

CERTIFICATE

no. 349/21

ePrivacyseal GmbH Große Bleichen 21, 20354 Hamburg, Germany

hereby certifies* that

as determined in the certification decision of 01 June 2021

Opinary GmbH

Engeldamm 62-64,10179 Berlin, Germany as a controller in the sense of art. 4(7) GDPR

operates its product or service

"Opinary"

version April 2021

as defined in annex 1 and to the exclusion of the processing activities in annex 2 to this certificate

in conformity with the criteria catalogue of ePrivacyseal GmbH, version 2.1. of May 2018.

final audit day: 30/05/2021 next planned monitoring by 01/06/2023 period of validity: 02/06/2021 – 01/06/2023

Annex 1 to certificate no. 349/21

Definition of processing activities

Opinary has developed a software solution for online polls. This evaluation relates only to the product "Opinary" and thus also only to the processes in which end users are involved.

Opinary from the user's perspective:

- A user visits website of the publisher which has integrated Opinary via a JavaScript widget.
- If the user is subject to GDPR the publisher website obtains consent for Opinary's vendor id.
- The Opinary JavaScript widget will check if the user grants consent to Opinary. If not, then
 nothing will happen.
- The JavaScript widget will load the poll into an iframe and will ensure that the poll has access
 to the consent string.
- The user has the opportunity to interact with the poll and to give their vote to the specific poll.
- After the user votes, they will potentially see aggregated statistics of how other users have voted or will see another poll.

The loaded poll can be either an editorial poll or a sponsored poll (advertising based on Xandr). Not all publishers show ads. Advertising is given priority: If there is advertising, an advertising poll is started, otherwise an editorial poll is shown.

Opinary collects data when the visitor interacts with the poll (e.g. Impression + Vote). Opinary collects personal data like the cookie identifier and the IP address. Opinary also collects data about the publisher, the page visited and the browser.

Annex 2 to certificate no. 349/21

Excluded processing activities

The evaluation relates only to the product "Opinary" and thus also only to the processes in which end users are involved. Further B2B processes between Opinary and its customers were not considered within the scope of this evaluation.