<u>SSP – Legitimate Interest Assessment ("LIA")</u>

Background

- 1. TypeA Holdings Ltd. ("**Company**"), is a provider of programmatic advertising and media solutions ("**Services**"), across a diverse range of geographic markets.
- 2. The Company's Services enable supply partners ("**Publishers**") to generate revenues from their duly owned or licensed respective online assets (e.g. websites and applications), by way of presenting data subjects who visit said assets ("**users**") with relevant advertisements, which are sourced from the Company's advertisers.
- 3. With regards to processing activities carried out in the European Union ("EU") or United Kingdom ("UK") markets, the Company intends to rely on a "legitimate interest" as a legal basis for the processing of certain limited users' personal data, for the purposes of presenting users with relevant advertisements based on limited data and based on the Company's technological data driven models and solutions, as well as for product improvement purposes.
- 4. This Legitimate Interest Assessment is designed to reflect how the Company has applied the "legitimate interest" basis, in accordance with regulatory guidelines and industry best practices, under applicable data protection laws in the EU and the UK.
- 5. This LIA will be subject to a periodical annual review and/or targeted review in the event of a material change to the underlying functionality or design of the Services.

Question	Answer
A. THE PURPOSE TEST	
 Why do you want to process the data? 	The Company provides programmatic advertising solutions for Publishers, offering them the ability to generate revenues from their online assets by presenting users with advertisements that correspond with the users' presumed preferences, thereby improving users' engagement with said assets. In order to enable the serving of relevant advertisements that are based on users' presumed preferences, it is necessary to collect and process certain personal data relating to the users. In addition, since the processing of personal data is at the heart of the Services, certain personal data is collected in order to allow the Company to improve its Services and maintain its technological advantage in the industry.
2. What benefit do you expect to get from the processing?	The processing of certain personal data is essential in order to enable the Company to provide its Services, as the Company technological solutions are based on processing of data. Further, the Company's advertising technologies provide the Company a competitive advantage and differentiates Company from its competitors within the industry. The ability to process certain personal data to improve the Company's Services is crucial to maintain technological advantage in the online advertising industry, which is data centric. Not being able to process personal data will interfere with the Company's ability to provide and improve its Services, which will in turn cause it to lose substantial revenue streams.
3. Do any third parties benefit from the processing?	 Yes. The processing conducted by the Company benefits both advertisers and Publishers who interact with and use the Company's Services, as well as the users themselves. Publishers – the Services provided by the Company enable Publishers to generate revenues from their online assets and thereby support the operation of said assets, without the need to charge fees from users. In addition, the use of the Services enables Publishers to focus their resources on the most relevant audience groups. The fact that the advertisements are customized to the users also improves the user's satisfaction with the Publisher's assets and may increase engagement with such websites or apps, leading to a correlated increment in existing revenue streams and traffic.

Question	Answer
	 Advertisers – the Services enable advertisers to better allocate their resources by ensuring that their advertisements are presented to users who have higher chances of being interested in their products or services, maximizing the effectiveness and exposure of their marketing campaigns. In competitive markets, the Services can give advertisers a competitive edge by enabling them to understand their target audiences better and deliver more compelling messages than their competitors. Lastly, the Services provide advertisers with valuable insights into online trends and user interests. These insights can be leveraged to improve product development, marketing strategies and overall business decisions, fostering innovation and contributing to business growth. Users – the Services do not only benefit the entities participating in the advertising schemes, but also benefit the users who are the audience of such advertising. The Services are designed to ensure that users are presented with advertisements that fit their interests, thereby improving their online experience. In addition, the Services enable the existence of free online services or the lowering of prices of products due to the optimization of advertising costs and efficiency. In addition to the above, the improvement of the Services will enhance the accuracy and efficiency of the Services and the advertisements even further, contributing and extending the benefits mentioned above.
4. Are there any wider public benefits to the processing?	 Yes, there are a variety of public benefits in the processing, as explained below – Supporting free online access/content – the Services support free access to online content and services (e.g. news sites), as revenues generated from advertisements enable Publishers to continue providing valuable content without requiring fees from users (e.g. subscription fees, which are standard in the media industry). Lowering prices for consumers – better advertising efficiency improves both the advertiser's advertising expenditure and return on advertising investment, thereby allowing advertisers to

Question	Answer		
	minimize their costs and provide their products and services in lower and more attractive prices, improving competition and social welfare.		
	 Content improvement – use of the Services incentivizes Publishers to improves the content of their online assets and increases engagement with users to maximize their revenues from advertising. This also encourages Publishers to create and manage content-specific websites and apps. 		
	 Relevant content for users and product discovery – the Services ensure that users are presented with content that is relevant to their preferences and reduces the chances of users being presented with advertisements that are not relevant to them, or that may be inappropriate. Further, users can discover new products, services, or interests that they might not have been exposed to otherwise. 		
5. How important are those	The importance of the public benefits is discussed below.		
benefits?	 Supporting free online access/content – ensuring that websites remain free reflects a substantial and compelling public benefit in several forms: 		
	i. Access to opportunities, education, innovation, and public safety – free access ensures that everyone, regardless of their financial status, can obtain important and potentially life- changing information. This democratizes access to knowledge and can help level the playing field. The foregoing is particularly true when the online resources are essential (e.g. education material, public safety materials, etc.), as ensuring such resources remain free would support lifelong learning and provide opportunities for self-improvement to those who might not have access to such content otherwise. Further, free websites can lead to economic growth by providing platforms for small businesses, freelancers, and innovators. For example, free online marketplaces or job boards can offer opportunities for employment and entrepreneurship.		

Question	Answer
	ii. Freedom of speech, cultural exchange and civic engagement : free access encourages diverse voices and perspectives. When website access is free, more people can share their opinions, stories, and experiences, leading to a richer and more diverse discourse. Further, websites that offer free access to media resources foster greater civic participation, as an informed public is more likely to participate in community activities and engage in constructive dialogue about societal issues. Moreover, free access to websites allows for a greater exchange of cultural, artistic, and creative content.
	 Lowering goods/services prices for consumers – this reflects an important public interest, in the sense that it reduces economical barriers to entry and support a strong consumer interest in price/costs reduction, in particular with regards to essential goods and services. Such benefits help promote fundamental rights such as inclusivity and accessibility (i.e. making certain goods and services more accessible to the general public, maximizing the aggregate welfare).
	 With regards to other benefits such as the improvement of content and its relevance – the other benefits discussed above present non-significant importance as they mostly affect the advertisements themselves and the public interest in such advertisements, and have no other material effects.
6. What would be the impact in case Company will not continue to provide services in this manner?	The Company's business model is based on its process of personal data to provide its Services. The Company's specialized technological solutions are at the heart of the Company's competitive industry advantage, in an industry that is data-driven and constantly evolving. Without the processing of personal data, the Company Services will not function properly and it will not be able to match advertisements based on user presumed preferences. This will eventually have a material negative impact on the Company's competitiveness and ability to profit and maintain a sustainable business model.
7. Are you complying with any specific data	Yes. The Company is, and will continue to be, processing personal data in compliance with the following data protection rules:

Question	Answer
protection rules that	
apply to your processing	In the EU –
(e.g. profiling	 General Data Protection Regulation (EU) 2016/679 ("GDPR");
requirements or e-	 E-Privacy Directive 2009/136/EC ("e-Privacy Directive");
privacy legislation?)	 European Data Protection Board ("EDPB") guidelines.
	 Member state supervisory authorities guidelines
	In the UK –
	 UK Data Protection Act of 2018 ("DPA 2018");
	 UK General Data Protection Regulation ("UK GDPR");
	 UK Privacy and Electronic Communications Regulations (EC Directive) Regulations 2003 ("PECR");
	 Privacy and Electronic Communications Directive 2002; and
	 The Information Commissioner's Office ("ICO") guidelines.
8. Are you complying with	No additional specific laws are applicable to the Services.
other relevant laws?	
9. Are you complying with	Yes, as discussed below –
industry guidelines or	
codes of practice?	 IAB TCF – the Company is a member of the IAB Transparency and & Consent Framework v2.2
	("TCF") which is a voluntary standard for online advertising companies, designed to standardize
	and facilitate compliance with the GDPR, UK GDPR, e-Privacy Directive and the PECR, taking into
	account guidance from the EDPB, the ICO, and other national data protection authorities.
	The TCF is an industry standard developed by the Interactive Advertising Bureau (IAB) to address
	privacy and lawful basis challenges in the digital advertising ecosystem. The TCF consists of a set
	of technical specifications and policies aimed at proving a standardized approach for establishing a
	legal basis for personal data collection and processing by online publishers, advertisers, and
	technology vendors. The framework allows users to have more control over their personal data and

Question	Answer
	provides a structured way for organizations to communicate their data usage and, as needed, obtain explicit user consent in compliance with relevant data protection regulations. The TCF aims to create a more transparent and user-centric advertising ecosystem while ensuring that data privacy and user preferences are respected.
	 NAI – the Company follows the code of the Network Advertising Initiative ("NAI") – a self-regulatory organization that focuses on promoting responsible data collection and use practices in online advertising. The NAI provides a framework for member organizations to adhere to, which includes transparency requirements concerning data collection practices, the provision of opt-out mechanisms for online advertising, and the implementation of secure data handling procedures.
	DAA – the Company follows the code of the Digital Advertising Alliance ("DAA") – a consortium of leading advertising associations and companies that focuses on self-regulation and consumer privacy in digital advertising. The DAA has established a set of principles and compliance requirements aimed at promoting transparency, consumer choice, and responsible data practices in digital advertising. These principles are designed to ensure that consumers are informed about how their data is collected and used for targeted advertising and that they have the option to exercise control over their online ad experience. Such principles include transparency requirements, data collection limitation, security requirements and providing users with choice over how their data will be used and processed in the context of online advertising.
10. Are there any other ethical issues with the processing?	The Company is attentive and committed to an ethical, fair and transparent advertising; while there are no direct ethical concerns or issues, the Company is attentive to the following general ethical issues that may arise:
	 Discrimination – algorithms used in serving online advertisements may inadvertently perpetuate biases and discriminatory practices by using personal data to serve advertisements to, or exclude, certain demographic groups based on existing biases in the data they are exposed to or trained on.

Question	Answer
	 However, as discussed below, the data collected in the context of the Services is extremely limited, and it does not include in any way any sensitive or special categories of data (nor any identifying data to begin with) therefore the risk here is completely mitigated. Manipulation – to the extent that the advertising is based on individual interests and preferences, this practice can also lead to manipulation by exploiting psychological and cognitive biases and other vulnerabilities. This concern is mitigated through enhanced transparency and user choice (as discussed below). Further, as discussed below, the data collected in the context of the Services is extremely limited, and it does not include in any way any sensitive or special categories of data (nor any identifying data to begin with), therefore the risk here is completely mitigated. Misuse of personal data & data security – typically, when large amounts of data are collected for the purpose of presenting tailored advertising, it presents certain privacy risks, including security risk and misuse of personal data. However, as discussed below, the data collected in the context of the Services is extremely limited, in scope (the volume of data is limited), nature (no identifiable personal data or special category of data are collected) and retention duration, therefore, the ethical concerns are addressed and minimized. Additionally, as discussed below, the Company employs multiple safeguards to protect the data and to mitigate the security and data risks.
A) THE NECESSITY TEST	
11. Will this processing actually help you achieve your purpose?	Yes. The processing of personal data is necessary for the provision of the Services and their improvement. Without processing personal data, the Company will not be able to provide its Services and achieve its purpose.
12. Is there an alternative way to achieve the	No. There is no alternative way to achieve the objective and provide the Services without the processing of personal data as detailed above. The Company employs multiple safeguards to protect the data and

Question	Answer
objective without	rights of its users, such as data minimization, short retention periods etc., as described below. Other
conducting this	ways explored by the Company to provide Services are more intrusive than the Company's solution
processing activity?	discussed in this document.
13. Is the processing proportionate to that purpose?	 Yes, the processing is proportionate to the purpose for which it is processed, given the following factors: Limited scope and non-invasive nature of data processed – as discussed below, the data
	processed by the Company is very limited in scope and nature, including technical data that only allows Company to single-out users rather than directly identifying them.
	 Limited data retention – as discussed below, the data processed by the Company is retained for a very short period of up to 30 days. As such, the processing period and the amount of data gathered about an individual user are limited in time and scope.
	User expectations (enhanced transparency and choice) – it is well-established that online advertising, including processing of personal data for the provision of services similar to the one in question, is a primary source of income that allows for the offering of free services online. Publishers are required to put in place a Consent Management Platform ("CMP") for obtaining consent to the use of tracking technologies upon user's first access to their assets. When accessing a website and providing consent under the CMP, users are likely expecting that some personal data relating to them will be processed, including for the purpose of the Services.
14.Can you achieve the	
same purpose by	as obvious and least intrusive as possible.
processing less data, or	
by processing the data	Data minimization – the Company only collects limited types of data including IP address, device
in another more obvious	identifiers and characteristics and the user's privacy choices. The Company does not collect or
or less intrusive way?	process data that can be used directly to identify users, such as name, address or contact details, and does not have access (either directly or indirectly) to any additional information, the combination

Question	Answer
	of which may allow the identification of the user with reasonable means. The data collected and processed by the Company can only be used to single-out certain users in specific scenarios.
	 Storage limitation (data retention) – the Company has a very restrictive data retention procedures in place, and all data collected about users is retained for a period of up to thirty (30) days, after which such data is automatically deleted from the Company's systems. This also increases the data accuracy, as the Company always relies on data that is relatively new and up-to-date, rather than historical and inaccurate data about the users.
	 Transparency – the Company contractually requires publishers to comply with the requirement of the applicable data protection laws, such as the GDPR, UK GDPR, ePrivacy Directive and the PECR. Under such laws, publishers are required to provide their users with a detailed privacy policy and implement a CMP to manage the use of, and access to, tracking technologies such as cookies, pixels etc. Such policies shall specifically include references to the processing of personal data for advertising purposes. The Company also maintains its own privacy policy which is publicly available to all users.
	 User choice (opt-out) – the Company allows, and requires its publishers to allow, users to opt-out of processing of their personal data for advertising purposes. As detailed above, the Company is also a member of the TCF and requires its Publishers to comply with the requirements of the TCF. As such, the Company accepts and respects signals from other members of the TCF, concerning the user's objection to processing and consent withdrawals.
	 Consent – the Company requires its Publishers to comply with the requirement of the ePrivacy Directive and the PECR and obtain the user's consent for the access to, or placement of, tracking technologies on the user's device. No tracking technologies shall be put in place or accessed absent of user's consent, with the exception of the user's privacy choices (and essential tracking technologies), which allows the Company and the Publishers to identify the user's previous choices

Question	Answer
	such as revoking consent. Users are also granted with the option to withdraw their consent at any time via the Publishers' CMP. As detailed above, since the Company is part of the TCF, it also accepts signals for the withdrawal of consent initiated in other online assets of publishers and vendors which are part of the TCF.
B) BALANCING TEST	
Nature of the data	
15. What is the nature of the data to be processed? Does data of this nature have any special protections under GDPR?	The processed data includes IP address, device identifiers (e.g. IDFA, AAID, etc.), device characteristics (e.g. model, operating systems etc.) and user's privacy choices. None of the data processed is of any special nature or subject to any special protections under applicable data protection laws.
16. Is additional data collected (compared to before)?	No.
17.Is it special category data or criminal offence data?	No.
18.How is the data collected?	The data is collected from the user's device automatically when accessing or engaging with the websites or other online assets of the Company's Publishers, subject to the user providing consent for the use of tracking technologies, via a CMP as detailed above.
19.Is it data which people are likely to consider particularly 'private'?	No, the data is mostly technical and refers to the user's device and network. The personal data processed cannot be used directly to identify users, but only to single-out users in specific scenarios.
20. Are you processing children's data or data relating to other vulnerable people?	The Company has no actual knowledge of children or vulnerable people the personal data of which is processed by the Company. In addition, the Company contractually requires its publishers to warrant that their assets are not directed at children under the age of 16. Further, the Company implemented

Question	Answer
	controls to prevent displaying ads where the publisher has indicated that the user is under the age of 16 (i.e. COPPA flag).
21. Is the data about people in their personal or professional capacity?	The data may be related to people either in their personal or professional capacity, depending on the context. The data is collected when the user is accessing certain websites or apps of Company's Publishers. Company's Publishers may be of different natures and industries, some of them may appeal to users in their personal capacity while others in their professional capacity.
Reasonable expectations	
22. Do you have an existing relationship with the individual? What's the nature of the relationship and how have you used the data in the past?	The Company has no direct relationship with the users. The users have a direct relationship with the Publishers which are the Company's clients. The personal data is collected in the first place for the Company's purposes and Company's Publishers are contractually required to provide users with sufficient transparency to accommodate for the processing of personal data by the Company for the purpose of providing the Services.
 23. Did you collect the data directly from the individual? What did you tell them at the time? 24. If you obtained the data from a third party, what did they tell the 	No. As detailed above, the data is collected by the Company's clients which are the Publishers of the websites and apps to which the users access and where the advertisements are displayed. Publishers are required to provide users with a transparent and easily understandable privacy policy detailing the purposes for the processing of their personal data, including for the Services. As detailed above, Company requires its Publishers to comply with the transparency requirements under applicable data protection laws, including the GDPR and UK GDPR, by disclosing to the users that the personal data collected will be processed for the provision of the Services.
individuals about reuse by third parties for other purposes and does this cover you?	that the Company does not share such personal data any further, save for demand partners and limited third party service providers, who process such information subject to applicable GDPR contractual obligations.
25. How long ago did you collect the data? Are there any changes in	The data is collected every time a user accesses the websites or apps of the Company's Publishers. Such data is retained for a period of up to thirty (30) days.

Question	Answer
technology or context since then that would affect expectations?	There was no change in technology or context that should affect the expectations of the users.
26. Is your intended purpose and method widely understood?	Yes. Company requires its Publishers to maintain an easily understandable privacy policy in compliance with applicable data protection laws, including the GDPR and the UK GDPR, as well as industry standards, and to disclose partnership with third party advertising partners such as the Company, including for the provision of the Services detailed above.
	In addition, the Company requires its Publishers to put in place a CMP to obtain consent from the users for the placement of and access to tracking technologies in accordance with the requirements of the ePrivacy Directive and the PECR. Such consent shall be obtained for each purpose separately, including for the purpose of advertising. As such, users are made well aware of the processing of their personal data for behavioral advertising and in practice no such processing may occur without the user's explicit consent to tracking technologies.
27. Are you intending to do anything new or innovative?	No.
28. Do you have any evidence about expectations - e.g. from market research, focus groups or other forms of consultation?	No.
29. Are there any other factors in the particular circumstances that mean they would or	It should be noted that processing of personal data for services similar to the ones in question has become a prevalent practice and the majority of websites and applications available use or include some kind of processing of personal data for such purposes. As a result, the processing of personal data in such instances can be expected by the subject of the personal data.

Question	Answer
would not expect the processing?	It should also be noted that in comparison to its competitors and the advertising industry, the Company's data processing practices are limited in terms of the data collected and its scope. The Company also does not further share personal data with other third parties, save for demand partners and limited third party service providers, who process such information subject to applicable GDPR contractual obligations.
Likely impact	
30. What are the possible impacts of the processing on users?	 Intrusion of privacy – the processing of users' personal data may be viewed by some users as intrusion of their privacy, especially since some users who have not read the privacy policy and the explanations in the CMP may not be aware of the Company's existence and of its processing activities, and since the data is usually collected automatically without the user actively providing their data. Discrimination – as detailed above, algorithms used in serving online advertisements may inadvertently perpetuate biases and discriminatory practices. Manipulation – online advertising can also lead to manipulation by exploiting psychological and cognitive biases and other vulnerabilities.
31. Will individuals lose any control over the use of their personal data?	The Company has taken necessary steps to ensure that individuals would not lose control over the processing of personal data, as discussed below:
	First, the processing of personal data will not occur without obtaining consent from the user for the use of tracking technologies as detailed above and as required under the e-Privacy Directive and the PECR. As such, the users will have full control of whether their personal data is collected and shared, and are provided with automated controls to that effect (as part of the compliance with the TCF).
	Users may also exercise their rights to object to the processing of personal data or revoke their consent for the use or placement of tracking technologies at any time.

Question	Answer
	In addition, the processed data is very limited in scope, mainly technical information (e.g. identifiers) that cannot be directly used to identify a specific person with reasonable means, but rather only to single out users in specific scenarios. Lastly, the data is retained for a very short period of time (up to 30 days) and afterwards such data is
	deleted from the Company's systems, meaning that the scope and amount of data, including historical and inaccurate data points, is very limited.
32. What is the likelihood and severity of any potential impact?	Taking into consideration the safeguards employed by the Company including data minimization, limited retention policy, the likelihood and the severity of any potential impact shall be low.
	Further, the Company has security measures in place in accordance with accepted industry standards, including access controls, encryption, firewalls, etc. All Company's personal data is stored on either AWS or GCP, which follow best security industry practices and are widely used in the industry.
33. Are some people likely to object to the processing or find it intrusive?	Yes, it is expected that some users will choose to object to the processing of personal data for the purposes, using the readily available and automated controls.
34. Would you be happy to explain the processing to individuals?	Yes. The processing and purposes are detailed in the privacy policies of the Company and the Company's Publishers, as contractually and legally required, and Company is committed to being transparent about its processing activities and provide users with meaningful information and controls concerning the advertisements and the related use of their personal data.
35. Can you offer individuals an opt-out?	Yes. Users will be given the option to refuse to the placement of tracking technologies through the client's CMP. In addition, the Company is a member of the TCF and as such Company has adopted standardized mechanisms for users to opt out and provide signals that they object to the processing of their personal data for the purpose of the Services. Company accepts consent strings sent from

Question	Answer				
	publishers and other partners to identify whether the users have provided their consent for the use and placement of tracking technologies.				
(D) Safeguards and Cor	(D) Safeguards and Compensating Controls				
Please indicate the safeguards - safeguards include a range of compensating controls or measures which may be put in place to protect the individual, or to reduce any risks or potentially negative impacts of processing. For example: data minimization, de-identification, technical and organizational measures, privacy by design, adding extra transparency, additional layers of encryption, multifactor authentication, retention, restricted access, opt out options, hashing, salting, and other technical security methods used to protect data. Please include a description of any compensating controls that	 Conducting a DPIA – Company will conduct a Data Protection Impact Assessment to better assess the risks of processing personal data for the purpose of the Services, and to consider whether additional safeguards are required. Data minimization – as detailed above, the Company has put in place strict data minimization policy, under which the Company only collects and processes limited personal data that cannot be used to directly identify an individual, but only to single-out an individual. Security measures – the Company has put in place technical and organizational measures to ensure the security of the personal data it collects and processes, such as encryption, access control, etc. Data retention – the Company has implemented data retention mechanisms, ensuring that all data is deleted after no more than 30 days. Opt-out options – as detailed above, as part of the Company's participation in the TCF, the Company allows users to opt-out of the processing of their personal data and accepts signals for the withdrawal of their consent from other third party members of the TCF, including its Publishers. Right to object – Company complies with the requirements of the GDPR and allows users to exercise their right to object to processing as detailed under Article 21 of the GDPR. 				

Question	Answer
are already in place, or will	 Periodical review – Company shall review its processing activities and this assessment on a
be put in place, to preserve	periodical basis, and at least once every 12 months, to ensure no material changes occur and that
the rights of the individual.	the Company may still rely on legitimate interests for the processing in question.
(E) Decision Making	
Can you rely on legitimate	Following the analysis detailed in this LIA, the Company can rely on legitimate interests for the
interests for this	processing activities in question.
processing?	