



MARTIN

PRIVACY NOTICE

Last Revised: *February 2020*

WHO Is Martin?

Consultmates, Inc. d/b/a Martin AI (“**Martin**” or “**We**”) is an artificial intelligence based advertising technology platform designed to optimize online digital advertising campaigns of advertising agencies and brands (“**Clients**”). Martin’s solution is referred to herein as “**Services**”. This Privacy Notice (“**Privacy Notice**”) is Martin’s way of being upfront about the collection, use, and processing of data when providing the Services to Martin’s Clients.

WHAT Kind of Information Does Martin Collect?

In order to provide the Services to its Clients, Martin utilizes or generates a unique device ID (UID). The UID is stored on a user’s browser through a cookie. Martin uses the UID to track and analyze how a given device interacts with an advertisement displayed on a publisher’s website or other publishing platform.

Martin analyzes, and in some case, incorporates certain data into Martin’s algorithm in order to improve or optimize the Service for Martin’s Clients. This data may include:

- **Anonymous/Aggregated Data** - consists of aggregated, statistical, or technical information and behavioral analytics not linked with any identified or identifiable individual. Specifically this type of information includes aggregated data on users’ operating systems, web browsers, smart-phone type and, screen resolution, duration of website use, click data, keyboard language, and advertising campaigns analytics.
- **Pseudonymous Data** – this information, including but not limited to Internet Protocol (IP) addresses and device identifiers may relate to an identified or identifiable person, and, with additional information, enable the identification of an individual. Martin does not process pseudonymous data in a manner that would allow Martin to identify any end user.

- **Personal Information** – Martin does not collect any personal information from any end user, and all of Martin’s clients are required to refrain from providing Martin with any personal data.
 - **NOTE:** most mobile devices, mobile operating systems and browser software, allow you to control or disable the use of certain collectable information including location services, by any application, in the applicable settings menu.

HOW Does Martin Collect This Information?

- We mainly collect the information mentioned above automatically through use of cookies, web beacons, unique identifiers, and similar technologies which allow us to collect information about the pages and screens viewed, the links clicked, and other actions taken when users interact with websites and applications. This is done through publisher’s use of our Service.
- A “**cookie**” is a small amount of data (text file) generated by a website or server and saved on your device in order to remember information about you such as preferences or log-in information. A “**web beacon**” is a transparent graphic image that is placed on a website used to monitor behavior of the visitor.

WHY Does Martin Collect This Information?

Martin collects information and data as part of Martin’s Service to its Clients. The information and data is processed in the following ways:

- In connection with the buying and selling of online digital advertising with our Clients and Third Parties.
- Analytics and reporting on advertising performance, including attribution to certain advertising campaigns, advertisement display performance, and user interaction.
- Utilizing cookies and other user IDs to determine and honor opt-out requests.
- Optimizing the buying and selling of online digital advertising.
- Optimizing the overall advertising interface as it relates to our clients content.

WHO Does Martin Share This Information With?

- **Clients** – Martin allows its Clients to review and utilize the information gathered and collected by Martin in order to improve the user experience and optimize a Client’s ad campaigns.
- **Third Parties** – Martin works with a select number of service providers in order to complement, facilitate, and enhance our own. Such services include hosting, database and server services like Amazon Web Services (AWS), payment processors, and our business, legal and financial advisors. Such Third Party Service Providers may receive or otherwise have access to the

data Martin collects, depending on each of their particular roles and purposes in facilitating and enhancing the Services. Such disclosure or access is strictly subject to the relevant services provider's undertaking of confidentiality obligations, and the prevention of any independent right to use this data except as required to help us to facilitate or enhance the Services.

- **Governmental/Law Enforcement** - Martin may disclose or otherwise allow access to the information processed by Martin pursuant to a legal request, such as a subpoena, search warrant or court order, or in compliance with applicable laws, with or without notice to you, if we have a good faith belief that we are legally required to do so, or that disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, counter terrorist financing verification requirements, fraud, or other wrongdoing.

YOUR Choices

You have the choice to “opt-out” of interest-based advertising by having a specialized cookie identifier stored on your device that signals your choice and preference. You can make that choice by emailing privacy@martin.ai.

Martin does not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

On mobile devices (e.g., iPhones and Androids), refer to your specific device privacy settings.

You may also send us an email at privacy@martin.ai to request access to, correct or delete any personal information that you have reason to believe we have. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

DATA RETENTION

We may retain the data Martin processes for as long as necessary to provide the Services to our Clients, including without limitation, as reasonably necessary to comply with our legal obligations and/or protect our legitimate interests.

DATA SECURITY

Martin has implemented measures designed to secure the data it collects from accidental loss and from unauthorized access, use, alteration, and disclosure, and has employed industry standard procedures, protocols, hardware, and software intended to ensure the protection of the data Martin processes.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect the data Martin collects and/or processes, we cannot guarantee the security of such data transmitted via the Services. We are not responsible for circumvention of any privacy settings or security measures contained on any third-party website, or service.

CHILDREN'S PRIVACY

We do not knowingly collect personal information from children under 13. If you are under 13, you should not provide any information about yourself to any publisher without the consent of a parent or guardian, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have unknowingly collected or received personal information from a child under 13 without verification of parental consent, we will immediately delete that information. If you believe we might have any information from or about a child under 13, please contact us at privacy@martin.ai.

CHANGES to Martin's Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this privacy policy to check for any changes.

GENERAL

This Privacy Policy, its interpretation, and any claims and disputes related hereto, shall be governed by the laws of the State of New York, without respect to its choice of law principles. Any and all such claims and disputes shall be brought in, and you hereby consent to them being litigated in and decided exclusively by a court of competent jurisdiction located in the State of New York, county of New York.

This Privacy Policy was written in English, and may be translated into other languages for your convenience. If a translated (non-English) version of this Privacy Policy conflicts in any way with the English version, the provisions of the English version shall prevail.

QUESTIONS?

If you have any questions (or comments) concerning this Privacy Policy, you are welcome to send us an email at: privacy@martin.ai and we will make an effort to reply within a reasonable timeframe.