

Privacy Policy

LEMO MEIDA GROUP LIMITED is committed to protecting your privacy.

Please read this document (“Privacy Policy”) carefully and with attention. If you have any questions please consult your attorney.

Section I. General Provisions.

Who we are.

Use of the terms “we” and “us” in this Privacy Policy means that LEMO MEIDA GROUP LIMITED., a Hong Kong corporation having its principal place of business in Hong Kong, and its affiliates, a limited liability partnership having duly organized under the law of Hong Kong. We are a software development company that is focused on providing various services in a digital advertising market. We create and operate various digital technology platforms and render related services that connect buyers with sellers of advertising inventory. Please read about SSP, DSP, and DMP technologies to understand what we are doing better. We are also actively involved in developing software algorithms and APIs for developers.

This Privacy Policy.

This Privacy Policy explains how information, including personal information, may be collected, used, and disclosed by LEMO MEIDA GROUP LIMITED advertisement materials and/or inventory with respect to the following instances:

(i) use of this website located at www.lemomedia.com (the “Website” or the Site), and

(ii) how personal information is collected, used, and processed through our technology on behalf of the online advertisers, publishers, business partners, and other businesses that use LEMO MEIDA GROUP LIMITED advertisement materials and/or inventory or services (hereinafter referred to as “clients”).

Our Services and Compliance with Law.

Providing our services, we do not directly interact with the owners of personal information unless the owner of information is our client. Rather we process information (including personal information, if any), provided by our clients using various software and services, and not always our software in this regard. Therefore, we obligate our clients to comply with all applicable laws in all applicable jurisdictions, while obtaining information and to indemnify us of any claims arising from such non-compliance. We do not directly target any particular group of personal information owners and intend to act in compliance with the laws of our jurisdiction. We police our client’s compliance with the laws of the jurisdiction where the information we process derives from to the extent it is technically possible and practicable. If you are our client, we collect information in accordance with our agreement and this Policy.

If you would like to read the information regarding our services and possible use of personal information, please read **Section II** of this Privacy Policy. If you would like to know about the information collected solely on this Website, please read **Section III** of this Privacy Policy. If you are our client please refer to our agreement and then to this Policy (if applicable).

Information Our Clients and Vendors Collect.

As stated herein, our clients, our contractors, and our clients' contractors may use our technology and operate it using their tags, pixels, cookies, or other similar technologies for their business activities. We are not responsible for our clients, our contractors, and our clients' contractors manner of use of your personal information or any sort of tracking technologies. As well, we don't bear responsibility for their privacy practices and we have no control over our clients, our contractors, and our clients' contractors. The only measure available to us is termination of certain contractual relationship in case violation of laws on applicable jurisdiction takes place.

Contact Us

If you have questions, want to find out more about our privacy practices, or if you would like to make a complaint, please contact our Data Protection Officer by e-mail: lewis@lemoemdia.com or by post using the details provided below:

LEMO MEIDA GROUP LIMITED

Attn: Privacy Officer

Mr. Lewis Sun

FULL WIN COMMERCIAL CENTRE 573 NATHAN ROAD YAU MA
TEI,KL,HK

Changes to this policy.

We reserve the right to revise this Privacy Policy from time to time. The most current version of the Privacy Policy will determine the order and procedure of your information usage and will always be reflected on our Privacy Policy page. This Policy version can be changed or modified by LEMO MEIDA GROUP LIMITED any time, without providing a personal notice. You are responsible for reviewing the terms of this Policy from

time to time to ensure you agree with it and any applicable changes. Your continued use of the Site constitutes your acceptance of the new Privacy Policy.

Section II. Information Collected from end users or owners of personal data other than clients.

Information We Collect.

In the course of providing services to our client we do not intentionally collect information that reveals your real-world identity, such as your name, address, phone number, or social security number, our clients may use our services to process some sensitive information, which may come from our clients' websites and may be processed through our technology without our awareness or control of it. Rather we collect data about your computer or device using a number of technologies, the explanation to which you will find below. The information we collect is pseudonymous, generalized, and is not considered to be personal information in the majority of jurisdictions. In some other jurisdictions in which we provide services to our clients, in certain contexts, such information, including Internet Protocol (IP) addresses and other pseudonymous information, like certain unique device identifiers that may identify a particular computer or mobile device (for instance, in European Union) such information is considered to be a personal information.

Please take notice, that we may work with third party data platforms or applications that may be directly integrated into our technology or used separately, supplementing our technology by us or our clients. It helps to deliver targeted advertisements using our advertising technology more efficiently or it allows our clients to use multiple interfaces and manage data more efficiently. Finally, our clients may use third-party data in

combination with your user information to deliver targeted advertisement materials and/or inventory across multiple devices that may ultimately be processed by our technology without our knowledge thereof.

Information that we process includes:

- Information about your behavior on our client's resources, websites, and platforms: including information about the domain, your referring website addresses, date and time of your visits, page view data, search keywords, visitor activities, and actions on publisher's sites, referring and exit pages, platform type, date/time stamp, geolocation (including city, country, zip code, and potentially geographic coordinates if you have enabled location services on your device), click data, types of advertisements viewed.
- Information about your browser: including information about your browser type and language, and browser history.
- Information about your device: including information about your IP address, device maker, device model, device operating system, device operating system version, and data connection type.
- Information about your Internet service: including information about which Internet Service Provider (ISP) you use. Our clients may also use our services to collect data regarding your interactions with them, including your use of our clients' websites and mobile applications, the websites, and applications or other pages on the Internet our client's monitor or control.
- Our clients may also use our services to capture additional data in order to calculate a statistical ID in certain cases.
- Our clients or third parties may also provide us with pseudonymous and generalized information that may include identifiers (like mobile advertising IDs) and interest-based advertising data tied to those identifiers, including segments provided by third-party data providers.

How We Collect User Information.

We use cookies and other standard web technologies to collect information automatically from your device, including:

Cookies. The cookie technology is based on a small-size data files that usually include a unique identifier, placed on a visitor's device or computer. Cookies are usually stored at user's computer permanently or temporarily (persistent cookies). We use cookies on our clients' websites in order to operate our technology, collect user information, and statistically analyze advertisement preferences.

Tags and Pixels. Tags and Pixels are blocks of code that we and our clients may use to track your browsing on the Internet: from resources to any particular websites or applications to track your browsing behavior. Sometimes web beacons are used for this purposes. They are usually transparent or invisible graphic images, no larger than 1x1 pixel, they are placed on a page or otherwise, Internet resource or sent within an e-mail to monitor the behavior of the user visiting the resource or sending the e-mail. It is often used in combination with cookies. We create and use a unique synchronization system to check the quality of information that we have collected with information that our clients collected independently, and later help our clients or third parties that intend to provide you with targeted advertisements.

Mobile device identifiers. Mobile Device Identifiers or Mobile Device IDs are unique identifiers which can be used to identify a mobile device. We may use standard device identifiers, to track your use of mobile applications and to determine if a piece of advertisement inventory has been delivered to a specific user or retargeted, or to determine the frequency of certain inventory for a certain user. Ultimately, passing device's ID back to advertisers helps us and our clients to improve the quality of advertising and its efficiency.

Software Development Kits. These are blocks of code or algorithm similar to Tags and Pixels that are embedded into a digital resource that allows us to track certain information related to the application use, gathered during the process of utilizing our technology.

Other technologies: Please be aware that we use other technologies, including locally stored objects, to collect user information in order to assist users with the inventory delivery and to provide reporting to our clients or to evaluate the quality of advertisement.

How We Use User Information.

We primarily use the user information we collect to enable our clients to find and purchase advertising space. In particular, our clients use two types of information in order to deliver end users a targeted advertisement material: our client's information and information that we provide in the course of our services delivery. Those two types of information are usually synchronized and mutually filtered and checked to identify what are the main interests of the user, and what targeted advertisement materials should be sent to him or her based on all the information that we stated as collected in this section.

Additionally, we may use the information that we collect directly for our purposes: to create sophisticated advertising segments, to run analytics, including forecasting analytics of inventory, and to check the quality of advertisement or for any other and further research and development purposes acceptable as our legitimate business interests and allowed within the Hong Kong, China. We constantly improve our algorithms targeting users with particular advertisement materials and/or inventory and measure the efficiency of advertisement materials. We use user information to improve our services and products that we provide to our clients, and to develop new products and services, to analyze the market, and generate performance reports. For above-mentioned purposes we may share information with our clients, partners, and service providers, taken, however, that all of the information sharing is done in aggregate without identifying particular users. Finally, we use user information to protect users, investigate security breaches, and to prevent all illegal activities within our systems.

SUBSECTION FOR EEA USERS ONLY

Legal basis for Processing EEA Users' Information.

If you are a user located in the European Economic Area, as defined in GDPR, our legal basis for collecting and using your user information shall be a subject to particular circumstances of collection and/or processing your information. We believe that the basis for collection, storage, or processing your information is your informed consent. In all other cases, we have a legitimate interest in processing the user information. We rely on consent to collect and/or process your user information, we obligate our clients to obtain such consent in compliance with applicable GDPR provision and applicable laws.

If you have questions or need further information with regard to the manner of use and legal basis for collecting and using your user information, please contact us. Please be advised that we will require reasonable proof that you are a subject to GDPR protection in order to process your inquiry in accordance with this subsection.

Consent Withdrawal.

You can withdraw your consent to personalized advertising experience any time in accordance with applicable laws and regulation. Please be aware that if you gave your informed consent to our client you should contact that respective client. Moreover, if your consent was granted through the application, please withdraw your consent directly from that application. In addition, your device setting likely allows you to generally withdraw or block personalized advertising: for instance, in iOS, you can do that by changing appropriate “Limit Ad Tracking” setting; on Android devices, you can do so by changing “Opt out of Ads Personalization” setting. Please be aware that this Provision is not intended to serve as your user manual for your device, and you should always contact the manufacturer to obtain all relevant information on how to withdraw your consent.

If you withdraw your consent in the appropriate manner, we will no longer collect, use, share, or otherwise process personal data from you (unless we have a right and/or obligation to store your personal data under applicable law or regulation). We will also delete or de-identify the personal data we have stored about you within the period provided by GDPR, if the technology allows us to do so. We will also inform our current clients if you withdraw your consent so that they, as independent controllers of your personal data, can also respect your choice to withdraw consent.

Even if you do not consent to a personalized advertising experience, or you later withdraw such consent, we will still process your personal data when necessary, to comply with the law or to support our legitimate interests, as described below.

Legal Necessity.

We process personal data in case of necessity to comply with applicable laws and regulations. For instance, for the mere purpose of identification, the jurisdiction of the information and where it comes from, we have to collect user IP. Similarly, your mobile device identifier will likely be used (unless our technology allows otherwise), in order to identify a user who had withdrawn his/her personal data processing consent. Similarly, as

soon as you withdraw your consent we will have to provide our clients with your personal information to make sure that your consent has been withdrawn throughout the entire system.

Legitimate Interest.

In some cases legitimate Interest allows us to process certain information without consent: for instance, to prevent fraudulent activity. Legitimate interest use will be determined by us on ad hoc basis for each particular platform or service.

European Data Subject Rights.

You have certain rights and protections under the law regarding the collection, processing, and use of information about you. As a resident of a country in the EEA, you have the right provided by Chapter 3 of GDPR. If you would like to exercise any of these rights, please contact us with a reasonable proof that you are subject to these rights.

Please note, as we already stated most information we deal with is anonymized when we receive and process it, therefore, we cannot identify you individually, you need to provide us with some additional information to enable us to identify the user information you are referring to, it may be technologically impossible to identify your information, although we will try to accurately fulfill your request. Please be aware that we are not a company located in the EEA, nor did we design our technologies to serve EEA purposes. Please also read regarding our responsibility for the actions of our clients in Section I.

END OF SUBSECTION FOR EEA USERS ONLY

Storage and Sharing of User Information.

We only store information in case of necessity. Typically, we delete all the information quarterly based on the analysis of the traffic and inventory quality control. Some information such as cookies may expire in accordance with your device settings. We do not need such information and we usually delete it unless it is necessary for performing our services to the client.

Please be aware that certain laws and regulations may subject us to store user information for a particular period of time: money laundering laws, financial reporting regulations, tax laws etc. Furthermore, we may have to comply with the decision of the court of appropriate jurisdiction and maintain information for the longer period.

We share user information that we collect as follows:

We share information with our clients. It is done to help them identify, buy advertising, and target particular publishers. Clients may use this information in conjunction with other information they have independently collected to provide you targeted advertising materials. They also evaluate and analyze particular advertisement campaigns, inventory, etc.

Change of Control. We may share user information in connection with mergers, acquisitions, events of change of control, including but not limited to sale or transfer of all or a part of our business or assets. In this case, your informed consent, if applicable, will be granted to a new entity in accordance with the event of a change of control.

Compliance with laws and regulations. We may share user information with law enforcement, regulatory authorities, courts with competent jurisdictions, emergency services or other necessary third parties for legal, protection, security, and safety purposes, including but not limited to the purpose of compliance with laws or regulatory requirements and to responses to lawful requests including requests of governmental entities, enforcement of our own policies and agreements, protection of our clients, agents, employees, directors, officers and alike.

Other service providers. SSP, DSP, and DMP services are based on specific platforms that actively communicate with other platforms, including but not limited to other SSP, DSP, and DMP platforms. Additionally, we use services of various third parties in order to analyze data, prevent fraud, host data, maintain, and support our client's platforms, and for such other and further related services that are necessary to provide our services.

Your Choices to Avoid Targeted Advertising.

Please be aware that although we believe that targeted advertisement is beneficial for all parties involved, we do not circumvent any devices, and there are many ways and technologies to stop receiving targeted advertising that our clients may apply using our technology. Note that different platforms and devices use different identifiers and different technologies, and also that each browser and each device has its own

applicable settings. Please be advised that should you delete your cookies the information of your withdrawal from a targeted advertisement may also be deleted. Same may be applicable to cookie-blocks.

If your consent to the targeted advertisement was granted through the application, please withdraw your consent directly from that application. In addition, your device setting likely allows you to generally withdraw or block personalized advertising: for instance, in iOS, you can do that by changing appropriate “Limit Ad Tracking” setting; on Android devices, you can do so by changing “Opt out of Ads Personalization” setting. Please be advised that this Provision is not intended to serve as your user manual for your device, and you should always contact the manufacturer to obtain all relevant information on how to withdraw your consent.

Security

To prevent unauthorized access and disclosure, to maintain data accuracy, and to ensure the appropriate use of your information, we utilize industry standard physical, technical, and administrative procedures to safeguard any personal information we collect. Please note that no transmission or storage of information, however, can ever be guaranteed to be completely secure, though we take all reasonable precautions to protect against security incidents.

Policy towards children.

Our Services are not directed to people under 18. If you become aware that your child has provided us with personal information without your consent, please contact us. We do not collect personal information from children under 18. If you are a minor, you may use our services only in conjunction with a parent or guardian.

Section III. This Website and Information Collected therein.

By using the Site, you are accepting the terms of this Privacy Policy.

IF YOU DO NOT AGREE TO TERMS OF THIS PRIVACY POLICY IN THEIR ENTIRETY, YOU MAY NOT ACCESS THIS WEBSITE OR OTHERWISE USE THE SITE, REGISTER AS A PUBLISHER OR ADVERTISER OR ENTER ANY PROMOTION.

Collecting Personally Identifiable Information.

For purposes of this Privacy Policy, “Personally Identifiable Information” shall mean any information obtained through your use of the Website. This section does not refer to any information we store, collect, or process using our services.

The Personally Identifiable Information that you must submit in order to register as an Advertiser or Publisher, or to enter into an agreement with us, may include, without limitation, your name, title, company name, mailing/billing address, e-mail address, telephone number, Skype name, credit card information and/or bank account information. To the extent Personally Identifiable Information has been collected from you, you acknowledge that such collection is done on a voluntary basis to enable us to provide you efficient access to our materials and/or inventory, services, promotions, and our other products and/or services.

Collecting Non-Personally Identifiable Information.

We automatically collect Non-Personally Identifiable Information when you access and use this Website. This Non-Personally Identifiable Information includes, without limitation, the type of browser that you use (e.g., Internet Explorer, Chrome, Safari), your IP address, the type of operating system that you use (e.g., Windows or Mac OS), and the domain name of your Internet service provider (e.g., Verizon, AT&T).

We use Non-Personally Identifiable Information to help diagnose problems with our server, to personalize your Internet experience, and to identify ways of making the Website better. We also may use this Non-Personally Identifiable Information in the aggregate to analyze Site usage, as well as to offer you products and services. This Non-Personally Identifiable Information is not linked to any Personally Identifiable Information.

IP address

An IP address is automatically assigned to your computer every time you establish a connection to the Internet. LEMO MEIDA GROUP LIMITED advertisement materials and/or inventory uses your IP address to help diagnose problems with our server and to administer our website. When you open an account on LEMO MEIDA GROUP LIMITED advertisement materials and/or inventory, your IP address will be associated with personally identifiable information.

Cookies

We use cookies on this site. We do not link the information we store in cookies to any personally identifiable information you submit while staying on our site. We use both session ID cookies and persistent cookies. We use session cookies to make it easier for you to navigate our site. A session ID cookie expires when you close your browser. A persistent

cookie remains on your hard drive for an extended period of time. You can remove them by following directions provided in your Internet browser's "help" file.

Cookies Opt-out

You can "Opt-out" from having cookies stored on your PC when advertisement materials and/or inventory are shown from LEMO MEIDA GROUP LIMITED. To "Opt-out" [click this link](#).

Policy towards children

Our Services are not directed to people under 18. If you become aware that your child has provided us with personal information without your consent, please contact us. We do not collect personal information from children under 18.

Important Information Regarding Social Media Websites, Testimonials, and Blog Comments Management.

Please pay attention, due to the fact that our blog is maintained with a help of the third-party service, you might need to register before leaving a comment.

Please also note that we are not eligible to manage your personal information or data placed in the comment section of our blog by users.

In case you need to delete information containing your personal information from the comments on our blog, you'll have to login into a third-party application or address them directly with your data deletion request.

All the valid information considering the storage and processing of your personal ID information you can find in the privacy policies, on the website of the third-party app provider.

Be aware, such tools like social media widgets, buttons, social media scripts, hyperlinks to FB, LinkedIn, Google+ or Instagram, along with Twitter, and Telegram messenger services, belong to the third-party app providers.

These third-party app providers may utilize above-mentioned tools for: information collection about your on-site behavior (pages visited), viewing your IP address, and cookies collection in order to optimize and streamline your browsing experience.

All of your actions and the way you interact with these social media tools, features or the social media, gets subjected solely to their privacy policies.

Submitting your data directly through social media, as well as via comments, and forum sections on websites, remember that your personal ID information can be accessed (in case you haven't restricted your social media privacy settings), and used by the third parties without your consent or pre-agreement.

Hence, we don't bear any kind of responsibility for your personal information that you submit through the comments.

The testimonials from customers belong to the confirmed and approved kind of information, if you would, with your consent, username, and info, we can arrange your own testimonial placement on our site. In case you want to delete, modify or edit your existing testimonial, don't hesitate to contact us via privacy@lemomedia.com