

# GDPR compliance

## **1. Who is your Data Protection Officer?**

According to the GDPR, it is not obligatory to have a DPO at our company, however, all questions and issues regarding privacy must be addressed to Eskimi advisers “Ivanauskas & partners” and specifically our counsel Tomas Ivanauskas.

## **2. What personal data are you processing?**

Eskimi processes and uses for the provisioning of DSP services so-called indirect data, such as location, device specifications, browsing history, etc. No data allows Eskimi identify the specific person and to know their name, phone number, or any other directly linkable personal data.

## **3. How do you gather consent (Clear affirmative act, GDPR preamble p.32) of people you process their personal data?**

Eskimi processes data that was gathered by our partners by either obtaining the consent from the data subjects or on other legal grounds for data control (such as legitimate interest, service provisioning, data security, etc.). The data has been transferred to Eskimi on a legitimate contractual basis having permission from the data subject. Eskimi requires that partners would ensure that the data initially has been collected on a legitimate basis.

## **4. How do you ensure it is transparent to natural persons that personal data concerning them are collected, used, consulted, or otherwise processed? (GDPR preamble p. 39).**

Eskimi is a vendor in the IAB Transparency and Control Framework. Framework dictates how collection, use and processing should be described. Eskimi adheres to these standards. In addition, data processing activities are clearly and transparently described in Eskimi Privacy Policy.

## **5. Data subject should have the right of access to personal data which have been collected concerning him or her, and to exercise that right easily and at reasonable intervals, in order to be aware of, and verify, the lawfulness of the processing (GDPR preamble 63). How these rights can be exercised?**

Eskimi has a special procedure and a form for data subjects to request information about the scope of a person's data processing including the possibility to require that the processing would be stopped and/or the data would be deleted. We follow all the provisions of GDPR ensuring that the data subject would have full access to information about his/her data processing. Normally we would provide all the information requested under the Data Subject Access Request Form within 30 calendar days.

## **6. For how long you keep data in your databases?**

Data is only kept for a limited period of time that is strictly required to perform the obligations towards the clients under the contracts or observing other legal requirements. The data is periodically reviewed and deleted if it is not required for the purposes of business, according to Data Retention and Erasure Policy.

## **7. Do you have a data breach policy?**

Eskimi has a procedure according to which the data breach incidents are detected, reported, and addressed. Eskimi complies with the GDPR provisions for reporting data breach incidents to relevant data authorities as well as data controllers.

### **Key statements:**

- Eskimi is fully GDPR compliant.
- Eskimi is data processors for the provision of B2B services.
- Eskimi does not process any direct personal data.
- Eskimi obtains data from data controllers and check with them for the legal basis of data use.
- Eskimi ensures that the user access we provide to our clients is based on either consent of the user or has another legal basis for processing.

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