

## DATA PROTECTION DECLARATION (GDPR PRIVACY POLICY)

### 1. Name and Address of the Controller

The controller within the meaning of the General Data Protection Regulation (GDPR) and other national data protection laws is:

**Adtarget Teknoloji A.Ş.**

İçerenköy mh. Çayır cd. No: 7 Daire: 12 Ataşehir İstanbul, Türkiye

**Represented by:** Tansel Okan (CEO)

**Email:** [info@adtarget.com.tr](mailto:info@adtarget.com.tr)

### 2. Scope of this Privacy Policy

This Privacy Policy explains how Adtarget processes personal data in connection with:

- the operation of our website
- the provision of advertising technology services
- participation in programmatic advertising systems

The policy applies to users accessing our website as well as individuals whose pseudonymous identifiers may be processed within digital advertising transactions.

### 3. Categories of Personal Data Processed

Within the operation of our advertising technology systems, Adtarget processes limited categories of technical and pseudonymous data.

These may include:

- pseudonymous cookie identifiers
- device identifiers
- browser and device information
- technical advertising transaction data
- IP address (processed temporarily for technical purposes)
- bidstream data generated during programmatic advertising auctions

The identifiers used within our systems consist of randomly generated pseudonymous values stored in browser cookies or similar technologies.

These identifiers do not contain directly identifiable personal data, such as:

- names

- email addresses
- postal addresses
- telephone numbers

**Adtarget cannot directly identify a natural person based solely on these identifiers.**

#### **4. Sources of Personal Data**

Personal data processed within our advertising technology systems may originate from the following sources:

- websites or applications that integrate advertising technology components
- advertising partners participating in programmatic advertising ecosystems
- browser cookies or similar technologies placed on user devices
- technical advertising requests generated during real-time bidding processes

Advertising request data may be transmitted through programmatic advertising systems as part of bid requests generated by publisher websites or applications.

#### **5. Legal Basis for Processing**

Personal data may be processed on the following legal bases under Article 6 GDPR:

Article 6(1)(a) – consent of the user  
(for non-essential cookies and advertising identifiers)

Article 6(1)(b) – performance of a contract  
(where processing is necessary for the provision of services)

Article 6(1)(f) – legitimate interests pursued by the controller

Legitimate interests include:

- operating digital advertising infrastructure
- ensuring fraud prevention and traffic validation
- delivering advertising campaigns efficiently
- maintaining system stability and platform security

Where processing relies on legitimate interests, we ensure that such interests are balanced against the rights and freedoms of data subjects.

## 6. Real-Time Bidding and Bidstream Data

Bidstream data is processed on a pseudonymous basis and is retained only for limited periods necessary to operate the advertising platform.

Adtarget participates in programmatic advertising ecosystems where advertising space is bought and sold through automated auctions known as real-time bidding (RTB).

When a user visits a website or application that integrates advertising technology, a bid request may be generated and transmitted through programmatic advertising systems in order to facilitate the auction of advertising inventory.

These bid requests may contain certain technical information necessary to conduct the auction and deliver advertising content.

The information contained in bidstream data may include:

- pseudonymous cookie identifiers or advertising identifiers
- device type and device characteristics
- browser type and browser settings
- IP address (which may be truncated or processed temporarily)
- approximate geolocation derived from the IP address
- information about the website or application where the ad request originated
- advertising slot characteristics (such as size or format)
- timestamp and transaction identifiers

Bidstream data is used exclusively for operational purposes related to programmatic advertising, including:

- facilitating real-time bidding auctions
- enabling demand-side platforms to evaluate advertising opportunities
- delivering advertisements
- measuring campaign performance
- detecting fraud and invalid traffic

Adtarget processes such data only to the extent necessary for these technical advertising operations and does not attempt to identify individual users.

Where applicable, bidstream data may be transmitted to advertising partners participating in the programmatic advertising ecosystem.

## **7. Recipients of Personal Data**

Within the programmatic advertising ecosystem, pseudonymous identifiers may be transmitted to certain categories of partners for operational purposes.

Recipients may include:

- Demand-Side Platforms (DSPs)
- Supply-Side Platforms (SSPs)
- advertising exchanges
- fraud detection providers
- brand safety providers
- measurement and analytics providers

These partners process the data strictly for advertising-related technical purposes.

**Adtarget does not sell personal data associated with these identifiers.**

## **8. International Data Transfers**

Programmatic advertising systems may involve partners located in multiple jurisdictions.

Where personal data is transferred outside the European Economic Area (EEA), such transfers are carried out in accordance with GDPR requirements, including the implementation of appropriate safeguards such as:

- Standard Contractual Clauses approved by the European Commission
- adequacy decisions where applicable
- other legally permitted transfer mechanisms

## **9. Data Retention**

Retention periods applied within the system are limited and strictly defined.

The following retention periods apply:

Bidstream log retention  
up to 7 days

Cookie identifier / mapping retention  
up to 93 days

Operational platform data retention  
up to 61 days

After the applicable retention period expires, data is automatically deleted or irreversibly anonymized.

## **10. Cookies and Similar Technologies**

Our website and advertising systems use cookies and similar technologies.

Cookies are small text files stored on the user's device that allow recognition of the browser.

These technologies may store information such as:

- cookie identifiers
- browser configuration data
- access paths
- device information

Some cookies are technically necessary for the operation of the website, while others may support analytics or advertising functions.

Where required by law, cookies are only set after obtaining user consent.

Users may withdraw their consent at any time through their browser settings or through the consent management interface.

## **11. Consent Management and IAB Transparency & Consent Framework**

Adtarget participates in the IAB Europe Transparency & Consent Framework (TCF) as a registered vendor (Vendor ID: 779) and adheres to its policies and technical specifications.

Origin of Consent Signals

In its capacity as a Supply-Side Platform (SSP), Adtarget does not directly collect or generate user consent signals. Consent preferences are captured by publishers through their own IAB TCF-compliant Consent Management Platforms (CMPs) when users visit a website or application.

Technical Validation and Transmission

These consent preferences are transmitted to Adtarget through industry-standard protocols (such as Prebid or OpenRTB) as technical TCF consent strings within advertising requests.

Upon receipt, Adtarget may technically validate these consent signals against the IAB Global Vendor List and the user's selected preferences regarding:

specific processing purposes (such as personalized advertising or measurement), and vendor authorizations (including Adtarget's Vendor ID 779).

#### Respecting User Choice

Adtarget acts as a participant in the programmatic advertising ecosystem and processes consent signals received from publishers in accordance with the IAB TCF framework.

Where necessary for the operation of programmatic advertising transactions, Adtarget may transmit validated consent signals to advertising partners participating in the programmatic auction (such as Demand-Side Platforms).

This helps ensure that advertising transactions respect the user's transparency and choice.

#### Data Storage

Adtarget does not create or permanently store consent data. Consent strings are processed only transiently and solely for the purpose of determining whether advertising processing activities may lawfully take place.

#### User Control

Users may change or withdraw their consent at any time through the Consent Management Platform (CMP) provided by the publisher of the website or application they are currently using.

## **12. Security Measures**

Adtarget implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk.

These measures are designed to protect personal data against:

- unauthorized access
- loss or destruction
- alteration or manipulation
- unlawful disclosure

### **13. Links to Third-Party Websites**

Our website may contain links to external websites.

We are not responsible for the privacy practices or content of such third-party websites.

Users are encouraged to review the privacy policies of those websites before submitting personal data.

### **14. Data Subject Rights**

Under the GDPR, data subjects have the following rights:

Right of access

Right to obtain confirmation as to whether personal data concerning them is being processed.

Right to rectification

Right to request correction of inaccurate or incomplete personal data.

Right to erasure

Right to request deletion of personal data where applicable.

Right to restriction of processing

Right to request limitation of processing in certain circumstances.

Right to data portability

Right to receive personal data in a structured, commonly used and machine-readable format.

Right to object

Right to object to processing based on legitimate interests.

Right to withdraw consent

Where processing is based on consent, it may be withdrawn at any time.

Right to lodge a complaint

Data subjects have the right to lodge a complaint with a competent supervisory authority.

If you have questions regarding data protection matters, you may contact our Data Protection Officer at: [kvkk@Adtarget.com.tr](mailto:kvkk@Adtarget.com.tr)

If you submit your requests regarding data processing to us via [info@adtarget.com.tr](mailto:info@adtarget.com.tr) or through other legally permitted methods, we will respond to your request within thirty (30) days at the latest.

If you receive a negative response to your request following your application to our Company, you have the right to lodge a complaint with the competent supervisory authority in your country of residence.

## COOKIE DETAILS

Category	Cookie / Identifier Name	Provider	Description / Purpose	Legal Basis	Storage Duration
Strictly Necessary Cookies	ade_cookie_permission	Adtarget	Stores and communicates the user's cookie consent preferences and privacy choices. Required for the proper operation of the consent management system.	Legitimate Interest (GDPR Art.6(1)(f)) / ePrivacy compliance	90 days
Advertising Identifier Cookies	uids	Adtarget / Partners	Pseudonymous identifier used to recognize a browser or device across advertising requests and enable advertising functionality and campaign execution.	Consent (GDPR Art.6(1)(a))	Up to 93 days
Programmatic Advertising Cookies	adtarget_id or similar identifiers	Adtarget/ Partners	Used to identify devices within programmatic advertising environments and facilitate participation in real-time bidding auctions.	Consent	Up to 93 days
Frequency Capping Cookies	fc_id / campaign frequency identifiers	Adtarget/ Partners	Limits the number of times a specific advertisement	Legitimate Interest / Consent	Up to 93 days

			is shown to the same user in order to improve user experience and campaign effectiveness.		
Fraud Prevention Cookies	fraud_detection_id	Adtarget / security partners	Detects invalid traffic, bot activity, and other forms of advertising fraud in order to protect advertising systems.	Legitimate Interest (GDPR Art.6(1)(f))	Up to 61 days
Analytics and Measurement Cookies	analytics_id	Adtarget / measurement partners	Measures advertising performance, campaign effectiveness and aggregated reporting for advertising partners.	Consent	Up to 61 days
Opt-Out Cookie	Adtarget_optout	Adtarget	Records the user's preference to opt-out of personalized advertising and tracking technologies.	Consent withdrawal indicator	90 days

