Short Public Report

1. **Name and version of the IT product:**

Adverity Platform v4.8.1. (IT product) as of January 2020

2. **Manufacturer or vendor of the IT product:**

Company Name: Adverity GmbH

Address: Mariahilfer Strasse 41-43, 1060 Vienna, Austria

Contact Person:

- Alexander Igelsböck, Chief Executive Officer, alex@adverity.com

- Martin Brunthaler, Chief Technology Officer, martin@adverity.com

3. Time frame of evaluation:

September 2018 – January 2020

4. EuroPriSe Experts who evaluated the IT product:

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On behalf of:	
RBS Responsible Business Solutions GmbH	
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5. Certification Authority:

Name: EuroPriSe Certification Authority
Address: Joseph-Schumpeter-Allee 25, 53227 Bonn, Germany
eMail: contact@european-privacy-seal.eu

6. Specification of Target of Evaluation (ToE):

The Adverity Platform consists of the following components:

- Adverity Datatap,
    - including the connectors to data sources, and
    - the ETL harmonisation interface, and
- Adverity Insights (the visualisation module),
- the respective WebUIs for each module.

Adverity Datatap serves as the ETL platform (extract, transform, load) to ensure that all datasets from potentially hundreds of sources are restructured to comply with a consistent schema across the Product Customers marketing data landscape. The Product therefore aims at improving the data quality and the efficiency of marketing analytics by running automatic cleaning and harmonization algorithms.

Adverity Insights helps the Product Customer explore, analyse and visualise the cleaned data and offers the possibility to work with datasets via intelligent algorithms and tools.

The product and the scope of the evaluation do not include:

- technical support functions (such as maintenance access for updates);
- Hardware and Software Components used by the Product Customer in connection with his marketing activities (e.g. CRM, E-Mail-Marketing-Services, custom datasets, Servers);
- Hardware and Software Components on the side of third-party data providers (the Product's Connector-APIs are the demarcation line of what is still in scope);
- services of choosing, installing or configuring the webserver or other IT environment of the Product Customer;
- third-party reporting tools such as Google Data Studio, Microsoft Azure, etc.

The product is intended to be used within the IT infrastructure of the customer. Therefore, no hardware components are included in the ToE.

7.   General description of the IT product:

The Adverity Platform serves as an enablement platform for data driven marketing decisions. Agencies and brands may use the product to analyse campaigns across channels and facilitate unified marketing analyses and reports. The platform offers a library of API connectors to online advertising services, customer relationship management (CRM) systems, communication tools and many more. Data retrieved from these different sources is then processed by ETL software components (extract, transform, load) to be cleaned and harmonised enabling customers to better control their marketing activities, channels and costs across the individual data sources. Customers can set the data sources, the categories of data from these sources, the data mapping and the data destinations via the WebUI.
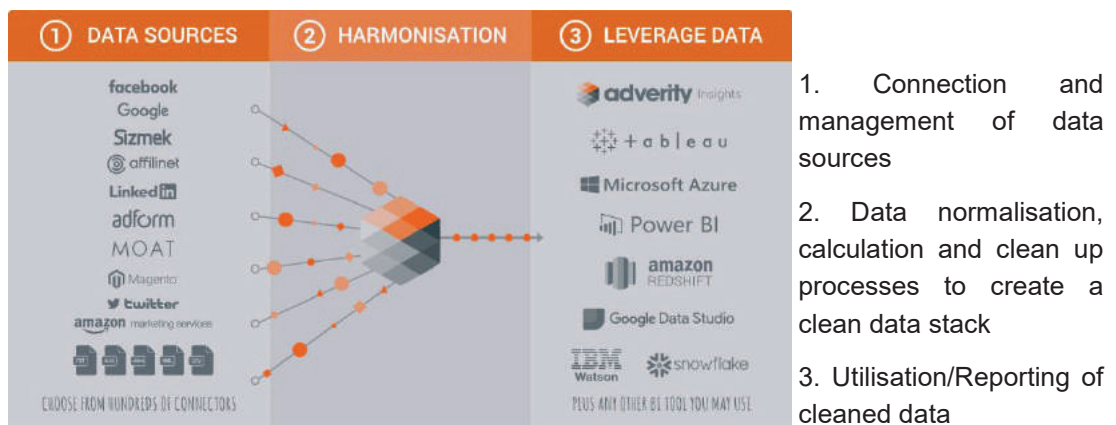

1.   Connection and management of data sources

2.   Data normalisation, calculation and clean up processes to create a clean data stack

3. Utilisation/Reporting of cleaned data

Figure 1 - Adverity Platform Overview

8.   Transnational issues:

The Product is sold primarily within the EU and the EEA. However, customers may use the Product worldwide.

The product does not require the transmission of personal data to third countries but rather all personal data is to be processed within the IT infrastructure of the Product Customer.

9. Tools used by the manufacturer of the IT product:

The ToE uses the following default IT environment (subject to the implementation of the customer, not part of the ToE):

- Application Server
    - Minimum: Multi Core Xeon, 4 GB RAM
    - Linux, preferably Debian/Ubuntu
    - Java 7+ Runtime Environment
    - Tomcat application server
    - Nginx as a reverse proxy
- ETL Server
    - Minimum: Multi Core Xeon, 8 GB RAM
    - Linux, preferably Debian/Ubuntu
    - Java 7+ Runtime Environment
    - RabbitMQ
- Database Server
    - Minimum: Quad Core Xeon E5, 32 GB RAM
    - Linux, preferably Debian/Ubuntu
    - PostgreSQL 9.6

10. Edition of EuroPriSe Criteria used for the evaluation:

- EuroPriSe Criteria in the version - January 2017
- EuroPriSe Commentary in the version - May 2017

11. Evaluation methods:

The following methods were applied to evaluate the ToE against the EuroPriSe Criteria:

- Review of documentation (esp. Customer Help Center, Blog, Data Protection Guidelines, Connector API)
- Interviews with executive, technical and legal leads
- Product presentations of features requiring real data (e.g. connectors, logs)
- Product demo test regarding functionality and privacy implementations

12. Evaluation results:

- Privacy by Design and Default measures

  The Adverity Platform can be used without processing personal data at all. Customers are free to choose which services they want to connect and which data to use. Data minimisation can therefore be achieved on every level of the product. Where services could provide personal data, such data fields are deselected by default on the reports. Customers are advised on necessary measures and precautions when processing personal data in the Adverity Data Protection Guidelines. In addition, the platform features privacy warnings on each of the relevant connectors.

  NOTE: This data stream may be used to obtain Personal Data. Such processing requires valid legal grounds (see Art 6, 9 GDPR). A prior consent of data subjects may be required, e.g. for marketing activities. Please carefully consider pseudonymization and anonymization techniques to be applied when retrieving fields such as name, contact details or IDs from this source. Please contact our support staff for more information.

  Figure 2 - Privacy Warning

- Guidance on data protection matters

  Adverity has developed and made publicly available the Adverity Data Protection Guidelines to inform customers on the data protection compliant use of the platform. As customers are either using their own marketing data or the marketing data of their clients, they are responsible to review the lawfulness of the processing and ensure that all data subject rights are met. The guidelines further inform the customers on how to use the platform to ensure data access on a need-to-know basis and highlight the pseudonymisation feature to restrict the use of personal data to the absolute minimum. These guidelines are publicly available at https://www.adverity.com/data-protection-guidelines/.

- No collection of new personal data

  The ToE solely relies on data generated or collected by the connected services. These services are used by the customers independently of the platform. Once connected with the platform certain data (personal and non-personal data) can be retrieved via the service's application interface (API). These data connectors are primarily used to analyse statistical data on marketing campaigns (e.g. how many impressions where made on mobile devices). Some of the service may provide personal data such as contact information or shipping address to further analyse the customer base. However, the platform never interacts with end users directly and therefore does not collect new personal data. The customers are notified to review the legal basis of the connected services and inform

their customers of the further processing purposes for marketing analysis.

13. **Data flow:**

The Product has four main processes:

1. Connectivity Module,

2. Data Schema Mapping & Transformation,

3. Data Load, and

4. Data Visualisation.

In a first step, the Product is "fetching" data from third parties. Data are provided from the channels set by the Product Customer. The Product connects to secure APIs (interfaces) of the third-party service providers via the predefined connectors (see above).

Once the data have been obtained, they are mapped by the Product to match the data schema of the Product Customer.

After completion of mapping, the data are transferred via secure protocols to the analysis and/or reporting tools.

Per default the Product includes Data Visualisation with the Adverity Insights module. In this step only the previously obtained data is processed.

The Product does not control/manage any other service nor does the Product directly or indirectly interact with customers of the Product Customer (e.g. send e-mails directly from the Product).
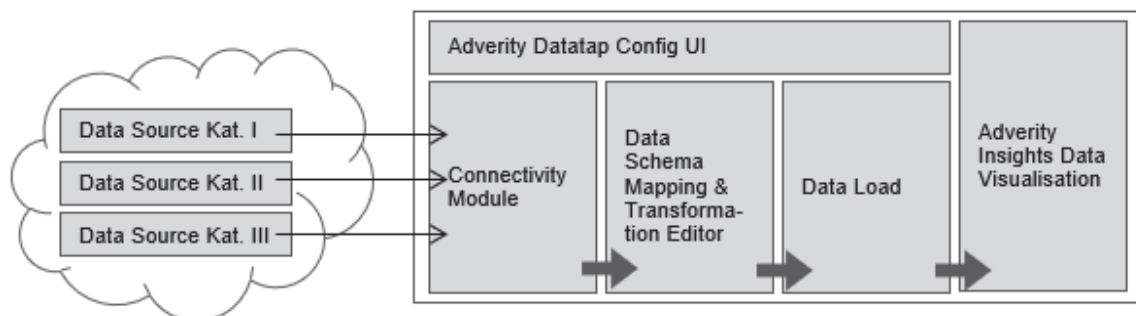
Figure 3 - Data Flow

14. **Privacy-enhancing functionalities:**

Connectors potentially processing personal data have personal data deselected by default and the customer is prompted a warning if he chooses such a connector (see Figure 2 - Privacy Warning). The customer is always free to exclude any or all personal data. He may also use pseudonymization techniques (esp. using a hashed code instead of personal names or IDs).

15. **Issues demanding special user attention:**

Special user attention is unlikely to further enhance privacy as the product does not directly interact with end users. However, users must be made aware of the processing of their personal data for (further) marketing purposes upon the collection of their data.

Within its means Adverity educates customers on data protection requirements, information duties, and the need for valid legal grounds for processing in the data protection guidelines. In combination with the implemented privacy warning upon using a connector that may retrieve personal data Adverity ensures that customers are aware of the privacy friendly use of the platform.

16. **Compensation of weaknesses:**

No requirement of the EuroPriSe criteria was rated as "Barely passing". Potential privacy weaknesses may only arise through the unlawful misuse of the product by customers (e.g. connecting databases with unlawfully collected personal data). Within its means Adverity educates customers on the data protection compliant use of the product. These guidelines also emphasize that the Product is not intended to process special categories of personal data or criminal data. This further highlights the strict focus on marketing analytics of pre-existing data.

17. Decision table on relevant requirements:

EuroPriSe Requirement	Decision	Remarks
Data Avoidance and Minimisation	Excellent	All use of personal data can be restricted and pseudonymisation techniques can be used to further ensure data privacy.
Transparency	Adequate	The product does not directly interact with end users. The product customers are informed of the necessity to provide information on data processing activities to all end users (employees and customers). Adverity provides further guidance for data privacy matters customers must attain to in the Adverity Data Protection Guidelines.
Technical-Organisational Measures	Adequate	The product is intended to be used by the customer as on-site solution within his IT infrastructure. Adverity provides guidance on the system requirements. Additionally, necessary organisational measures to ensure data access on a need-to-know basis and pseudonymisation features are mentioned to maximize data privacy.
Data Subjects' Rights	Adequate	The product does not directly interact with end users. Customers are informed to include the processing within the product in information notices to end users.

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Experts' Statement

We affirm that the above-named IT product has been evaluated according to the EuroPriSe Criteria, Rules and Principles and that the findings as described above are the result of this evaluation.

Vienna, 31.01.2020	**Roland Marko**	
Place, Date	Name of Legal Expert	Signature of Legal Expert

Vienna, 31.01.2020	**Helmut Waitzer**	
Place, Date	Name of Technical Expert	Signature of Technical Expert

Certification Result

The above-named IT product passed the EuroPriSe evaluation.

It is certified that the above-named IT product facilitates the use of that product or service in a way compliant with European regulations on privacy and data protection.

Place, Date	Name of Certification Authority	Signature