

**PRIMIS**  
**PRIVACY NOTICE**

*Recently Updated: September 2019*

**1. Who Are We?**

We are McCann Disciplines Ltd., an Israeli Company, company number 513083147, with main offices at 2 Raoul Wallenberg St., Tel Aviv, 6971902 Israel.

- 1.1. McCann Disciplines Ltd. (“**McCann**” or “**us**”), is committed to your right to privacy. This Privacy Notice (“**Privacy Notice**”) sets out how McCann, trading as **Primis** governs the processing and transfer of data collected in connection with our website, available at: [www.primis.tech](http://www.primis.tech) (“**Website**”) analytics tools, sites, and as well as otherwise processed by McCann through other technical applications that we may provide through third-party websites (collectively, “**Services**”), to each person accessing or using the Website and/or the Services (the “**User**” or “**you**”).
- 1.2. This Privacy Notice is an integral part of our Publisher Terms and Conditions, which can be found at: <https://www.primis.tech/publishing-agreement-general-tc/> (the “**Terms**”). Please note that if you are an End-User (as defined below) or visitor of the Website the Terms may not be applicable to you, thus only this Privacy Notice shall apply to you.
- 1.3. McCann’s Services, provided by Primis, include an online platform enabling an advertiser (“**Advertiser**”) to display advertisements and marketing materials by video to End-Users who use or otherwise interact with certain web-pages owned by publishers we engaged with (“**Publishers**”).
- 1.4. We may process data collected through the Website and/or Services in various ways, depending on whether: (i) you are an Advertiser, Publisher or other content provider with whom McCann has a contractual relationship (“**Partner(s)**”); (ii) you are a visitor of our Website; or (iii) you are an End-User using or visiting our Partners websites or platforms.
- 1.5. You may not use the Services or the Website or submit any data through them if you do not agree to any of the terms hereunder. This Privacy Notice shall not be construed in any manner to derogate from the Terms or any other agreement or understanding between McCann and you.
- 1.6. Please note, that the Website and/or Services may contain links to other websites, products or services offered by third parties, which are not governed by this Privacy Notice. This Privacy Notice does not apply to the practices of entities which are not controlled by McCann.
- 1.7. If you are a Partner, please note that additional terms may be applicable to you in connection with the processing of Personal Data by you regarding your users and customers, as further specified in the relevant Data Processing Agreement.

**2. THE HIGHLIGHTS:**

- **You are not required by law to provide us with any Personal Data. Sharing Personal Data with us is entirely voluntary.**

- **Our Services are intended for Users over the age of 16 or equivalent minimum age for providing consent to processing of Personal Data in the relevant jurisdiction. Children under such age are not permitted to use the Services. If you are under such age you should cease to use the Services immediately.**
- **You may be entitled under applicable law to request to review, amend, erase or restrict the processing of your Personal Data. Please note that in case you request to erase or restrict the processing of your Personal Data, your use of the Services may be restricted or disabled.**
- **We do not sell, trade, or rent Users' Personal Data to third parties. We only share Personal Data with third parties in connection with the provision of the Services to our Users, or other limited circumstances as specified herein.**
- **If you have any questions or requests regarding the processing of your Personal Data, or would otherwise like to contact us in connection with this Privacy Notice, please send us an email to: [privacy@primis.tech](mailto:privacy@primis.tech).**

### **3. Amendments to this Privacy Notice**

We reserve the right to periodically revise or update this Privacy Notice. Any modifications to this Privacy Notice will go into effect upon the publication of the revised Privacy Notice on our Website. The last revision date will be reflected in the “*Recently Updated*” heading located at the top of the notice.

We will make a reasonable effort to provide notification in the event that we implement any amendments that substantially change our privacy practices. We recommend that you review this page periodically to ensure that you understand our privacy practices and to check for any amendments.

### **4. What are Personal Data, and What kinds of Personal Data does McCann collect?**

“**Personal Data**”, means any information which identifies or can be used to identify a natural person, including, but not limited to, first and last name, phone number, email address, IP address, billing information, etc.

“**Non-Personal Data**” means non-identifiable information, for example we may collect information regarding Users concerning their use of the Website and Services, such as the scope, frequency, latency, pages accessed, what and when a User views or interacts with content and materials displayed through our Services, device specifications, and other technical information regarding the device used to access the Services, such as model, operating system, etc.

We collect certain information about you and your use of the Website and Services, including information we collect from you directly (*e.g.* when you contact us directly we will collect your contact details) and information we collect about you from others (*e.g.* certain cookies of third parties. See below more information about cookies). Such information may include Personal Data and Non-Personal Data.

We also use third-party advertising companies to serve ads when you visit our Website. These companies may use aggregated information (not including your name, address, email address or telephone number) about your visits to this and other Web sites in order to provide advertisements about goods and services of interest to you. If you would like more information about this practice and to know your choices about not having this information used by these companies, please press [here](#) and [here](#) in order to opt-out.

## 5. Personal Data Processed by McCann

5.1. We use the data collected from Uses for the specific purposes listed in the table below. Please note that this table explains:

5.1.1. The **types** of Personal Data and Non-Personal Data we collect about User

5.1.2. The **legal basis** for processing your Personal Data, linked to each processing **purpose**; and

<b>Type of Data</b>	<b>Purpose of Processing</b>	<b>For EU Persons - Legal Basis Under the GDPR</b>
<p><b><u>Customers Registration</u></b></p> <p>When you register to one of our Services or request a demo, you will be requested to provide certain Personal Data, such as full name, e-mail address, your company's name, phone number, country of residence, your industry role (publisher, advertiser or other), and your website's URL.</p>	<p>To administer our relationship with you, provide services and ensure the billing of any procured Services by you and obtain payment.</p>	<p>Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p>
<p><b><u>Contact Details</u></b></p> <p>If you voluntarily contact us in any manner, or for any requests or to notify us about something, you may be required to provide us with certain information such as your name and email address which we will then process.</p>	<p>We will use your contact details only in order to respond to you, provide you with support and assist you or provide you with any other service that you may request.</p>	<p>Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p>
<p><b><u>Technical Data</u></b></p> <p>We may collect technical data from you. This information includes the type of device, operating system and browsers you use, the time and date you accessed the website, User's actions (i.e. regarding the User's viewing of and interaction with the Website, including the web pages the user visited and clickstream), your approximate geographical location, and any redirecting URLs.</p>	<p>We collect this data solely in order to operate, provide, maintain, protect, manage, customize and improve our Website.</p>	<p>Necessity of processing for the purposes of the legitimate interests of McCann.</p>

<p><b><u>Career</u></b></p> <p>In the event you are interested in joining our team, and wish to submit your CV, you will be required to provide us with your full name, phone number, email address and submit your CV.</p>	<p>We collect this data in order to process your job application, including assessing suitability, eligibility and/or fitness to work.</p>	<p>Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p>
<p><b><u>Commercial materials and newsletters</u></b></p> <p>In the event a you sign up to receive our newsletter or other marketing materials, you will be requested to provide your email address.</p>	<p>We will use this data solely to send the newsletter and other requested marketing materials.</p>	<p>User's active consent, as demonstrated by User's voluntary registration to receive commercial materials and newsletters.</p>
<p><b><u>Data Regarding End-Users</u></b></p> <p>When you use the Services as an end-users of our Partners (e.g. when you visit certain websites that we have placed our cookies or other similar technologies as detailed in our Cookies Policy, we use certain online identifiers to collect certain information, such as session duration, page impressions, Internet protocol (IP) address, the domain name that served you to access the Service, the geographic location of the computer system that you are using to log-in to, or access the Services, your advertising ID</p> <p>Data about End-users' access and use of advertisements that our customers embed on their websites through the use of the Services, and the redirection of end-users from such advertisements to the advertisers' websites and web pages.</p>	<ul style="list-style-type: none"> <li>- To provide our Services to our Partners.</li> <li>- To tailor the content and information that we may send or display to Users.</li> <li>- To retarget content to end-users through our Services and elsewhere.</li> <li>- To personalize end-users' experience while interacting with our Services.</li> <li>- To operate, provide, maintain, protect, manage, and improve the Website and Services.</li> <li>- Performing research, as well as for analytical and statistical purposes.</li> <li>- To audit and track usage statistics and traffic flow, audit our affiliates, calculate payments, detect fraud, for security or technical reasons in</li> </ul>	<p>Necessity of processing for the purposes of the legitimate interests of McCann and its customers.</p> <p>End-Users' consent, where necessary under applicable laws for the processing of such data.</p>

	connection with the Website and the Services.	
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5.2. We do not knowingly collect or process any Personal Data included in Special Categories of Personal Data (as defined in the GDPR). In the event you become aware that such data has been posted to the Website or collected by us, please inform us immediately.

**6. Cookies**

We use data files such as cookies, pixel tags, “Flash cookies,” or other local storage files provided by your browser or associated applications (“**Cookies**”). We use these technologies in order to recognize you as an End-User, customize our Services, content, and advertising; measure promotional effectiveness; help ensure that your account security is not compromised; mitigate risk and prevent fraud; and to promote trust and safety across our Website and Services. For more information please refer to our Cookie Policy.

**7. How Can You Control Your Personal Data?**

- 7.1. **Reviewing and amending your Personal Data.** If you are registered to the Services, you may review the information included in your account on the Website. You may also send us a request in connection with reviewing your Personal Data to: [privacy@primis.tech](mailto:privacy@primis.tech). In the event any Personal Data is incorrect or outdated, you may update and correct such data by providing us with appropriate notification or correcting the data directly on the Website, as applicable to you. False, incorrect, or outdated information may prevent you from registering to the Services, or impair McCann’ ability to provide you with the Services.
- 7.2. **Right of erasure and restriction.** You may also be entitled request the erasure or the restriction of your Personal Data, and we will comply with such requests, to the extent required under applicable law.
- 7.3. **Portability of Personal Data.** To the extent relevant to you and to the Services, you may be entitled to request the portability of your Personal Data, and we will comply with such requests, to the extent required under applicable law.

**8. Will McCann Share My Personal Data With Others?**

**WE DO NOT SELL OR RENT ANY OF YOUR PERSONAL DATA TO NON-AFFILIATED THIRD PARTIES FOR THEIR MARKETING PURPOSES.**

- 8.1. Non-Personal Data, aggregate and statistical or otherwise anonymized data may be shared without limitation with third parties at our discretion. This information does not contain Personal Data and is used to develop content and services for our Users and clients.
- 8.2. We share Personal Data only under the following limited circumstances:
  - 8.2.1. With our Partners to whom you provide your consent to.
  - 8.2.2. With trusted partners and third parties who assist us in operating the Services and conducting our business, such as fraud prevention, bill collection, account maintenance, marketing and technology services.
  - 8.2.3. For personalizing your experience of the Services, including by way of targeted advertising on the Website.

8.2.4. As necessary to help detect and prevent potentially illegal acts and fraud, and to guide decisions about products, services and communications.

8.2.5. We may share your Personal Data with a parent company, subsidiaries, joint ventures, or other companies under common control (“**Affiliated Companies**”) solely if and when applicable or necessary. In addition, we may share information, in the event of a corporate transaction (e.g. sale, merger, consolidation, etc.), provided however, that our Affiliated Companies or acquiring company will be subject to the obligations detailed herein with respect to your Personal Data ;

8.2.6. To comply with a legal requirement, for the administration of justice, to protect your vital interests or the vital interests of others, to protect the security or integrity of our databases or the Services, to take precautions against legal liability, or in the event of a corporate sale, merger, reorganization, dissolution or similar event.

8.2.7. Other third parties with your consent or direction to do so.

**9. For how long do we retain the data we collect and process?**

We retain the data we collect solely for as long as required to fulfil the purposes for which it was initially collected, or for longer periods in the event we are required to do so in order to comply with legal, tax and accounting requirements. In addition, we will retain information we believe is needed in order to protect our rights and interests in accordance with applicable laws. For additional information on our data retention policy in connection with different types of Personal Data, see the below table.

<b>Type of Personal Data</b>	<b>Retention Period</b>
<b>“Contact Us” communications</b>	As long as needed to provide you with the Services you have requested and for longer periods in the event, we believe it is required in order to defend our rights and interests, subject to applicable laws.
<b>Data regarding end users</b>	Where such data constitutes Personal Data, we will retain the data for the duration of the term of provision of our Services to our customers, and in addition a reasonable terms for the defense and assertion of legal claims.  Non-personal data may be retained indefinitely.
<b>Email address for receiving Commercial materials and newsletters</b>	Until the User has opted out of the service.
<b>Career – C.V.</b>	In the event the User has become an employee, for the duration of employment and in addition for as long as necessary to for the defense and assertion of legal claims.
<b>Technical Data</b>	Technical data is retained in a manner which does not enable the identification of any individual, and may be retained indefinitely.

<b>Customers Registration</b>	Where such data constitutes Personal Data, we will retain the data for the duration of the term of provision of our Services to our customers, and in addition a reasonable terms for the defense and assertion of legal claims.
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**10. Will McCann transfer my Personal Data internationally?**

Our databases are currently located in the Netherlands and the U.S. Some of our processing activities are made in Israel. The European Commission has decided that the State of Israel ensures an adequate level of privacy and data protection, therefore, in accordance with the GDPR, the transfer of Personal Data from the EU to Israel is lawful and does not require any specific authorization.

Any other transfer of Personal Data originating from the EU to a third country (other than Israel) shall be made in accordance with applicable law, including by providing adequate protections, or otherwise implementing appropriate safeguards to ensure the protection of our Users' rights.

**11. Will I receive promotional materials from McCann?**

McCann may send you offers that may be of special interest to you via email or SMS. You may unsubscribe from receiving such communications at any time, by sending us a notification to: [privacy@primis.tech](mailto:privacy@primis.tech), or following the instructions for unsubscribing included in such communications.

We may also engage with third parties to track and report performance of advertising and marketing campaigns to and from McCann and third party web sites. We may combine your information with information we collect from third parties and use it to improve and personalize our Services, content, and advertising.

**12. Persons under 16**

Our Website is a general audience Website, which is not directed to persons under 16 years old. If a parent or guardian becomes aware that his/her child has provided us with Personal Data without their consent, he/she should contact us immediately. We do not knowingly collect or solicit Personal Data from people under 16 years old. If we become aware that a person under 16 years old has provided us with Personal Data, we will delete such data from our databases.

**13. Applicable Laws**

The provisions included in this Notice relating to matters regulated under the GDPR will apply only to the processing of Personal Data which is subject to the GDPR in accordance with the applicability provisions contained therein. If the GDPR does not apply to the processing of your Personal Data, some of the provisions above may not apply to you.

**14. Questions or Concerns Regarding Privacy**

If you have any questions or concerns regarding privacy issues, please send us a detailed message to [privacy@primis.tech](mailto:privacy@primis.tech), or via regular mail to: McCann Tel Aviv, at 2 Raoul Wallenberg St., Tel Aviv, 6971902 Israel and we will make every effort to resolve your concerns without delay.

You may also be entitled to file a complaint with the appropriate supervisory authority in connection with concerns you may have with regards to your privacy.