**Privacy policy**

This privacy policy of Fastad. PRO's services (hereinafter the "Privacy Policy") regulates the use and processing of all data and information disclosed to Fastad. PRO while using the website https://fastad.pro, its subpages and associated services (hereinafter the “Services“). By using the Fastad. PRO's services the user consents to adhere to this Privacy Policy.

**1. Scope of Services**

Fastad.PRO’s Services include:

The Fastad.PRO corporate website (the “Site”);

Digital Advertising Platforms for managing programmatic advertising of interactive video ads;

Server-Side Ad Insertion solutions (SSAI), which may be integrated into third-party apps, sites, or OTT platforms.

This Policy applies whenever you access or use the Site or a mobile application/website that uses Fastad.PRO’s Services. It is intended for both (1) publisher customers (“Publishers”), who are our B2B clients integrating or accessing our platform, and (2) individual End Users of websites/apps where advertising is served via Fastad.PRO’s technology.

Please read this entire Policy. Capitalized terms used herein are defined in this Policy or in the applicable agreements.

**2. Fastad.PRO’s Commitment**

Fastad.PRO acknowledges the importance of privacy and data protection. We are committed to protecting the privacy of internet users and fostering trust in online advertising. This Policy outlines how we collect, process, and protect personal data in the context of our Services.

**3. Your Rights**

If you are located in certain countries (including those that fall under the scope of the European General Data Protection Regulation, “GDPR”), data protection laws give you rights with respect to your personal data, subject to any exemptions provided by law, including rights to:

• Request access to your personal data;

• Request correction or deletion of your personal data;

• Object to our use and processing of your personal data;

• Request that we limit our use and processing of your personal data; and

• Request portability of your personal data.

If you wish to exercise any of these rights, please contact us at **support@fastad.pro**. We will handle your request in accordance with applicable data protection law.

**4. Fastad.PRO services**

4.1. B2B Platform and Publisher Onboarding

Fastad.PRO offers a platform where Publishers can register an account to manage their advertising inventory and use interactive video ad solutions (e.g., SSAI). In this B2B context, we may collect and store personal information such as name, email, business website, and contact details of Publisher representatives in order to:

Provide access to the Fastad.PRO platform;

Manage contractual and billing relationships;

Communicate updates, changes, and improvements of our Services.

4.2. SSAI / SDK-less Ad Serving for End Users

When End Users visit or use a Publisher’s website or OTT service that has integrated Fastad.PRO’s server-side ad insertion solution, ads may be served. In an SSAI (SDK-less) model, we do not operate a direct SDK on the end-user device; instead, the ad insertion and data processing occur on our server side. In such scenarios:

We may receive requests containing IP address, user-agent, and general context (e.g., which stream or content is being requested).

We do not collect any personal data that would directly identify an End User (e.g., name, email, phone).

We do not collect or use precise geolocation data (GPS) for any advertising purposes, nor do we retrieve or store device identifiers like IDFA or AAID if we have no integrated client SDK.

**5. Automatically Collected Data from Ad Serving Requests**

When End Users engage with a Publisher’s website or OTT stream where Fastad.PRO’s ad-serving code is integrated (via server-side insertion), our systems may automatically process:

IP address (used to route traffic and perform approximate geo-location to city/region level, if needed);

Browser/User-Agent (device type, operating system, etc.);

Date and time of ad request;

Content or ad request details (e.g., which show/stream is being requested, or the ad request parameters);

Non-precise location (derived from IP, if relevant, for basic geo-targeting at the city or region level);

Log data about the ad served (which advertisement was served, how many times, etc.).

No unique device IDs (such as IDFA, GAID) are captured in purely SDK-less scenarios. No precise location (GPS) is collected. No hashed emails from End Users are collected. We do not build or store long-term user profiles (e.g., interest segments).

**6. Lawful Basis for Processing**

Fastad.PRO participates in the IAB Europe Transparency & Consent Framework (TCF) as a Vendor. Depending on the specific Purpose, we may rely on Consent or Legitimate Interest under GDPR principles. For example:

Use limited data to select advertising and Measure advertising performance may be based on Consent if required by the Publisher or applicable law.

Measure content performance and Develop/improve our services may be processed under Legitimate Interest, where we keep short-term logs to debug, optimize, and enhance our ad-serving infrastructure.

We do not create or use long-term profiles for personalized advertising (Purposes 3–4 in TCF) nor collect or store data for advanced audience insights (Purpose 9). We also do not process precise geolocation data (Special Feature 1) nor actively scan device characteristics (Special Feature 2).

**7. Use of personal data**

Ad Delivery: Deliver and present advertising content, respond to ad requests on behalf of our Publisher clients, and ensure basic frequency capping (if applicable).

Basic Measurement: Measure ad performance (e.g., how many times an ad was served) if user consent is provided, or measure content performance (legitimate interest) to understand streaming metrics.

Security & Fraud Prevention: Use IP and other technical signals to detect invalid traffic or malicious activities, stored for a limited period.

Product Improvement: Use short-term log data to debug errors, maintain system stability, and develop new features.

Publisher Account Management: Manage the user accounts of Publishers (B2B relationship), handle billing, and provide support.

**8. Cookies in Server-Side Environments**

In an SSAI SDK-less setup, we generally do not set cookies on End Users’ devices for advertising purposes, as the logic occurs on the server side. However, if a Publisher’s integration uses standard web-based ad delivery, cookies might be employed:

Session/Authentication cookies for logged-in Publisher accounts on our Site.

If some Partners integrate additional ad networks that rely on cookies, those are subject to the Partners’ own privacy policies.

End Users can learn more about how to opt out of cookies or manage cookie settings through their browser preferences or the Publisher’s CMP interface.

**9. Data Retention**

Fastad.PRO retains personal data only as long as it is necessary to fulfill the outlined purposes, or to comply with legal requirements. Specifically:

Security & Fraud Logs may be kept for up to 180 days to investigate anomalies.

Content Performance Measurement logs may be stored for ~7 days (non-personally identifiable usage metrics).

Ad Performance logs, if processed under Consent, may be stored for a short period (e.g., 7–30 days) depending on the Publisher’s configuration.

Develop and Improve Services data may be stored up to 60 days for debugging and internal analytics.

We do not store data that directly identifies End Users (e.g., name or email) beyond what is collected from Publishers in the B2B relationship.

**10. Information Sharing**

Fastad.PRO does not sell raw personal data to third parties. We may share relevant data with:

Partners (DSPs, SSPs, or other ad networks) in order to fulfill ad requests and measure performance;

Sub-processors that help us provide infrastructure, analytics, or support (see “List of Sub-processors” below);

Corporate affiliates within our group (if any) that adhere to similar privacy standards;

Legal or regulatory authorities, if required by law or necessary to defend legal claims.

**11. International Transfers**

If data is transferred outside the EEA or UK, Fastad.PRO will ensure an appropriate level of protection through EU Standard Contractual Clauses or other recognized legal mechanisms. Personal information of European visitors is generally stored and processed on servers located within the EU.

**12. Opt-Out and Industry Tools**

End Users primarily manage their consent/objections via the Publisher’s CMP under IAB TCF, or via their browser/app privacy settings. Additionally:

Global Opt-Out (e.g., from interest-based advertising) can be done through industry platforms such as YourOnlineChoices.eu (EDAA) or the Network Advertising Initiative.

Since our SSAI is typically SDK-less, we do not store an ID on the user’s device. However, if any cookie-based mechanism is present, End Users can disable or remove cookies via their browser or device settings.

**13. Security Measures**

We apply reasonable measures to protect collected data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, and access. We also conduct periodic reviews of our data processing activities to maintain compliance with this Policy.

**14. Publisher & Third-Party Content**

Publishers or third-party networks may collect additional data per their respective privacy policies. Fastad.PRO is not responsible for the practices of external websites, apps, or networks, even if integrated with our Services.

**15. Sub-processors**

Fastad.PRO uses certain vendors to deliver hosting, analytics, payment, or email services. We ensure all sub-processors adhere to GDPR and relevant privacy obligations. A detailed list is available upon request or in our “List of Sub-processors” section on the Site.

**16. Changes to This Policy**

Fastad.PRO may update or amend this Privacy Policy from time to time. Any changes will be posted on this page with a revised “Last Updated” date. Continued use of our Services indicates your acceptance of the updated Policy.

**17. Contact Information**

If you have any questions or comments about this Privacy Policy or wish to exercise your rights, please contact us at: support@fastad.pro

**VICOM SOLUTION LTD**

Address: Arch. Makariou Ill

155 PROTEAS HOUSE, 5th floor

3026, Limassol, Cyprus