

AndesML Privacy Policy

Last Updated: October 2025

1. Introduction

AndesML (“we,” “our,” or “us”) is a Retail Media technology company that empowers retailers to monetize their digital traffic through AI-driven personalization and automation.

This Privacy Policy explains how AndesML collects, uses, and protects information in connection with our platform and services.

2. Our Commitment to Privacy and Security

We treat privacy as a core value and protect data with market-leading standards.

AndesML implements strict access controls, encryption, and monitoring systems to safeguard the confidentiality, integrity, and availability of our clients’ and users’ data. We comply with applicable privacy and data protection laws in all jurisdictions where we operate.

3. Data Collection and Processing

AndesML processes data solely to enable our Retail Media technology and deliver our contracted services.

A. First-Party Data (Client-Owned Data)

Our platform helps retailers activate and monetize their first-party data.

- **Source:** User interactions on our clients’ digital or physical channels.
- **Purpose:** To personalize advertising, optimize campaign performance, and generate insights for brands and advertisers.
- **AI & Insights:** Our algorithms analyze pseudonymized data to predict consumer intent, improve ad relevance, and provide analytical reports that support strategic decisions.

B. Data Minimization & Security

The categories of data processed are determined by our clients (the data controllers). AndesML acts as a data processor, handling only pseudonymized or aggregated data and never using it to directly identify individuals.

4. How We Use Data

Our AI and ML models process data to support several platform modules:

Solution	Description	Data Use
Onsite (Website/App)	Displays personalized ads on the retailer's digital properties.	Uses interaction data to optimize placement and conversion.
Offsite (External Media)	Extends ad reach to other digital platforms.	Expands visibility to new, relevant audiences.
In-Store (Physical Stores)	Enables targeted digital media within retail locations.	Uses AI-based segmentation for contextual messages.
Insights	Provides analytics and audience reports.	Generates aggregated insights for brands decision-making.

5. Data Sharing and Transfers

- **Service Providers:** We may share data with infrastructure and technology providers strictly necessary to operate our platform, under confidentiality and data protection agreements.
- **International Transfers:** Data may be processed or stored internationally. We use approved safeguards (such as Standard Contractual Clauses) to ensure compliance with applicable laws.
- **Legal Disclosures:** We may disclose information when required by law, regulation, or judicial process, or in connection with corporate transactions such as mergers or acquisitions.

6. Data Retention

We retain personal data only as long as necessary for the purposes outlined in this Policy or as required by law or contract.

7. Your Rights

Depending on your jurisdiction, you may have the right to:

- **Access** your personal data.
- **Correct** inaccurate or incomplete data.
- **Delete** your data in certain cases.
- **Restrict or object** to processing.
- **Receive** your data in a portable format.
If processing is based on consent, you may withdraw it at any time without affecting prior lawful processing.
Exercising these rights will not result in discrimination or reduced service quality.

8. Contact Us

If you have questions, concerns, or wish to exercise your rights, please contact us:

AndesML SpA

contact@andesml.com

Attn: Data Protection Office / Legal Department

jose.vaisman@andesml.com