

Our partners can rely on the fact that Teads is committed to GDPR compliance across our products and services. We have been actively working on being ready, and have reviewed our data practices in the light of the new regulation. We are committed to comply with the legislation and collaborate with our partners throughout this process. As such this document intends to provide Teads GDPR legal stance regarding the our True Visit service.

The Media Agency must share this document with their final advertiser clients at the time they will implement Teads pixels on their websites. This disclosure is required in order to allow the advertiser clients to comply with their GDPR obligations to provide transparency and information to the users visiting their websites.

1. What is Teads True Visit?

Teads True Visits requires a pixel to be implemented to track landing page view ideally before the start of any campaign in order to ensure the best exclusion reach.

Teads True Visits campaigns targets Teads cookies pool of users who have given their consent to Teads through Teads publisher partners.

2. What is the purpose of Teads pixel on the Advertiser site?

The Teads pixel installed on the Advertiser landing page is calling Teads for each user visiting the Website in order to allow Teads to confirm if the user is known by Teads:

- *If it is known by Teads, the user will be excluded from the Advertiser campaign.*

If it is unknown by Teads, Teads will not do anything as the pixel only read users who have Teads cookie already and therefore agreed on the tracking.

- *The sole purpose of this pixel is to read and recognize whether or not Teads Cookie are already set up in the user's device. In the affirmative, Tead cookies will thereafter (i) track Teads users visiting the advertiser website and exclude them from the advertiser campaigns and (ii) conversion to charge the advertisers only for unique and incremental visitors who have actually loaded the landing page. .*

3. What data are collected through this pixel ?

Teads pixel allows to have access to following information and technical characteristics of the device:

- Current URL
- auctid parameter (*this is an optional parameter that we send through our clickthrough url*)
- Device
- browser
- OS

Therefore, there are no personal information data flow. Teads delivers campaign on its own audience, based on its data capabilities. Teads does provide aggregated campaign performance reportings which do not include personal information.

The pixel installed on the Advertiser site is not used to collect or share PII, single out a user by dropping any tracking technology or display targeted ads. Furthermore, the pixel is not subject to the consent from the user to this extent his/her consent has already been given and collected for the setting of our tracking technologies when such user has been visiting the website of publishers from our network.. Indeed, as provided by the Article 29 Working group on the grounds of the ePrivacy directive, “the consent obtained to place the cookie and use the information to send targeting advertising would cover subsequent ‘readings’ of the cookie that take place every time the user visits a website partner of the ad network provider which initially placed the cookie” (Opinion 2/2010).

Teads deliver True Visit campaign on its own cookie pool and is acting as a Data Controller for the delivery of Teads True Visit service.

4. Teads as a Data Controller

In the framework of Teads True Visit offer, Teads is the Data Controller according to the GDPR.

The Controller is the entity which “**determines the purposes and means of the processing of personal data**”. This is the case when a company decides the reasons, the occasion, the nature and the scope as well as the objectives of the data processing - put another way, whether, for what reason and to what extent –, and if it defines the material technical means and methods – the how – of the data processing (Article 4 (7) of the GDPR).

TEADS is considered as a Data Controller when it uses the collected Data according to the media plan decided by the Agency/ Advertiser but determines the purposes of tailored marketing campaign designed according to Agency/Advertiser needs (selection of the data segments and guidance about the targeting process) and will own the ad tech means used for the delivery of ads. Despite processing Data in the interest of the Agency/ Advertiser, it does not follow the Agency/Advertiser documented instructions.

5. Teads Legal Basis as a Data Controller

In the framework of our Teads Advertising Solutions, including Teads True Visit, as a data controller Teads has determined the legal basis according to the GDPR and based on the purposes defined in the [Transparency and Consent Framework \(TCF\)](#) according to the consent we collect on the publisher network.

Purposes of the Personal Data processing by Teads

(Teads is using the purposes as defined by the IAB transparency and consent framework)

Storage and access of information: The storage of information, or access to information that is already stored, on your device such as accessing advertising identifiers and/or other device identifiers, and/or using cookies or similar technologies.

Personalization: The collection and processing of information about your use of this site to subsequently personalize advertising for you in other contexts, i.e. on other sites or apps, over time. Typically, the content of the site or app is used to make inferences about your interests which inform future selections.

Ad selection, delivery, reporting: The collection of information, and combination with previously collected information, to select and deliver advertisements for you, and to measure the delivery and effectiveness of such advertisements. This includes using previously collected information about your interests to select ads, processing data about what advertisements were shown, how often they were shown, when and where they were shown, and whether you took any action related to the advertisement, including for example clicking an ad or making a purchase.

Content selection, delivery, reporting: The collection of information, and combination with previously collected information, to select and deliver content for you, and to measure the delivery and effectiveness of such content. This includes using previously collected information about your interests to select content, processing data about what content was shown, how often or how long it was shown, when and where it was shown, and whether the you took any action related to the content, including for example clicking on content.

Measurement: The collection of information about your use of the content, and combination with previously collected information, used to measure, understand, and report on your usage of the content.

Below the legal basis and purposes implemented by Teads:

Purposes where Users consent is required to be collected by the Partner

Storage and access of information

Personalization

Purposes where Teads is relying on Teads legitimate interest

Ad selection, delivery, reporting

Content selection, delivery, reporting

Measurement

6. How Teads is collecting the consent?

The publisher is the main interlocutor of the data subject as it is directly in contact with them and, therefore only the publisher can collect the consent of the users.

Teads is supporting the IAB Transparency and Consent Framework for passing consent and is listed as a Vendor (ID 132). Teads has worked with its publishers to ensure GDPR-level consent is being obtained and recorded. Teads is asking its publisher network to implement consent management providers in order to provide relevant information to the user on data collection, collect, pass and store the consent appropriately according to the GDPR principles.

The reading of the pixel by Teads does not require any specific action on the Advertiser website on behalf of Teads as the user has already provided consent to Teads for Teads Services, being reminded that the subsequent processing implemented for the performance of such services is managed by Teads as Data Controller as mentioned here above.