

# SHOWHEROES GROUP

## PRIVACY POLICY

**Last Updated: November, 2025**

This Privacy Policy of ShowHeroes Group, comprising ShowHeroes SE and its affiliated subsidiaries (collectively referred to as "ShowHeroes," "we," "us," or "our"), sets forth the principles and terms under which we collect, use, and process data, including personal data, in accordance with applicable data protection laws.

Given the different types of natural or legal persons interacting with ShowHeroes, we have divided this policy based on whether you are a Business Partner, a Visitor to our own websites, or a User on a third-party property where our technology is used.

ShowHeroes is committed to upholding the highest standards of data protection. We process all data according to the principles of lawfulness, fairness, and transparency, and we have implemented extensive technical and organizational measures to secure its protection and confidentiality.

We adhere to the Interactive Advertising Bureau's (IAB) Self-Regulatory Principles for Online Behavioral Advertising and the IAB Europe OBA Framework. Consequently, we participate in and comply with the IAB Europe Transparency & Consent Framework (TCF) v2.2. Our IAB TCF identification numbers are 111 (for ShowHeroes SE) and 276 (for ShowHeroes SRL).

### 1. Definitions

To ensure this policy is clear and understandable, we have defined the key terms used throughout this document.

<b>Term</b>	<b>Definition</b>
<b>Business Partners</b>	Any natural or legal person that registers or communicates with ShowHeroes to inquire about or use our services.

<b>Consent</b>	Any freely given, specific, informed, and unambiguous indication of your wishes, signifying your agreement to the processing of your personal data.
<b>Controller</b>	The legal entity that determines the purposes and means (the "why" and "how") of processing personal data.
<b>Cookie ID</b>	A unique identifier assigned to a specific cookie, used to recognize and track your device across different websites.
<b>Cookies</b>	Small text files placed on your device to collect and store information about your preferences and online activities.
<b>CMP</b>	A Consent Management Platform, which is a tool used by website and app publishers to request, receive, and store your consent and privacy preferences.
<b>Data Protection Laws</b>	All applicable legislation and regulations governing privacy, data protection, and the collection, use, and sharing of Personal Data, including GDPR, UK Data Protection Laws, CCPA, CPRA, and PIPEDA.
<b>Data Subject</b>	An identified or identifiable natural person whose personal data is being processed (in the context of this policy, this is <b>you</b> ).

<b>Device ID</b>	A unique identifier assigned to a physical device (e.g., a smartphone or smart TV), such as Apple's IDFA or Google's AAID.
<b>Personal Data</b>	Any information relating to you. This can include direct identifiers (like a name) or indirect identifiers (like a Cookie ID, Device ID, or IP Address).
<b>Processor</b>	An entity that processes personal data on behalf of a controller and follows their instructions.
<b>Profiling</b>	The automated processing of personal data to evaluate personal aspects and make predictions, such as creating interest-based segments for advertising.
<b>Pseudonymisation</b>	Processing personal data in such a way that it can no longer be attributed to a specific individual without the use of additional, separately kept information.
<b>Recipient</b>	A natural or legal person to which personal data is disclosed.
<b>Users</b>	Any person who visits a Digital Property (like a website or app) where ShowHeroes' technology is used to provide advertising services.
<b>Visitors</b>	Any person who visits or interacts with ShowHeroes' own websites, pages, or blogs, such as <a href="https://showheroes.com/">https://showheroes.com/</a> .

## 2. Data Controller and How to Contact Us

The data controller for all personal data processed under this Privacy Policy is:

ShowHeroes SE  
Att. Data Protection Officer  
Brunnenstraße 154  
10115 Berlin  
Germany

If you have any questions, concerns, or requests about this policy or your personal data, you can contact us by post or email at [privacy@showheroes.com](mailto:privacy@showheroes.com)

We may need to verify your identity before responding to certain requests and aim to reply to all legitimate inquiries without undue delay. If you have a complaint that we cannot resolve, you have the right to contact the relevant supervisory authority.

## 3. Our Guiding Privacy Principles

Our approach to data protection is built on the following core principles:

<b>Principle</b>	<b>Our Commitment</b>
<b>Consent is Key</b>	For any data processing that requires it, particularly for personalized advertising, your consent is the essential prerequisite. We do not process such data without a valid consent signal.
<b>Transparency</b>	We are committed to being open and honest about how we collect, use, and share your data. This policy is designed to be comprehensive and easy to understand.

<b>Data Minimization</b>	We only collect and process the data that is necessary to achieve the specific, stated purposes. We do not collect data that we do not need.
<b>Security by Design</b>	We integrate data protection into our systems and processes from the ground up and implement robust security measures to safeguard your information.
<b>User Control</b>	We believe you should have meaningful control over your data. We provide clear mechanisms for you to manage your preferences and exercise your rights.

**4. How We Collect and Use Your Data**

This section provides a detailed breakdown of the personal data we collect, why we use it, and our legal justification, based on your relationship with us.

**If you are a Business Partner**

As a Business Partner, we collect your data directly from you through our service agreements, platform, and other business communications.

<b>Category of Personal Data</b>	<b>Specific Examples</b>	<b>Purpose of Processing (Why we use it)</b>	<b>Legal Basis (Our Justification)</b>
<b>Contact &amp; Identity Data</b>	Company name, representative names, business address, email, phone number.	To manage our relationship and set up your account.	<b>Performance of a Contract</b>

<b>Account &amp; Technical Data</b>	Login credentials, user permissions, IP address used to access our platform.	To provide and manage your account and deliver our services.	<b>Performance of a Contract</b>
<b>Financial &amp; Transactional Data</b>	Invoicing details, payment records, bank account information.	To handle billing and process payments.	<b>Performance of a Contract</b>
<b>Campaign &amp; Performance Data</b>	Advertising campaign specifications, creative content, performance metrics.	To process, deliver, and optimize advertising campaigns.	<b>Performance of a Contract</b>
<b>Platform Usage Analytics</b>	Data on how you use our platform features.	To improve our platform and services.	<b>Legitimate Interests</b>
<b>Financial Records</b>	Invoices and transaction logs kept for legal retention periods.	To comply with tax and financial regulations.	<b>Legal Obligation</b>

**If you are a Visitor to Our Website**

As a Visitor, we collect your data directly from you through your interactions with our website, such as filling out forms or managing your preferences in our cookie banner.

<b>Category of Personal Data</b>	<b>Specific Examples</b>	<b>Purpose of Processing (Why we use it)</b>	<b>Legal Basis (Our Justification)</b>
<b>Technical Data</b>	IP address, browser type and version, operating system, server logs.	To deliver our website content and ensure its technical security and stability.	<b>Legitimate Interests</b>
<b>Usage Data</b>	Pages visited, time spent on pages, clickstream data.	To analyze website traffic statistically to improve our content and user experience.	<b>Consent</b> (for analytics cookies)
<b>Cookie Data</b>	Information stored in cookies about your preferences and interactions.	To enhance your browsing experience, remember your settings, and deliver relevant content.	<b>Consent</b> (for non-essential cookies)
<b>Form Submission Data</b>	Your name, email address, company, and any message content you provide.	To respond to your inquiries and process partnership requests.	<b>Taking steps prior to entering a Contract</b>

**If you are a User on a Property with Our Technology**

For Users, ShowHeroes usually does not directly collect personal data or consent from you. We act based on the privacy choices you make on the publisher’s website or app, communicated to us through their Consent Management Platform (CMP) via the IAB TCF v2.2

framework. Only for certain formats or features such as HeroChat, ShowHeroes may collect your consent directly..

<b>Category of Personal Data</b>	<b>Specific Examples</b>	<b>Purpose of Processing (Why we use it)</b>	<b>Legal Basis (Our Justification)</b>
<b>Technical Identifiers</b>	IP address, Cookie ID, Mobile Advertising ID (IDFA/AAID).	To recognize your device for personalized ad delivery and measurement.	<b>Legitimate Interest for IP address, otherwise Consent</b>
<b>Device &amp; Browser Information</b>	Browser type, operating system, language settings.	To ensure advertising content renders correctly for your specific device.	<b>Legitimate Interests</b>
<b>Usage &amp; Interaction Data</b>	Ad views and clicks, video viewing behavior.	To measure the performance of advertising campaigns in an aggregated way.	<b>Legitimate Interests</b>
<b>Fraud Prevention Data</b>	Interaction patterns, technical identifiers.	To detect and prevent invalid or fraudulent ad traffic.	<b>Legitimate Interests</b>
<b>Contextual Data</b>	Content categories of pages visited, keywords.	For contextual (non-personalized) matching of ads.	<b>Legitimate Interests</b>
<b>General Location Data</b>	Non-precise location (e.g., country/city) from your IP address.	To deliver advertising relevant to your general geographic area.	<b>Legitimate Interest</b>

<b>Inferred Interest Data</b>	Topics and categories of interest derived from your browsing behavior for Profiling.	To create audience segments and deliver personalized, interest-based advertising.	<b>Consent</b>
<b>AI Chat Data / HeroChat Conversations</b>	Chat questions, responses, any submitted info.	To understand user interests, improve products, and provide anonymized insights/reports to advertisers.	<b>Consent</b>
<b>Your Privacy Choices</b>	The IAB TCF Transparency & Consent (TC) String.	To receive, store, and respect your privacy choices and communicate them to other partners in the ad ecosystem.	<b>Consent</b>

*\*Legitimate interest may be applicable only for non-personalized, operational needs and must be justified as not overridden by user rights*

If we process political advertising data, we comply with all applicable transparency, consent, and record-keeping obligations under EU TTPA and local law.

**5. Your Privacy Choices, Consent, and Opt-Out**

We are committed to providing you with meaningful control over your data. This section outlines how you can manage your consent and opt out of certain data processing activities.

**Managing and Withdrawing Your Consent**

Where we rely on your consent for processing, you have the right to withdraw it at any time. This will not affect the lawfulness of any processing carried out before you withdrew your consent.

- **For Visitors & Business Partners:** You can manage and withdraw consent for cookies at any time by adjusting the settings in our cookie consent banner on our websites.

- **For Users:** You can update your privacy choices, including withdrawing consent, at any time via the Consent Management Platform (CMP) on the website or app you are visiting.

## Marketing Communications

All our marketing communications operate on a double opt-in basis. We obtain separate, explicit consent for each type of marketing or profiling activity. Your consent for marketing is never bundled with other terms or conditions.

## Important Considerations When Opting Out

- **Ad Visibility:** Opting out of personalized advertising does not mean you will stop seeing ads. The ads you see will simply be contextual or less relevant to your interests.
- **Device and Browser Specificity:** An opt-out is tied to the specific browser and device you use. If you use multiple devices or browsers, you must opt out on each one separately.
- **Cookie Dependence:** Our web opt-out mechanism relies on an opt-out cookie. If you clear your cookies, you will also clear your opt-out preference, and you will need to opt out again.

## 6. Data Collection Technologies We Use

We use industry-standard technologies to collect data needed to provide and improve our services.

### Cookies

Cookies are small text files stored on your device when you visit our website, helping us improve your experience and analyze usage. Some cookies are set by us and others by third-party partners; all are listed in our Cookie Table.

Essential cookies (required for site operation) are set under our legitimate interests. Other cookies—performance, analytics, functionality, targeting, or advertising—are only set if you provide explicit, granular consent via our cookie banner. You may manage your cookie preferences or withdraw consent anytime within our banner settings.

We maintain records of cookie consent for audit and compliance, and will notify users of important changes to our cookie practices or policy.

We use different types of cookies depending on how you interact with our services. Our cookie banner and our comprehensive, always-accessible Cookie Table (linked on our website) provide granular, per-category selection for each cookie and partner, detailing all cookies, their purposes, and their duration.

<b>Cookie Type</b>	<b>Purpose</b>
<b>Essential Cookies</b>	Necessary for our websites and platforms to function properly (e.g., authentication, security). These cannot be disabled.
<b>Performance &amp; Analytics Cookies</b>	Help us understand how you interact with our websites by collecting and reporting information anonymously (e.g., popular pages, errors).
<b>Functionality Cookies</b>	Remember choices you make (such as language or region) to provide a more personalized experience.
<b>Targeting &amp; Advertising Cookies</b>	Used to build a profile of your interests and show you relevant advertisements on other sites. These are also used for frequency capping, performance measurement, and cross-device matching.

### **Pixel Tags and Server Logs**

Pixel tags (or web beacons) are small pieces of code embedded in web pages or emails. They are used to track user interactions like page views and ad impressions to help us and our partners measure the effectiveness of advertising campaigns. Server logs automatically record technical information when you visit our websites.

### **Mobile Advertising Identifiers**

In mobile app environments, we utilize device-specific, resettable identifiers like Apple's IDFA and Google's AAID for advertising purposes. These function similarly to cookies, enabling personalized ad experiences and cross-app tracking. You can reset these identifiers or limit their use at any time through your device's operating system settings.

## **7. Connected TV (CTV) Data Processing**

ShowHeroes provides advertising services on Connected TV (CTV) platforms. This section explains our specific role and practices in the CTV environment.

### **Our Role as a Data Processor**

On CTV platforms, the publisher (e.g., the app owner or TV manufacturer) acts as the primary data controller. The publisher is responsible for collecting and recording your consent for personal data processing via an integrated Consent Management Platform (CMP). We process data only after we have obtained your valid consent.

### **How We Use CTV Data**

We receive device and engagement data from the publisher only after the publisher certifies that valid consent has been obtained. We process this data solely for:

- Technical delivery of advertising.
- Campaign frequency-capping (limiting how many times you see the same ad).
- Contextual targeting (showing ads based on the content being viewed).
- Aggregated measurement and analytics.

Cross-device tracking and individual-level analytics are never performed unless specifically permitted by publisher-provided consent and in full compliance with legal requirements.

### **QR Codes in Ads**

Some interactive CTV ads may feature QR codes. If you scan such a code, you interact directly with the advertiser who owns the landing page. Any personal data you provide after scanning is governed by that advertiser's privacy policy. ShowHeroes only receives aggregated, non-identifiable analytics for campaign reporting.

### **Managing Your CTV Privacy**

Privacy settings for CTV advertising, including consent management and withdrawal, can be managed exclusively through the publisher's interface, CMP, or app settings on your

device—not with ShowHeroes directly. For further information about our CTV data processing, you may contact [privacy@showheroes.com](mailto:privacy@showheroes.com).

## 8. EU AI Act Compliance

ShowHeroes complies with the EU Artificial Intelligence Act (AI Act). If we deploy AI systems, we inform users when they interact with AI, provide required instructions and transparency, ensure records and human oversight, and support staff training as mandated. Please contact [privacy@showheroes.com](mailto:privacy@showheroes.com) for any questions about our AI practices.

## 9. How and Why We Share Your Data

We may share certain pseudonymized Personal Data with partners to facilitate the delivery of digital advertising.

Category of Recipient	Types of Data Shared (Examples)	Purpose of Sharing
<b>Advertising Technology Partners</b> (e.g., Supply-Side Platforms, Data Management Platforms, Ad Exchanges, Ad Networks)	Cookie ID, Device ID, IP Address, browser/device information, general location, interest segments.	To enable the real-time buying and selling of ad inventory, deliver targeted ads, synchronize user profiles (cookie syncing), and for campaign reporting and optimization.
<b>Measurement &amp; Analytics Partners</b>	Aggregated and pseudonymized interaction data (views, clicks).	To measure the effectiveness of advertising campaigns and for fraud detection.

<b>Corporate Affiliates</b>	Data may be shared within the ShowHeroes Group for administrative, operational, and service-provision purposes.	For efficient group-wide operations and service delivery.
<b>Legal, Regulatory &amp; Professional Bodies</b>	As required by law, court order, or other legal process.	To comply with our legal obligations, protect our legal rights, or in connection with a corporate transaction (e.g., merger or acquisition).

**Third-Party Processors**

We engage third-party service providers to process personal data on our behalf. All such processors are contractually required to comply with GDPR standards, protect your data, and act only on our instructions.

**10. Automated Decision-Making & Profiling**

This section provides transparency about our use of automated systems.

- **Profiling:** We use automated systems for Profiling to create audience segments based on your inferred interests. This includes enriching interest profiles by combining data from your interactions with our services and, where permitted, from trusted partners. This allows us to deliver more relevant and useful advertising.
- **No Significant Legal Effects:** These activities do not involve making decisions that produce legal or similarly significant effects on you (such as affecting your credit, employment, or access to essential services).
- **Your Rights:** Under GDPR, you have the right not to be subject to decisions based solely on automated processing that significantly affects you, and you may request human review.
- **Ethical Use:** No AI or automated systems are used for manipulative or discriminatory practices, or for profiling based on sensitive categories of data, without your explicit prior consent.

## 11. International Data Transfers

As a global company, we may transfer personal data outside of the European Economic Area (EEA). Such transfers will only occur with appropriate legal safeguards in place.

- **Mechanisms:** We use mechanisms such as an Adequacy Decision from the European Commission or by implementing Standard Contractual Clauses (SCCs) to contractually obligate recipients to protect personal data to GDPR standards.
- **Assessments:** Where we rely on SCCs, we conduct Transfer Impact Assessments (TIAs) to ensure the data remains adequately protected in the destination country.

## 12. Data Security

ShowHeroes implements appropriate technical and organizational measures to protect your personal data against unauthorized access, loss, or damage. These include encryption of data in transit and at rest, access controls based on the principle of least privilege, and regular system monitoring. All personnel handling personal data receive mandatory privacy training and compliance reviews. In case of a data breach involving personal data, ShowHeroes will notify affected individuals and relevant supervisory authorities within 72 hours, providing details on the nature of the breach and mitigation measures, in accordance with legal requirements.

## 13. Retention

### How Long We Keep Your Data

We retain personal data only for the period strictly necessary to fulfill the purpose for which it was collected, or as required by law. When data is no longer needed, it is securely erased or anonymized.

<b>Data Type (Example)</b>	<b>Retention Period</b>	<b>Justification</b>
<b>User Interaction &amp; Profiling Data</b>	Up to 13 months from the last interaction.	To maintain relevant interest profiles and for lookback analysis.

<b>Business Partner Contractual Data</b>	For the duration of the contract + up to 10 years.	To comply with legal, tax, and contractual obligations.
<b>Visitor Inquiry Data</b>	Up to 24 months after the last communication.	To maintain a record of correspondence and for follow-up purposes.

## 14. Children’s Privacy

Our services are not intended for use by individuals under 16 years of age. We do not knowingly collect or process personal data from children under 16. If you believe we have inadvertently collected data from a child, please contact us immediately at [privacy@showheroes.com](mailto:privacy@showheroes.com) so we can promptly delete it. We also contractually require our publishing and advertising partners not to use our technology on pages or services directed at individuals under 16.

## 15. Your Data Protection Rights

You have specific, legally protected rights regarding your personal data. We are committed to upholding these rights. To exercise any of them, please use the contact details provided in Section 2.

<b>Your Right</b>	<b>Description and How to Exercise It</b>
<b>The Right of Access</b>	You have the right to ask for confirmation of whether we process your data and to request a copy of the personal data we hold about you.
<b>The Right to Rectification</b>	If the personal data we hold about you is inaccurate or incomplete, you have the right to have it corrected.

<b>The Right to Erasure ('Right to be Forgotten')</b>	You have the right to ask us to delete your personal data when it is no longer necessary for the original purpose, when you withdraw consent, or in other specific circumstances.
<b>The Right to Object to Processing</b>	You have the right to object to our processing of your data, particularly for direct marketing purposes or when our processing is based on our legitimate interests.
<b>The Right to Data Portability</b>	You have the right to request your personal data in a structured, commonly used, and machine-readable format, and to have it transferred directly to another controller where technically feasible.
<b>The Right to Withdraw Consent</b>	You have the right to withdraw your consent for any data processing that is based on your consent at any time, without affecting the lawfulness of processing before its withdrawal.
<b>The Right to Object to Automated Decision-Making</b>	You have the right not to be subject to decisions based solely on automated processing, including profiling, which produce legal or similarly significant effects on you.
<b>The Right to Opt-Out of Sales/Sharing (CCPA/CPRA)</b>	If you are a California resident, you have the right to opt-out of the "sale" or "sharing" (for cross-context behavioral advertising) of your personal information.
<b>The Right to Non-Discrimination</b>	We will not discriminate against you for exercising any of your privacy rights.

To exercise any of these rights, please contact us at [privacy@showheroes.com](mailto:privacy@showheroes.com) or fill out our dedicated [rights request form](https://docs.google.com/forms/d/1jEbYzdxQapCILAe4fWibkN8sAtvu-RXiQSPHy-BjASE/edit): <https://docs.google.com/forms/d/1jEbYzdxQapCILAe4fWibkN8sAtvu-RXiQSPHy-BjASE/edit>. We process all requests promptly and within one month, and provide clear escalation options as required by law.

## **16. Changes to This Privacy Policy**

We may modify this Privacy Policy to reflect changes in our practices or in applicable laws. Any material changes will be communicated through a notice on our website and, where appropriate, via email, prior to the changes taking effect. The date of the latest revision is indicated at the top of this policy. Your continued use of our services after any changes constitutes your acceptance of the revised policy.