

PRIVACY POLICY
ASK LOCALA PTE LTD
(Singapore)

ASK LOCALA is developing an omnichannel digital advertising platform, primarily aimed at major retail chains, restaurants, and car dealerships. ASK LOCALA enables clients to evaluate the performance of their points of sale in real time, identify the best consumer clients in the vicinity, generate in-store traffic, and measure return on investment to maximise the potential of each establishment.

ASK LOCALA delivers targeted advertising to consumers during their use of mobile apps or websites accessible via mobile devices, participating in real-time bids.

ASK LOCALA also provides a proprietary solution that allows its clients to obtain detailed statistics on footfall in specific geographic areas – including physical points of sale – whether as part of an advertising campaign or not. This policy (the "**Policy**") covers the processing of personal data carried out by ASK LOCALA in connection with the services described above. It is intended to explain in detail how we process your data and applies to you if you are located in the United Kingdom.

ASK LOCALA processes personal data in accordance with applicable data protection laws, including the Singapore Personal Data Protection Act 2012 (PDPA) and the Malaysian Personal Data Protection Act 2010 (PDPA).

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A. WHO IS THE DATA CONTROLLER?

The processing of personal data implemented in the context of the services described above is carried out by the following entities in their capacity as joint data controllers:

- **ASK LOCALA:** a single-shareholder simplified joint-stock company, registered with the Paris Trade and Companies Register under number 534 318 415, with its registered office at 32 BOULEVARD HAUSSMANN, 75009 PARIS, FRANCE
- **ASK LOCALA PTE LTD:** a private limited company, registered with Companies House under number 08585913, with registered office at 31 Boon Tat Street #02-01,069625, Singapore. Therefore, when we mention "ASK LOCALA" in the Policy, this refers to the two aforementioned entities.

B. INFORMATION WE PROCESS

We process data about you that is associated with the mobile advertising identifier of your mobile device.

If you have given your consent, our partners provide us with information collected via your mobile advertising identifier (such as IDFA for Apple or AAID for Android) when you use mobile apps or websites. Your consent to the use of this information is obtained by the publisher operating the websites and mobile apps you use.

The categories of data processed in this respect by ASK LOCALA are as follows:

- **Consent data:** consent string to verify that you authorise us to process your data.
- **Indirect identification data:** Mobile Unique Identifier (MAID), IP address.
- **Browsing data,** including, for example, information related to the devices or browsers used (device types, operating systems, device language, screen sizes, device time and time zones, etc.), and information about the advertisements viewed or clicked on by users (e.g., number of impressions, ad clicks, etc.).
- **Precise geolocation data,** derived from the connection used by the device, including the latitude and longitude of the device. We may associate this precise geolocation data with specific zones and locations (for example, the area around a client's shop) and infer the presence of a user within these zones or locations at a given time.
- **Tracking tools:** ASK LOCALA and its clients or partners may use tracking tools (e.g., pixels) if you have consented to this.

This data does not identify you directly (ASK LOCALA does not use data such as your name or postal address).

C. HOW DO WE USE THE INFORMATION?

We process your data for the following purposes:

1. [Dissemination of targeted or non-targeted advertisements](#)

Processing name	Purpose of the processing	Legal basis	Length of time data is kept

Delivery and targeting of advertising via our own platform (Fusio DSP) or via third-party DSP platforms	Deliver targeted advertising campaigns through a real-time bidding (RTB) system on our proprietary DSP or third-party DSPs according to our advertiser clients' criteria	Consent	13 months
Measure the performance of advertising campaigns via our Fusio DSP platform	Measure advertising campaign performance (ad serving) to produce reports. This includes tracking ad impressions, tracking in-ad user actions (in-ad events), and the number of clicks.	Consent	13 months
Pre-bid filters with third-party partners via our Fusio DSP platform (IAS, DoubleVerify)	Optimise campaigns by applying filters before deciding to participate in a bid. These filters take into account the visibility of the ad placement, fraud risks, and consistency with the advertiser's brand image (brand safety)	Consent	13 months
Media buying optimisation algorithms	Adjust bids in real time based on publisher performance	Consent	13 months
Configuration of "capping" conditions via our Fusio DSP platform	Set a maximum ad display repetition per ad ID (IDFA, AAID) to limit the number of times an ad is shown to the same user	Consent	60 days
Use of third-party audiences via Fusio DSP (Adsquare)	Use audience segments to decide whether to participate in a bid when the user matches the targeted audience	Consent	13 months
Drive-to-store measurement (Adsquare) via Fusio DSP	Evaluate the impact of campaigns on physical in-store visits via the Adsquare tool	Consent	13 months
Centroid detection algorithms	Use mobility data to identify suspicious or inconsistent locations (fraudulent latitude/longitude coordinates).	Legitimate interest	3 months

2. [Audience creation](#)

Processing name	Purpose of the processing	Legal basis	Length of time data is kept
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Custom audience creation	Create segments (groups of users with common characteristics) for ad targeting	Consent	Daily calculation with rolling 30-day window
Integrate custom audiences into the Fusio DSP platform.	Build audience segments for ad targeting based on information provided by our clients	Consent	13 months
Retarget users who have already seen or clicked on an advertisement (click impressions), thanks to the campaigns broadcast via our Fusio platform.	Build audience segments for ad targeting based on exposure or clicks recorded during previous campaigns managed via Fusio DSP.	Consent	13 months

3. [Measurement of in-store visits](#)

Processing name	Purpose of the processing	Legal basis	Length of time data is kept
Drive-to-store measurement (Locala)	Evaluate the impact of campaigns on physical in-store visits of users with the Locala tool	Consent	13 months

4. [Trend analysis](#)

Processing name	Purpose of the processing	Legal basis	Length of time data is kept
Trend analysis via the planning platform	Provide studies to improve clients' strategies by using mobility data flows to produce statistical trend reports, media strategies, and target audience descriptions	Consent	Raw data: 120 days

5. [Selection of premium advertising inventories](#)

Processing name	Purpose of the processing	Legal basis	Length of time data is kept
Curated Deal	Inventory curation based on publishers, geotargeting and/or custom audiences to maximise campaign performance and deliver premium advertising campaigns, optimised to appear on the right sites, with the right	Consent	13 months

	audiences and in the right geographic areas		
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6. [Compliance with our legal obligations](#)

Processing name	Purpose of the processing	Legal basis	Length of time data is kept
Manage requests to exercise rights	Manage requests to exercise your rights under data protection regulations to ensure that your choices and rights are respected	Legal obligation	5 years from the closure of the request
Manage the opt-out list	Maintain an opt-out list to identify MAIDs that oppose the processing of their data	Legal obligation	Until the opt-out is withdrawn
Verify consent string validity	Verify the consent given by the user to ensure that the processing associated with their data is only activated if the user has previously consented to it	Legal obligation	13 months for Fusio DSP 120 days max for mobility data

The retention periods referred to above do not preclude the exercise of the rights detailed in point E of the Policy, insofar as these rights can be legally exercised.

D. SHARING INFORMATION

7. [Data recipients](#)

As part of the processing of your data, ASK LOCALA may give access to your data to the following categories of persons:

- ASK LOCALA staff members responsible for processing your data as part of their duties;
- The entire ASK LOCALA group, including its subsidiaries and affiliates;
- Where applicable, to our partners and service providers, including performance measurement providers;
- SSP (Supply Side Platform) platforms that are involved in the real-time bidding process for advertising spaces;
- Our clients (advertisers or media agencies). In this case, our clients act as independent data controllers under the conditions set out in their own privacy policies;
- Authorised third parties who may obtain access to data under a legal or regulatory provision, as well as our legal advisors;
- In the event of a merger, acquisition of our business or assets or other similar event, to a potential buyer or investor of our business or assets with whom we have a contractual relationship.

8. [International transfers](#)

Personal data processed as part of our Services may be transferred outside the European Union, Singapore, or Malaysia, in particular when some of our hosting servers or partners are located in other jurisdictions such as the United States. Our hosting provider is Amazon Web Services (AWS), which is certified under the EU–U.S. Data Privacy Framework (DPF), considered by the European

Commission to provide an adequate level of protection for personal data transferred between the European Union and the United States. Where personal data is transferred to countries that do not provide an adequate level of protection, ASK LOCALA ensures that such transfers are carried out in compliance with applicable data protection laws — including the Singapore Personal Data Protection Act 2012 (PDPA) and the Malaysian Personal Data Protection Act 2010 (PDPA) — and with the European General Data Protection Regulation (GDPR) where applicable.

In such cases, ASK LOCALA implements appropriate safeguards, such as contractual clauses ensuring a level of protection and security of personal data equivalent to that required under the applicable regulations.

For any questions regarding these transfers or to obtain more information about the safeguards implemented, you can contact us at the address indicated in point H below.

E. YOUR RIGHTS

1. [User rights under applicable regulations](#)

In accordance with the regulations on the protection of personal data, Users have the following rights, which you can exercise by contacting us at the contact details indicated in point H:

- **Access:** You have the right to access your personal data free of charge, to obtain a copy of the processed data and information on how we process this data.
- **Rectification:** You have the right to request the rectification of your personal data.
- **Restriction (where applicable) :** You can request the restriction of the processing of your personal data, in the following cases:
 - When you dispute the accuracy of your personal data – for a period of time that allows us to carry out the necessary checks;
 - When the processing is unlawful, but you oppose the erasure of the data and instead require the restriction of its use;
 - When the processing is no longer necessary for us but you want us to keep the data for the establishment, exercise or defence of legal rights;
 - When you exercise your right to object – while verifying whether we have compelling legitimate grounds to continue processing.
- **Withdrawal of your consent:** When we process your personal data on the basis of your prior consent, you have the right to withdraw it at any time and in the future.
- **Objection (where applicable) :** You can object, for reasons relating to your particular situation that you will have to communicate to us, to the processing based on our legitimate interest.

In such cases, we will stop processing the relevant data unless (i) there are compelling legitimate grounds for processing that override your interests, rights, and freedoms, or (ii) the processing is required for the establishment, exercise, or defence of legal claims.

- **Portability (GDPR only)** : You may request the portability of your personal data when processing is based on contract performance.
- **Deletion/erasure**: You can request the deletion of all or part of your personal data in the following cases:
 - When processing is no longer necessary for the purposes for which it was collected;
 - When you withdraw your consent or exercise your right to object as described above;
 - When the data has been the subject of unlawful processing; or
 - When its erasure is required to comply with a legal obligation to which we are subject.
- **Give instructions on the fate of the data**: You have the right to register with us instructions on the fate of your data after your death.

You can exercise these rights at any time, or ask any other question relating to the processing of your personal data, by contacting us at the contact details indicated in paragraph G below.

In order to facilitate the processing of your request, we invite you to indicate in the subject line of your message or letter “Exercise of rights relating to my personal data”. We will respond to any request received from you within one (1) month from the date of receipt of your message.

If your request is not sufficiently precise or does not contain all the elements required to respond to it, ASK LOCALA may ask you to provide additional information. Finally, if you believe that your personal data has not been processed in compliance with applicable data protection laws, you have the right to lodge a complaint with the relevant supervisory authority:

- In Singapore: the Personal Data Protection Commission (PDPC) – Website: <https://www.pdpc.gov.sg>
- In Malaysia: the Department of Personal Data Protection (JPDP) – Website: <https://www.pdp.gov.my>
- In France: the Commission Nationale de l’Informatique et des Libertés (CNIL) – 3 Place de Fontenoy – TSA 80715 – 75334 Paris Cedex 07, France – Website: <https://www.cnil.fr>

2. [Behavioural advertising and mobile advertising identifier](#)

We use information to help our customers deliver advertising that is of interest to Users, i.e., targeted advertising.

To learn more about behavioural advertising or to opt out of certain types of third-party behavioural advertising, users can visit the Digital Advertising Alliance website: <https://digitaladvertisingalliance.org/>.

This type of advertising is based on mobile advertising identifiers, which are unique identifiers associated with mobile devices.

There are two types of mobile advertising identifiers:

- The Android identifier is called **GAID**
- The Apple identifier is called **IDFA or IFA**. This is an Apple device identifier launched with iOS 6 which is an application/publisher identifier.

You can refuse the use of your identifier for targeted advertising purposes and/or disable targeted advertising based on your location by following the steps below:

- **On iOS:** to control personalised ads on Apple services, go to "Settings", "Privacy and Security", "Apple Advertising" and finally disable the "Personalised Advertising" option (see demo on [Apple Support](#)). In addition, if you want to control the data that the apps installed on your device have access to, you can follow the procedure "Manage sharing and access" (option two) (see demo on [Apple Support](#)).
- **On Android:** to control personalised ads on Google services, go to "Settings", "Google", "Ads", then "Delete advertising identifier" (see demo on [Google Support](#)). In addition, if you want to control the data that the apps installed on your device have access to, you can change the permissions granted (see demo on [Google Support](#)).

Following these steps will stop our partners from collecting data via your mobile advertising identifier and will stop our advertising campaigns from being displayed on your mobile device.

You can also contact us directly via [this form](#) or at the address indicated in section H if you wish to withdraw the consent you gave us to process your data.

To process your request, we may need your mobile advertising identifier so we can identify you:

If you have an Android: please go to Settings -> Google -> Ads. You will find the unique advertising identifier of your device.

If you have an iOS mobile: Apple no longer natively displays your ID in the settings. You will need to use a third-party application designed for this purpose, such as My Device ID by AppsFlyer (free on the App Store).

F. ADHERENCE TO THE IAB EUROPE TRANSPARENCY AND CONSENT FRAMEWORK (TCF)

ASK LOCALA is a member of the IAB Europe *Transparency and Consent Framework (TCF)* and is committed to complying with all the specifications and policies defined in this framework.

In accordance with the principles of the TCF, we use our technologies to automatically collect information on the devices of mobile users, subject to the prior consent of end users in the European Union. This consent is collected by the partner publishers with whom we collaborate and is transmitted to us in the form of a "consent string", in accordance with TCF standards.

ASK LOCALA is identified under number 119 as part of the IAB Europe TCF.

G. CHANGES TO THIS POLICY

ASK LOCALA may modify this Policy.

We will ensure that you are informed of these changes.

In any case, we invite you to regularly consult our Policy.

H. CONTACT US

ASK LOCALA has a Data Protection Officer ("DPO").

For any questions relating to this privacy policy, you can contact us by email: privacy@asklocala.com.

Our DPO will take care of your request.