

PRIVACY POLICY

LAST UPDATED: December 16, 2024

ABOUT US

Our Platforms (“**Platforms**” means the website(s), including but not limited to <https://www.kadam.net/>, <https://pub.kadam.net>, <https://partners.kadam.net/> and related websites and/or subdomains (the “**Site**”) and any related documentation, services; any images, logos, photographs and video content, software, designs, graphics, photos, illustrations, animations, videos, scripts, texts, music, sounds, voiceover, interactive features, and all other materials and content accessible within the Site that are incorporated into and form part of our Site and etc. (“**Site Content**”) are owned and/or managed, and operated by the Company.

Company shall mean:

Kadam Advertising Ltd, company incorporated and acting under the laws of the Republic of Cyprus under the registration number HE 441056, VAT ID: 60023404I, address: Omonoias, 13, 3052, Limassol, Cyprus (hereinafter - “**We**”, “**Company**”, “**Kadam**”).

We can be contacted by writing to:

Kadam Advertising Ltd, Omonoias, 13, 3052, Limassol, Cyprus or via support@kadam.net.

Kadam is a large advertising network, leveraging cutting-edge technologies to deliver comprehensive solutions for advertisers and affiliates. We excel in optimizing performance, expanding reach, and fostering impactful partnerships across diverse verticals. Our innovative approach ensures enhanced engagement, higher conversions, and a seamless experience for all participants in the dynamic landscape.

We believe in the remarkable potential of technology to drive positive change and are committed to the highest standards of privacy and security. As trusted keepers of your personal data, we prioritize transparency and accountability in our data practices, ensuring that you have full knowledge of your data while benefiting from our Platforms.

When you use Platforms, we may collect, store and process some data, including personal data. This privacy policy (“**Privacy Policy**”) sets out the main principles on which the data collected from you, or that you provide to us, will be processed by us. This Privacy Policy also aims to remind you about your rights and to provide you with all the elements you need to exercise them. In accordance with data protection legislation (GDPR, UK GDPR, CCPA and etc.), we act as the controller of your personal data. In some cases, we may act as the processor of personal data, as indicated in this policy below.

We encourage you to review our Privacy Policy in its entirety to gain insight into our data handling practices. We have meticulously crafted this policy to be clear and accessible, but if you have any questions or concerns, please don't hesitate to contact us via support@kadam.net or the address below for further information:

Kadam Advertising Ltd

Omonoias, 13, 3052, Limassol, Cyprus.

IF YOU DO NOT ACCEPT THE TERMS OF THE PRIVACY POLICY, PLEASE DO NOT USE OUR PLATFORMS.

YOUR DATA COLLECTED BY US

As you engage with our Platforms, we gather data concerning a recognized or identifiable living individual ("personal data") through the following means:

Data Directly Provided by You: this encompasses any information you manually input or furnish to us while utilizing our Platforms. For instance, this might include details like your name, email address, phone number, photo, geolocation data, place names and addresses, added by you or any other information you decide to disclose during registration or account setup.

Data Automatically Collected by Us: when you access our Platforms, we automatically procure certain details regarding your engagement and activities within the Platforms. This may entail specifics about your device, such as its model, operating system, unique identifiers, IP address, and data related to your actions within the Platforms.

Data Acquired via Cookies: to understand your interactions with our Platforms better, we utilize cookies and similar technologies. Cookies enable us to retain particular details about you, such as your preferences or previous interactions, thereby enhancing your experience on our Platforms and delivering tailored content. You can find more in our [Cookie Policy](#).

CDD PROCEDURE

As stated in the [Kadam User Agreement](#), from time to time we may require you to undergo "Customer Due Diligence" (hereinafter referred to as - "CDD"). You understand and agree that your personal data will be processed by a third party - Sumsb Group of Companies (hereinafter referred to as the "Service Provider"), in order to verify your identity for the CDD procedure, in order to comply with applicable laws, age restrictions and/or other laws and regulations.

By accepting this privacy policy, you understand and expressly, voluntarily, unambiguously and informedly agree that in the event of the CDD procedure, your personal data, including biometric information, will be processed for the purposes specified in this clause by the Service Provider, who is obliged to apply appropriate technical and organizational measures to ensure the security of your personal data to achieve the purpose of processing.

For a more detailed examination of the verification process, please refer to the Sumsb [Privacy Notice](#).

KADAM'S PIXEL

Kadam's pixel ("pixel") offers its clients and business partners a small piece of JavaScript code that may be added to the advertisers' website in order to retarget the particular group of website users to optimize advertising on the basis of their interest in a particular ad. The pixel was designed to respect the website visitor's privacy and choices: the website does not need to collect or send the website visitor's name or contact information to Kadam, its business partner or client. The pixel is an option offered to advertisers, and the advertiser may refuse to use the pixel and use other targeting criteria instead.

Legal basis and visitor rights. Where a website visitor is situated in the EU or EEA country, the client or business partner must ensure that:

(i) website visitors are informed on the use of ad tag or pixel and their rights with respect to these technologies, and

(ii) their consent is obtained prior to collecting their personal data for advertising and marketing purposes and, particularly for retargeting, where applicable.

The business partner must either inform and/or require their partner(s) to inform the website visitors about the use of retargeting and their rights with respect to the processing of their data. An individual can opt-out of interest-based advertising using Kadam's opt-out tool, deleting the cookies via their web browser's settings or the website cookies.

Data access. The data collected is processed and stored within Kadam's systems. Neither clients (such as users or advertisers) nor our pixel licensees receive access to the raw personal data collected via the advertiser's pixel or collected via the ad tag and provided by the user. Kadam solely organizes the collection and use of personal data for retargeting to facilitate access to data subjects' rights and provide a smooth advertising service. Where more than one business partner or publisher uses our pixel to retarget one individual, Kadam does not provide such partners or publishers with access to the whole information it keeps, but only helps them optimize ads for people that expressed consent with advertising on such publisher's website.

Purposes. We use data collected by the user(s) and advertiser(s) and sent to the Kadam Advertising Ltd to enable the business partner or publisher to use our advertising services to better reach people who visit partners' websites, to optimize their ads and to measure their effectiveness (gain reports about the results from the ads) or to cap the frequency with which a website visitor receives certain advertisements. We can occasionally use this information to improve our service to serve more relevant ads to people, subject to confidentiality obligations imposed on our product service team. We may collect any information on the website user's device (such as its properties, OS, battery, version of browser etc.) to prevent fraud and gather accurate statistics on the ad efficiency.

Responsibility. The client or business partner bears full and sole responsibility for:

(i) Ensuring that website visitors are properly informed about the use of ad tags, pixels, and any related technologies on the website, as well as their rights regarding the processing of personal data for advertising and marketing purposes, including retargeting;

(ii) Securing valid, prior consent from website visitors for the collection and use of their personal data for advertising and marketing purposes, particularly for retargeting, in compliance with applicable data protection laws (e.g., GDPR in the EU/EEA).

The client or business partner must take all necessary steps to ensure compliance, including implementing appropriate mechanisms to inform visitors and collect consent, and, where applicable, ensuring that their partners or sub-contractors fulfill these obligations.

Indemnity. Clients and business partners shall defend, indemnify, and hold harmless Kadam, its affiliates, officers, directors, employees, contractors and agents from and against any and all claims, damages, liabilities, losses, costs, or expenses (including reasonable attorneys' fees) arising out of or in connection with:

(i) Non-compliance with Privacy Laws: Any failure by the client or business partner to comply with applicable data protection laws, regulations, or directives (including, but not limited to, GDPR or equivalent local legislation), particularly with regard to the requirements to:

- Inform website visitors of the use of pixels, ad tags, or similar technologies and their associated rights.
- Obtain valid, prior consent from website visitors for the collection, use, or processing of personal data for advertising or marketing purposes.

(ii) Misuse of Pixel Technology: Any unauthorized or improper use of Kadam's pixel or associated technologies by the client, business partner, or their agents, including but not limited to:

- Deploying the pixel in a manner that violates Kadam's guidelines or applicable laws.
- Collecting or transmitting personal data without appropriate consents or for purposes beyond those authorized by the visitor.

(iii) Third-party Actions: Any claim, action, or proceeding brought by third parties, including but not limited to:

- Website visitors asserting violations of their rights due to the client's or business partner's failure to comply with legal requirements.
- Business partners or advertisers failing to adhere to their contractual or legal obligations in connection with the use of Kadam's pixel.

(iv) Breach of Responsibilities: Any breach of the responsibilities outlined hereinabove, including the obligations to:

- Properly inform and secure consent from website visitors.
- Ensure that any subcontractors, partners, or third parties involved in the advertising process adhere to the same standards.

This indemnity obligation shall survive the termination or expiration of the client's or business partner's agreement with Kadam. Kadam reserves the right to assume the exclusive defense and control of any matter subject to indemnification at the client's or business partner's expense.

WHY WE PROCESS YOUR DATA

Data processing is crucial to enable your usage of our Platforms. Whenever you use our Platforms, some personal and non-personal data is collected, stored, and analyzed using internal and third-party tools.

Below are several additional purposes for which we process your data:

- **provide customer support**, we may engage in email communications with you if you have contacted our support team with any queries relating to our Platforms.
- **enhance the features of our Platforms**, we analyze how you interact with the Platforms to tailor the experience to your needs. This includes refining prediction accuracy, developing new algorithms for enhanced insights, and generating content on topics of interest to you.
- **enhance the technical aspects of our Platforms**, we continuously work to improve your experience and streamline features for your benefit.
- **optimize our advertising strategies**, we analyze the performance of our advertising campaigns on the Platforms. This helps us identify your engagement, as well as gauge interaction with our advertisements.
- **improve our Platforms**, we utilize website analytics to track performance and understand user behavior. This aids us in offering an improved user experience and optimizing our Site's functionality.

HOW YOUR DATA IS HANDLED

Depending on which features of the Platforms you use, we will process your personal data based on one or more of the following legal bases (we have provided you with some examples):

TYPES OF LEGAL BASIS WE USE

DESCRIPTION

Legitimate interest

We process your usage data on this legal basis to technically improve the Platforms based on our legitimate interest as a Company to continuously improve the Platforms and deliver an improved service to you.

Contract

We process your usage data on this legal basis to fulfill the contractual duty of granting you access to use our Platforms.

Legal obligation

We process your usage data on this legal basis to comply with pertinent laws and regulations. This implies that we may handle personal data

as mandated by law, ensuring adherence to applicable legal mandates.

Consent

We process your usage data on this legal basis to promote Platforms and optimize our advertising efforts to effectively tell more people about Platforms.

We are committed to being clear and transparent so that you can really understand what we do with your data. Below, we explain the purposes for which we process your personal data and the legal basis supporting this. We also give you some basic examples:

LEGAL BASIS	PURPOSE OF PROCESSING	EXAMPLE
Legitimate interest	Responding to your requests.	We may process your name and email, e.g., to properly respond to your request.
Contract	Processing transactions and sending you related information, including confirmations, notices and reminders for account management and other administrative purposes.	We may send you reminders regarding payments, or we may email you containing your invoice, if applicable, using your device data.
Consent	Making offerings to you.	We may offer you some discounts.

For the processing of physical data and special categories of personal data, including sensitive information, explicit consent from the user serves as the legal basis. This consent is essential for enabling users to utilize the Platforms provided by us.

When you make purchases directly through our Site, you authorize an applicable payment system and/or provider to collect this payment information. We do not collect or process your payment data (such as credit card number, expiration date, etc.) for purchases made through our Platforms. We strongly recommend reviewing the Privacy Policy of the payment system you use for making payments, such as (for example) the privacy policy of Stripe: <https://stripe.com/en-pl/privacy>.

DATA RETENTION

We retain your personal data for as long as your account is active or for as long as it is necessary for the purposes of its collection and processing (e.g., for resolving disputes, for safety and security reasons, or for complying with our legal obligations). However, the period for which we may retain your personal data cannot exceed 6 (six) months from the date of account deletion.

SHARING OF YOUR PERSONAL DATA

We may need to share your personal data with certain third parties as follows:

Third-party service providers:

This may include providers of certain systems and services that we use to host, administer, and maintain our Platforms, including the servers used to host our Platforms, email service providers, payment processors, fraud prevention vendors, analytics, customer service providers, providers of verification process services and other service providers.

Third-party service providers for marketing purposes:

If you consent to receive any marketing from us, certain personal data may be shared with third-party service providers we use to help us carry out marketing including, e.g., third-party marketing automation platforms.

Compliance with Laws:

We may disclose your personal data to a third party if:

- a) we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process, or governmental request; or
- b) to protect the security or integrity of the Platforms; or
- c) to protect us, our customers or the public from harm or illegal activities; or
- d) to respond to an emergency which we believe in the good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

Aggregated or Anonymized Data:

We may also share aggregated or anonymized information with third parties that do not directly identify you.

Group companies:

Your personal data may be shared among affiliates and subsidiaries. In such cases, these companies must abide by our data privacy and security requirements and are not allowed to use personal data they receive from us for any other purpose. We may also disclose personal data as part of a corporate transaction, such as a merger or sale of assets.

THE FOLLOWING ARE A FEW OF THE ESSENTIAL PROCESSORS WE TRUST:

Processor's name	Processor's privacy policy	Purpose
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Intercom	https://www.intercom.com/legal/privacy	Obtain real-time customer interaction, providing instant support and engagement.
Wootric	https://inmoment.com/privacy-policy/	Collect user feedback.
UniConsent	https://www.uniconsent.com/privacy	Receive a GDPR-compliant cookie banner for the Site.
Google tag manager	https://policies.google.com/privacy	Launch and track Google ads.
Sumsub	https://sumsub.com/privacy-notice-service/	Verification of your identity.

DATA STORAGE AND CROSS-BORDER TRANSFERS

The personal data we maintain will primarily be stored and processed within the EU. We will do our best to keep this personal data secure. All information we hold is stored on our secure servers (which we own or license from appropriate third parties). We use industry-standard procedures and security standards to prevent unauthorized access to our servers.

However, there may arise situations where we need to collaborate with trusted third parties located outside the EU to deliver services to you (for instance, when utilizing servers in the US). We choose our processors very carefully. We do not work with processors based in countries where we are concerned about the rule of law with respect to privacy.

We have entered into Standard Contractual Clauses with all non-EEA third parties whose data processing tools we use (data processors) if there is no adequacy decision by the EU Commission for their particular country. We adhere to the principles of minimization and anonymization, where feasible, to ensure compliance with the GDPR and other relevant data privacy laws when transferring personal data, if necessary.

By providing your personal data, you explicitly consent to its transfer, storage, or processing outside the EU. We will take all reasonable steps to ensure that this information is handled securely and in accordance with this Privacy Policy.

SECURITY

Ensuring the security of your data is a top priority for us. We employ robust technical and organizational measures to safeguard the personal information entrusted to us.

Your personal data is safeguarded by the password you create when registering on our Platforms. It's essential to choose a strong password and keep it confidential to prevent

unauthorized access. Additionally, refrain from sharing your password and ensure the security of your computer or mobile device.

We have instituted reasonable administrative, technical, and physical security measures to protect your personal data from unauthorized access, alteration, or destruction. For instance:

- We utilize SSL encryption (HTTPS) for all interactions involving personal data.
- Our databases are encrypted, and we store data on physically secure servers protected by firewalls.

In the event of a personal data breach as defined in Article 4.12 of the GDPR, we will promptly notify you. This notification will include relevant details, measures taken, and an assessment of associated risks, as required by applicable law and our Privacy Policy. We are committed to addressing breaches promptly and transparently, taking necessary actions such as logging affected users out, initiating password resets, and other appropriate measures to mitigate the breach.

To report a personal data breach or seek assistance, please contact us at support@kadam.net or dpo@kadam.net. We will address your concerns accordingly.

YOUR PRIVACY RIGHTS

We aim to ensure that you are fully informed about all your data protection rights and the methods available to exercise them. Please note that these rights may vary depending on your location:

- **Access:** you can request to receive a copy of the personal data we hold about you.
- **Rectification:** if you believe that any personal data, we are holding about you is incorrect or incomplete, you can request that we correct or supplement it. You can also correct some of this information directly from your account. Please contact us as soon as possible upon noticing any such inaccuracy or incompleteness.
- **Objection:** you can contact us to inform us that you object to the collection or use of your personal data for certain purposes.
- **Erasure:** you can request that we erase some or all of your personal data from our systems.
- **Restriction of Processing:** you can ask us to restrict or limit further processing of your personal data.
- **Portability:** you have the right to ask for a copy of your personal data in a machine-readable format. you can also request that we transmit the personal data to another entity where technically feasible.
- **Withdrawal of Consent:** if we are processing your personal data based on your consent (as indicated at the time of such data collection), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have then to provide express consent on a case-by-case basis for the use or disclosure of certain of your personal data, if such use or disclosure is necessary to enable you to utilize some or all Platforms.

- **Right to File Complaint:** you have the right to lodge a complaint about our practices with respect to your personal data with the supervisory authority of your country.

To exercise your rights, please contact us via support@kadam.net or write to us at the address specified hereinabove.

If you submit a request, we typically aim to fulfill it within one month. If additional time is needed to assist you in exercising your rights, we will inform you accordingly. We reserve the right to reject manifestly unfounded or excessive requests.

During the process of exercising your data protection rights, we may ask you to confirm your identity. This verification step ensures that you are entitled to access certain information and that the rights of third parties are not infringed upon. If we are unable to verify your request, we will be unable to fulfill it

OUR POLICIES CONCERNING PEOPLE UNDER 18 YEARS OLD

If you are at least 18 years old, you are eligible to provide explicit consent for the processing of your data. Alternatively, if you are under the required age, you can't use our services.

In the event that we learn that we have inadvertently gathered personal data from children, we will take reasonable measures to promptly erase such information from our records.

If you are a parent and learn that your child is using our Platforms without your permission, or if you have a specific question about data privacy, do not hesitate to get in touch with us via support@kadam.net.

If we become aware that information has been collected from persons under the age of 18, we reserve the right to promptly delete the account and erase all associated information, including health and sensitive data, from our servers.

HOW CAN YOU MANAGE YOUR DATA?

If you wish to access, correct, or update your personal data, you can do so at any time by contacting us via support@kadam.net.

If you would like us to delete your personal data, please write an email to our support team on the following email: support@kadam.net.

If you proceed with the deletion of your account, you will no longer have access to the account.

Please note that if you ask us to delete your account, all your statistics and other items will be lost and we may not be able to restore them in the future.

DATA PROTECTION OFFICER

You can reach the Company's Data Protection officer via email: dpo@kadam.net.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to amend this Privacy Policy from time to time to reflect changes in the law, our data collection and data use practices, the features of our Platforms, or advances in technology.

Please check this page periodically for changes and refer to the “last updated” date at the top of the page to know if it has been revised since your last visit. If we make any changes to this Privacy Policy that we consider to be material to your consent, we will notify you of them.