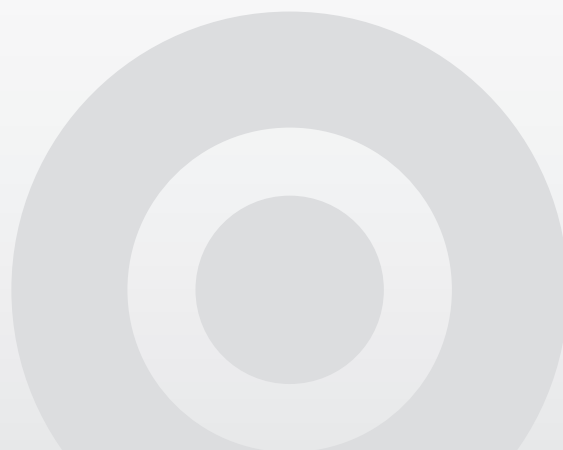


# nugg.ad

## Privacy Policy



Version 2.2.4  
September 2009



This Privacy Policy is intended to provide you with information on our privacy and data protection policies over and above the legal requirement.

For nugg.ad AG predictive behavioral targeting (nugg.ad), the protection of all forms of data is of utmost importance. nugg.ad lives with and from the use of data, but above all from the trust given to us by our customers and our sensitive handling of their data. Our inviolable principles on data protection include the uncompromising respect for the right of informational self-determination of each citizen.

nugg.ad is uncompromisingly committed to the legal regulations on privacy and data protection in Germany and Europe and, moreover, to perceived privacy requirements. This is why we would like to take this opportunity to inform you about how we handle data at nugg.ad, and the importance of data to our technology.

## 1. What data do we record and process?

nugg.ad carries out surveys on the websites of its clients. Filling out these questionnaires is voluntary, unpaid and participation can be broken off by the user at any point. The information given is stored in the nugg.ad system along with an anonymised ID code. In addition, nugg.ad stores aggregated information on user behaviour in the nugg.ad system together with an anonymised ID code. Data is never passed on to third parties, such as to the local authorities or other companies.

Special measures have been built into the nugg.ad system to implement the principle of data minimisation. In particular, an anonymisation service, which is managed by an independent third party, ensures that no user IP addresses ever enter the nugg.ad system (see page 5). Specific contractual arrangements also ensure that this anonymising protection service can not be circumvented by nugg.ad staff.

## 2. Identifying target Groups

nugg.ad identifies relevant target groups for advertising, according to socio-demographic criteria and product interests. This, however, does not mean the interests of individual people are identified, but rather those of anonymous groups of people. We make use of statistical patterns only, which are created by the anonymous behaviour of users towards online advertising and editorial content published on websites.

## 3. The use of “cookies”

nugg.ad uses cookies. Of course our cookies do not contain spy, adware, spam or viruses. Our cookies are solely used to analyse target groups and only contain aggregated statistical information on user behaviour. It is not possible for us to trace any information in the cookies back individual users or to identify anyone, for example, by name or address.

However, of course you have the option of refusing to accept cookies by choosing the relevant setting in your browser. There is a short guide to deleting cookies in various browsers below, on pages 3 and 4.

## 4. The Opt Out Function

You have the possibility of preventing the nugg.ad system from recording measurement data at any time. In order to do this, please visit the nugg.ad internet homepage and click on the opt out button, which can be found at the bottom right of the page. This will place a cookie which will uncouple you from the nugg.ad system. This cookie is called “nugg stop” and is placed by “nuggad.net”.

**Please note!** This cookie should not be deleted as long as you wish to prevent the recording of measurement data. If you delete all of the cookies in your browser, you will have to carry out the opt out process again.

Once this opt out function has been activated, no further measurement data will be recorded for the nugg.ad system and you will not receive any more advertising with nugg.ad targeting.

## 5. Data Protection

All nugg.ad staff who deal with the data mentioned above sign a secrecy agreement in accordance with paragraph §5 of the Federal German Data Protection Law when they are recruited.

In addition, nugg.ad applies technical and organisational security measures in order to protect data from being manipulated, destroyed or lost.

## 6. Contact

If you have any questions on the subject of privacy and data protection, you can contact us at any time by sending an email to [privacy@nugg.ad](mailto:privacy@nugg.ad). You are also welcome to contact our data protection officer, Christian Pfeiffer, directly ([christian.pfeiffer@nugg.ad](mailto:christian.pfeiffer@nugg.ad)).

It may become necessary to update this privacy declaration in future, as a result of further developments in our services or the implementation of new technologies. nugg.ad reserves the right to be able to change this privacy declaration at any time with immediate effect. We therefore recommend you to read the current version of the privacy policy again from time to time.

## Deleting Cookies

### A short browser-specific guide

#### Internet Explorer 7

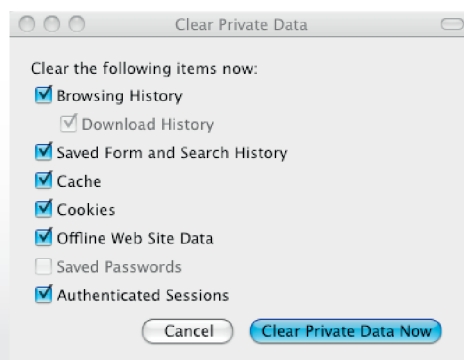
Main menu: Extras -> Delete Browsing History



You must click on the “delete cookies” button and confirm the subsequent security check.

#### Firefox 2, Firefox 3

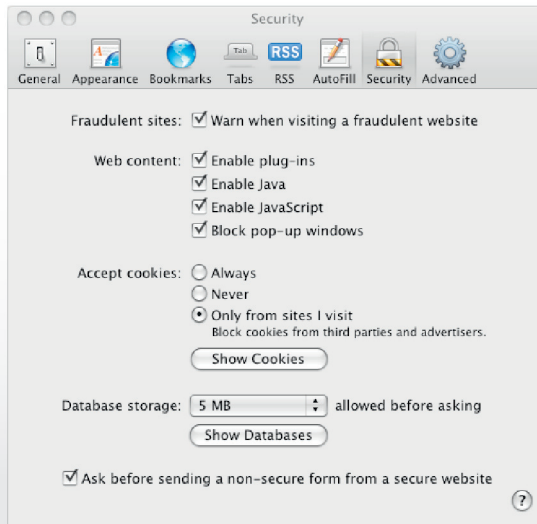
Main menu: Extras -> Clear Private Data



You must tick the „cookies“ box and click on the „Clear Private Data Now“ button.

## SAFARI 3

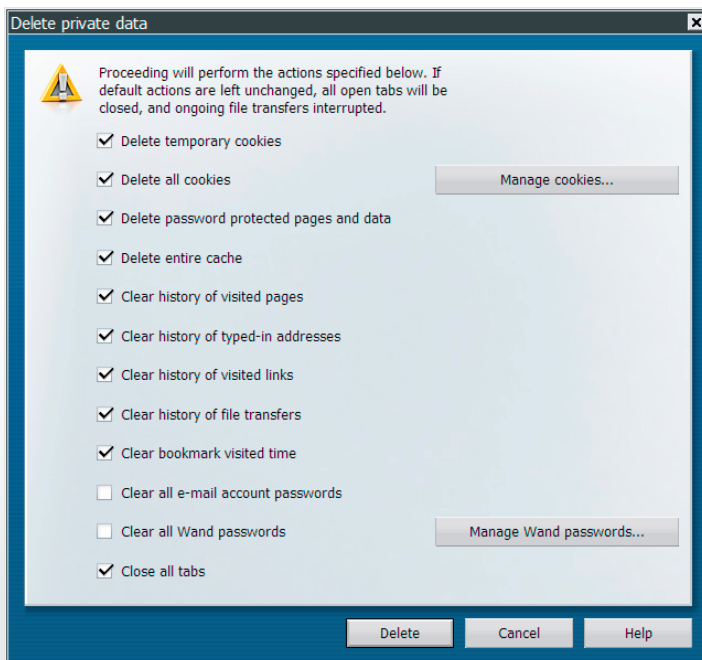
Main menu: Settings -> Security



Click on the “show cookies” button and then select “delete all” in the following dialogue box.

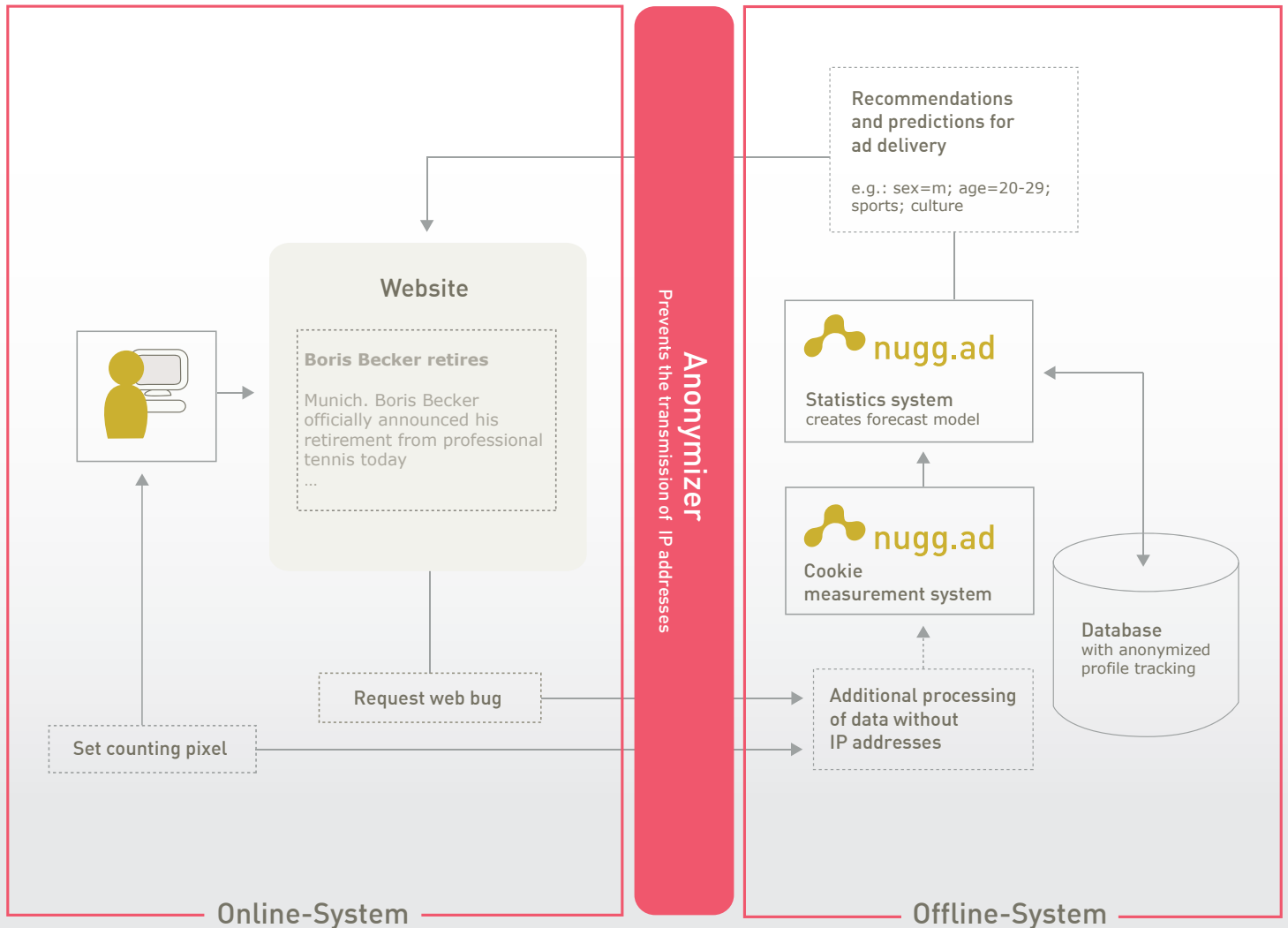
## OPERA 9

Main menu: Extras -> delete private data



Tick the “delete temporary cookies” and “delete all cookies” boxes and then click on the “delete” button.

### Schematic representation of the nugg.ad system



#### Contact

Christian Pfeiffer | Data Privacy Officer  
 +49 30 29 38 1999-0 | christian.pfeiffer@nugg.ad