



## The Newco Products and Services Privacy Policy

The Newco S.r.l. (“The Newco”, “Us”, “Our”, “We”) is an innovative startup company in the ad-tech industry. Our main business is to deliver innovative solutions for the collection, storage and analysis of anonymous online data.

Our clients and data partners use our technology for many different purposes like:

- Advanced digital attribution
- Cross Device matching
- Cross Platform matching
- Data Monetization
- Persistent ID vs Cookie matching

The list above is just to clarify the scope of application of our technology that is not limited to these specific use cases.

The Newco also provides consulting services in the Ad-Tech and Mar-Tech industries.

The Newco develops its technology following a “privacy-by-default” principle, all the data managed through our technology are hashed and no personal information are stored in our systems.

One of the most typically usage that clients make of our technology is to match persistent IDs (i.e CRM ID, Emails, etc.) with non-persistent data (i.e. cookies).

All the persistent and non-persistent IDs provided by our “Data Partners” are only managed by The Newco as data processor of third-party data.

Our “Data Partners” may collect data directly from users (both online and offline) or receive data from third parties.

The “Data Partners” are fully responsible of collecting proper consent from the user to manage their data.

At any time, the “Data Partners” must be able to provide full evidence of handling the data provided to The Newco in full compliancy with the local privacy laws and regulation.

We request that our “Data Partners” provide users with all required information about the use of their data and provide an opt in / opt out option according to applicable laws and regulations.

For this reason, this policy does not apply to any data collected by our “Data Partners”, as their user data management practices are covered by their own privacy policies.

If you have any concern regarding this privacy policy (“Policy”) you can write to:

The Newco S.r.l.  
Via De’ Carracci, 6/B  
40129 Bologna (BO)  
Italy  
Email: [privacy@thenewco.it](mailto:privacy@thenewco.it)



This Privacy Policy was updated on April 1<sup>st</sup> 2019. We suggest checking periodically this page as this Policy can change following local and regional regulation updates.

Any update to this privacy policy will be communicated to our customer base by email and notice on our website or by any other means when required by law. For all the users that are not part of our customer base this page will be the official place to inspect our Privacy Policy.

Our external Data Protection Officer is:  
Avv. Alessandro Mercurio  
Corso Magenta, 68 - Legnano (MI)  
Tel. +39 0331 1820124 - Email: info@avvocatomercurio.it

### **Legal Basis for Processing Data**

Our technology enables our Clients to keep an update matching table between persistent IDs and non-persistent IDs.

The legitimate interest of connecting persistent IDs with non-persistent IDs to simplify the connection with users for communication purposes is our basis for the processing of "Data Partners" data.

Our legitimate interest lies in conducting and managing our business.

Our Data Partners or other third parties who provide User Data to us may use another basis; such as consent to process your personal data and share it with us according to their respective privacy policies.

### **With Whom Do We Share User Data**

We share User Data with the following categories of third-parties:

- third parties that could use data for target advertising purposes, including measurement and analysis of the advertising campaigns performances, personalization, modeling, on-boarding and match with other data; those third parties include zeotap GmbH - for more information on how Zeotap manages your data you can examine their privacy policy available at the url: [https://www.zeotap.com/privacy\\_policy](https://www.zeotap.com/privacy_policy) . If you prefer not to share your personal data with Zeotap, it's possible to exercise your own right to opt-out following the specific instructions that can be found at the same url ([https://www.zeotap.com/privacy\\_policy](https://www.zeotap.com/privacy_policy)).

- third party data platforms such as Demand Side Platforms (DSPs), Data Management Platforms (DMPs), etc. ("Data Platform");

- our hosting provider Google Cloud Platform.

We only share hashed email addresses and hashed phone numbers with Data Platforms that wish to match their offline users' data to Ad IDs or Cookies to be able to target their customers.

We store User Data in data centers provided by third parties based in EU.

We also share data with Data Partners outside the EU only for technical purposes like data analysis, data cleaning, data transformation, etc.

We will also disclose data stored in our systems in response to valid legal processes, for example, in response to a court order, a subpoena or other legal request for information, and/or to comply with applicable legal and regulatory reporting requirements.

Rev. 1.1 – 24<sup>th</sup> April 2019

The Newco S.r.l. – P.I. e C.F. 03670431208 – Cap. Soc. 6.000,00€ i.v.  
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