

# Data Privacy Framework

VRTCAL Markets Inc. (“VRTCAL, we, our or us”) is committed to protecting your privacy. This Data Privacy Framework notice sets out the privacy principles we follow with respect to transfers of personal information from the European Union (“EU”), UK and Switzerland to the United States, including personal information we receive from individuals who visit our web and mobile sites, who interact with our Digital Media Properties (as defined in our [Privacy Policy - Advertising](#)), and who otherwise communicate or interact with us.

VRTCAL commits to comply with the EU-US, UK Extension to the EU-US and Swiss-US Data Privacy Framework (“**DPF**”) Program as set forth by the US Department of Commerce, European Commission, UK Government, and Swiss Federal Administration, regarding the collection, use and retention of personal information from the EU, UK and Switzerland. We have certified to the US Department of Commerce that we adhere to the DPF in respect of all personal information received from the EU, UK and Switzerland in reliance on the DPF.

The Federal Trade Commission has jurisdiction over our compliance with the DPF.

For more information about the DPF generally and to view our certification online, please visit <https://www.dataprivacyframework.gov/s/>.

If there is any conflict between the terms of this DPF Notice and the DPF, the DPF shall govern.

## **Types of personal information we collect and use**

The types of personal information we may receive in the United States, as well as the purposes for which we collect and use it, are set out in our [Privacy Policy - Corporate](#) (which concerns the collection and processing of personal information through our website) and our [Privacy Policy – Advertising](#) which concerns the collection and processing of personal information when you use or otherwise interact with Digital Media Properties that use our ad technology).

## **Your choices**

We give you an opportunity to opt out where personal information we control about you is to be disclosed to an independent third party, or is to be used for a purpose that is materially different from those set out in our privacy policies. If you otherwise wish to limit the use or disclosure of your personal information, please email us at the contact details set out below.

For further information on how to opt out of targeted advertising using our technologies, see the section entitled “**B. Your Opt-Out Choices**” in our [Privacy Policy – Advertising](#).

## **Transfers to third parties**

Information about the types of third parties to which we disclose personal information and the purposes for which we do so is described in our [Privacy Policy - Corporate](#) and [Privacy Policy - Advertising](#) respectively.

If we have received your personal information in the United States and subsequently transfer that information to a third party acting as an agent, and such third party agent processes your personal information in a manner inconsistent with the DPF, we will remain responsible unless we can prove we are not responsible for the event giving rise to the damage.

## **Disclosures for national security or law enforcement**

Please note that under certain circumstances, we may be required to disclose your personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## **Your rights**

You may have the right to access personal information that we hold about you and request that we correct, amend, or delete it if it is inaccurate or processed in violation of the DPF.

If you would like to exercise these rights, please write to us at the contact details provided below. We may request specific information from you to confirm your identity and we will respond to your request in accordance with the DPF and applicable data protection laws.

You may also opt out of receiving marketing communications from VRTCAL by clicking on the “unsubscribe” in the marketing e-mails we send you.

To find out more about your data protection rights under European, UK and Swiss law, please see the section entitled “EEA, UK and Switzerland Residents” in our [Privacy Policy - Corporate](#) and “C. European Data Subject Rights” in our [Privacy Policy - Advertising](#)

### **Questions or complaints**

In compliance with the DPF, we commit to resolve complaints about our collection or use of your personal information. EEA, UK and Swiss individuals with inquiries or complaints regarding our DPF practices should first contact us by email at **info@vrtcal.com** or by post using the details provided below:

VRTCAL Markets Inc.

Attn: Privacy Team

104 W Anapamu Street, Suite F, Santa Barbara, CA 93101, USA

We will investigate and attempt to resolve any DPF-related complaints or concerns within forty-five (45) days of receipt.

If you have an unresolved DPF complaint or concern that we have not addressed satisfactorily or in a timely manner, you may contact JAMS (“JAMS”), our US based third party dispute resolution provider. JAMS services are provided to you at no cost. To find out more about JAMS or to file a complaint, please go to:

**<https://www.jamsadr.com/DPF-Dispute-Resolution>**

You may also have the option to select binding arbitration for the resolution of your complaint under certain circumstances.

**Changes to this Notice**

We reserve the right to amend this Notice consistent with the DPF's requirements.