

Global Device Privacy Policy

In accordance with data protection legislation and, more specifically, with the European General Data Protection Regulation (**GDPR**), this Privacy Policy complies with the duty to inform you about the Services provided by TITAN OPERATING SYSTEM, S.L.

1. Data Controller

In accordance with GDPR, TITAN OPERATING SYSTEM, SL. (hereinafter, "**Titan**" or "**Data Controller**" or "**We**") as data controller of the Personal Data shall process your personal data (hereafter, the "**Personal Data**") in a lawful, fair and transparent manner. Titan's contact details are the following:

- Tax Identification Number: B10741833.
- Registered Office: Plaça de Catalunya 9, 3rd floor, 08002, Barcelona, Spain.
- DPO/Data Protection email address: data@titanos.tv

2. Purpose and lawful bases for processing

Titan shall process your personal data for different purposes. For ease of reference, the purposes for which Titan processes your personal data are detailed below, identifying the applicable lawful basis for each of them.

2.1 Connected TV Devices

Titan offers their operating system services to end-customer Connected TV users (hereafter, "**CTV Users**" or "**you**"), collaborating with various brands in the Connected TV sector (hereafter, "**CTV Sector**"). Some of these brands incorporate Titan's services since the design and manufacture stage of their devices, and these are referred to as Connected TV Devices (hereafter, "**CTV Devices**") throughout this Global Privacy Policy. The provision of Titan's services consists of allowing the display of content and other functionalities associated with the online advertisement sector in CTV Users' CTV Devices.

The operating system services provided by Titan through the CTV Devices involve the

purposes:

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- **Provide services:** We use your information to ensure the provision of Titan's services, for example, offering content through fast channels and processing the terms you search for in order to return the expected result on the CTV Device. The lawful basis for this data processing is the execution of a contractual relationship.
- **Maintenance and Security:** We also use Personal Data to ensure that our services are working properly, such as tracking network outages or troubleshooting problems you report to us. Additionally, we may use Personal Data to ensure security, prevent and detect fraud, and fix errors. The lawful basis for this data processing is Titan's legitimate interest.
- **Improve our Services:** Titan collects the Personal Data in order to conduct internal research, analysis and development to improve our services, content and new features and services. The lawful basis for this data processing is Titan's legitimate interest.
- **Communicate with CTV Users:** We may contact CTV Users to resolve issues, if needed and deal with any complaints or questions. The lawful basis for this data processing is the contractual relationship.
- **Offer non-personalized services:** We may offer CTV Users non-personalized services. The lawful basis for this data processing is Titan's legitimate interest.
- **Offer personalized services:** Titan uses the information collected to customize services. This might mean offering recommendations, personalized content and personalized search results. The lawful basis for the processing is the consent of the user given in the Consent Management Platform.
- **Manage the CTV Users' account** and identify the devices based on information transmitted automatically. The lawful basis for this data processing is the contractual relationship.
- **Link different devices** to allow you to connect your Smart TV to Apps and social media. The lawful basis for the processing is the consent of the user given in the Consent Management Platform.

2.2 Titan Advertisement Services

In this regard, Titan covers the provision of the services, in particular the delivery of the advertisement to you as a CTV User of Titan or to another device, as well as the management of the relationship between Titan, advertisers and CTV Users, and the usage of any Personal data processed. For the provision of the services, Titan offers the possibility for advertisers engaged in this sector to display advertisements, thus acting as partners of Titan.

Titan is highly committed to protecting your personal data. For this reason, Titan will only

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stated hereunder, ensuring that the
line with the purposes and features that

Titan is registered for under the Global IAB Vendor framework, and consisting of the following:

- **Store and/or access information on a device.** The lawful basis for the processing is the express consent of the user given in the Consent Management Platform (hereafter, "CMP").
- **Use limited data to select advertising.** The lawful basis for the processing is the express consent of the user given in the CMP.
- **Create profiles for personalized advertising.** The lawful basis for the processing is the express consent of the user given in the CMP.
- **Use profiles to select personalized advertising.** The lawful basis for the processing is the express consent of the user given in the CMP.
- **Measure advertising performance.** The lawful basis for the processing is the express consent of the user given in the CMP.
- **Understand audiences through statistics.** The lawful basis for the processing is the express consent of the user given in the CMP.
- **Develop and improve services.** The lawful basis for the processing is the express consent of the user given in the CMP.
- **Ensure security, prevent and detect fraud, and fix errors.** The lawful basis for the processing is legitimate interest.
- **Deliver and present advertising and content.** The lawful basis for the processing is legitimate interest.
- **Save and communicate privacy choices.** The lawful basis for the processing is legitimate interest.
- **Match and combine data from other data sources.** The lawful basis for the processing is the express consent of the user given in the CMP.
- **Link different devices.** The lawful basis for the processing is the express consent of the user given in the CMP.
- **Identify devices based on information transmitted automatically.** The lawful basis for the processing is the express consent of the user given in the CMP.
- **Use precise geolocation data.** The lawful basis for the processing is the express consent of the user given in the CMP.
- **Actively scan device characteristics for identification.** The lawful basis for the processing is the express consent of the user given in the CMP.

Other purposes:

Regardless of the provision of Titan's services, Titan may conduct processing activities of

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- Send newsletters and/or other commercial communications regarding Titan Services. The lawful basis for the processing is the legitimate interest of Titan.
- Send newsletters and/or other commercial communications regarding Titan partners' products and/or services. The lawful basis for the processing is the express consent of the user.
- Comply with potential legal obligations. The lawful basis for the processing is the compliance of Titan's with legal obligations.

3. Categories of Personal Data processed

Titan will process CTV User personal data provided by users during the provision of Titan's services, in particular:

3.1 Connected TV Devices

With regards to Titan' services on CTV Devices, Titan will process the following personal data:

- **CTV Users' account:** identification data (name, surname, email address, phone number, username and password).
- **Hardware and software information:** IP address, device ID, device type and apps settings and characteristics, app crashes, browser type, version and language, operating system, time zones, service provider and signal strength of your wireless network.
- **CTV Users' usage data:** date and time you logged in, features you've been using, searches, clicks and content which have been shown.
- **Geolocation data:** live-location, via IP address.
- **Online identifiers:** device ID, online identifiers collected through cookies, pixel or other technologies that may uniquely identify your device or browser (e.g., MAC address, Device id).

Further information regarding the use of cookies may be accessed through the CMP.

3.2 Titan advertisement services

With regards to Titan's advertising services, Titan will process the following CTV User categories of Personal data:

- **Audience and advertising data:** CTV User preferences, interaction with the services and

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identifiers collected through cookies, pixel or
your device or browser (e.g., MAC

address, Device id).

- **Hardware and software information:** IP address, web browser, operating system, device information, time and date of downloads, IP logs of the server, metadata, or similar traffic data.
- **Geolocation data:** live-location, provider and signal strength of your wireless network, via the IP address.

Further information regarding the use of cookies may be accessed through this [link](#).

4. Data sources

For the provision of the Services, Titan will process certain CTV User Personal Data that either CTV Users provide to us directly (such as through their CTV device) or supplied by third parties and partners that collaborate with Titan.

4.1 Connected TV Devices

Personal data of CTV Users may be received by Titan from the manufacturer partners. In particular, when the CTV User navigates through their CTV Device, the manufacturer of such CTV Device, a technological partner or a contractor that acts as our partner, providing their services, may share with us with CTV User Personal Data to process for the purposes stated above in this Privacy Policy.

4.2 Titan advertisement services

Personal data of users may be received by Titan from the following third-party partners:

- **Technical partners.** In particular, when the CTV User is navigating through the CTV Device, the manufacturer of such CTV Device, a technological partner or a contractor that acts as our partner.
- **ACR providers.** Providers that collect data related to publicly available content displayed on your CTV Device, such as the identity of your broadcast, cable, or satellite television provider, and the television programs and commercials viewed (including time, date, channel, and whether you view them live or later) and the location of your Smart TV.
- **Advertising Technical Partners.** Partners of the advertising sector which use Personal Data, such as marketing purposes, ad targeting purposes, or analytical purposes, among others. For instance, these may include, among others, partners used to provide services such as server-side ad-insertion, data management platforms, supply side audience extension activities, etc.

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5. Data recipients

Personal data from CTV Users may be shared with technological partners or contractors, acting as our partner for the provision of their services. Titan requires its partners to protect CTV User Personal data.

5.1 Connected TV Devices

Titan may share CTV User Personal Data with the CTV Devices' manufacturer partners. In particular, when the CTV User is navigating through CTV Device, the manufacturer of such CTV Device, a technological partner or a contractor that acts as our partner may receive CTV User Personal Data to process for the purposes stated above in this Privacy Policy.

5.2 Titan advertisement services

Titan may share CTV User's Personal Data to the following third-party partners:

- **Technology Partners:** Manufacturers and partners of your CTV Device.
- **Advertising Technical Partners:** Partners of the advertising sector may use CTV User data for their own purposes, such as marketing purposes, targeting purposes, or analytical purposes, among others. For instance, these may include partners that provide ad-supported free channels, to whom Titan might carry out the sale of backfill inventory, as well as retail media companies, sales houses, etc.
- **Advertisers, media agencies, and related third parties.**
- **Ad Measurement Companies:** Companies that select advertisements, and measure and improve advertising effectiveness.
- **Content Partners:** Companies that provide content in audio, visual or other forms, as well as supporting us in the curation of content so as to personalize this to CTV Users potential interests.

Further information regarding these third-party partners may be accessed through the CMP.

Additionally, Titan may disclose and otherwise use CTV User personal and other information where we or they reasonably believe such disclosure is needed to (a) satisfy any applicable law, regulation, legal process, or governmental request, (b) enforce applicable terms of use, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address illegal or suspected illegal activities (including payment fraud), security or technical issues, or (d) protect against harm to our rights, property or safety, its users or the public, as required or permitted by law.

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Titan may engage third parties to act as service providers to perform certain tasks or services on Titan's behalf (i.e., data processors) that may imply processing CTV User Personal data in connection with the use of Titan's services. Such tasks or services may include hosting and cloud services providers, IT support services, CRM, mailing, analytics, Ad-server providers, Server-side Ad-insertion systems, Supply-Side Platforms, etc.

These providers will not process the Personal Data for their own purposes but only to comply with Titan's instructions and are obliged to handle CTV User personal data in a manner consistent with Titan's privacy policy.

7. Data retention

Titan will retain CTV Users' Personal Data only for the time necessary to carry out the purposes they were collected for or for as long as the consents granted are not revoked, whenever the processing activity has been based on CTV User's consent. Subsequently, if required, Titan will keep the information blocked until the legal liabilities that may have arisen as a result of the processing of CTV users' Personal Data have expired.

Further information regarding the data retention periods may be accessed through the CMP.

8. Security and confidentiality duties

Titan has implemented the necessary technical and organizational measures to guarantee the security of Personal Data and to prevent its alteration, loss, or unauthorized access or processing, taking into account the state of the art, the nature of the data, and the risks to which it is exposed. However, please note that measures on the Internet, due to their nature and global character, are not impregnable.

9. International data transfers

In order to fulfill the aforementioned purposes, Titan may use partners and service providers located outside the European Economic Area or in countries that have not been declared to have an adequate level of protection. In any case, Titan ensures the security and lawfulness of the processing that is guaranteed by implementing appropriate safeguards.

In this sense, Titan ensures due mechanisms are established for international data protection transfers, such as Standard Contractual Clauses approved by the European Commission, or other similar mechanisms, or transfers to entities that are registered under the law of countries with adequate safeguards.

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10. Personal Data from third parties

When you provide personal data of a third party, you undertake to provide Personal Data of lawful origin, and to inform such third party about the purposes of the processing of personal data and other information included in this Privacy Policy.

11. User Responsibility

The CTV User guarantees that he or she is over 18 years old and that the data provided belongs to him or her and that they are true, accurate, complete and up to date. To this effect, the CTV User is responsible for the ownership and veracity of all the data provided and will keep the information provided duly updated.

The CTV User accepts that he or she will be liable for any false or inaccurate information provided through the Website and for any damages, direct or indirect, that this may cause to Titan or third parties.

12. Data subjects' rights

The data subject may contact and exercise the following rights, at any time and free of charge, by contacting Titan registered office indicated above or to the following e-mail address: data@titanos.tv.

- Access to Personal Data.
- Rectify inaccurate or incomplete Personal Data.
- Request the erasure of Personal Data when, among other reasons, the data is no longer necessary for the purposes for which they were collected.
- Obtain from Titan the limitation of data processing when any of the conditions set out in the data protection regulations are met.
- Request the portability of Personal Data.
- Object to the processing of Personal Data when such processing is based on the Data Controller's legitimate interest and not be subject to automated individual decision-making, where applicable.
- File a complaint with the relevant data protection authority when the user considers that Titan has violated the rights recognized by the applicable data protection regulations.
- Where a processing operation is based on the CTV User's consent given through Titan's CMP, it may be withdrawn at any time, through the CMP or by writing to the

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the processing is based on the legitimate interest and the right to object at any time. However,

the withdrawal of the consent and the objection to the processing will not affect the lawfulness of the processing activities carried out prior to that moment.

13. Update of this privacy policy

We may, from time to time, need to update our Privacy Policy. All amendments to this Privacy Policy will be available on our [Website](#).

USERS LOCATED IN ARGENTINA

This section of the Privacy Policy applies only if you use the services covered by this Privacy Policy in Argentina, and supplements and/or, where applicable, replaces the information in this Privacy Policy.

Database registration

Titan has registered its database in Argentina with the Agency for Access to Public Information. The Agency for Access to Public Information, as Control Authority of Law No. 25.326, has the power to deal with complaints and claims filed by those whose rights are affected by non-compliance with the regulations in force on the protection of personal data.

Consent

Your consent will be requested on the Consent Management Platform to process your data for the following purposes: improve Services of Titan; offer non-personalized services; link different devices; Match and combine data from other data sources; identify devices based on information transmitted automatically; use precise geolocation data; actively scan device characteristics for identification; send newsletters and/or other commercial communications.

Effects of not providing personal data

When requesting personal data from users in Argentina, we will identify whether the data is mandatory or optional. In case of refusal to provide mandatory personal data or providing incorrect data, the service may not be provided.

International data transfers

In order to fulfill the purposes mentioned in this Privacy Policy, Titan may use partners and

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countries that have not been declared to use, Titan ensures the security and lawfulness of the processing that is guaranteed by implementing appropriate safeguards.

In this sense, Titan ensures due mechanisms are established for international data protection transfers, such as Standard Contractual Clauses approved by Resolution N°198/2023 of the Agency for Access to Public Information.

Last update: June 2025.

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	Cookie Policy			