TRUSTED PRIVACY
P
EU data protection
ePrivacyseal

C E R T I F I C A T E

no. 294/20

ePrivacyseal GmbH

Große Bleichen 21, 20354 Hamburg, Germany

hereby certifies* that

as determined in the certification decision of 26 August 2020

Singular Labs Inc.

181 South Park Street, San Francisco, CA 94107, USA

as a processor in the sense of art. 4(8) GDPR

operates its product or service

„Singular"

version 31 May 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: 25/08/2020

next planned monitoring by 24/05/2022

period of validity: 25/05/2020 – 24/05/2022

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

Annex 1 to certificate no. 294/20

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" and is accessible as an SDK. It is marketed as a tool to maximize the ROI on marketing spending. Singular provides its customers analytics to track ad spend, attribution and prevent fraud on mobile app advertising.

Data collected by the product is only used for the purpose of its analytics and attribution services and is provided to Singular's customers, and relevant partners of the customer. 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 product is based on SaaS. The user (customer) registers online, takes note of the terms and conditions and approves them, then logs in to the dashboard and sets up the account. The user has to integrate an SDK to start sending Singular their data. Moreover he has to setup Partners to attribute users to their campaigns and share it with them. Then the user can analyse the attribution results within the dashboard reports, and integrate with the API to receive the attribution results in their internal systems.

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 that the customer would choose to send to Singular. This data will then be processed and stored for attribution purposes. This data processing runs for every event that is received by the customer (as an entire run each time), for as long as Singular provides its services to the customer. All received data is stored in the Singular Labs Inc. servers which are located 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 incude a security hash that is derived from the client's API secret. The data at rest is not encrypted.

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. 294/20

Excluded processing activities

The evaluation relates only to the product mentioned in annex 1 and thus also only to the processes in which Singular Labs and its customers are involved.