

## DATA PROTECTION GUIDELINES FOR TRAFFICWATCHDOG CUSTOMERS

### Compliance with RODO regulations

Spark DigitUP Sp. z o.o. - the owner of the Trafficwatchdog service and program, operates in a manner, remaining in compliance with the provisions of the RODO.

- Data processing countries - data processed by "Trafficwatchdog" is mainly stored in the European Union. When using third-party providers located in the USA or other countries outside the EU, we guarantee that the level of data protection meets European standards.
- All entities cooperating with us in data processing (e.g. hosting services) meet the highest standards of personal data protection.

### Processing data from customer sites using "Trafficwatchdog"

We enter into a personal data processing agreement with our customers using "Trafficwatchdog", which specifies in detail the scope of data processing, types of data and where they are stored. Since "Trafficwatchdog" uses cookies, the necessity of obtaining the consent of your Users, depends on how you use "TrafficWatchdog" at your site:

- **Basic functions of "TrafficWatchdog"**  
If you use the basic operational functions of "Trafficwatchdog", Users' consent is not required. The data is processed within the framework of a legitimate legal interest, which includes the prevention of ad fraud and in order to respond to Users' inquiries and provide them with appropriate support.
- **Advanced "TrafficWatchdog" features**  
When using the advanced marketing and analytical features of "Trafficwatchdog", it is necessary to obtain Users' consent. You can do this through a banner or cookie bar, where Users select the option that is appropriate for them.

### What actions you should take when using "TrafficWatchdog" as a customer on your site

#### Privacy policy update:

- Enter in your list of data processors: **Spark DigitUP Sp. z o.o., Plac Wolnica 13 lok. 10, 31-060 Kraków, NIP 6762496391 - owner of "Trafficwatchdog"**.
- Add notation: **"It is in our legitimate interest to prevent ad fraud and provide adequate customer service, which requires the processing of cookies or data provided by customers. Advanced features are activated only with customers' consent, which includes the use of analytical or marketing cookies."**
- Inform about the scope of data processed by "Trafficwatchdog". These are the following data:
  - IP address, cookies, basic information about the computer device that is used to access the Client's Site, identifier assigned to the device from which the visit is generated, parameters of the terminal device, operating system parameters, browser parameters, general geographic location of the visit, how the potential Client's User interacts with the Client's Site and activity data on the Client's Site, time on the Site, HTTP header parameters, marketing campaign parameters, data about the websites visited, URLs of the visited websites, date and time of the visit

- in the case of the use of 'chat bot' solutions, this may also include contact information provided by the User during the conversation: name, surname, e-mail, telephone number, social network account details.

### **Cookies used in relation to Users of your service**

During the use of "Trafficwatchdog" there is processing of cookies User ów using your service. A detailed overview of the processed files can be found below.

#### **Operational cookies**

lsp\_vid - the main purpose of this cookie is to generate a unique identifier of the User's last visit. Storage time 30 days, HTTP type.

trafficscanformdata - this cookie saves data about the form filled out by the User. The storage time is the validity of the session (that is, until the browser session is closed), type SESSION STORAGE.

twd\_cs - this cookie counts the number of user visits per session. Storage time 30 days, HTTP type.

twd\_dc - this cookie checks the number of pages visited by the User. Storage time 30 days, HTTP type.

twd\_ds - this cookie checks the number of pages visited by the User during a given session. Storage time 30 days, HTTP type.

twd\_du - this cookie counts the number of visits of the User. Storage time 30 days, HTTP type.

twd\_s - this is a unique identifier of the first recorded visit of the User in a given session. Storage time 30 days, HTTP type.

twd\_u - this is the unique identifier of the User's first recorded visit. Storage time 30 days, HTTP type.

twd\_v - this is a unique identifier of the User's current visit. Storage time 30 days, HTTP type.

twd\_vc - this is the unique identifier of the first recorded external visit of the Usage in a given session. Storage time 30 days, HTTP type.

twdOpenedMO - this cookie collects information about the state of the chat window when the user leaves the site. Storage time 30 days, HTTP type.

rotate\_textvars\_x - this cookie contains an index of a random content variant. Storage time 30 days, HTTP type.

twdPopupOpened - this cookie collects information about the state of the last time the User opened a chat window. Storage time 30 days, HTTP type.

twdPopupOpenedRuleId - this cookie collects information about the last chat window rule. Storage time 30 days, HTTP type.

twdPopupRuleIdFromParam - this cookie collects information about the state of the chat window opened with a special rule. Storage time 30 days, HTTP type.

courier\_message\_pathXYZ - this cookie contains the history of the conversation with the User. The storage time is the session expiration time (that is, until the browser session is closed), HTTP type.

courier\_widget\_unread\_messages - this cookie contains unread messages by the User. The storage time is the validity time of the session (that is, until the browser session is closed), HTTP type.

twdhsb - this cookie contains a history of User activity on the site. The storage time is permanent (persistent memory) until it is deleted by the application or the User, kind of LOCAL STORAGE.

twd\_cb\_XYZ - this cookie contains the User's conversation history. The storage time is permanent (persistent memory) until it is deleted by the application or the User, type LOCAL STORAGE.

twd\_rh\_XYZ - this cookie contains the User's activity history. The storage time is permanent (persistent memory) until it is deleted by the application or the User, type LOCAL STORAGE.

#### **MARKETING cookies**

twdSalesProfilerRecommendationOpened - this cookie collects information about the status of product recommendations. Storage time 30 days, HTTP type.

coupon\_code\_xyz - this cookie collects coupon status information from the coupon list. Storage time 30 days, HTTP type.

twdEmptyCode - this cookie collects information about the status of the coupon when the coupon list was empty. Storage time 30 days, HTTP type.

#### **Final recommendations for compliance with RODO**

- **Transparency to Users**  
Make sure that Users of your service are fully informed about what data is being collected, for what purpose and on what legal basis. This information should be easily accessible and understandable.
- **Mechanism for obtaining consent**  
Apply a visible and functional cookie banner that allows Users to make an informed choice about the extent of their data processing, including analytical and marketing cookies.
- **Regular review of processes**  
Periodically audit your data processing processes to ensure they comply with current RODO regulations and data protection best practices.
- **Cooperation with suppliers**  
Remember that all service providers processing data on your behalf, including Spark DigitUP Ltd. - owner of "Trafficwatchdog", are covered by appropriate contracts that regulate data protection in detail.