



Inspire your customers

Ve - Platform Privacy Statement

Last updated: September 2016

Introduction

This Statement applies to our technology platform which helps our ecommerce clients engage with their users. We have made this Statement available in order to be transparent about how our platform works and how it uses data for the benefit of our ecommerce clients. If you have any questions about this Statement, please email us at privacy@ve.com.

Our platform provides various offerings designed to help our ecommerce clients advertise to users who may be interested in their products or services and provide tailored messages to their website users in various ways, including on their websites and by email. To do this, we collect certain categories of data including email addresses and anonymous information about consumers and their online activities and interests. We collect these kinds of information mostly through our clients' websites and some of the anonymous online activity and interest data we obtain from our online partners.

Information we collect through our platform

We collect users' email addresses and/or mobile phone numbers if they choose to enter it on a client website or app to buy a product or service, become a registered user, sign up for marketing communications.

When a user visits a website or app operated by a Ve Interactive client, the client permits us to collect:

- URLs (website addresses) of the pages of the client's website the user visited and their activities on the website or app (e.g. products they looked at or bought)
- Using cookies, beacons, tags and anonymous mobile identifiers we collect information on the user's device, browser software and operating system, IP (Internet protocol) address, a unique number assigned to their device, referring site URL, time of browsing

In this Statement, we call the above categories of information "Log Data".

We collect information on onsite interactions (meaning user interactions with Service Offerings on the customer website) and offsite interactions (meaning user interactions with our technology and services outside the customer website, mainly through logging users when they open emails or click-through the content of emails sent by our platform).

Because our clients typically engage with users across multiple online devices (desktop, tablet, mobile phone.) Log Data is combined with hashed (i.e. scrambled) email addresses to enable our clients to benefit from anonymised information on user activity and interests across those different categories of device. See below for more information on our use of cookies and other identifiers.

Information obtained from third parties

We share and exchange information collected with trusted partners mainly through "cookie synching" – a long-standing process in online advertising and marketing – which allows advertisers to use data on multiple advertising platforms, and increase the chances of users seeing advertising communications which are relevant to them. We obtain information from our trusted partners on users' online activity on websites and apps generally (and not limited to our clients' websites and apps).

Through the Log Data we collect through our platform and the third party data we combine it with, we create information and inferences about users' interests, the approximate geographic location of the device(s) they use and the products and services they may be interested in, all held in anonymised form.

How we use the information we collect

We use the information collected to operate, manage, maintain and improve our platform and the services we provide to our ecommerce clients.

We collect Log Data across the websites of all our clients, and combine it with third party data and hashed email addresses to determine what products and advertisements might be interesting to users. We use this information to support our clients in implementing their online advertising campaigns across the Internet and mobile apps generally (including buying interest-based advertising) and engaging with the visitors to their websites, and to provide related services. Clients are able to access reports through Ve's reporting platform which cover the performance of their websites and apps. They can access performance-related Log Data (pertaining to any conversions driven by Ve, which may include, as necessary, email addresses and order ID's of Ve-converted consumers) in doing so, and are able to review reports of user interactions within our platform to check against their own records.

Email addresses and mobile phone numbers are also used to support our online clients in marketing their products to users who have consented to receiving marketing communications.

We may disclose your personal information, if we are legally obliged to do so, to a third party buyer or seller in the event that we buy or sell any part of our business or assets. If Ve Interactive Limited or substantially all of its assets are acquired by a third party, personal data held by it about its clients will be one of the transferred assets.

We also have a duty to disclose your personal information to comply with legal obligations, to enforce our website's terms of use or other agreements, to protect the rights, property or safety of Ve Interactive Limited, our clients, or others. This includes disclosure for the purposes of fraud protection and credit risk reduction.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

How do we store the information?

Users, particularly those living in Australia, should be aware that in a globalised online world, information relating to them may be transferred to countries other than the country where they live or where the Ve clients whose websites and other online properties they visit are based. In particular, information may be transferred to the USA where the law and practice in respect of privacy and law enforcement access to information is very different from that in Australia and certain other countries.

How long do we keep information?

We do not keep information on users longer than is necessary to achieve the purpose for which it was collected. User-related information will typically not be kept longer than 30 days. Any Log Data kept longer than 30 days will be kept only as aggregated statistics.

Unless the client requests their deletion, user emails relating to a transaction where Ve has procured the conversion shall be kept for longer than 30 days for reconciliation purposes between the systems of Ve and the client.

Our use of cookies and other anonymous identifiers

What is a cookie?

A cookie is a small file of letters and numbers containing information that we store on user's browser or the hard drive of your device. They allow us to 'remember' users and to tailor our services to clients.

We also use mobile device identifiers which perform a similar role to cookies, like the IDFA used by Apple devices and the Advertising ID used by Android devices. We use them in similar ways to how we use cookies on desktop and laptop computers and to collect the same categories of information.

List of the main platform cookies

We use the following cookies through our platform:

- Targeting cookies. These cookies record a user's visit to a Ve client's website, the pages the user has visited and the links they have followed. We use this information to help clients make their websites and the advertising displayed on it (and elsewhere as users access other websites and apps) more relevant to their interests.
- Advertising Cookies. Ve uses cookies for the purpose of serving contextual and behavioural advertising to users. Ve also uses cookies for the purpose of serving retargeted adverts to users. No identifiable information is stored. Users can opt out of tracking by Ve advertising cookies and other behavioural marketing companies by clicking <http://www.youronlinechoices.com/uk/your-ad-choices>, locating "Ve Interactive" in the list of behavioural tracking companies and setting the control panel to 'OFF'. Alternatively users can visit <http://ve.com> and scroll to the bottom of the home page where they will find an opt in / out option.
- You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie domain	Cookie name	Cookie Description	Ve or other 3 rd party	Expiry
Ve.com	_ngid	This cookie contains an anonymous numerical identifier. It is used to link anonymous product codes in a product database to an	Ve	1 year

		anonymous user to suggest products that will be of interest. No personally identifiable information is collected.		
Ve.com	_ssid	This cookie contains an anonymous numerical identifier. It is used to link and "synch" data relating to an anonymous user of Ve client sites to data relating to an anonymous user stored on the AppNexus online advertising platform (see below) to join Ve Service Offering behaviours with VeAds behaviours. No personally identifiable information is collected.	Ve	1 year
Ve.com	ae2f069-d272-4373-a18b-c2d803a98d7 Session ID	Fixes broken online sessions. No personally identifiable information is collected.	Ve	1 hour
Ve.com	_trid	This cookie contains an anonymous numerical identifier. It is used to extend the session length to provide agencies with 30-day cookie windows. No personally identifiable information is collected.	Ve	30 days

Adnxs.com	anj	The anj cookie is used by our 3 rd party trading platform. It contains data denoting whether a cookie ID is synced with our partners. ID syncing enables our partners to use their data from outside our trading platform on the platform.	Other 3 rd party - AppNexus	3 months
Adnxs.com	sess	The sess cookie is used by our third party trading platform. It contains a single non-unique value: "1". It is used by the platform to test whether a browser is configured to accept cookies.	Other 3 rd party -- AppNexus	1 day
Adnxs.com	Uuid2	This cookie is used by our third party trading platform. It contains a unique randomly-generated value that enables the platform to distinguish browsers and devices. It is matched against information – such as advertising interest segments and histories of ads shown in the browser or device – provided by clients or other third parties and stored on the platform. This information is used by Ve clients to select advertisements for delivery by the platform, and to measure the performance of, and attribute	Other 3 rd party -- AppNexus	3 months

		<p>payment for, those advertisements. In addition, to enable Ve clients to use non-PII they collect outside the platform or acquire from other third parties, this cookie is sometimes matched to (or "synched" with) clients' or other third parties' cookies that contain such non-PII. It is also used for opting out of behavioural adverts where a user wishes to do that.</p>		
go.flx1.com	id	<p>This cookie is used by our third party data management platform. It contains a cookie ID used by the data management platform. ID syncing enables our data management platform to use their data from outside our platform on the platform.</p>	Other 3 rd party - FLX	2 years
go.flx1.com	Ans3, check,dbm1,r	<p>This cookie is used by our third party data management platform. It contains data denoting whether a cookie ID is synced with the data management platform. ID syncing enables our data management platform to use their data from outside our platform on the platform.</p>	Other 3 rd party - FLX	2 days
dc.flxads.com	data	<p>This cookie is used by our third party dynamic creatives platform. It contains data</p>		

		about which products were shown last to this user.		
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Opting out of cookies and mobile identifiers

Users are always free to block, delete or disable cookies by activating the setting on their browser that allows them to refuse the setting of all or some cookies. However, if users use browser settings to block all cookies (including essential cookies) they may not be able to access all or parts of the websites and other online properties they want to visit. For more information about how users can block, delete or disable these technologies, we suggest users review their browser or device settings. Links to information for the main browsers are set out below:

- Internet Explorer: <http://windows.microsoft.com/en-US/internet-explorer/delete-manage-cookies#ie=ie-11>
- Firefox: support.mozilla.com/en-US/kb/Cookies
- Chrome: www.google.com/support/chrome
- Safari: http://support.apple.com/kb/PH19214?viewlocale=en_US&locale=en_US.

Alternatively, to opt out of specific cookies the [opt out](#) is available. After opting-out of Ve Interactive cookies, we will place a cookie on the user's browser that identifies them as having opted out. Because an opt-out is cookie-based, browsers must be set to accept third party cookies for us to be able to do this. Users who use multiple devices or browsers, will need to opt out on each of them.

For mobile users, Apple iOS and Google Play offer an opt-out choice communicated to companies providing in-app advertising through those platforms, and typically activated through your mobile device privacy settings.

PRIVACY AND Changes to our privacy statement

We at all times comply with the applicable requirements of the Privacy Act 1988 (Cth) and the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth) as amended from time to time to the extent that its provisions apply to the performance of the services by Ve Interactive Pty Ltd ACN 149 285 129. We regularly review this statement and any changes we may make in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy statement.

Contact

If you have any questions, comments or requests regarding this privacy statement, please contact our Data Protection Officer at: Ve Interactive Pty Ltd Data Protection Officer, Email: privacy@ve.com.