

Tesco Media Ad Manager Privacy Notice

1. Introduction

1.1 The Tesco Media Ad Manager (the "Platform") is owned and operated by dunnhumby Limited ("dunnhumby", "we", "us" or "our").

1.2 This Privacy Notice:

- applies to personal data that we collect through the Platform;
- explains how we collect, use, share and retain personal data (information about you as an end user of the Platform from which you can be directly or indirectly identified, "you"); and
- explains how you can exercise your rights in respect of the personal data we hold about you.

1.3 This Privacy Notice does not apply to information about consumers who are shown advertising through the Platform. Any information about consumers provided to our clients through the Platform is provided in aggregate form only and does not identify individual consumers.

2. Quick links

This Privacy Notice is broken down into sections, please click on the links below if you want to navigate to a section:

Page no.	Section					
1	Personal data we collect about you					
2	<table border="1"> <tr> <td rowspan="2">1.1 Collected / Stored automatically</td> <td>Device and Systems</td> <td> <ul style="list-style-type: none"> • IP address and time zone, device type, browser type and other technical information </td> </tr> <tr> <td>Access, Application and Security Logs</td> <td> <ul style="list-style-type: none"> • the time you access or attempt to access the Platform • the operations you perform when using the Platform, including pages viewed </td> </tr> </table>	1.1 Collected / Stored automatically	Device and Systems	<ul style="list-style-type: none"> • IP address and time zone, device type, browser type and other technical information 	Access, Application and Security Logs	<ul style="list-style-type: none"> • the time you access or attempt to access the Platform • the operations you perform when using the Platform, including pages viewed
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	How we use personal data and our legal basis for processing it					
3	Who we share personal data with					
4	How we protect your personal data					
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3. Personal data we collect about you

We collect the following personal data about you:

Source of personal data	Category of personal data	Personal data included in this category
You or Your employer (our client)	Identity and Contact	<ul style="list-style-type: none"> Identity: your first and last name Contact: your work email address Employer: the name of your employer
You	Communication	<ul style="list-style-type: none"> your communications with us (including notes, e-mails and other messages between you and us)
dunnhumby	User account credentials	<ul style="list-style-type: none"> Username, user ID and password for the Platform
Collected / Stored automatically	Device and Systems	<ul style="list-style-type: none"> IP address and time zone, device type, browser type and other technical information
	Access, Application and Security Logs	<ul style="list-style-type: none"> the time you access or attempt to access the Platform the operations you perform when using the Platform, including pages viewed

4. How we use personal data and our legal basis for processing it

We rely on the following legal bases to use your personal data for the following purposes:

Source of personal data	Legal basis	Purposes
You, Your employer (our client) and dunnhumby	Legitimate Interests	<ul style="list-style-type: none"> register you as a user of the Platform allow you to connect to and use the Platform manage your access to the Platform

		<ul style="list-style-type: none"> • provide you with help and support in using the Platform • provide user guides and education • respond and deal with your queries or comments • to manage approvals of advertisement creative • email you with notifications about the Platform, such as maintenance and updates, and your use of the Platform, such as the status of your bookings and reports
	Compliance with law	<ul style="list-style-type: none"> • comply with the law • exercise, establish or defend our legal rights • protect the rights, property, or safety of dunnhumby or others
You, Collected / stored automatically	Consent	<p>We rely on consent as the legal basis to process data collected automatically through analytics or performance cookies or similar technology (see our Cookie Notice for more information) for the following purposes:</p> <p>to store your 'don't show this again' user preferences in pop-ups</p> <p>1.2 for our internal analytics purposes and to improve the quality and relevance of the Platform</p> <p>1.3 on an aggregated basis, for our internal analytics purposes, including:</p> <p>1.4 improving the quality and relevance of the Platform</p> <p>1.5 tracking performance of Platform pages and features and identifying potential areas for optimization</p> <p>1.6 monitoring metrics such as total number of visitors, and traffic</p> <p>1.7 identifying potential issues or bugs</p> <p>1.8 creating management reporting about aggregated usage and performance of the Platform</p> <p>on an individual user basis, for our internal analytics purposes including:</p> <p>1.9 tracking how users engage with pages and features of the Platform (e.g., clicks, mouse movements)</p> <p>1.10 recreating individual user journeys so that we can test user experiences with the Platform</p> <p>1.11 using the above information to inform feedback conversations with individual users about the Platform</p> <p>1.12 to create management reporting about aggregated usage and performance of the Platform</p>

	<p>Legitimate Interests</p>	<p>We rely on legitimate interests as the legal basis to process data collected automatically through essential cookies or similar technology (see our Cookie Notice for more information) for the following purposes:</p> <ul style="list-style-type: none"> • to store your acceptance of the Platform Terms and your cookie preferences • for network and information security purposes to enable us to verify your identity and access rights for the Platform <p>We rely on legitimate interests as the legal basis to process data which is automatically collected through our application database for the following purposes:</p> <ul style="list-style-type: none"> • to automate the billing process through our corporate billing systems • to identify performance issues and provide technical support
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Where we have mentioned above that our use of your personal data is based on “legitimate interests”, the legitimate interests are:

- to service our clients’ needs, including delivering our products and services;
- to improve the Platform; and
- to protect and support our business.

If you are using the Platform as part of a pilot or usability testing programme, we will use personal data collected through the Platform to administer the programme, provide support, troubleshoot issues and improve the Platform. Please do not share screen shots, recordings or other materials from the pilot externally unless we have confirmed this is permitted.

5. Who we share your personal data with

5.1 We will only share personal data with the following categories of third parties:

- our **group companies** who help us to provide the Platform to you and they will only use the personal data for the purposes described in this Privacy Notice;
- **third party service providers** who help us to provide the Platform for example by hosting it, enabling certain features or functionality, or by providing other services such as support and maintenance, security technology, or helpdesk support. The third-party service providers we use for the Platform are as follows:

Third party	Reason for disclosure & personal data disclosed
Google Cloud Platform (GCP)	To host the Platform and maintain the data collected by the Platform. GCP hosts, and therefore has access to, all categories of personal data within the Platform.
Adzerk Inc. (T/A Kevel)	To provide API-first ad-serving infrastructure that underpins the Platform’s sponsored search / sponsored ads campaign delivery and tracking (including making ad decisions, serving ads, measuring

	delivery and performance and attributing interactions). Kevel may have access to Identity and Contact Data (e.g., name and business email address (where required for user administration/support)), Device and Systems data, Access, Application and Security Logs.
Hitachi	To provide Platform deployment and maintenance services. Hitachi has access to all categories of personal data within the Platform.
Full Story Inc.	<p>Provided you have given your consent to the use of cookies and similar technologies, to collect and analyse data regarding your use of the Platform for the following purposes:</p> <ul style="list-style-type: none"> • improving the quality and relevance of the Platform • tracking performance of Platform pages and features and identifying potential areas for optimisation • monitoring metrics such as total number of visitors and traffic • identifying potential issues or bugs • tracking how users engage with pages and features of the Platform (e.g., clicks, mouse movements) • recreating individual user journeys so that we can test user experiences with the Platform <p>Full Story may have access to the following categories of personal data (as described in section 3 above): Identity and Contact Data (e.g. name and business email address), Device and Systems data, and Access, Application and Security Logs.</p>
OpenFGA	To identify authenticated users and ensure they can access only the features and resources they are authorised to use. OpenFGA may have access to Identity and Contact Data (e.g. name, business email address and user ID) and information relating to user roles, permissions and access rights.

- **our client (your employer)** who may access and use the bookings created in the Platform through their corporate account;

- any **competent law enforcement body, regulator, government agency, court or other third party** to (i) comply with the law; (ii) exercise, establish or defend our legal rights, or (iii) protect the rights, property, or safety of dunnhumby or others; and
- **third parties** in the context of the possible **sale or restructuring of our business** or when you have provided your **consent** and the third parties will only use the personal data for the purposes described in this Privacy Notice.

5.2 If the Californian Consumer Privacy Act (CCPA) applies to the processing of your information, we confirm that we do not sell your personal information.

6. How we protect your personal data

6.1 We use appropriate security measures to protect the personal data that we collect and process about you to help ensure it remains secure against accidental or unlawful destruction, loss, alteration or unauthorised access.

6.2 We protect the personal data with a combination of technical and physical measures which are designed to provide a level of protection appropriate to the risk of processing the personal data.

6.3 Whilst we take appropriate technical and organisational measures to safeguard your personal data, it is important that you keep your Platform login details protected from unauthorised access.

6.4 Access to the Platform (and to any personal data within it) is restricted to authorised users and is managed using role-based access controls. We also restrict access by account so that users only see information relevant to the corporate account(s) they are authorised to manage.

6.5 Our staff and service providers may access personal data on a need-to-know basis for account administration, customer support, maintenance and security monitoring, subject to appropriate access controls and confidentiality obligations.

7. Where we store and transfer your personal data

7.1 We store your personal data in our third party hosting provider's data centres and if we otherwise share personal data as described in section 5 (**Who we share personal data with**) above, these third parties may process the personal data at locations outside of the country or region in which you are resident. If we do this or undertake any other international transfers of personal data, we will take appropriate measures to ensure your personal data remains protected to the standards described in this Privacy Notice, for example by entering into contractual agreements based on the EU Commission's standard contractual clauses, a copy of which can be found [here](#).

7.2 If you have any questions or need more information regarding international transfers of your personal data, please **Contact** us.

8. How long we use personal data for

8.1 With the exception of Google Analytics (see section 8.3), we will retain your personal data for as long as we provide the Platform to your employer.

8.2 Unless we need to keep your personal data for a legitimate business reason (for example, compliance with applicable legal, tax or accounting requirements) and with the exception of data stored in Google Analytics, we will delete your personal data following the expiry or termination of our contract with our client (your employer) or, if we stop providing certain services in accordance with our client's (your employer's) request. We will also instruct third parties to delete personal data.

8.3 Your data in Google Analytics will be stored for a period of 14 months. See section 5.1 for information on how Google Analytics uses your data.

9. Data protection rights

- 9.1 If European Union or United Kingdom data protection laws apply to you, you have the right to access the personal data we hold about you and know how we use it and who we've shared it with. You can also ask that we delete or correct personal data that you believe is inaccurate or no longer relevant in this same way. Other countries' laws may grant you similar rights. Please make any such requests in writing to individualrights@dunnhumby.com. We may ask you for information to verify your identity (e.g. a copy of your passport, national ID or other such documentation which will allow us to determine your identity and therefore your legal right to access the personal data) or clarify your request.
- 9.2 In addition to being able to update and correct your personal data, you may also have other data protection rights:
- 9.2.1 If we have collected and processed your personal data with your consent, you have the right to withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we carried out prior to your withdrawal, nor will it affect processing of your personal data carried out in reliance on other lawful grounds other than consent;
- 9.2.2 You may have certain additional rights in relation to your personal data, such as:
- in certain circumstances you may have the right to object to our processing of your personal data or to ask us to restrict processing of your personal data (although sometimes we may not be able to comply with this request).
 - you may have your personal data erased in a number of circumstances, such as where it has been unlawfully processed, or where there is no overriding legitimate grounds for the processing.
- 9.2.3 You can make any of these requests by using the email address individualrights@dunnhumby.com. We will respond to all requests in accordance with applicable data protection laws
- 9.2.4 You have the **right to complain to an information authority** about our collection and use of your personal information. For more information, please contact your local authority. (Contact details for authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).)
- 9.3 We respond to all requests we receive from individuals wishing to exercise their rights in accordance with applicable laws.

10. Cookies

Please read the [Tesco Media Ad Manager Cookie Notice](#) for information about how we use cookies on the Platform.

11. Changes to this Privacy Notice

- 11.1 We can update this Privacy Notice at any time and we will update this notice if we change the Platform in a way that changes the personal data we collect about you or how we use it; or, if the law changes so that we need to change our Privacy Notice. If we make any updates, we will inform you of the changes by posting the updated Privacy Notice on the Platform. The current version of the Privacy Notice will always be the version which you can access through the link on the Platform and replaces all previous versions.

12. Contacting us

- 12.1 If you have any queries about this Privacy Notice or the way we handle or process your personal data, please contact our Data Protection Officer via:

- email: individualrights@dunnhumby.com; or
- post: FAO Data Protection Officer, dunnhumby Limited, 184 Shepherds Bush Road, London, England, W6 7NL

13. Data Controller

dunnhumby Limited provides the Platform and is the data controller of your personal data.

14. Additional Information

To find out more information about:

1.15 dunnhumby Limited, please visit [About Us](#)

1.16 [Tesco Media Ad Manager Cookie Notice](#) for information about how we use cookies on the Platform

1.17 cookies in general, including how to see what cookies have been set and how to manage and disable them, visit [All About Cookies](#)

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