



Who are we and what do Affilired do?

Affilired operates as a marketing agency which connects Advertisers to multiple marketing sources, helping them to get more traffic and generate sales.

And for this, and to facilitate the process for our advertisers, we have built an all-in-one platform which aggregates data from these multiple sources. This platform tracks traffic sources and the conversions generated by these, helping advertisers attribute sales to the right traffic source and pay them accordingly.

What does this Privacy Policy do?

We are committed to protecting and respecting your privacy. This Privacy Policy explains the basis on which personal information we collect from you will be processed.

On this website, where we decide the purpose or means for which personal data we collect is processed, we are the “data controller.”

On the advertiser websites, they decide the purpose or means for which personal data we collect is processed on their behalf, and we are “data processors”.

This Privacy Policy contains important information about:

- What information we may collect about you;
- How we will use information we collect about you;
- Whether we will disclose your details to anyone else; and
- Your choices and rights regarding the personal information you have provided to us.

Who are you and what information do you need?

Depending on how you are interacting with Affilired, you may need different information and we may be processing this information on different ways. To make it easier for you, we suggest you to click on the link which most represents your position.

- You are [a Visitor on this website](#)
- You are [an end user \(or consumer\)](#), using services by Advertisers using Affilired services.

You don't find the information you're looking, or you have more questions?



You can always contact our DPO (Data Protection Officer) which will be more than happy to help you.

Post address:

Affilired S.L

Affilired Data Protection Officer

Carrer Ada Byron s/n. Edificio NTIC. Bajos local F.

07121 Parc Bit, Palma. Spain.

Email: dpo@affilired.com

Affilired Website Visitors

How we use data from visitors of our website?

To address your enquiries

If you contact us about our services, the forms you complete or the emails you send may include information about you, such as your name, your email address and your enquiry.

In line with the legitimate interest we have in promoting and operating our business or an existing statutory or contractual requirement, we will process your enquiries to reply and provide you with information about the services we offer.

To send you news and updates

If you ask to be added to our mailing list, under your consent we will keep you updated with information on news by email unless you would like to be removed from that list (in which case please let us know by clicking unsubscribe at the bottom of any marketing email that you receive).

Website Analytics

We use Google Analytics on our website for anonymous reporting of website usage. If you would like to opt-out of Google Analytics monitoring your behaviour on our website please use this link: <https://tools.google.com/dlpage/gaoptout/>.

Alternatively, you can always configure your preferences for cookies on this website.

How do we use data to manage our business?

We process personal information for the legitimate interests of ensuring that use of our services is lawful and non-fraudulent, does not disrupt the operation of our services, does



not harass our staff or other individuals, and to enforce our legal rights and comply with our legal obligations.

Where we reasonably believe that you are or may be in breach of any of the applicable laws, we may use your personal information to inform relevant third parties such as your email/internet provider or law enforcement agencies about the content.

With whom do we share your information?

Group members, [service providers](#): We keep your information confidential, but disclose it to our group members, our personnel, suppliers or subcontractors insofar as it is reasonably necessary for the purposes set out in this Privacy Policy. However, this is on the basis that they do not make independent use of the information and have agreed to safeguard it.

Merger or acquisition: If we are involved in a merger, acquisition or sale of all or a portion of our assets, you will be notified via email, account message and/or a prominent notice on our website of any change in ownership or uses of information, as well as any choices you may have regarding this information.

Required by law: In addition, we disclose your information to the extent that we are required to do so by law (e.g. to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

Enforcement: We disclose your personal information to third parties in order to enforce or apply the terms of agreements, to investigate potential breaches or to protect the rights, property or safety of Affilired, our customers or others.

How do we keep your data safe?

We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

Please be aware that, although we endeavour to provide security for information we process and maintain, no security system can prevent all potential security breaches.

For how long do we keep your data?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, tax, accounting or reporting requirements.

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 unauthorised 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 the applicable legal requirements.



What rights do you have in respect of your data?

We will honour your rights under applicable data protection laws. These rights are not absolute, and they do not always apply in all cases. You may:

- request access to your information and information related to our use and processing of your information;
- request the correction or deletion of your information;
- request that we restrict our use of your information;
- request a machine-readable copy of your information or that your information be transferred to other IT systems;
- object to the processing of your information for certain; and
- withdraw your consent to our use of your information at any time where we rely on your consent to use or process that information.
- the right to lodge a complaint with a supervisory authority

Please send your requests to dpo@affilired.com

If you are unhappy with the way we are processing your personal data, please let us know by contacting us.

Do we transfer data outside of the EEA?

We are established in Spain, but in the course of our business we may transfer personal information to other entities or persons in our group in other countries. We also transmit your data to our subcontracted [service providers](#), both in and out of the EU.

Where we transfer your personal information to entities in our group or service providers in countries which have not been deemed to have an adequate level of protection under an adequacy decision of the EU Commission, we have put in place specific contracts containing the EU Commission's standard contractual clauses (the "Model Clauses") to ensure that your personal information is treated by all parties in a way that is consistent with and which respects laws on data protection, in particular the GDPR.

If you require further information about these protective measures, please contact dpo@affilired.com

What happens when we make changes to this Privacy Policy?

This Privacy Policy may be updated from time to time. You can always find the last updated Privacy Policy on this same URL.

Advertiser's Consumers (end users)

How do we use data from Advertiser's end users?



Affilired only uses the data collected to provide its services and charge Advertisers for them.

For any other data treatment: Affilired it's a data-processor, and as such we process data in behalf of the Advertiser. Therefore, our processing is limited to the extent of the Advertiser's instructions and interests and follows their Privacy Policies and guidelines.

Advertiser's primarily uses end user data collected for the purpose of tracking an end user from a Partner to an Advertiser. Affilired's Tracking enables the Advertiser to see that an end user has visited a Partner's service, found a product, and clicked the link to be taken to the Advertiser's service to purchase the product.

The purpose of tracking is to attribute sales and marketing efforts by a Partner to a particular transaction, to enable Advertisers to reward Partners on a per transaction basis. Tracking also allows Affilired to provide Advertisers with related reports. Most of these reports contain only aggregated statistical data.

Affilired also permits Partners to enquire as to whether an action by a user ought to have generated a commission for that Partner. This necessitates the sharing of information between Partners and Advertisers, but this information is limited to the strictly necessary.

How do we collect data from end users?

Our technology is based on a Privacy's First principle: unlike other marketing platforms, we only collect the data which is strictly needed to provide our services.

We don't even really store much information on every click: just the click, the stamp and the country. And no other data.

Any other information is stored in your browser, and it's automatically deleted once the defined attribution window has passed (usually from 15 to 90 days) unless you end up buying a product or service on the advertiser's website.

Only in this unique case, we will store information about the product or service you bought, and the information associated to the partner traffics sources you used and provided to the Advertiser.

The main technologies used for Affilired's Advertiser tracking are Tracking Domain Cookies, Master Tag and First party tracking cookies.

Affilired Tracking Domain Cookies: These are cookies served by Affilired's own domain when an end user clicks on an advertisement displayed by a Partner. We use this information to understand which end users are referred by which Partners to which Advertiser. Please find some general information on cookies [here](#). Our tracking cookies are listed at this same Privacy Policy.

Affilired Master Tag: This is a JavaScript code integrated into the Advertiser's service to enable Affilired to receive transactional information from Advertisers. Affilired uses this information to record, validate and report the completion of transactions, for the purposes of apportioning commissions to Partners.



First party tracking cookies: these cookies are set by Affilired on behalf of the Advertiser and under its domain name, using the functionalities included in our Master Tag. As well as the Affilired Tracking Domain cookies, these are also used to understand which end users are referred by which Partners to which Advertiser.

How do we keep your data safe?

We will take all reasonable technical and organisational precautions to prevent the loss misuse or alteration of your personal information.

Please be aware that, although we endeavour to provide security for information we process and maintain, no security system can prevent all potential security breaches.

Do Advertiser's or Affilired transfer data outside of the EEA?

Advertisers

Please see their respective Privacy Policy for more information.

A list of advertisers [can be found here](#).

Affilired

Affilired is established in Spain, but in the course of our business we may transfer personal information to other entities in other countries. We also transmit your data to our subcontracted [service providers](#), both in and out of the EU.

Where we transfer your personal information to other entities or service providers in countries which have not been deemed to have an adequate level of protection under an adequacy decision of the EU Commission, we have put in place specific contracts containing the EU Commission's standard contractual clauses (the "Model Clauses") to ensure that your personal information is treated by all parties in a way that is consistent with and which respects laws on data protection, in particular the GDPR.

If you require further information about these protective measures, please contact dpo@affilired.com

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Cookies used to attribute the sales of our Advertiser's consumers

Cookie Name	Domain	Scope	Duration	Purpose
XXXX	.affilired.com	3rd party	15 to 90 days	Cookie name is 4 digits figure which identifies the advertiser. This cookie is used to monitor and track the sources and conversions. It is set when you click on a partner link, but do not track any other activities unless you buy any product or service on the advertiser's website.
_afflrdm1cXXXX	Advertiser-domain.tld	1st party	15 to 90 days	XXXX is a 4 digits figure which identifies the advertiser. This cookie is used to monitor and track the sources and conversions. It is set when you land on the advertiser's website from a partner link. It does not track any other activities unless you buy any product or service on the advertiser's website.

Cookies used on this Website

The following table describes each cookie set by gtag.js.

Cookie name	Default expiration time	Description
_ga	2 years	Used to distinguish users.
ga<container-id>	2 years	Used to persist session state.



Affilired's sub processors (Service Providers)

The Authorised Subprocessor of Affilired, S.L. for the general provision of services are the following:

I) Affilidok Media, whose service centre where the Subprocessor processed the Data Controller personal data is located in B/401 Sushma Urban View Gazipur Sas Nagar Mohali Pb 160104, India.

The Data Controller personal data information that may be provided or made available to the Subprocessor is the following:

Tracking number, price, location of the provision of the service/Product (if applicable) IP of the device and date of the provision of the service/Product (e.g. check-in and check-out dates).

The purpose of the transfer to and processing of the Data Controller personal data by the Subprocessor is the following: processing of the requests of the Processor in connection with the providing of the Services as set forth in the Agreement.

II) Joopbox, S.L., whose service centre where the Subprocessor processed the Data Controller personal data is located in Palma de Mallorca, Gremi de Fusters, n^o 33, Planta 2^a, office 2. Edif. VIP ASIMA, 07009.

The Data Controller personal data information that may be provided or made available to the Subprocessor is the following:

Tracking number, price, location of the provision of the service/Product (if applicable) IP of the device and date of the provision of the service/Product (e.g. check-in and check-out dates).

The purpose of the transfer to and processing of the Data Controller personal data by the Subprocessor is the following: processing of Cloud Services, in connection with the providing of the Services as set forth in the Agreement.

Other subprocessors

Please be advised that Advertiser's using Affilired's tracking technology may use another subprocessors.

You can visit their respective Privacy Policies for more information.

A list of our advertisers and they websites [is available here.](#)