



Privacy Policy

Effective Date: May 25, 2018

Who we are

Terragon Group is a company incorporated under the Laws of the Federal republic of Nigeria with company registration number 765455. Our principal place of business is 2, Ahmed Onibudo Street, Victoria Island Lagos, Nigeria. For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at: info@terragonltd.com

What kind of data we may hold about you

Terragon holds personal data such as names, addresses, ages, dates of birth, emails, telephone numbers, transactional data, lifestyle and demographic data. This information may be kept in its identifiable form, or in an aggregated form (so that individuals cannot be identified), for the purposes listed below. We do not hold any sensitive personal data on people, as defined by GDPR.

What this policy covers

This Privacy Policy describes Terragon's data practices associated with our corporate website (www.Terragongroup.com) and Terragon and Twinpine services ("Services"), and the choices that Terragon provides in connection with our collection and use of your information. This Privacy Policy explains how Terragon may collect, use and disclose information associated with your company and with your company's websites and apps that use Terragon Services. For individual website and app users, this Privacy Policy explains how Terragon may collect, use, and disclose information when you visit our website or when you use any website or app that uses Terragon Services.

Terragon acts as a service provider to enable advertisers, ad networks, and other clients to manage their consumer inventory and to collect and use data to provide marketing services on their digital and mobile properties and across the Internet, and in this case, our clients may use our services to process data, which they collect or source. Clients may also have their own policies that govern how they collect, use, and share data. These policies may differ from Terragon's policies described in this Privacy Policy. Please consult the privacy policies of the websites you visit and apps you use to become familiar with their privacy practices and to learn about any choices that these companies may offer with respect to their information practices.

Finally, the Terragon website may contain links to websites or content operated and maintained by third parties, over which we have no control. We encourage you to review the privacy policy of a third-party website before disclosing any information to the website.

How we obtain data about you

Terragon collects contact information through our website when you choose to provide it, such as your name, username, or email address. For example, you may be asked to provide us with contact information when you register with Terragon and when you purchase Services. The decision to provide this information



is optional; however, if you elect not to register or provide such information, you may not be able to access certain content, features, or services available on or through the Terragon website.

We may also collect additional information through our website and Services, such as the following:

- 'Free form' demographic information (e.g. age, gender, marital status)
- Browser information (e.g. URL, browser type, 'click through' data)
- Ad reporting or delivery data (e.g. size/type of ad, ad impressions, location/format of ad, data about interactions with the ad)
- Device-type information (e.g. screen dimensions, device brand and model)
- Unique identification numbers (e.g. IP address and mobile/cell phone device ID)
- Location data (as derived from IP address or GPS (for mobile))
- Interest segments (i.e. inferred information on the behaviour or likely interests associated with a device)
- Retargeting data (i.e. data revealing previous interest in a product or website)
- Information about the possible relationships among different browsers and devices
- Information about your activities on our website and Services

What we do with personal data

Terragon uses this information to operate and improve our website and Services, such as to provide notices about our Service, to fulfil your service requests, or to request your feedback or conduct research. Terragon also uses contact information to send you information about new products or Services; where Terragon needs your permission to do this, we only send such information in accordance with any permissions granted.

We also use the information we collect to host, operate, maintain, secure, and further develop and improve our Services, such as to keep track of advertising and marketing delivery and to measure the effectiveness of advertising delivered through our Services, and investigate compliance with Terragon's policies and terms and conditions.

Terragon does not engage in activities that require parental notice or consent for underage children. If you believe that Terragon has inadvertently collected information from a child under 13 that is subject to parental notice and consent, please contact Terragon using the contact information below to request deletion of the information.

Cookies and Other Similar Technologies. We use cookies and similar technologies to operate and improve our website and Services, including for interest-based advertising as described below. Some of our Service



Providers (defined below) may also use such technologies in connection with the services they perform on our behalf.

Who we may share your personal data with

We share information with our commercial partners – such as brands, agencies, public authorities and marketing companies – in all industry sectors to help them deliver better marketing and service/communication experiences to people.

They may use this personal data for the following purposes:

- to send you relevant marketing or other communications
- to improve the relevance of marketing or other communications through the use of lifestyle and demographic insight data
- to clean, validate and enhance marketing or other databases
- to undertake research and analysis
- for product development and testing
- for identity validation and fraud reduction
- to support client relationship
- to connect and link your data to other marketing and advertising databases and platforms
- for work planning, management and strategic decision making and
- for the fulfilment of statutory functions.

Some examples of the industry types you can expect data to be used in are: automotive, charity, education, gaming, retail, leisure, financial services (including retail banking, investments, loans, credit cards, insurance, wills and funeral plans), politics, health/mobility, home improvements, mail order, market research, publishing, media, FMCG (toiletries/cosmetics/food and drink), travel, telecoms and utilities.

We share data directly with brands and via agencies. We also share data (usually in a form where individuals cannot be directly identified) with other marketing companies such as social media and programmatic platforms. We make sure the recipients of our data are reputable entities by conducting appropriate checks on them. Before we share our data, we enter into written agreements with recipients which contain data protection terms that safeguard your data.

Personal data used in Terragon's data products and services may also be passed to and used by members of the Terragon group of companies worldwide. We may also pass data to other companies that process personal data on our behalf to help us conduct our business. When we do so, we ensure that appropriate contractual safeguards are put in place.



Terragon may also disclose personal data as required by law and to comply with legal process. We will disclose information to third parties only as described in this Privacy Policy:

- with your express permission;
- with our affiliates, which include entities controlling, controlled by, or under common control with Terragon;
- where we contract with third parties to provide certain services ("**Service Providers**"). We ask Service Providers to confirm that their privacy and security practices are consistent with ours, we provide our Service Providers with only the information necessary for them to perform the services we request, and Service Providers are prohibited from using such information for purposes other than as specified by Terragon. In the event that Terragon is merged, sold, or in the event of a transfer of some or all of our assets (including in bankruptcy), or in the event of another corporate change, we may disclose or transfer information in connection with such transaction; and
- where we believe it is necessary to protect Terragon or our users; to enforce our terms or the legal rights of Terragon or others; or to comply with a request from governmental authorities, legal process, or other legal obligations.

We may also share and disclose other information that we collect, including aggregate information, as we consider necessary to develop and provide our Services, including in the ways described above.

Terragon may also be required to disclose information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Reviewing and Updating Information

Terragon takes reasonable steps to ensure that information is accurate, complete, current, and reliable for its intended use.

International Information Transfers

Please be aware that the information we collect, including contact and billing information, may be transferred to and maintained on servers or databases located outside your state, province, country, or other jurisdiction, where the privacy laws may not be as protective as those in your location.

Security

Information that we collect is stored using procedures and practices reasonably designed to help protect information from unauthorized access, destruction, use, modification, or disclosure.



Policy Updates

From time to time, we may change this Privacy Policy. If we decide to change this Privacy Policy, in whole or in part, we will inform you by posting the revised Privacy Policy on the Terragon website. Those changes will go into effect on the effective date disclosed in the revised Privacy Policy.

Contact Us

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at: info@terragonltd.com