



September 18, 2020

RE: Response to Access and Portability Request Dated August 20, 2020 (the "Request")

Dear Mr. Gundersen,

We write in response to the above-referenced Request. Article 15 of the EU General Data Protection Regulation (Regulation (EU) 2016/679) ("*GDPR*") grants data subjects the right to:

- Obtain confirmation that Venntel, Inc. ("*Venntel*") processes their personal data.
- Receive certain information about the processing.
- Receive a copy of the personal data we process.

In addition to the access right, the GDPR also grants data subjects the right to:

- Request correction or erasure of their personal data.
- Restrict or object to certain types of data processing.
- Make a complaint with the local data protection authority.

For more information on the rights granted under the GDPR, see Venntel's [EEA Privacy Notice](#). You can also view our general [Privacy Policy](#) ("*Privacy Policy*"). Should you wish to remove your device from our systems, you have the ability to do so by submitting our [Opt Out & Do not Sell Form](#).

We have reviewed your Request, and, following your provision of additional information in order for Venntel to verify your identity, we reasonably believe that we process your personal data. Article 15 of the GDPR entitles data subjects to the following information:

- 1) Categories of Personal Data Processed:** We process the following categories of personal data about you:
 - Location data (latitude/longitude, horizontal accuracy (for some, but not all, signals))
 - Timestamp
 - IP address
 - Device information: browser type, operating system, time zone setting and location, browser plug-in types and versions
 - Mobile Advertiser Id
 - If and when available, mobile applications from which your personal data has been collected. Note that we do not normally receive this information, but, occasionally, it is inadvertently provided by a supplier and ingested it into our system.



2) Purpose of Processing: We process the above listed categories of personal data for the purpose of providing our customers and partners with our data services. Our services are described in our [Privacy Policy](#). You can also visit our [website](#) for more information on the company and our services in general. We rely on our third-party partners (described in paragraph 4 below) to have the appropriate legal basis and have collected the data in compliance with the GDPR and applicable data privacy laws and regulations. Contractually, we describe the purposes for which we use the data and require our third-party partners/data suppliers to represent and warrant that they have received the appropriate consents for our specific uses of the data.

3) Categories of Recipients: The following categories of recipients have received the personal data associated with the identifier you provided

- Commercial third-party customers, who provide data analytics services to their customers.

These categories of recipients are located outside of the country where you live, including the United States. When we disclose the personal data to recipients located outside of your home country, we use appropriate safeguards to protect the personal data, including: prior to its invalidation, transferring data under the Privacy Shield Framework, and, following Privacy Shield Framework's invalidation, via standard data protection contractual clauses adopted by the EU Commission. For more information on the standard contractual clauses, please visit the European Commission Website [Here](#).

4) Sources of Personal Data: We collect the personal data categories described in paragraph 1 above from sources other than you. The sources of these categories of personal data are third-party data brokers and aggregators who receive data from other third-party partners. Specifically, we received the personal data categories described in paragraph 1 above from the following source: Gravy Analytics, Inc.

5) Storage Period: We store the listed categories of personal data for three (3) years. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and applicable legal requirements.

6) Automated Decision Making. We do not use the personal data for solely automated decision-making or profiling.

In response to your request, we are attaching a copy of the personal data we process about you in a commonly used electronic format. If you wish us to provide the data to a third party in accordance with your portability request, please inform us of such recipient's contact information so that we may promptly provide the data to such party.



If we did not take appropriate action in response to your Request, you have the right to lodge a complaint with the relevant supervisory authority and seek a judicial remedy.

If you have any additional questions, please contact Venntel Privacy at privacy@venntel.com.

Sincerely,

Chris Gildea
President
Venntel, Inc.