

# Privacy Policy

Programmatic Partners Sdn. Bhd. — Mobile Demand-Side Platform

<b>Effective Date:</b>	1 March 2026
<b>Last Updated:</b>	1 May 2026
<b>Document Version:</b>	2.1
<b>Jurisdiction:</b>	Malaysia (PDPA 2010) & Applicable International Law

Programmatic Partners Sdn. Bhd. ("**we**," "**us**," "**our**," or the "**Company**") is committed to protecting the privacy and personal data of all individuals who interact with our demand-side platform (DSP), website, and related services. This Privacy Policy explains how we collect, use, disclose, retain, and protect information in accordance with the **Personal Data Protection Act 2010 (PDPA)** of Malaysia and other applicable data protection laws.

By accessing our platform or engaging our services, you acknowledge that you have read, understood, and agreed to the practices described in this Privacy Policy. If you do not agree, please discontinue use of our services immediately.

## 1. Company Information & Data Controller

The data controller responsible for your personal data is:

<b>Legal Name:</b>	Programmatic Partners Sdn. Bhd.
<b>Registered Address:</b>	The Met Club by Colony A1002, The Met Corporate Tower No. 20, Jalan Dutamas 2, 50480 Kuala Lumpur W.P. Kuala Lumpur, Malaysia
<b>Business Type:</b>	Demand-Side Platform (DSP) — Mobile Programmatic Advertising
<b>Data Protection Officer:</b>	privacy@programmaticpartners.com
<b>General Enquiries:</b>	hello@programmaticpartners.com

## 2. Scope of This Policy

This Privacy Policy applies to:

- Advertisers, agencies, and trading desks accessing the Programmatic Partners DSP platform
- Publishers and supply-side partners whose inventory is accessed through our platform
- Visitors to our website and marketing landing pages

- End users whose anonymised or pseudonymised mobile device identifiers may be processed as part of programmatic advertising campaigns
- Employees, contractors, and job applicants of the Company

This Policy does **not** apply to third-party websites, services, or platforms linked from our properties. We encourage you to review the privacy policies of any third parties you interact with.

### 3. Information We Collect

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We collect information in the following categories, depending on your relationship with us:

#### 3.1 Platform User Data (Advertisers & Partners)

- Name, business email address, phone number, and job title
- Company name, registration number, and billing address
- Payment and invoicing details (processed via secure third-party processors)
- Campaign configurations, targeting parameters, and creative assets
- Platform usage logs, IP addresses, browser type, and session data

#### 3.2 Programmatic & Advertising Data

In the course of delivering mobile advertising campaigns, we may process the following pseudonymised or aggregated signals from mobile devices:

- Mobile Advertising IDs (IDFA / Google AAID) — subject to user consent under applicable law
- IP address (truncated to city or region level for targeting purposes)
- Device type, operating system, and app information
- Contextual signals: app category, content genre, time of day, and location (geo only)
- Bid request data received from supply-side partners via OpenRTB protocol
- Impression, click, and conversion event signals for attribution and optimisation

We do **not** collect names, email addresses, phone numbers, or government identification numbers of end users through the programmatic advertising process.

#### 3.3 Website & Communications Data

- Contact form submissions and email correspondence
- Website analytics data (page views, referral sources, device type) via first-party analytics
- Cookie preferences and consent records

### 4. Legal Basis for Processing

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Under the PDPA 2010 and, where applicable, the EU General Data Protection Regulation (GDPR) and other privacy frameworks, we process personal data on the following legal bases:

Legal Basis	Circumstances
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Contractual Necessity	Processing required to deliver platform services, fulfil billing obligations, and provide campaign m
Legitimate Interests	Analytics, fraud prevention, platform security, improving our services, and direct B2B marketing t
Consent	Sending marketing communications, use of non-essential cookies, and processing end-user adv
Legal Obligation	Compliance with financial regulations, anti-money laundering laws, and legal orders from compe

## 5. How We Use Your Information

- **Platform Delivery:** Operating the DSP, processing bid requests, serving impressions, and reporting campaign performance.
- **Account Management:** Creating and managing advertiser accounts, processing payments, and providing customer support.
- **Optimisation & Machine Learning:** Training bidding algorithms and audience models using aggregated, pseudonymised data to improve campaign performance.
- **Fraud Prevention & Brand Safety:** Detecting invalid traffic (IVT), bot activity, and brand-unsafe placements using automated and manual review.
- **Compliance & Legal:** Maintaining records required by law, responding to regulatory enquiries, and enforcing our Terms of Service.
- **Communications:** Sending service notifications, invoices, product updates, and (with consent) marketing communications.
- **Analytics & Improvement:** Understanding platform usage patterns to improve features, performance, and user experience.

## 6. Data Sharing & Disclosure

We do not sell personal data. We may share information with the following categories of recipients:

### 6.1 Supply-Side Partners (SSPs) & Exchanges

Bid request and response data is transmitted to and from supply-side platforms and ad exchanges as part of the RTB process. This data is transmitted in pseudonymised form per the IAB Tech Lab's OpenRTB specification.

### 6.2 Service Providers & Sub-Processors

We engage trusted third-party processors for cloud infrastructure, analytics, payment processing, fraud detection, and customer relationship management. All sub-processors are bound by data processing agreements ensuring equivalent data protection standards.

### 6.3 Attribution & Measurement Partners

With advertiser consent, we integrate with mobile measurement partners (MMPs) such as AppsFlyer, Adjust, and Branch for conversion attribution. Data shared is limited to the minimum necessary for

measurement purposes.

#### 6.4 Legal & Regulatory Disclosure

We may disclose information when required by law, court order, or lawful request from a government authority, or where necessary to protect the rights, property, or safety of the Company, our clients, or the public.

#### 6.5 Corporate Transactions

In the event of a merger, acquisition, restructuring, or sale of assets, personal data may be transferred to the relevant successor entity, subject to equivalent privacy protections.

## 7. International Data Transfers

As a global programmatic platform, data may be transferred to and processed in countries outside Malaysia, including Singapore, the United States, the European Union, and other jurisdictions where our supply and technology partners operate. We ensure that:

- Transfers to countries without an adequacy decision are governed by Standard Contractual Clauses (SCCs) or equivalent safeguards
- All international sub-processors are contractually bound to maintain data protection standards equivalent to those required under Malaysian PDPA
- End-user advertising data is transmitted in pseudonymised form and subject to data minimisation principles

## 8. Data Retention

Data Category	Retention Period	Basis
Advertiser account data	Duration of contract + 7 years	Legal / Tax obligation
Campaign & bid log data	24 months	Analytics / Optimisation
Programmatic event data	12 months	Attribution windows
Website analytics	13 months	Industry standard
Legal / compliance records	7 years or as required by law	Regulatory obligation
Marketing consent records	Until consent withdrawn + 3 years	Accountability

Upon expiry of the applicable retention period, data is securely deleted or permanently anonymised in accordance with our data disposal procedures.

## 9. Your Rights

Subject to applicable law, you have the following rights with respect to your personal data:

- **Right of Access:** Request a copy of the personal data we hold about you.
- **Right to Rectification:** Request correction of inaccurate or incomplete data.
- **Right to Erasure:** Request deletion of your data where there is no overriding legal basis for retention.
- **Right to Restriction:** Request that we restrict processing of your data in certain circumstances.
- **Right to Data Portability:** Receive your data in a structured, machine-readable format (where applicable).
- **Right to Object:** Object to processing based on legitimate interests or for direct marketing purposes.
- **Right to Withdraw Consent:** Withdraw consent at any time where processing is based on consent, without affecting prior lawful processing.
- **Right to Lodge a Complaint:** File a complaint with the Personal Data Protection Commissioner of Malaysia or your local supervisory authority.

To exercise any of these rights, please contact our Data Protection Officer at [privacy@programmaticpartners.com](mailto:privacy@programmaticpartners.com). We will respond within **30 days** of receipt. We may require verification of your identity before processing your request.

## 10. Cookies & Tracking Technologies

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Our website uses cookies and similar technologies to provide functionality, analyse usage, and, with your consent, deliver personalised content. Categories of cookies we use:

- **Strictly Necessary:** Essential for the operation of our website and platform login. Cannot be disabled.
- **Analytics:** Help us understand how visitors use our site (e.g., page views, session duration). Require consent.
- **Functional:** Remember your preferences and settings. Require consent.
- **Marketing:** Track visits across websites for retargeting and campaign measurement. Require explicit consent.

You can manage cookie preferences via our cookie consent banner or your browser settings. Note that disabling certain cookies may affect the functionality of our services.

## 11. Security Measures

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We implement industry-standard technical and organisational security measures to protect your personal data against unauthorised access, loss, alteration, or disclosure, including:

- TLS 1.3 encryption for all data in transit
- AES-256 encryption for sensitive data at rest
- Role-based access controls and multi-factor authentication for platform access
- Regular penetration testing and vulnerability assessments

- SOC 2 Type II aligned security practices
- Incident response and breach notification procedures compliant with PDPA requirements

In the event of a personal data breach that poses a risk to affected individuals, we will notify the relevant authority and affected parties as required by applicable law.

## 12. Children's Privacy

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Our platform is designed for business users and is not directed at individuals under the age of 18. We do not knowingly collect personal data from children. If we become aware that we have inadvertently collected data from a minor, we will take immediate steps to delete such data.

## 13. Changes to This Policy

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We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or business operations. Material changes will be communicated via email to registered platform users and/or a prominent notice on our website at least **30 days** before the changes take effect. Continued use of our services following the effective date constitutes acceptance of the updated Policy.

## 14. Contact & Complaints

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For any questions, concerns, or requests relating to this Privacy Policy, please contact:

<b>Data Protection Officer</b>	Programmatic Partners Sdn. Bhd.
<b>Email:</b>	privacy@programmaticpartners.com
<b>Postal Address:</b>	The Met Club by Colony A1002 The Met Corporate Tower, No. 20, Jalan Dutamas 2 50480 Kuala Lumpur, W.P. Kuala Lumpur, Malaysia
<b>Response Time:</b>	Within 30 calendar days of receipt

This Privacy Policy was approved by the Board of Directors of Programmatic Partners Sdn. Bhd. and is effective as of 1 March 2026.

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