Privacy Policy
Last updated on 15 December 2025

This document describes the Privacy Policy on the collection, use and disclosure of your information that we collect when you use our website and/or our service (the "Site" or "Service"). By accessing or using the Site, you are consenting to the collection, use and disclosure of your information in accordance with this Privacy Policy. If you do not consent to the same, please do not access the Site or use the Service.

We may modify this Privacy Policy at any time and will post the revised Privacy Policy on the Site. We recommend that you periodically review this page.

HOW WE COLLECT YOUR INFORMATION

We collect information about you in various ways when you use our Site. For example, we collect information you provide to us when you register for a Publisher or Demand Partner, use the interactive areas and features of our Service, apply for a job, and when you email, call, or otherwise communicate with us.

Specific information we collect to fulfill obligations under contracts or agreements: name, email address, phone number, billing address, social security number, tax identification number, credit card information, bank account information, PayPal email address, and other contact or demographic information you choose to provide.

When you visit our Site, some information is automatically collected, including:

Log information: such as your operating system, IP address, access times, browser type and language, and the website you visited before our Site are logged automatically. We also collect information about your usage and activity on our Site.

Cookies and Other Tracking Technologies: are used on our Site for analytics purposes, such as to understand which areas and features are popular and to count visits to our Site. You may block cookies by our Site by setting your browser settings to block cookies.

However, if you choose to remove cookies or reject cookies, this could affect our Site's functionality. For more information on how we use cookies, visit our Cookie Statement.

We may also receive information about you from other sources and combine that with information we collect through our Site or Service.

ANALYTICS SERVICES PROVIDED BY OTHERS

We may allow other companies to provide analytics services on our behalf. These entities may use cookies, web beacons and other technologies to collect information about you, including your IP address, web browser, pages viewed, time spent on pages and links clicked. For example, we utilize Google Analytics. For more information on how Google collects and processes data, visit http://www.google.com/policies/privacy/partners/. To opt-out of Google Analytics, visit https://tools.google.com/dlpage/gaoptout.

HOW WE USE YOUR INFORMATION

We use information collected through our Site for purposes described in this Policy or otherwise disclosed to you in connection with our Site or Service. For example, we may use your information to:

- operate and improve the Site;
- carry out our advertising services and related operations;
- respond to your comments and questions and provide customer service;
- monitor and analyze trends, usage and activities in connection with our Site or Services;
- prevent fraudulent transactions;
- provide and deliver your products and services and to send you related information, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages;
- communicate with you about new contests, promotions and rewards, upcoming events, and other news about products and services and our selected partners; and
- link or combine with other information we get from third parties, to help understand your needs and provide you with better service.

We do not collect, store any sensitive data nor do we share this information with any 3rd parties.

By accessing or using the Site or otherwise providing information to us, you consent to the worldwide processing and transfer of information in other countries.

HOW WE SHARE YOUR DATA

We may share the information collected through our Site with third parties as follows:

- with third-party vendors, consultants and other service providers who work on our behalf or with us to provide the Service, and need access to your information to carry out their work;
- with third parties that perform specific services on our behalf and may use your information in connection with the provision of such services for other companies;
- in response to a request for information if we believe disclosure is in accordance with any applicable law, regulation or legal process, or as otherwise required by any applicable law, rule or regulation;
- if we believe your actions are inconsistent with the spirit or language of our user agreements or policies, fraudulent, or to otherwise protect the rights, property and safety of others;
- in connection with, or during negotiations of, any merger, sale of assets, financing or acquisition of all or a portion of our business to another company; and
- with your consent, such as if we notify you that the information you provide will be shared in a particular manner and you provide us with information.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

We bear full liability for transfers of your data to our third party agents.

Under certain circumstances, we may be required to disclose your data in response to valid requests by public authorities or to meet national security or law enforcement requirements.

SECURITY AND INTEGRITY OF YOUR INFORMATION

We take reasonable precautions to safeguard the information we collect through our Site or Service in an effort to prevent loss, misuse and unauthorized access, disclosure, alteration and destruction.

ACCESS TO YOUR INFORMATION AND YOUR CHOICES REGARDING OUR SITE

If you are EU individual, you have the right to obtain from us confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from us rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from you, any available information as to their source;
- the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

Where personal data are transferred to a third country or to an international organisation, you shall have the right to be informed of the appropriate safeguards relating to the transfer.

We shall provide a copy of the personal data undergoing processing. For any further copies requested by you, we may charge a reasonable fee based on administrative costs. Where you make the request by electronic means, and unless otherwise

requested by you, the information shall be provided in a commonly used electronic form.

ENFORCEMENT AND CONTACT

We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of information.

If you have any questions regarding this Policy, please contact us by email at privacy@betweenx.com.

GDPR Privacy Policy

The terms below apply to data processing of data subjects from EU and EEA.

This Privacy Policy ("Policy") applies to those who visit the Site, as well as users of our Service and their end users. This Privacy Policy describes how we collect, use, share and secure the personal information you provide. It also describes your choices regarding use, access and correction of your personal information.

Amendments to this Policy will be posted to this URL and will be effective when posted. You can choose to discontinue use of the Site or Service, if you do not accept the terms of this Policy, or any modified version of this Policy.

We do not knowingly collect any personal information from children under the age of 16. Our Site and Service are not offered to individuals under the age of 16. You should not use the Site and the Service in you are below 16. If you are under the age of 16, please do not submit any personal information through the Site and the Service. If you are under 16 and want to use our Site and Service, please contacts us to settle this matter individually.

If you have questions or complaints regarding our Privacy Policy or practices, please contact us by the contacts below.

Email: privacy@betweenx.com

Privacy Team

COLLECTION AND USE

We may use the personal information collected from within the Site and the Service on the basis of legitimate interest to:

- send you promotional and marketing communications;
- facilitate your transactions with other persons when you use the Service;
- analyze user experience with the Site and the Service;
- analyze your data for the purpose of fraud detection.

We may use the personal information collected from the Site and the Service as it's required for performance or entering an agreement with us:

- enter the agreement on the use the Service by you and administering your account;
- provide you with the Site and the Service content;
- send you service messages related to the Site and the Service.

Each data subject has the right to withdraw previously provided consent or object to processing under specific circumstances.

Provision of personal data with our Site and Service is required for proper aligning of the Site features to your preferences and entering an agreement with you on the use of the Site and the Service. Inability to process this data will result in inability to provide proper access to the Site and ability to use the Service.

Processing of personal data with the Service is our contractual obligation. It is required to show you ads based on your personal features (including language) instead of random contextual ads.

CONDITIONS OF PROCESSING

We warrant that data processing will take place only if and to the extent that at least one of the following applies in case if we act as a data controller:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

- processing is necessary for the 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;
- processing is necessary for compliance with a legal obligation to which the Site or the Service is subject;
- processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- processing is necessary for the performance of a task carried out in the public interest;
- processing is necessary for the purposes of the legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child;
- we took reasonable measures to ensure that no data of children below 16 is processed;
- processing of personal data (sensitive data) revealing racial or ethnic origin, criminal offences, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation is not conducted.

Where personal data relating to a data subject is collected, we shall, at the time when personal data are obtained or by data subject's request, provide the data subject with all of the following information by a link to this Privacy Policy:

- the identity and the contact details of the controller and the controller's representative;
- the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
- where the processing is based on legitimate interests stipulated by applicable, such legitimate interests pursued by the controller or by a third party;
- the recipients or categories of recipients of the personal data;
- the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction

of processing concerning the data subject or to object to processing as well as the right to data portability;

- the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- the right to lodge a complaint with a supervisory authority;
- whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data.

SENSITIVE INFORMATION

Each User is restricted from collecting and processing the following information:

data related to children below 16, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric and health data or data concerning a person's sex life or sexual orientation.

SHARE

We may transfer personal information to our affiliated companies and sub-contractors that involved in provision the Site and the Service. We may exercise cross-border transfer of your data provided that the recipient committed to comply with Standard Terms of Data Processing which provides suitable safeguards for your personal data.

Categories of controllers we share your data with: - advertisers, demand partners, publishers advertising networks, advertising data brokers.

Categories of processors we share data with: - hosting services providers, fraud detection service providers, advertising statistics and tracking service providers.

DATA SUBJECTS' RIGHTS

As a data subject you have the following rights:

- right to access allows you to request the if data is processed, to request the data itself and information related to purpose, data categories, recipients (or categories) including their countries, storage period or criteria to determine the storage, existence of right to rectification/erasure/restriction/objection, the right to lodge a complaint to supervisory authorities, data source, existence of profiling including logic and consequences, safeguards of transfer to third countries.
- right to rectification is the right to correct incorrect data and the right to complete incomplete data.

Right to erasure (to be forgotten) means that the data subject may request erasure if the data is:

- no longer needed for the purposes of processing;
- consent is withdrawn and no other grounds apply;
- data subject object processing;
- processing was unlawful;
- the data is related to a child and was processed in the context; of offering a service directly to a child.

Right to erasure does not apply if the processing is required for defense against legal claims and exercising of legal obligations.

Right to restriction means that processing shall be restricted if:

- the user claims that the data is inaccurate and controller needs to verify if it's really inaccurate;
- processing is unlawful but the data subject want it to be restricted rather than erased;
- processing is no longer required for its purposes but the data subject requires it for legal defense;
- processing is under objection but the controller need to verify if objection is not overridden by legitimate interest of controller.

When restriction is applied the data may be only stored except for processing under user's consent or for legal defense.

Right to notification means that the controller shall communicate the request to erasure/rectification/restriction to each recipient

unless it proves that it will take disproportionate effort. The controller shall inform the user about those recipients by request.

Right to data portability means that data subject may request the controller to provide collected data in structured and readable form if the processing is based on consent or for the purpose of contract performance/conclusion.

Right to object means that the data subject based on its personal circumstances may override legitimate interests of the controller which are the basis for processing. This right shall be communicated at the time of first communication with the user separately from other information.

The data subject has the right not to be subject to profiling which significantly affects him or her.

The data subject has the right to lodge a complaint to supervisory authorities at any time.

CORRECTION OR REMOVAL

If you would like to request your information to be removed from our database, please contact us. We acknowledge that you have the right to access your personal information.

RETENTION OF PERSONAL INFORMATION

We retain personal data we process for as long as needed to provide the Site and the Service and as long as you use the Site and the Service. If you wish to request that we no longer use your data, please contact us. We will retain your data as necessary to comply with our legal obligations, maintain accurate financial and other records, resolve disputes, and enforce our agreements.

PROCESSING PERSONAL INFORMATION ON THE WEBSITES

We are the data controller in respect of information provided from our Site and Service for the purposes of the General Data Protection Regulation ("GDPR").

We may collect the following information from you within the Site and the Service: - Contact Information, such as name, IM

username, email address, mailing address, phone number and billing information.

When you use our Site and Service, we automatically collect information on the type of device you use, operating system version, and the device identifier to ensure you receive proper notifications and proper settings of the Site.

PROCESSING PERSONAL INFORMATION ON THE SERVICE

Our publishers are responsible to inform the individuals using the Service on the users' properties with all necessary information and obtain necessary consent for any personal information that is collected through the Service.

We may collect the following information from you when you use our Site and Service:

- application id;
- publisher id;
- android id;
- SDK version;
- application source;
- device id/IMEI;
- device model;
- device specifications;
- OS type/version;
- IP address;
- local time;
- carrier;
- device location;
- language;
- network type;
- user agent.

RECORDS OF PROCESSING

We maintain a record of processing activities under its responsibility. The record shall contain all of the following information:

- the name and contact details of the data controller;
- the purposes of the processing;

- a description of the categories of data subjects and of the categories of personal data;
- the categories of recipients to whom the personal data have been or will be disclosed;
- transfers of personal data to a third country, including the identification of that third country and suitable safeguards;
- where possible, the envisaged time limits for erasure of the different categories of data;
- where possible, a general description of the technical and organisational security measures in respect of processed data.

USE OF COOKIES

When you use our Site and Service, we may store some information on your device. This information will be in the form of a "cookie" or similar file/technology. Cookies are small pieces of information stored on your device. We use cookies to help you navigate the Site and the Service as easily as possible, and to remember information about your current session. Session Cookies and they are removed from your device when you end your session. You must enable cookies on your web browser to use all features of the Site and the Service. Essential Cookies are essential for the basic functionalities offered by the Site and the Service. These cookies help in keeping a user logged in to the Site and the Service and remember relevant information when they return to the Site and the Service. Insight cookies are used for tracking the user activities within the Site and the Service, which helps us in improving your user experience. Marketing cookies are used for providing you with customized and interest-based ads based on your browsing behavior and other similar activities on our Site and Service.

PROTECTION OF INFORMATION

We perform the following measures on protection of personal data to prevent the data breaches, misuse and the violation of rights of data subjects:

- providing this policy for review to any person or entity which is about to process the personal data to/from us;
- keeping our officers and contractors responsible for proper data processing conducted by such officers and contractors;

- providing prior examination of the source and destination of personal data in respect of possible violations of data processing;
- providing advice to any officer, data subject or partner on the subject of compliance with this policy;
- making sure no access to personal data is provided to unauthorized parties;
- using only reliable and tested software for processing or personal data;
- assuming technical and organizational risks of data processing before such processing takes place;
- ensuring that all actions in respect of the data are exercised by protected accounts to access the data and all data storages are available only to a limited number or persons on a password basis;
- ensuring that company is able to suspend data processing or withdraw any piece of data from processing if we believe that such processing may violate applicable law;
- in case of change in any business process we will determine whether such change is data-related and check if such change falls in line with this policy;
- providing that each location and device where personal data may be stored is a safe environment;
- utilizing firewall to minimize the risk of unauthorized access to the hosting infrastructure;
- where necessary use third-party vendors to perform security assessments to identify issues with its data security that could result in security vulnerabilities;
- providing encryption of most valuable personal data;
- ensuring ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- providing the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- processing regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the data processing.

DATA BREACHES

We continuously review our internal processes and external relations in respect of compliance with this Policy. If a present or

potential violation is detected we shall investigate the reasons and decide if the violation may be cured. We shall assign officers to manage the violation or terminate the relations with the respective partner or data subject which will result in suspension of data processing.

In case of a personal data breach, we shall without undue delay and, where feasible, not later than 48 hours after having become aware of it, notify the personal data breach to the supervisory authority, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 48 hours, it shall be accompanied by reasons for the delay.

The notification shall at least:

- describe the nature of the personal data breach including where possible, the categories and approximate number of data subjects concerned and the categories and approximate number of personal data records concerned;
- communicate the name and contact point where more information can be obtained;
- describe the likely consequences of the personal data breach;
- describe the measures taken or proposed to be taken to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

Where, and in so far as, it is not possible to provide the information at the same time, the information may be provided in phases without undue further delay.

We shall document any personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken. That documentation shall enable the supervisory authority by request.

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, we shall communicate the personal data breach to the data subject without undue delay. The communication to the data subject shall describe in clear and plain language the nature of the personal data breach and contain at least the information on taken measures.

The communication to the data subject shall not be required if any of the following conditions are met:

- we have implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- we have taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialise;
- it would involve disproportionate effort – in such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

LEGAL DISCLOSURE

We may disclose your personal data as required by applicable law, in response to lawful requests by public authorities, including meeting national security or law enforcement requirements and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or other legal process served on us. Your personal data will also be shared between our affiliated companies for the activities permitted under this Policy.