PRIVACY POLICY

— Hong Kong Vosaco Technology Development Co., Limited

Effective Date: [2026/01/01]

This Privacy Policy applies to user data collected, stored, or processed by **Hong Kong Vosaco Technology Development Co., Limited** ("we," "us," "our") for providing DSP / SSP ad-exchange, ad-serving and monetization services. We comply with the EU General Data Protection Regulation (GDPR), Hong Kong Personal Data (Privacy) Ordinance (Cap.486) ("PDPO"), and applicable data-protection provisions of other regions where Vosaco services are used, including the United States and Asia.

For Vosaco, protection of personal data is a core value, and we strictly comply with applicable data-privacy legislation and global ad-tech industry standards. User data is processed by **Hong Kong Vosaco Technology Development Co., Limited (Room P, 4th Floor, Yicai Center, 72 Kaiyuan Road, Kwun Tong, Hong Kong)** — acting as service provider and data controller / processor under GDPR and Hong Kong PDPO.

Our services are intended for general-audience internet users and are not designed for children. We do not knowingly collect personal information from users regarded as children under their applicable national laws. This document also applies to tracking and bidding technologies embedded within our ad-serving services deployed on third-party websites and mobile applications, from which we receive event and device information.

What is personal information?

Pursuant to **Article 4(1) GDPR** and Hong Kong PDPO: Personal data means any information relating to an identified or identifiable natural person. Such information may be used to derive personal or factual details about the data subject (examples: full name, postal address, telephone number, date-of-birth, email address).

Information that cannot, directly or indirectly, be linked to an identifiable natural person — such as fully anonymous or aggregated statistical data — is **not regarded as personal information**.

Cookies and advertising identifiers

We deliver targeted digital advertisements for our publisher and advertiser partners. To improve ad relevance, we process device-level data, session context, resource-usage signals, and records of user interactions with ad creatives. For these purposes we only rely on **pseudonymised / anonymised identifiers**, including HTTP cookies and mobile advertising-IDs.

Categories of cookies utilised:

- **Technical / Necessary cookies**: Required for core ad-exchange and bidding functionality; cannot be disabled.
- **Preference cookies**: Store runtime user-environment settings such as language or regional parameters.
- **Statistic cookies**: Used for platform analytics, traffic reporting and measuring user-engagement metrics.
- **Advertising cookies**: Deployed to serve relevant advertisements, measure campaign performance, enforce frequency-capping and complete RTB auction workflows.

Note: Vosaco's Exchange platform itself does not set first-party cookies on end-user browsers. Most cookie operations take place on third-party publisher-controlled websites and apps. For EU-EEA traffic, personalised interest-based advertising will only execute when valid consent signals (IAB TCF consent string) are received within OpenRTB bid-request payloads.

What data do we collect and process?

Through our programmatic ad-exchange platform we may process the following pseudonymised data, either in our capacity as data controller or as a data-processor acting on instructions of our contractual business partners pursuant to **Article 28(3) GDPR**:

- General device information (device type, model, manufacturer)
- User-Agent metadata (operating-system version, browser name and build)
- Network-connection information (masked-IP address, mobile / fixed-line carrier)
- Approximate geographic location (country, region, city) inferred from IP-address
- Session-context information (signal of visited third-party websites or mobile-apps)
- Ad-event information: advertiser identity, ad format, placement context, impression / click / conversion interaction records and post-click behavioural signals.

We do NOT collect directly-identifiable personal data, including real-world names,

phone numbers, personal email addresses, payment-card data or physical postal addresses.

How we use data

Vosaco processes collected information strictly for digital marketing, real-time bidding and ad-delivery purposes:

- Infer user interests and preferences to enable interest-based targeted advertising;
- Allow advertiser partners to customise ad campaigns based on observed user behavioural signals;
- Support remarketing workflows (displaying advertisements for brands whose websites a user has previously visited);
- Measure ad-campaign performance, optimise targeting logic and auction parameters;
- Generate aggregated, non-identifiable reporting for publishers and advertisers on advertising effectiveness;
- Maintain platform security, execute invalid-traffic detection and anti-fraud checks;
- Debug, stabilise, maintain and improve our DSP / SSP ad-exchange services.

Legal basis for data processing

Our legal bases for processing user-related information include:

1. **Consent — Article 6(1)(a) GDPR**: Where end-users provide explicit consent for personalised advertising, signalled via IAB TCF within OpenRTB bid-requests.
2. **Performance of contract — Article 6(1)(b) GDPR**: To perform our Master-Services-Agreement obligations towards DSP and SSP business partners.
3. **Legitimate interest — Article 6(1)(f) GDPR**: e.g. service improvement, anti-fraud operations, platform technical security, enforcement of contractual rights between contracting parties. We have completed legitimate-interest balancing tests for such processing activities.
4. **Legal obligation — Article 6(1)(c) GDPR**: Where processing is required to satisfy statutory or regulatory requirements applicable to our organisation.

Data sharing

We may share fully anonymised or aggregated statistical data with our advertiser and publisher partners. Non-aggregated pseudonymised event data may be stored and processed by authorised third-party hosting and cloud-infrastructure providers, with data-centres located inside or outside Hong Kong, EU-EEA, USA and Asia. Such third-party vendors act as our data-processors and are bound by written data-processing agreements imposing strict confidentiality and data-protection obligations.

We do not sell personal-identifiable information to unaffiliated third-parties for independent commercial purposes. We may disclose data when compelled by law, court-order or valid request from competent governmental authorities.

Children's information

Our advertising-technology services are not directed towards children under the age of 16. We do not knowingly collect or process personal data belonging to children. If we receive signals indicating data originates from children, we will refrain from personalised targeting and seek to delete such records as soon as reasonably practicable.

Data security

Vosaco implements reasonable and strict technical, administrative and organisational safeguards to protect user pseudonymised data against unauthorised access, loss, misuse, alteration or leakage. Please note that no internet-connected system can guarantee absolute security against all possible risks.

International data transfer

User-related data may be processed in jurisdictions outside Hong Kong and the user's country of residence, including servers located within EU-EEA, USA and Asia. For data transfers outside the EEA we apply appropriate safeguards compliant with European data-protection law such as the European Commission Standard Contractual Clauses (SCCs), where required.

Your data-protection rights

If you are an end-user located in EEA, United Kingdom or Switzerland you hold the following rights under GDPR:

- Right to access, rectify or request erasure of your personal data;
- Right to restrict processing or object against certain grounds of processing;

- Right to request data portability in machine-readable format;
- Right to withdraw previously-given consent at any time (withdrawal does not affect lawfulness of processing performed prior to withdrawal);
- Right to lodge a formal complaint with your local competent data-protection supervisory authority.

For users located in Hong Kong you may exercise rights of access and correction under the Hong Kong PDPO.

We respond to valid user-submitted requests in accordance with GDPR, PDPO and other applicable local legislation. Privacy-related enquiries and subject-rights requests should be sent to: privacy@vosacosg.com. We aim to reply within 30 calendar-days. Complex requests may be extended for up to two additional months with prior notification.

California privacy rights (CCPA / CPRA, United States)

California residents have the right to request:

- Categories of personal information disclosed to third-parties;
- Categories of third-party recipients to whom such information has been shared.

Such requests may be submitted once per 12-month period by emailing privacy@vosacosg.com.

Opt-out from personalised advertising

If you wish to opt-out of interest-based personalised advertising processing, you may disable personalised ads at browser-level or via your mobile-device advertising-identifier settings. After opt-out you will still receive generic non-targeted advertisements. You may also use industry opt-out tools such as EDAA Your-Online-Choices or DAA WebChoices.

Amendments to this Privacy Policy

We may revise and update this Privacy Policy from time-to-time. Revised versions will be published. Material changes will be notified to our business-contracting partners. Continued usage of Vosaco services after the effective update date constitutes acceptance of the revised policy.