, from its collection through to its storage and disposal, and everything in between.

"Special Category Data" refers to sensitive personal information. This includes details about your race or ethnicity, sexual orientation, political views, religious or philosophical beliefs, membership in trade unions, genetic or biometric information, and health data. Also, personal data about health or criminal records or offenses falls into this category, unless consented or permitted by EU or national law. In general, we won't ask you for this kind of information unless you explicitly consent or there's significant public interest, as outlined by EU or national laws, which requires such processing.

How do we collect personal data and for what purposes?

Adsterra collects Personal Data when the customer signs up on the Website and at any subsequent stage of our business relationship when relevant data are provided to us or at the point of enquiry, by filling in and submitting web-based enquiry forms, during telephone or face-to-face communications with us, by email or by post.

Subsequently, you may enter into an agreement or contract with Adsterra, and where this is the case, Personal Data will be processed only as is necessary for the performance of that agreement or contract or in order to take steps at your request prior to entering into that contract or agreement. Following that, your Personal Data is kept on record during the time you're partnered with Adsterra and even after the partnership ends, unless you express your objection to this.

Once the relationship is terminated, your Personal Data will be processed solely to the effects of demonstrating compliance with the legal obligations of the Company or only as is necessary for the purposes of any legitimate interests pursued by Adsterra or by a third party (and in the latter case, if we are ordered to do so by a Court of competent jurisdiction or other Authority and only to such extent as those legitimate interests are not overridden by your interests or fundamental rights and freedoms).

We shall process your Personal Data for a variety of purposes. These include the following:

- To deliver services and facilities to you;
- To personalise the Website for you;
- To keep the Website secure and prevent fraud and to detect, prevent and investigate attacks on our Website;
- To improve and develop the Website and/or our services and products;
- To be able to compile usage statistics;
- To prepare reports;
- To administer any billing information;
- To communicate with you by post, phone, email or other electronic media, in order to provide you with relevant information and updates relating to our services;
- To fulfil and monitor our legal responsibilities and/or obligations, or as required to disclose such information by applicable law or by any government, judiciary, regulatory or similar authority or pursuant to any order of a court of competent jurisdiction;
- With your consent, to communicate with you for marketing and promotional purposes.

As a data subject, you have rights under applicable legislation to access, change/rectify, request deletion or restriction, object of processing, or requesting to receive or for us to transfer (port) your personal data free of costs at any time, according to the law in force and the present Privacy Policy. Further information on these rights is included within this Privacy Policy.

Adsterra collects and processes personal data needed for the provision of products & services. We may collect and process the following data about you, depending on your relationship with Adsterra:

- Identity Data includes first name, last name, username or similar identifier, date of birth.
- Contact Data includes billing address, delivery address, email address, social media (network) profiles, and telephone numbers.
- Financial Data includes bank account, other account and payment card details (where applicable).
- Transaction Data includes details about payments to and from you and other details of products/services/transactions you have purchased or obtained from us or from one of our business partners.
- Technical Data includes internet protocol (IP) address, your login data, details of advertisements, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website. This data also includes information about how you use our website, products and services, and navigate through the website, and may not necessarily comprise personal data. It may for example include information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, any phone number used to call our customer service number, and other information. More information on this is contained in our Cookies Policy available at <https://adsterra.com/cookies/>.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

With the exception of Technical Data and certain Transaction Data, most of the personal data collected is the information you give us by filling in forms on our Website or by corresponding with us by phone, e-mail or otherwise.

We may also collect personal data about you from information we receive from other sources. This may occur if you use any of the other websites we operate or the other services we provide. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We may notify you when we receive information about you from them and the purposes for which we intend to use that information.

If you fail to provide personal data: Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you, and we may not be able to provide our services. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Purposes of using your personal data

Notwithstanding any other provision contained in the present Privacy Policy, the Company complies with the following principles, when processing Personal Data:

- Lawfulness, transparency and fairness; This means that Personal Data shall be fairly processed in a lawful and transparent manner;
- Purpose Limitation; This means that Personal Data shall be collected for specified, explicit and legitimate purposes;
- Data Minimization; This means that Personal Data shall be adequate, relevant and limited to what is necessary;
- Accuracy; This means that we shall take every reasonable step to ensure that Personal Data are accurate and kept up to date;
- Storage limitation; This means that Personal Data shall be kept in a form which permits identification of data subjects for no longer than necessary; however personal data may be stored for longer periods insofar as the personal data will be processed solely for legal or archiving purposes, in the public interest, scientific or historical research or statistical purposes, but in such case, we shall take all appropriate technical and organizational measures to safeguard rights and freedoms of the data subject;
- Confidentiality and integrity; This means that we shall ensure appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage;

How we use your personal data

When visiting our website or for using our Services

We may collect and process personal data about you, for the creation and performance of contracts or agreements with you or while you use our website or services. This data may include Technical Data as described above.

This data may also be processed in order to deliver the content of our website or provide our services correctly, to optimize the content of our website to ensure the long-term viability of our information technology systems and website technology.

We also collect, use and share 'Aggregated Data' such as statistical or demographic data. Aggregated Data may be derived from your Personal Data but is not considered personal data in law provided it has been de-identified and anonymised. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. If we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data; such data will be processed in accordance with this Privacy Policy.

The legal bases for this processing may include the performance of a contract, legitimate interests, legal obligations, and, where applicable, your consent, depending on the specific processing activity involved.

Personal Data will be stored in accordance with the time limits of such cookies and how they are set to expire and will be deleted automatically afterwards (normally no more than one year), or de-identified for statistical purposes, and in this latter case shall be kept indefinitely.

In certain cases, some of the above data is collected using cookies, and includes data from which you cannot be identified. Such data will be retained in accordance with our Cookies Policy, which can be accessed via the following link <https://adsterra.com/cookies/>.

Verification and anti-fraud checks

We and other organizations may also access and use your personal data to conduct 'know your client' ("KYC") checks, credit checks and checks to prevent fraud, money laundering and terrorist financing ("AML/CFT"). If false or inaccurate information is provided or fraud or any other illegal act is identified or suspected, details may be passed to the relevant authorities including credit reference agencies and fraud prevention agencies. We will also record this. Law enforcement agencies may access and use this information. We, and other organizations that may access and use information recorded by such agencies, may do so from other countries.

The legal basis for this processing is your consent, our legitimate interests, the creation and performance of contracts and services and additionally, to meet our legal obligations derived from applicable Laws and European Directives.

Other uses of your personal data

We may process your data during the provision of our services or the performance of contracts between you and us, i.e. the legal basis is the performance of a contract.

We may also process any of your personal data where it is necessary to establish, exercise, or defend legal claims. The legal basis for this processing is our legitimate interests, including our legal obligation, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

In addition to the above, we may process your personal data where such processing is necessary in order for us to comply with a legal obligation to which we are subject. Subsequently, we may process your personal data if we are ordered to disclose certain information by a Court Order or the authorities of competent jurisdiction.

However, despite what was mentioned earlier, contact details might still be used for communication reasons, which can include email messaging like system emails and marketing emails.

Confidentiality and Security

Adsterra commits to taking all the necessary measures to prevent and secure the data that's collected and treated, preventing them from being damaged, destroyed or even stolen. However, we don't control every risk associated with internet usage, so there're always risks associated with the usage of internet and data sharing online.

No data transmission over the Internet or website can be guaranteed to be secure from intrusion; any transmission is at your own risk. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.

All information you provide to us is stored on our or our subcontractors' secure servers and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

Third parties' access

Your data may be transferred to third parties as described above or for compliance with legal obligations to which the Company is subject based on its activity, or as may be required in order to provide the services that those third parties were hired for. Providers with whom Adsterra has subscribed will need to enter into confidentiality and data processing agreements that are necessary and mandatory under any applicable privacy legislation. We may permit selected third parties such as business partners, suppliers, service providers, payment processors, agents and contractors who will be subject to obligations to process such information in compliance with the same safeguards that we deploy, to use your personal information.

To operate our promotional campaigns and related services, we may process your email address using third-party service providers, including but not limited to Selzy, Intercom, SendGrid, WordPress, Tilda, Framer and Salesmate. These service providers act as data processors and handle your personal data exclusively under Data Processing Agreements (DPAs) and in

compliance with applicable data protection laws. If you wish to review the DPA of a specific processor, please contact us at support@adsterra.com.

We may also use third party applications and software for the purposes of creation and maintenance of mailing lists, webform collection, and transmission of social media links. We are not responsible for the privacy practices and policies of such third-party service providers and you are strongly encouraged to review such policies in order to ensure you agree to the processing of your personal data by third parties in the manner described therein. We will, however, to such extent as reasonably possible, ensure that third parties we use keep your information secure and agree not to use it for their own direct marketing purposes.

In addition, we may transfer your personal information to a third party as part of a sale of some, or all, of our business and assets or as part of any business restructuring or reorganisation, or if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation. However, we will take steps to ensure that your privacy rights continue to be protected.

Finally, as described in the previous section, relevant authorities, including credit reference agencies and fraud prevention agencies may be given access to your personal data in connection with our relevant KYC and AML/CFT obligations.

Exports outside the EEA

Your personal information may be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside the European Economic Area (EEA) in which data protection laws may be of a lower standard than in the EEA. Regardless of location or whether the person is an employee or contractor we will impose the same data protection safeguards that we deploy inside the EEA.

Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections to EEA data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions. If we decide that, staff or suppliers in those countries which have not had these approvals, will have access

to your personal information, we will either ask for your consent to the transfer or transfer it subject to European Commission approved contractual terms that impose equivalent data protection obligations directly on the recipient unless we are permitted under applicable data protection law to make such transfers without such formalities.

The EEA includes all the EU Members States plus Norway, Iceland and Liechtenstein.

Existence of Automated Decision-making

We do not use automatic decision-making or profiling when processing personal data. This means decisions are not made by robots or computers, and therefore not 'automated'. However, certain third parties may use certain automated decision-making tools or software. We are not responsible for the privacy practices of others and will take reasonable steps to bring such automated decision-making to your attention, but you are encouraged to become familiar with the privacy practices of any third parties you enter into any agreements with.

Storage limits and retention

We will retain your personal information for as long as is necessary for the processing purpose(s) for which it was collected and any other permitted linked purpose (for example certain transaction details and correspondence may be retained until the time limit for claims in respect of the transaction has expired or in order to comply with regulatory requirements regarding the retention of such data). So, if information is used for two purposes we will retain it until the purpose with the latest period expires, but we will stop using it for the purpose with a shorter period one that period expires.

We restrict access to your personal information to those people who need to use it for the relevant purpose(s). Our retention periods are based on business needs and your information that is no longer needed is either irreversibly anonymized (and the anonymized information may be retained) or securely destroyed.

Cookies

Our Website uses cookies to distinguish you from other users of the Website. This helps us provide you with a good experience when you browse our Website and allows us to improve our Website. For detailed information on the cookies we use and the purposes for which we use them, please see our Cookies Policy available at <https://adsterra.com/cookies/>.

Changes to our Privacy Policy

We may change the content of our website or services without notice, and consequently our Privacy Policy (and/or Cookies Policy) may change at any time in the future. When we post changes to these policies, we shall revise the “Effective Date” at the top of the privacy policy and we will describe the changes in Change History Page. If there are material changes to the privacy policy, we will notify you either by posting a notice of such changes before they take effect or by directly sending you a notification. We, therefore, encourage you to review it from time to time to stay informed of how we are using personal information.

Any amended policy will be effective immediately after the date it is posted. If you do not agree to the revised policy, you should discontinue your use of the Website. In the event of material changes, we may request that you acknowledge the updated Privacy Policy and review the revised terms incorporated therein.

Any social media channels connected to the Website and third-party applications will be subject to the privacy and cookies policies and practices of the relevant platform providers which, unless otherwise indicated, are not affiliated or associated with us.

Your rights as a data subject

You have certain rights under applicable legislation, and in particular under the GDPR. We explain these below. You can find out more about the GDPR and your rights by accessing the [European Commission's website](#).

If you want to exercise any of the below rights or are dissatisfied with the way we have used your information, please contact us at: support@adsterra.com. We will seek to deal with your request without undue delay, but in any event according to the present Privacy Policy and the requirements of the GDPR. Note that we may keep a record of your communication to help us resolve any issues raised.

Requests are free of charge, unless manifestly unfounded or excessive, in which case we may charge a reasonable fee. Alternatively, we may refuse to comply with your request in these circumstances.

Requests will be processed within one month of receipt, but this might be extended to two months in case of a complex request, where you have made a number of requests, or if the identity of the requestor cannot be verified. In such cases, we will notify you and keep you updated and may seek additional information to allow us to understand your request.

Note that the Company may be subject to legal and regulatory obligations which may limit or restrict the enforcement of your rights on some occasions.

Right to be informed

You have a right to be informed about the processing of your personal data (and if you did not give it to us, information as to the source) and this Privacy Policy intends to provide such information. Of course, if you have any further questions, you can contact us on the above details.

Right of access

You have a right to obtain confirmation from us as to whether or not your personal data are being processed and, where this is the case, a right to access your personal data. We have an obligation to provide additional information when complying with an access request, and we have endeavored to capture this information within this Privacy Policy. We are happy to provide you with details of the personal data that we process about you. To protect our customers' personal information, we follow strict storage and disclosure procedures, which means that we will require proof of identity from you prior to disclosing such

information. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Right to rectification (correction)

You have the right to have any inaccurate personal data rectified and corrected and to have any incomplete personal information about you complete.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. If we do hold personal data and you believe it is incorrect, you may submit a request to us to correct any alleged mistakes.

We shall communicate any rectification of personal data to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort, and shall inform you about such recipients if you request it.

Right to erasure ('right to be forgotten')

You have the general right to request the erasure of your personal information in the following circumstances:

- the personal information is no longer necessary for the purpose for which it was collected;
- you withdraw your consent about processing and there is no other legal justification for processing;
- you object to processing for direct marketing purposes;
- we unlawfully processed your personal information; and/or
- erasure is required to comply with a legal obligation that applies to us.

We will proceed to comply with an erasure request without delay unless continued retention is necessary for:

- Exercising the right of freedom of expression and information;
- Complying with a legal obligation under EU or other applicable law;

- The performance of a task carried out in the public interest;
- Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; and/or
- The establishment, exercise, or defence of legal claims.

We shall communicate any erasure of personal data to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort, and shall inform you about such recipients if you request it.

Right to restrict processing

Instead of requesting erasure, you also have the right to restrict processing of your personal information where:

- you contest the accuracy of the personal information;
- processing is unlawful, but you do not want us to erase it;
- we no longer need to process your personal information but you need us to retain your information as you need it for the establishment, exercise, or defence of legal claims; or
- you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

We shall communicate any restriction of personal data to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort, and shall inform you about such recipients if you request it.

Right to object to processing

You also have the right to object to processing of your personal information under certain circumstances, such as:

- where the processing is based on your consent and you withdraw that consent;

- where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms; or
- where we are processing your personal data for direct marketing purposes.

Exercise of this right may impact on the services we can provide and we will explain this to you if you decide to exercise it. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms, and this may allow us to continue to (wholly or partly) process your personal information.

Right to data portability

With respect to automated information which you initially provided consent for us to use, or where the processing is necessary for the performance of a contract to which you are party (or in order to take steps at your request prior to entering into a contract), you have a right to receive the personal information you provided to us in a structured, commonly used and machine-readable format, or ask us to send it to another person.

Right to object

You have a right to object at any time to processing of personal data (including profiling) concerning you which is based on:

- the performance of a task carried out in the public interest or in the exercise of official authority vested in a controller; or
- the legitimate interests pursued by a controller.

We do not process personal data on grounds of public interest or exercise of official authority. We do however rely on the following legal bases, for processing your personal data: i) Consent, ii) Contract, iii) Legal Obligation, iv) vital interests, v) Legitimate Interests, as outlined in this Privacy Policy. Acting on our legitimate interests, we will only send you marketing information where you have agreed to opt-in to receive it. You have a choice about whether or not you wish to receive direct marketing information from us. We will not contact you for marketing purposes unless:

- you have a business relationship with us, and we rely on our legitimate interests as the lawful basis for processing (as described above); or
- you have otherwise given your prior consent.

We will only use your preferred communication channels to contact you, and on each and every marketing communication, we will always provide the option for you to exercise your right to object to the processing of your personal data for marketing purposes (known as 'opting-out') by clicking on the 'unsubscribe' button on our marketing emails or choosing a similar opt-out option on any forms we use to collect your data. You can change your marketing preferences and/or opt-out at any time by contacting us with the above details.

Please note that any administrative or service-related communications (to offer our services, or notify you of an update to this Privacy Policy or applicable terms of business, etc.) will solely be directed at our clients or business partners, and such communications generally do not offer an option to unsubscribe as they are necessary to provide the services requested. Therefore, please be aware that your ability to opt-out from receiving marketing and promotional materials does not change our right to contact you regarding your use of our website or as part of a contractual relationship we may have with you.

Other rights

Right to withdraw consent

Where the legal basis for processing your personal information is your consent, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing conducted before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Raising a complaint about how we have handled your personal data

If you wish to raise a complaint about how we have handled your personal data, you can contact us as set out above and we will then investigate the matter.

Right to lodge a complaint with a relevant supervisory authority

If we have not responded to you within a reasonable time, as described herein, or if you feel that your complaint has not been resolved to your satisfaction, you are entitled to make a complaint to the Office of the Commissioner for Personal Data Protection Commissioner. You may contact the Office with the below details:

Iasonos 1, 1082 Nicosia, Cyprus

Website: <http://www.dataprotection.gov.cy>

You also have the right to lodge a complaint with the supervisory authority in the country of your habitual residence, place of work, or the place where you allege an infringement of one or more of our rights has taken place, if that is based in the EEA.

Your California Privacy Rights

If you are a California resident, you have the following rights:

- Right to know and access: You can request that we disclose to you: (1) the categories and/or specific pieces of personal information we have collected about you, (2) the categories of sources for that personal information, (3) the purposes for which we use that information, (4) the categories of third parties with whom we disclose the information, and (5) the categories of information that we disclose to third parties. You can make a request to know up to twice a year, free of charge.
- Right to delete: You can request that we delete personal information we collected from you, subject to certain exceptions (such as if we are legally required to keep the information).
- Right to opt-out of sharing: You may request that we stop sharing your personal information (“opt-out”).
- Right to correct: You may ask us to correct inaccurate information that we have about you.

- Right to limit use and disclosure of sensitive personal information: You can direct us to only use your sensitive personal information (for example, your financial account information or your genetic data) for limited purposes, such as providing you with the services you requested.

Contacting us

If you have questions or concerns regarding this statement, you should first contact us by email. You can address your general questions and comments by e-mail to support@adsterra.com.

This website is owned and operated by Ad Market Limited; a company incorporated in Cyprus (Company Registration Number HE 361574) with its registered address at Christaki Kranou 49, Germasogeia, 4041 Limassol, Cyprus.

Our trading address where we can be contacted is at:

Christaki Kranou 49, Germasogeia, 4041 Limassol, Cyprus