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**nugg.ad**  
Privacy Policy



Version 2.4.2  
June 2015



The purpose of this privacy policy is to provide you with information regarding our privacy and security policy over and above our statutory obligations.

For nugg.ad AG predictive behavioral targeting (nugg.ad), the protection of all forms of data is of utmost importance. At nugg.ad, our business is driven by and relies on data but above all, we rely on our clients trusting us to handle their data sensitively. That is why one of our unshakable principles is an uncompromising respect for the informational autonomy of each and every citizen.

nugg.ad is unconditionally committed to data protection legislation in Germany and Europe and moreover to perceived privacy requirements. That is why we would like to take this opportunity to inform you about how we handle data at nugg.ad and the importance of data to our technology.

## 1. What data do we record and process?

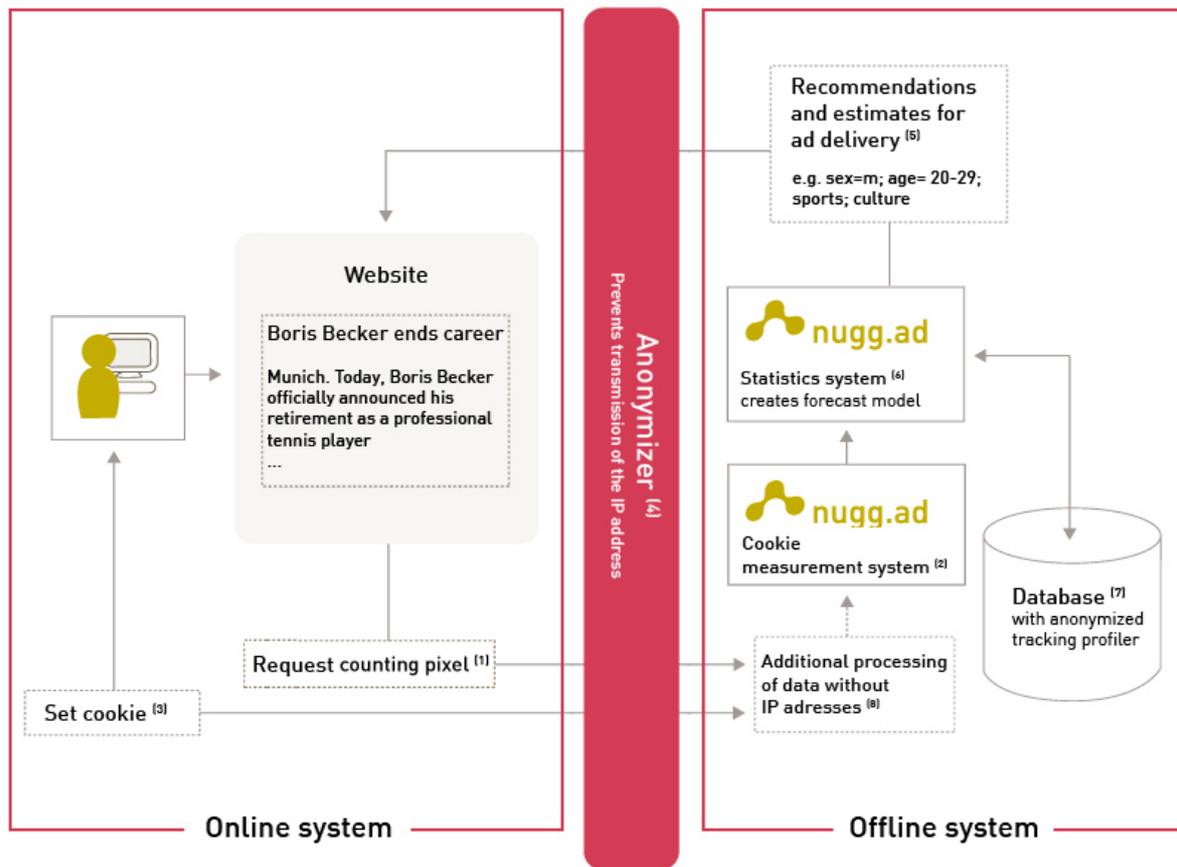
nugg.ad offers website providers a technology that enables them to deliver interest-based advertising. nugg.ad's interest-based advertising is useful to advertisers because it increases the effectiveness of advertising. As a result, it enables the number of adverts placed to be reduced so that you, as a user, benefit from being shown less advertising and what you do see is more likely to be relevant to your areas of interest as opposed to the purely random insertion of advertising.

nugg.ad achieves this by using general information based on your use of the Internet. In order to do that, nugg.ad's technology monitors the surfing pattern of Internet users by storing a cookie with a lifespan of 26 weeks in the browser of your device. That means that the number of website hits in various subject areas is counted. nugg.ad stores aggregated information on user behaviour with a hashed ID in the nugg.ad system. In other words, rather than recording the specific Internet addresses that you have visited, nugg.ad stores the frequency of use for various subject areas based on websites accessed in a cookie (see point 3 below for more details on this). This general information relating to your Internet use can be used by nugg.ad's technology across websites.

Sensitive subject areas such as religion, health or sexuality, for example, are not taken into account. In addition, no other data is recorded. In particular, nugg.ad never stores information relating to your name, address, e-mail address or IP address. We use data protection-friendly technologies and a sophisticated anonymisation system which means that we have no way of actually finding out the identity of the individual user viewing a particular page. Basically, directly personal data is never passed on to third parties, especially not local authorities or other companies.

A schematic representation of the nugg.ad system is shown below:

Schematic representation of the nugg.ad system



In addition, nugg.ad carries out surveys on customer websites. Those surveys are voluntary, unpaid and the person being surveyed can stop the survey at any time. The information collected as a result is stored in the nugg.ad system along with a hashed ID.

We never include children under the age of 14 in our surveys. We will never ask you questions about your ethnic origin, your political opinion, your religious or philosophical views, your trade union activities, your health or your sexual habits. We will also never include these categories when analysing your user behaviour.

Special precautions are taken in the nugg.ad system in order to comply with the principle of data economy. In particular, we use an anonymisation service operated by an independent party in order to ensure that no user IP addresses enter the nugg.ad system. Special technical and contractual precautions have also been taken in order to ensure that this anonymising protection cannot be circumvented by nugg.ad employees.

## 2. Targeting of target groups and campaign management

nugg.ad identifies campaign-relevant target groups based on socio-demographic criteria and product interests. We process the statistical patterns resulting from the use of online advertising and editorial content.

In order to ensure that you are not being constantly bombarded with the same advertisements and that you do not perceive advertisements as intrusive in any way, we count how often you are shown an advertisement during various campaigns. Once a certain level of exposure is reached, you will not be shown any further advertisements from that particular campaign.

nugg.ad does not deliver any advertising itself but rather sends the target group information to Adserver or other platforms involved in delivering advertising. This is done either in real time via a direct link to the relevant platform or via asynchronous communication. No IDs are used in the first variant. The second variant requires the one-off synchronisation of IDs. Before the ID of another platform enters the nugg.ad system, that individual ID is fully pseudonymised by an independent third party so that nugg.ad cannot identify any of an individual person's details from that ID.

## 3. Use of "cookies"

nugg.ad uses cookies. It goes without saying that our cookies do not contain any spyware, adware, spam or viruses. Our cookies are stored in the browser of your device (e.g. your PC, laptop, smartphone, etc.) and have a lifespan of 26 weeks.

Just like the ut cookie, our d cookie is used to analyse target groups and contains the number of website hits in various subject areas. We use the ci cookie to store information on how often you have been shown a particular advertisement. Cookies only contain general information relating to your Internet use.

We cannot trace any direct personal data on an individual user from the information in a cookie. In particular, we cannot identify a user's name, address or any other directly identifying details.

However, you do of course have the option of refusing to accept these cookies by choosing the corresponding setting in your browser or of simply deleting them.

A brief guide on deleting cookies in various browsers can be found on pages 6 and 7.

## 4. Opt-in/opt-out function and Topic Monitor

If you are interested in having advertising that matches your areas of interest displayed on web pages, then you can select an opt-in to continue the topic-based analysis of your user behaviour. If you opt in, that opt-in cookie will also be stored in the browser of your device. It will be stored for 1 year. If nugg.ad has already stored information in cookies as mentioned in point 3 previously installed in the browser of your device, setting the opt-in cookie will have the following effect: if you opt in, the lifespan of the cookies already set by nugg.ad will be extended to an overall total of 1 year (calculated from the date on which those cookies were set). Information already stored in cookies before you opt in will therefore be retained and will be deleted when the cookies expire, i.e. after a maximum period of 1 year.

You have the right to suppress the recording of measurement data by the nugg.ad system at any time by exercising your right to opt out. You can also revoke any previous consent that you have given at any time with immediate effect. An opt-out will also be stored in a cookie in your browser's end device. It will have a lifespan of 10 years, will be named "nuggstopp" and will be set by "nuggad.net".

**Please note that it will no longer be technically possible for us to detect your opt-out if you delete the cookies in your browser.**

You can declare or decline your consent online by clicking the corresponding button on the nugg.ad homepage or the "My Topic Monitor" page.

The self-regulating principles of IAB Europe which nugg.ad adheres to stipulate that every OBA-based advertisement shown is to contain a pictogram element. Click on the pictogram in the advertisement to either go to the website [youronlinechoices.com](http://youronlinechoices.com) or the nugg.ad intermediate page <http://ad-choices.nuggad.net>.

You can find out how nugg.ad has categorised your surfing behaviour by visiting the "My Topic Monitor" information page. In order to do that, the aggregated frequencies of your usage behaviour are read in encrypted format from the cookie and displayed in generalised categories. Further information on this can be found on the "My Topic Monitor" page.

## 5. Data security

All nugg.ad AG employees who work with the above-mentioned data are obliged to maintain secrecy from the time they join our company in accordance with § 5 of the Federal Data Protection Act.

In addition, nugg.ad applies technical and organisational security measures in order to protect data from being manipulated, destroyed or lost.

## 6. Contact

If you have any questions on the subject of data protection and data security, you can contact us at any time by sending an e-mail to [privacy@nugg.ad](mailto:privacy@nugg.ad). You are also welcome to contact our Data Protection Officer Christian Pfeiffer directly ([christian.pfeiffer@nugg.ad](mailto:christian.pfeiffer@nugg.ad)).

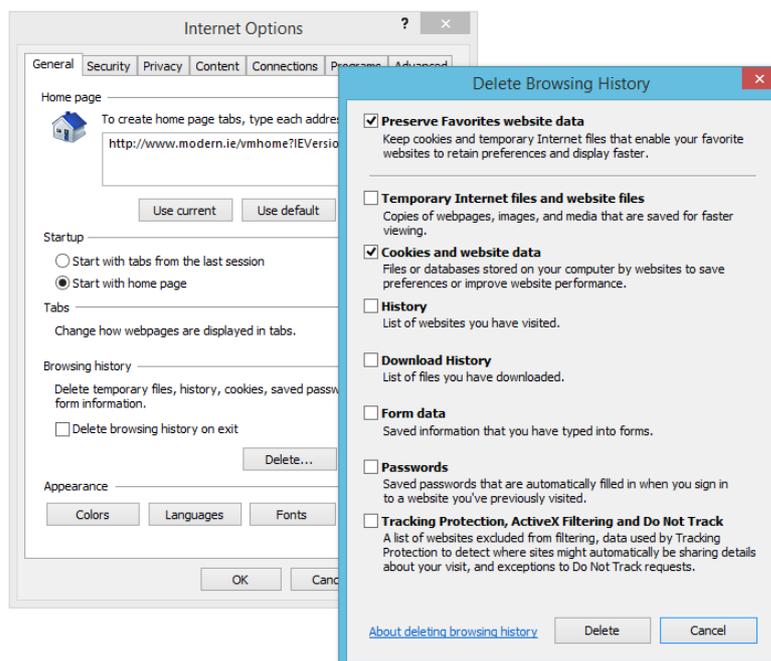
It may become necessary to update this privacy policy as a result of further developments to our services or the implementation of new technologies. nugg.ad reserves the right to edit this data protection declaration at any time with immediate effect. We therefore recommend you to read through the latest data protection declaration again from time to time.

## Deleting cookies

### Quick browser-specific guide

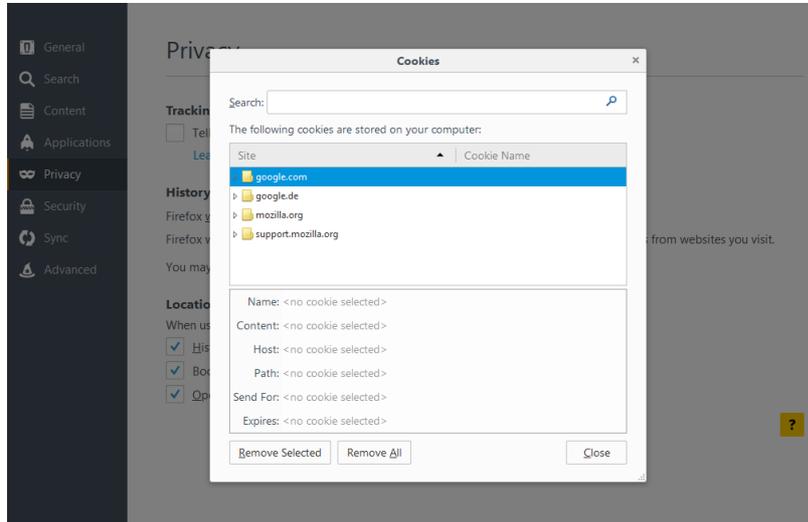
#### Internet Explorer

Internet Options -> General -> Browsing history -> Delete



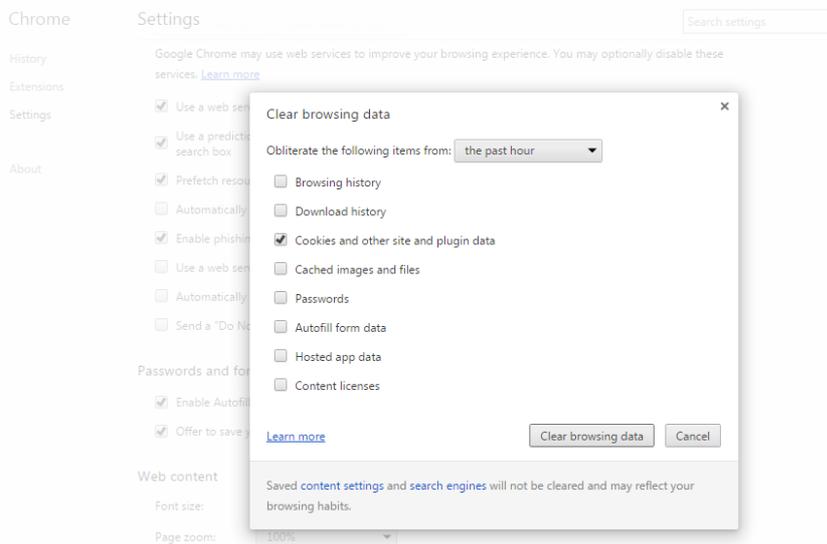
## Firefox

Options -> Privacy -> History -> Remove individual cookies



## Chrome

Settings -> History -> Clear Browsing Data



## Contact

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