

# VPP Technologies Privacy Policy

**Effective Date:** 1 October 2024

**Last Updated:** 7 November 2024

## 1. Introduction

VPP Technologies, LLC (“we,” “our,” or “us”) is committed to protecting your privacy and ensuring that your personal data is handled in accordance with applicable data protection laws, including the EU-U.S. Data Privacy Framework (DPF) and the General Data Protection Regulation (GDPR). This Privacy Policy explains how we collect, use, store, and protect your data when you use our services or interact with our websites and platforms.

## 2. Data We Collect

We do not collect sensitive personal data or any data that directly identifies individuals, such as names or addresses. However, we may collect the following types of data, some of which may be considered personal data under certain circumstances, through cookies, pixels, and other tracking technologies:

- **Online Identifiers:** IP addresses, cookie IDs, advertising IDs.
- **Internet Activity:** Browsing history on our platform, interactions with ads, device information.
- **Geolocation Data:** Approximate location information.

We utilize the following types of cookies:

- **Session Cookies:** Temporary cookies that expire when you close your browser.
- **Persistent Cookies:** Remain on your device for a specified period or until deleted.
- **Third-Party Cookies:** Set by third-party service providers such as Yahoo, Google, and Facebook.

We engage with third-party services from Yahoo, Google, and Facebook to help facilitate our ad buying and selling services. These partners may provide us with aggregated and anonymized data about user demographics, interests, and online behavior to enhance our advertising capabilities.

We do not collect or process personal data from children under the age of 16.

## 3. Use of Data

The data we collect is used for the following purposes:

- **To improve the functionality of our websites and services:** This includes using website analytics to understand user behavior, conducting A/B testing to optimize website design,

and analyzing user interface interactions to enhance usability.

- **To facilitate our ad buying and selling operations:** This involves using aggregated and anonymized data to target ads effectively, measure campaign performance, and optimize bidding strategies.
- **To track and analyze website traffic and user behavior for performance analytics:** We use this information to understand how users interact with our platform, identify areas for improvement, and measure the effectiveness of our services.
- **To manage our relationships with third-party partners (e.g., Yahoo, Google, Facebook):** This includes sharing aggregated and anonymized performance data for reporting, billing reconciliation, and service optimization purposes.

No automated decision-making or profiling is currently conducted based on the collected data. However, we may introduce automated decision-making processes in the future, and any such changes will be reflected in updated policies.

#### 4. Cookies and Tracking Technologies

We use cookies and pixels to enhance user experience and optimize our services.

- **Pixels:** Small image files used to track user engagement and ad effectiveness.

You may adjust your cookie preferences through your browser settings. For more details on how we use cookies and obtain your consent, please refer to our Cookie Policy, which can be found at end of this document and our website at [www.worthathousandwords.com](http://www.worthathousandwords.com)

#### 5. Sharing and Disclosure of Data

We do not sell, rent or trade personal data to third parties.

We may share aggregated, non-personal data, which is data that has been combined and anonymized to remove any identifying information, with:

- **Brokers and non-brokers involved in ad buying and selling:** To provide insights into market trends and campaign performance.
- **Third-party service providers such as Yahoo, Google, and Facebook:** To measure advertising effectiveness and improve our services. We have contracts with these providers that require them to protect your information and comply with applicable data protection laws.

We may also share data with:

- **Service providers who assist us with essential business functions like payment processing and customer support:** We have contracts with these providers requiring them to protect your information.

We confirm that no personal data is directly used in our core ad-buying and selling operations.

We may disclose your personal information when required to do so by law or in response to

lawful requests by public authorities. This includes disclosures necessary to meet national security or law enforcement requirements. We are committed to protecting your privacy and will only disclose personal information under such circumstances when legally obligated to do so.

We may transfer your personal information to third parties for specific purposes, such as providing services on our behalf. When we do so, we remain responsible for ensuring that those third parties process your personal information in a manner consistent with our obligations under the Data Privacy Framework (DPF) Principles. In the event that a third party processes your personal information in a way that violates the DPF Principles, we will be liable for such violations unless we can prove that we are not responsible for the event giving rise to the damage.

## **6. Security Measures**

We take data security seriously and have implemented appropriate technical and organizational measures to safeguard the data we handle. These measures include:

- **Encryption in transit using industry-standard TLS protocols.**
- **Least privileged access controls to limit data access to authorized personnel.**
- **Regular security audits and vulnerability assessments by independent security experts.**
- **Firewalls and intrusion detection systems to protect our systems from unauthorized access.**
- **Ongoing employee training on data protection best practices.**

## **7. Data Transfers**

We do not transfer data outside the U.S. and the EEA. Should any future cross-border transfers occur, they will be in compliance with the EU-U.S. Data Privacy Framework (DPF) and GDPR requirements, including the implementation of appropriate safeguards such as Standard Contractual Clauses.

## **8. Data Retention**

We retain collected data for as long as necessary to fulfill the purposes outlined in this policy or as required by law. Data is securely deleted or anonymized once no longer needed.

## **9. Data Subject Rights**

As per the GDPR and the DPF, individuals have the following rights concerning their personal data:

- **The right to access:** You can request a copy of the personal data we hold about you.
- **The right to rectification:** You can request correction of any inaccurate or incomplete data we hold about you.
- **The right to erasure (“right to be forgotten”):** You can request the deletion of your personal data, subject to certain exceptions.
- **The right to data portability:** You can request a copy of your personal data in a portable format.
- **The right to object to processing:** You can object to the processing of your personal data based on legitimate interests or for direct marketing purposes.

To exercise these rights, users may contact our Data Protection Officer (DPO) by completing our online data subject request form by emailing [dpo@worthathousandwords.com](mailto:dpo@worthathousandwords.com). We will respond to such requests within 45 days or less of receiving the request, as required by applicable laws.

## 10. EU - US Data Privacy Framework

VPP Technologies, LLC complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) as set forth by the U.S. Department of Commerce. VPP Technologies, LLC has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and [the EU-U.S. DPF Principles](#), the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>

In compliance with the EU-U.S. DPF, VPP Technologies, LLC commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF to the International Centre for Dispute Resolution, the international division of the American Arbitration Association (ICDR-AAA), an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit [https://go.adr.org/dpf\\_irm.html](https://go.adr.org/dpf_irm.html) for more information or to file a complaint. The services of the International Centre for Dispute Resolution, the international division of the American Arbitration Association (ICDR-AAA) are provided at no cost to you.

## 11. Data Breach Response Plan

We are committed to maintaining the security of your data and have a comprehensive Data Breach Response Plan in place. This plan outlines procedures for:

- **Incident identification and assessment:** Promptly detecting and evaluating potential data breaches.
- **Containment:** Taking immediate steps to limit the impact of a breach.
- **Notification:** Notifying affected individuals and regulatory authorities as required by

applicable laws.

- **Investigation:** Conducting a thorough investigation to determine the cause and scope of the breach.
- **Recovery:** Implementing measures to restore data and system integrity.
- **Corrective actions:** Taking steps to prevent future breaches.

## 12. Contact Information

If you have any questions about this Privacy Policy or wish to exercise your data protection rights, please contact our customer support or Data Protection Officer at:

- **Email:** [dpo@worthathousandwords.com](mailto:dpo@worthathousandwords.com)
- **Name:** Phil Dayalu
- **Title:** Data Protection Officer

## 13. Enforcement and Oversight

Our organization is subject to investigative and enforcement powers of the Federal Trade Commission (FTC). This means that the FTC has the authority to enforce our compliance with privacy laws and regulations, ensuring that we adhere to our commitments under applicable data protection frameworks.

Under certain conditions, you may have the option to invoke binding arbitration to resolve disputes regarding our privacy practices. This process is outlined in Annex I of the Data Privacy Framework (DPF) Principles. If you wish to invoke binding arbitration, you must provide us with written notice and follow the procedures and conditions specified in Annex I. We are committed to resolving privacy-related complaints in accordance with the terms of this framework.

## 14. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. Any significant changes will be communicated via our website or directly to users. Continued use of our services after updates to this policy will be deemed acceptance of the revised terms.

# VPP Technologies Cookie Policy

**Effective Date:** October 1, 2024

**Last Updated:** October 4, 2024

## 1. What are Cookies?

Cookies are small text files that websites place on your computer or mobile device when you visit them. They are widely used to make websites work more efficiently, as well as to provide information to the website owners.

## 2. How We Use Cookies

VPP Technologies, Inc. uses cookies to enhance your experience on our website and platform, and to optimize our advertising services. We use the following types of cookies:

- **Strictly Necessary Cookies:** These cookies are essential for the operation of our website and platform. They enable you to navigate the site and use its features, such as accessing secure areas. Without these cookies, our services would not function properly.
- **Performance Cookies:** These cookies collect information about how visitors use our website and platform, such as which pages are visited most often and if they receive error messages. This data helps us improve the performance and usability of our services. We use Google Analytics to analyze website traffic. This data is aggregated and anonymized, meaning it cannot be used to identify individual users.
- **Functionality Cookies:** These cookies allow our website and platform to remember choices you make (such as your language preference) and provide enhanced, more personal features.
- **Targeting/Advertising Cookies:** These cookies are used to deliver ads that are more relevant to you and your interests. They are also used to limit the number of times you see an ad and to help measure the effectiveness of advertising campaigns. We use cookies from third-party partners, such as Yahoo, Google, and Facebook, to support our advertising activities.

## 3. Third-Party Cookies

We work with third-party service providers, including Yahoo, Google, and Facebook, who may also set cookies on your device when you visit our website or platform. These cookies allow our partners to provide their services to us and may be used to track your activity across different websites for advertising purposes. You can find more information about these third-party cookies and their privacy practices on the respective websites of these providers.

## 4. Managing Your Cookie Preferences

Most web browsers allow you to control cookies through their settings preferences. You can set your browser to refuse all cookies or to indicate when a cookie is being set. However, if you disable cookies, some features of our website and platform may not function properly.

You can also use browser extensions or privacy tools to manage your cookie preferences.

For more detailed information about managing cookies, you can visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **5. Cookie Consent**

When you visit our website or platform for the first time, you will be presented with a cookie banner that provides information about our use of cookies and allows you to consent to the use of non-essential cookies. You can change your cookie preferences at any time by clicking on the "Cookie Settings" link in the footer of our website.

## **6. Updates to this Cookie Policy**

We may update this Cookie Policy from time to time to reflect changes in our practices or applicable laws. We encourage you to review this policy periodically for any updates.

## **7. Contact Us**

If you have any questions about this Cookie Policy, please contact customer service at [contact@worthathousandwords.com](mailto:contact@worthathousandwords.com) or our Data Protection Officer at [dpo@worthathousandwords.com](mailto:dpo@worthathousandwords.com)