Privacy Policy

Last Updated: July 14, 2019

Please read the following carefully to understand our use of your personal data and how the Arpeely collects data. We believe users’ privacy and anonymity are a basic right and are one of the foundations of the entire thriving digital ecosystem as it is today.

Who We Are and What We Do
Arpeely provides digital advertising and analytics services for the benefit of our business partners, giving them the ability to reach and understand Internet users and consumers (like you) who are most likely to be interested in their respective products, content and services. This allows us and our partners the ability to display more relevant advertising to users and for you to see more interesting and relevant advertisements and content.

We do not collect your name or your email and we take care to ensure that we do not collect anything that tells us, or anyone we work with, who you are “in the real world”. Our intention is to never collect any information about you that can directly identify you.

Our Platform automatically recognizes that it is the same user (without knowing who you are) if you visit another Partner site. The platform “knows” it is you because we assign a random unique identifier we call an “Arpeely User ID” and in our secure database, we log information about activities of that User ID, only when you use one of our connected services. We also use profiling, including algorithms, to analyze your interests online and assign a score based on your activity. This improves our, and our Partners’ ability, to serve related advertising.

What Do We Mean By Personal Data?
“Personal Data” is defined as any data relating to a living individual who can be identified directly from that data or indirectly in conjunction with other information. It can take the form of a name or address and, now, under new data protection laws in Europe, this can extend to uniquely generated IDs, IP addresses and other “unique identifiers” which do not tell us who a user is in the “real world". 
We cannot identify a user by name or find out where they live, but instead, it gives us and our business customers a picture of the demographic characteristics of a user.

**What personal data does Arpeely collect?**
Arpeely does not collect PII (Personally Identifiable Information) regarding personal use

“Pseudonymous” data and technical identifiers;
Interests for products and services; and
Measurement statistics on the performances of Arpeely services.

Arpeely collects data and pseudonymizes it, which means that we are not aiming to identify a person in the “real world”. Data, collected by Arpeely includes:

- cookie identifier;
- general location data about the individual.

Arpeely ensures that no directly identifying information is stored on our platform, by requiring all data to be hashed before collection (i.e. pseudonymized). Arpeely does not collect the following types of personal data: an individual’s name or data associated with the individual’s physical, physiological, genetic, mental or cultural identity. We do not knowingly collect or categorize users based upon sensitive data or ‘special categories of data’, such as racial or ethnic origins, political or religious beliefs, financial information, precise information about health conditions or treatments or other similar or related information. Arpeely does not collect any sensitive or special categories of data.

We neither intentionally collect information from, nor target any services to, children under 13 years of age. If we learn that we have collected information of a child under 13, we delete that information as soon as possible.

**What does Arpeely do with this data?**
Arpeely collects the data, and then decides on the specific business use depending on one of the main business activities:

Online advertising: We will use the collected data to make decisions or buy, monitor, or report on the delivery of online advertising for our advertiser via ad exchanges. We may also share performance data (i.e. relating to viewability of the ad, and any subsequent conversion) with advertisers and their representatives in the digital advertising ecosystem. During this process, we may overlay third-party data...
collected from third-party data providers, to enhance our decision making. We may also use data to target ads on televisions and peripheral devices.

Measurement and Analytics: Once Arpeely collects data, it is collated and classified in the database in aggregated form, and may be made available via reporting or via the Arpeely platform for high level trend analysis in an aggregated form. We may also use the data to create analytics about industry trends, the effectiveness of media, or for content marketing.

The collected data may also be transferred in an encrypted format to our vendors and suppliers; including cloud data centers and hosting providers. The data will also be used for specific internal Arpeely operations including troubleshooting, data analysis, testing, research, and statistical or survey purposes.

**How long do we process personal data for?**
Arpeely will never store data for longer than necessary and always in accordance with data privacy laws and regulations. As is the normal practice in the advertising technology industry, we set our cookies to expire after the two-year from the last use of our product.

**Where We Keep Your Information**
Platform Data may be transferred, processed and stored outside of your state or country (including in the United States), where the privacy laws may not be as protective as those where you live.

**What are your rights?**
You have the following rights in relation to personal data relating to you that we process:

- You may request access to the personal data we hold about you
- You may request that any incorrect personal data about you that we are processing be rectified.
- In certain circumstances, you may be entitled to request that we erase the personal data concerned subject to some specific legal reasons we may have to retain certain data relating to you.

We will process this request once we have affirmed that the pseudonymous identifier we hold, matches the information provided by the user. This request can be made
and carried out in our contact-us section. Alternately, you can also email privacy@arpeely.com We will respond to each request within 30 days.

Information Shared in Aggregated or De-Identified Form
We may use Platform Data to create de-identified and aggregated information, such as de-identified demographic information, de-identified location information, de-identified information about the computer or device from which you access Digital Properties or other de-identified analyses we may create. De-identified or aggregated information is not personal data, and we may use such information in a number of ways, including to provide the Advertising Services, research, internal analysis, analytics, and any other legally permissible purposes. De-identified or aggregated data may be shared with our advertising customers, business partners, Marketing Partners, and other third parties.

Changes to this Privacy Policy
Any personal data that we collect is subject to the version of this Privacy Policy in effect at the time the information is collected. However, we reserve the right to revise this Privacy Policy at any time. If appropriate, we’ll notify you of any material changes to the Privacy Policy by posting them clearly on our website or by sending you an email or other notification if we have your contact information, and we’ll indicate when such changes will become effective.

How to Switch Off Cookies in Your Browser
Usually you can stop your browser from accepting cookies in general or from accepting cookies from a particular website. All modern browsers allow you to change your cookie settings. You can typically find these settings in the “options” or “preferences” section of your browser. Many browsers also offer private browsing windows which do not save your browsing history and which ask websites you visit not to track you.

Our Memberships and Affiliations
As above, Arpeely adheres to the NAI Self-Regulatory Code of Conduct (https://www.networkadvertising.org/sites/default/files/nai_code2018.pdf),

Contacting Us
We have appointed a Data Protection Officer, whose contact details are the following:
ARPEELY Ltd.
Midtown Commerce Tower
Menachem Begin 144
Tel Aviv, Israel

e-mail: privacy@arpeely.com