



## **CERTIFICATE**

**no. 440/23**

ePrivacyseal GmbH  
Große Bleichen 21, 20354 Hamburg, Germany

hereby certifies\* that

as determined in the certification decision of 18 November 2020

**TUNE, Inc.**  
2200 Western Ave., Suite 200, Seattle, WA, 98121 USA  
as a processor in the sense of art. 4(8) GDPR

operates its product or service

**„Partner Marketing Platform“**

version June 2020

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: 15/11/2020

next planned monitoring by 03/05/2024

period of validity: 04/05/2023 – 03/05/2024

\*ePrivacyseal GmbH is not an accredited certification body within the meaning of art. 42(5) GDPR.

## **Annex 1 to certificate no. 440/23**

### **Definition of processing activities**

An advertiser decides to buy traffic for a campaign and puts together an offer. This offer includes a brief description, some pre-approved banner images, and the payment structure. The payment structure defines conversions e.g. as a sale, and pays out a commission on each conversion. One of the advertiser's network contacts takes interest in the offer and decides on a price they're willing to pay publishers per conversion. The network looks for publishers to promote the offer, and publishers interested in that network's offer choose to post the ads. User traffic starts flowing, and some users who entered the advertising funnel convert on the offer.

The network uses TUNE both to measure the traffic of its publisher contacts and to link that traffic with conversions reported by the advertiser. Data comes to TUNE from both the publisher and the advertiser. When a user clicks on a publisher's ad or converts on an advertiser's offer, TUNE stores data from those interactions in a session—the collection of a user's measured actions and information. TUNE uses sessions to connect a user's clicks with their conversions. Sessions contain identifiers for aspects of a user's journey and for the session itself. Each session is unique and associates users and their conversions with specific offers, publishers, and networks. TUNE automatically manages user session information by a process called session tracking. A prerequisite is that publishers and advertisers pass information to TUNE by tracking links and conversion links. Ad networks using TUNE generate, customize, and provide these links to their publishers and advertisers. Tracking links are used by publishers to send information about a user. When a publisher promotes an offer, they have to embed the tracking link in the accompanying ad. Then when a user clicks on that ad, this tracking link:

- Creates a session and starts session tracking in TUNE
- Optionally requests and stores additional information from the publisher
- Redirects that user to the offer's landing page

Conversion links are used by advertisers to send information about a conversion. When publishers run an advertiser's offer, they report conversions by using the advertiser's conversion link for that offer. When a user converts on that offer, the advertiser's conversion link

- Identifies the user's session in TUNE
- Optionally requests and stores additional information from the advertiser
- Records a conversion for that user in the session

Sessions keep track of various identifiers necessary for attribution. In TUNE, also other pieces of information from publishers and advertisers, like a user's geographic region, mobile device type, or web browser, can be requested and stored. Such information can be used to better match offers with ad space by

- Selectively modifying and delivering offers
- Adjusting offer payments and revenue
- Filtering session data and creating reports

**Annex 2 to certificate no. 440/23**

**Excluded processing activities**

The evaluation relates only to the product mentioned in annex 1 and thus also only to the processes in which TUNE is involved.