



## **CERTIFICATE**

**No. 476/24**

ePrivacyseal GmbH  
Burchardstr. 14, 20095 Hamburg, Germany

hereby certifies\* that

as determined in the certification decision of 07 March 2024

**Singular Labs, Inc.**  
2345 Yale Street, Palo Alto, CA 94306, USA  
as a processor in the sense of art. 4(8) GDPR

operates its product or service

**“Singular”**

version available on 07/02/2024

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

final audit day: 07/03/2024

next planned monitoring by 24/05/2026

period of validity: 07/03/2024 – 24/05/2024

The certification decision takes place under the validity condition described in Annex 3  
and in conformity with the criteria catalogue for the “ePrivacyseal EU” (version 3.0 of May 2022)  
of ePrivacyseal GmbH.

## **Annex 1 to certificate no. 476/24**

### **Definition of processing activities**

The evaluated product is called Singular and is developed and distributed by Singular Labs Inc. Singular consists of two main components the "Attribution" and "Analytics". It is marketed as a tool to maximize the ROI on online marketing spending. Singular provides its customers analytics to track ad spend, attribution and prevent fraud on mobile app advertising. Singular states that data collected by the product is only used for the purpose of its analytics services and is provided to Singular's customers, and relevant partners according to the customer choice.

Singular is a SaaS-based product. The customer registers online, approves terms and conditions, then logs in to the dashboard and sets up the account. The customer has to integrate an SDK to start sending their data to Singular, and to set up Partners to attribute customers to their campaign and share it with them. Then the customer can analyse the attribution results within the dashboard reports, and integrate with the API to receive the attribution results in their internal systems. The customer can choose to send attribution data to its partners, usually the marketing channels (such as Facebook, Google, etc) for which the customer has live campaigns with in order to attribute their users. Singular sends the IDFA/AIFA to these marketing channels, and receives in return attribution data if the user viewed or clicked on an ad for the app in question. The purpose of this processed data is to provide the attribution analytics services. The customers use the SaaS dashboard to manage their account. Data subjects do not communicate with Singular directly, as Singular acts as a Data Processor for the customer.

Singular acts as a Processor for the customer – the customer collects the data when a user views an ad, clicks an ad, opens the app or makes any specific actions in the app and sends it to Singular to be processed and stored for attribution purposes. Data is processed to provide attribution and analytics services and all data is stored encrypted in the servers of Singular Inc. in the United States. The transfer paths are encrypted using HTTPS. In detail all API calls from mobile devices to the Singular servers are encrypted using HTTPS, they also include a security hash that is derived from the client's API secret.

A full process can be described as followed: At first the data is received from the customer/partner via the SDK or Server-to-Server from the mobile app, website or the customer servers. The data is then processed in real-time by processes that analyse its attribution, detect if it's Fraud or Bot-related, and then save the attribution decision in the Attribution database. The next step is to send the Attribution decision using Postbacks to the customer servers, and to any partners that the customer would choose to send Postbacks to. The attribution data is also available to the customer via Log exports in Singular's SaaS Dashboard, in which the customers can also manage their account. The last step is the aggregation processing, which summarises and anonymises all the attribution decisions and stores them in an Aggregated Analytics DB, to provide analysis reports for the customer and help them understand their attribution results and marketing performance. All these internal systems are part of the same network and architecture and the interfaces/connections between them are based on secure REST APIs.

**Annex 2 to certificate no. 476/24**

**Excluded processing activities**

This evaluation refers only to the above mentioned product and therefore only to the processes in which Singular Labs, Inc. and its customers are involved.