



End User Privacy Approach

N.Rich GDPR Compliance Overview

N.Rich as Data Controller

- The data is owned and controlled by N.Rich
- Only pseudonymised personally identifiable information
- Storing cookies, IP-addresses and marketing automation id's of individuals

[Privacy Notice](#)

Processing based on legitimate interest

- Purpose is to enable personalised advertising and behavioural analytics
- Add value to individual, don't undermine rights
- Always inform user about processing and opt-out alternatives

[Read more about legitimate interest assessment procedure](#)

[Legitimate Interest Assessment Sheet](#)

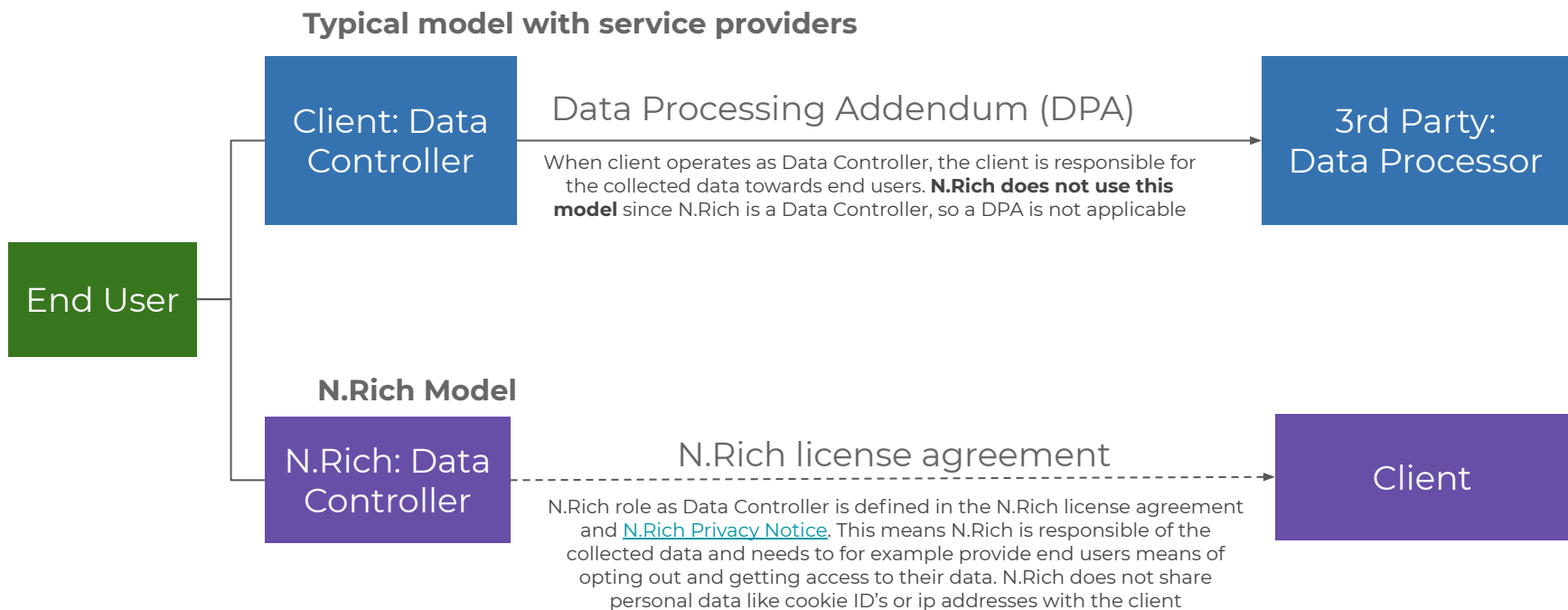
Various options to Opt-out

- Opt-out: <https://N.Rich/optout>
- Browser Do-Not-Track standard (DNT)
- Advertising industry's transparency & consent framework
- Opting out results in anonymising personal data retrospectively

[Ad Transparency & Consent](#) 

Read more: [Our approach to end user privacy](#)

Why is GDPR Data Processing Addendum (DPA) not needed?



N.Rich CCPA Compliance Overview

N.Rich only uses “deidentified” or aggregate personal information

- N.Rich stores personal information in 3 categories according to CCPA:
 - A: Identifiers (only “deidentified”)
 - D: Commercial information
 - F: Internet or other electronic network activity information,
 - G: Geolocation data, Category
 - I: Professional or employment-related information
- N.Rich uses personal data for targeting and analytics, which may be considered as “selling” according to CCPA

[Privacy Notice](#)

Various options to Opt-out and Do-not-sell requests

- Opting out results in anonymising personal data retrospectively
- Opt-out and Do not sell available on N.Rich privacy notice, own ad formats and website
 - Opt-out: <https://n.rich/optout>
 - Do not sell: <https://n.rich/do-not-sell>
- Browser Do-Not-Track standard (DNT)
- In the process of implementing IAB’s CCPA framework
- Deletion requests of personal data: waiting for California AG’s guidance on verifiability of consumer request with when only cookie is used as an identifier

Read more: [Our approach to end user privacy](#)

N.Rich GDPR / CCPA Q&A

1. What personal data does N.Rich Website Tag collect?

N.Rich does not collect any directly personally identifiable information like name, email or job title. N.Rich only collects users' [IP addresses](#) and sets [cookies](#) to users' browser, which are considered "Pseudonymised" personal data as defined in [articles 26, 28, 29 of the GDPR](#). See also, [Technical details of the data collected with N.Rich Website Tag](#)

2. What is the legal basis of processing personal data and does N.Rich require Opt-in?

N.Rich operates as Data Controller and the legal basis of processing is based on "Legitimate Interest" as defined in [Article 47 of the GDPR](#) (see also [N.Rich Legitimate Interest Assessment Sheet](#)). Opt-in is therefore not required.

3. When does N.Rich set and update cookies?

N.Rich sets or updates cookies primarily using a process called "cookie syncing", which essentially takes place when end users visit any websites with programmatic advertising available through N.Rich distribution. Additionally, after you have installed [N.Rich Website Tag](#) on your website, N.Rich sets or updates cookies when the user visits your website and it loads the tag (depending on your approach tag could be loaded on every page view, or only after user consents to cookies on your website).

4. Why is N.Rich not using typical 30 days cookie lifetime, but instead preserves cookies for 540 days?

N.Rich uses its data in relation to targeting and providing analytics about companies related to their B2B enterprise buying processes. These buying processes can take anywhere between from 90 days to more than 1000 days. This is why the standard consumer / transactional buying process based cookie lifetime is not sufficient and N.Rich uses the industry standard 540 day maximum cookie lifetime (see [Google remarketing list membership duration](#))

5. How does N.Rich support Opt-out?

N.Rich provides several methods for end users to opt-out.

(1) You can opt out at any time using [N.Rich opt-out form](#). This opt-out link is communicated using the [top-right corner menu of N.Rich own ad formats](#) and is recommended to be communicated on the cookie policy of your website. The link is also stored to end user's browser as a cookie.

(2) If the user has enabled browser's "[Do-Not-Track / DNT](#)" feature, this is considered as opt-out

(3) N.Rich is part of [Internet Advertising Bureau's Transparency and Consent Framework](#), which enables relaying opt out notification from publisher (e.g. media) website to N.Rich system.

6. What are the effects of opt-out in N.Rich system?

When user uses any of the above mentioned opt-out methods, N.Rich will anonymise the cookie and ip address data of the user. This means that the behaviour data associated with the cookie can never again be associated with the cookie or ip address or consequently with the person's historical or future actions.

7. How should we inform our visitors about N.Rich cookies?

The only absolute requirement related to informing the end users is that your website cookie notification links to your privacy policy that gives user a possibility of accessing [N.Rich Privacy Notice](#). Recommended method is to describe how N.Rich collects and uses personal data and to include a link to [N.Rich Privacy Notice](#) directly to your own privacy notice as described in [Our Approach to End-User Privacy -article](#). However, if adding links to 3rd party providers is not part of your approach, at minimum it is required that end users will get this information when requesting from your support.

N.Rich Data collection Q&A

What does N.Rich do?

Account Based (ABM) Advertising and related analytics

What data does N.Rich collect?

Cookies, IP-addresses, and end-user behavior data. No direct personal data, such as email address, name or title are stored. Please refer to N.Rich [Privacy Notice](#) for details and [N.Rich Knowledge base article](#)

What does N.Rich do with the collected data and for how long time is it stored?

It is used for ad targeting for increasing the relevance of advertising as well as for advertising analytics (account based). The data is stored as long as it is necessary for the business purpose. N.Rich cookies expire 540 days after the previous impression from the user.

How does N.Rich comply with GDPR Data Portability requirement?

No. It's not required since N.Rich doesn't store any direct personal data.

How does N.Rich comply with GDPR Right to be forgotten requirement?

N.Rich Supports the right to be forgotten

Will N.Rich impact User Experience on our website, if so how?

N.Rich tag has been optimised for minimum impact to website's load times for users in Europe, the Americas and APAC.

Will N.Rich be used to engage with customer through email, advertising or other means? If yes how?

Yes, N.Rich is used for personalized advertising and potentially website personalization for selected named accounts and existing opportunities.

Does N.Rich comply with CCPA?

N.Rich is CCPA compliant providing the required Do-Not-Sell and Opt-Out functionalities for California residents.

Does N.Rich participate in the Digital Advertising Alliance AdChoices program?

No, however, N.Rich participates to IAB Transparency and consent framework (GDPR) and is implementing IAB CCPA Framework (once it is live). Also, N.Rich respects Do Not Track (DNT) setting of the browsers. N.Rich also stores a link to its privacy notice and opt-out as a cookie to the end-user's browser every time a cookie is set.

Is a JavaScript pixel necessary or could an Image pixel be used?

N.Rich supports also an image tag, but it is not recommended. Javascript tag enables integration with marketing automation and a two-stage "cookieless" implementation, which enables capturing analytics also before cookie-consent. What are the detailed data elements being collected with this pixel?

- IP-address
- Cookie ID (N.Rich)
- Standard website visit analytics (referrer, url, visit duration etc.)

How is N.Rich addressing the fact that it's possible to browse our website without consent, leading to missing analytics data

N.Rich provides two tags, one that is not writing cookies and must be used if no consent has been given or it's rejected. With this cookieless tag, N.Rich only reads IP-address and possibly available cookie data to associate the visitor to the account. Once consent has been provided, N.Rich provides a standard tag that is writing cookies as well.

N.Rich: Alternative sample snippets for Privacy Notice

TABLE OF PROVIDERS

We work with our partners to provide targeted advertising and behavioural analytics of our current and potential customers. When you visit our website, or engage with a marketing email sent by us, your browsing activities may be tracked through cookies. Cookie-based data may be shared and exchanged with our partners for the aforementioned purposes. You can discontinue this data collection at any time by adjusting your browser settings or by opting out at our partner's site (see below).

Advertising and analytics partner[s]:

[N Technologies Inc.](#) | [Privacy notice](#) | [Opt-out](#)

LISTING EACH PROVIDER SEPARATELY (short)

N.Rich— These cookies allow us to analyse how you use our website and to show you ads across the internet so that we can provide more relevant content for you. N.Rich permits you to opt out from use of these cookies here and you can read N.Rich Privacy Notice here.

LISTING EACH PROVIDER SEPARATELY (long)

Use of N.Rich Website Tag

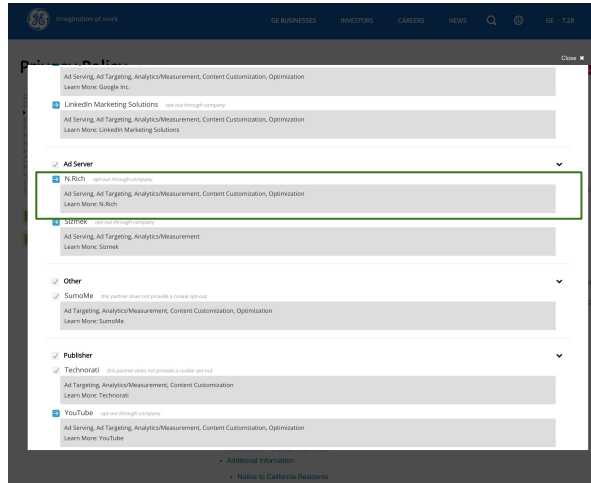
On our website we use a N.Rich Website Tag from N Technologies Inc. (<https://n.rich>). N.Rich associates end user behaviour data to the specific company's IP address, which is being used for the website visit or that the visitor has used before browsing other websites including N.Rich Tag. Furthermore, N.Rich associates your behaviour to a cookie stored to your browser enabling tracking you on consecutive sessions on our website and on other websites including N.Rich Tag. N.Rich enables us to gather analytical data about your interests towards our content and offerings on our website and on other websites with N.Rich tag. N.Rich further enables us to target personalised advertising to you based on your company association and other data that could help us deliver more relevant content and advertising. The data gathered remains anonymous for us, offering us no way to determine the identity of the users. The data is saved and processed by N Technologies in accordance to N Technologies Privacy Notice:

<https://n.rich/privacy-notice>. You can opt-out at any time from being tracked by N.Rich Website Tag either by using N.Rich Opt-out form: <https://app.nrich.ai/optout/> or by enabling your browsers [Do Not Track](#) feature.

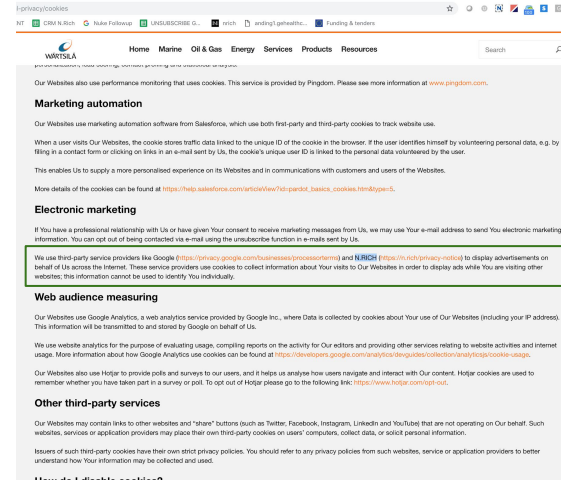
N.Rich can provide sample text in English, German, French, Spanish, Italian, Swedish, Norwegian, Danish and Finnish

Examples: How to Refer to N.Rich within Privacy Notice

N.Rich recommends adding link to N.Rich Privacy Notice and Opt out page to the cookie notice section of any websites using N.Rich tag. At minimum, on such websites, the customer support personnel should be able to inform end users about these.



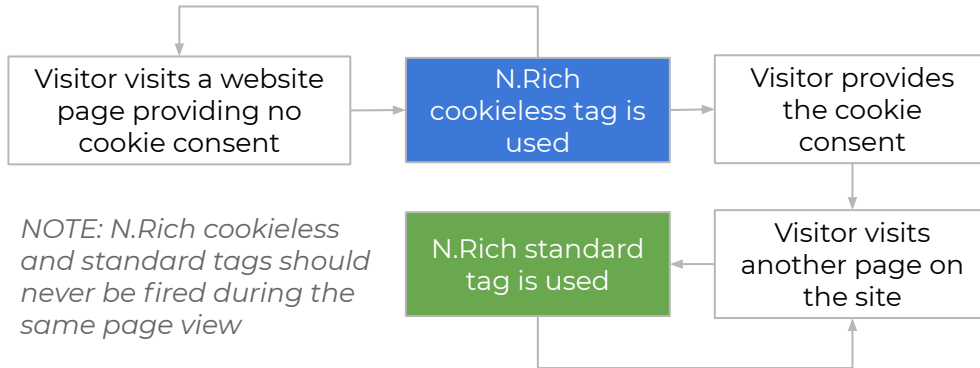
[Consent Management Tool](#)
find term "Consent Tool"
(General Electric)



[Custom Electronic Marketing Description](#)
(Wärtsilä)

Details about N.Rich Tag and cookies

How to use N.Rich Cookieless and Standard Website Tags



Cookieless tag does not set cookies, it only reads user's existing cookies and ip address. **Cookie consent is not required**

Standard tag sets N.Rich cookie and enables tracking on individual (browser) level. **Cookie consent is required**

Categorisation of N.Rich Cookies

1. N.Rich cookies are “3rd Party Cookies”
2. N.Rich cookies should be categorised as Non-necessary Advertising cookies
3. Other recommended categories:
 - Advertising: Ad serving, Ad targeting, Retargeting, Demand side platform
 - Analytics/Measurement and optimisation
 - Content Customisation

Website's Privacy / Cookie Notice must always link to [N.Rich Privacy Notice](#)

N.Rich Opt-Out Examples: N.Rich Native Ads

N.Rich provides one-click opt-out on address: <https://app.nrich.ai/optout>. Opt Out link is available on all N.Rich native ad formats

The screenshot shows the top navigation bar of The Economist website. Below the navigation, there are several article teasers. A native advertisement for Microsoft Analytics is highlighted with a green border. The ad includes a 'Privacy Notice' link and an 'Opt Out' link, which is highlighted with a red box. An orange arrow points from the 'Opt Out' link in the ad to the 'Opt Out' link in the Microsoft Analytics native ad.

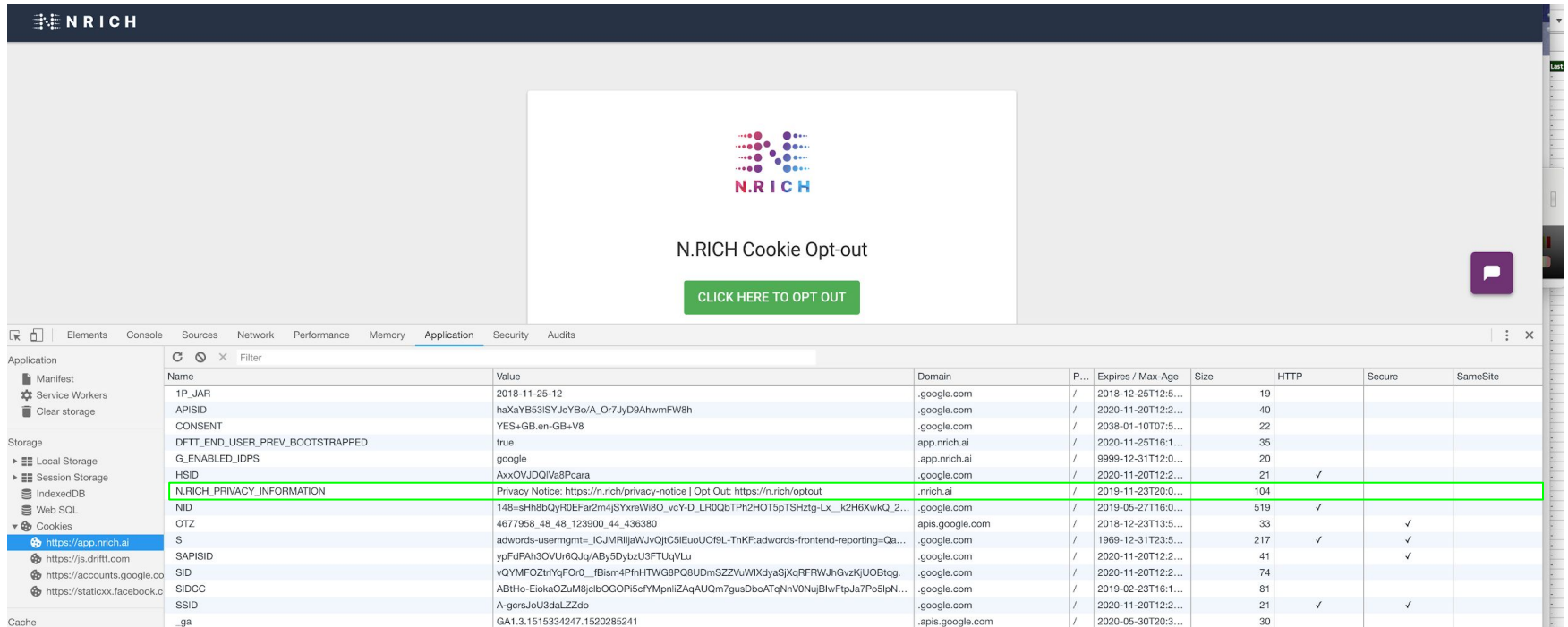
[Opt-Out menu on N.Rich Native Articles](#)

The screenshot shows the N.Rich Cookie Opt-out page. It features the N.Rich logo at the top, followed by the heading 'N.RICH Cookie Opt-out'. Below the heading is a green button that says 'CLICK HERE TO OPT OUT'. The main content of the page explains that N.Rich is a software platform for managing targeting and behavioural analytics data of advertising and websites on behalf of their clients. It states that cookies are used to ensure the advertising is relevant, but users can choose whether to let N.Rich set cookies. It also provides instructions on how to opt-out, including a link to the Privacy Notice.

[N.Rich Opt-Out page](#)

N.Rich Opt-Out Examples: Browser Cookie

N.Rich Opt Out link is also passed to the end users' browsers as a cookie value, which always accompanies N.Rich Cookie. This means that if the user's cookie / ip address data has been stored, user always has the opt out and N.Rich privacy notice available.



The screenshot displays the N.Rich Cookie Opt-out page, which features the N.Rich logo and a prominent green button labeled "CLICK HERE TO OPT OUT". Below the page, the browser's developer console is open to the "Application" tab, showing a list of cookies. The "N.RICH_PRIVACY_INFORMATION" cookie is highlighted with a green border, indicating its importance in the context of the opt-out process.

Name	Value	Domain	P...	Expires / Max-Age	Size	HTTP	Secure	SameSite
1P_JAR	2018-11-25-12	.google.com	/	2018-12-25T12:5...	19			
APISID	haXaYB53ISyJcYBo/A_Or7JyD9AhwmFW8h	.google.com	/	2020-11-20T12:2...	40			
CONSENT	YES+GB.en-GB+V8	.google.com	/	2038-01-10T07:5...	22			
DFTT_END_USER_PREV_BOOTSTRAPPED	true	app.nrich.ai	/	2020-11-25T16:1...	35			
G_ENABLED_IDPS	google	.app.nrich.ai	/	9999-12-31T12:0...	20			
HSID	AxxOVJQIva8Pcara	.google.com	/	2020-11-20T12:2...	21	✓		
N.RICH_PRIVACY_INFORMATION	Privacy Notice: https://n.rich/privacy-notice Opt Out: https://n.rich/optout	.nrich.ai	/	2019-11-23T20:0...	104			
NID	148=sHh8bQyR0EFar2m4jSYxreW8O_vcY-D_LR0QbTPh2HOT5pTSHztg-Lx_k2H6XwkQ_2...	.google.com	/	2019-05-27T16:0...	519	✓		
OTZ	4677958_48_48_123900_44_436380	apis.google.com	/	2018-12-23T13:5...	33		✓	
S	adwords-usermgmt=_JCJMRlIjaWJvQjC5EuoUO9L-TnKF:adwords-frontent-reporting=Qa...	.google.com	/	1969-12-31T23:5...	217	✓	✓	
SAPISID	ypFdPAh3OVU6QJq/ABysDybzU3FTqVlu	.google.com	/	2020-11-20T12:2...	41		✓	
SID	vOYMF0ZtrnYqFo0_IBism4PfnHTWGBPQ8UDmSZZVhWixdyaSjXqRFRWJhGvzKJUBtag.	.google.com	/	2020-11-20T12:2...	74			
SIDCC	ABH0-EiokaOZuM8/clbOGOPi5cYmPrniZaqAUQm7gusDboATqNnVNUjBlwFtpJa7PosIpN...	.google.com	/	2019-02-23T16:1...	81			
SSID	A-gersJoU3daLZZdo	.google.com	/	2020-11-20T12:2...	21	✓	✓	
_ga	GA1.3.1515334247.1520285241	.apis.google.com	/	2020-05-30T20:3...	20			

IAB Transparency and Consent Framework

N.technologies Inc. (N.Rich) is an IAB registered Vendor with ID: 20. See: <https://advertisingconsent.eu/vendor-list/>

The screenshot shows the IAB Europe Transparency and Consent Framework website. At the top, the logo "iab europe" is displayed in blue and orange, followed by the text "Transparency and Consent Framework". Below the logo, there are navigation links: "Home", "Select your profile", "About us", "News", "Newsletter sign-up", and a "Register now" button. The main content area features a grid of vendor logos, each with its name and a brief description below it. The vendors listed are: Meetrics GmbH, MGID Inc., MIQ, Mirando GmbH & amp; Co KG, mobalo GmbH, mobfox, Mobile Journey B.V., Mobusi Mobile Advertising S.L., MySense Inc., Myntelligence Limited, N Technologies Inc. (highlighted with a green border), Nano Interactive GmbH, Nativo, Inc., Neodata Group srl, and NEORY GmbH.

The screenshot shows a publisher's consent management interface. At the top, there is a navigation bar for "WELT N24 DIGITAL ZEITUNG TV" with links for "HOME", "LIVE TV", "MEDIATHEK", "POLITIK", "WIRTSCHAFT", "SPORT", and "MEHR". Below the navigation bar, there is a large image of a news article with the headline "Verdächtiger aus islamistischer Szene vorläufig festgenommen". Below the article, there is a section titled "Your consent for third party software" with a list of vendors. The vendors listed are: Widespace AB, Intent Media, Inc., N Technologies Inc. (highlighted with a green border), The Trade Desk, and admetrics GmbH. At the bottom right of the interface, there is an "OK" button.

The Transparency and Consent Framework enables end users to opt-out from N.Rich (N Technologies Inc.) data collection directly at the publisher (media) website using a “Consent Management Provider” or a “CMP”. Opt-out information will be delivered as part of the “Bid Request” of the impression to N.Rich.

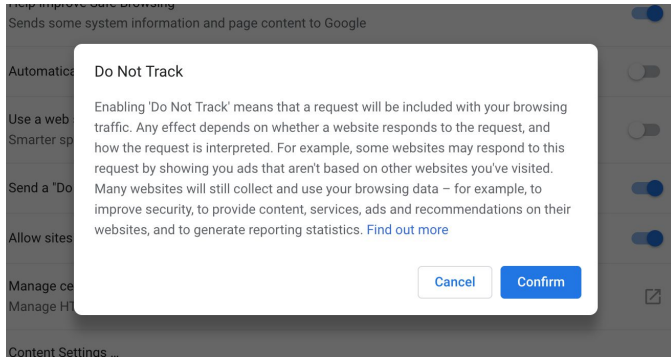
See a demo of an example CMP at: <https://consentmanager.mgr.consensu.org/demo.php>

Browser Do Not Track (DNT) functionality

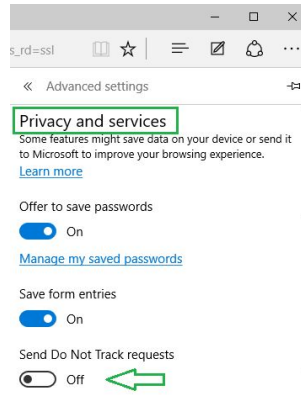
Read more about DNT here: <https://allaboutdnt.com/>

N.Rich considers enabled Do Not Track setting as equivalent to opt-out. If DNT is enabled, N.Rich anonymises cookies and ip addresses so that there is no possibility to associate the data to the personally identifiable information of the individual.

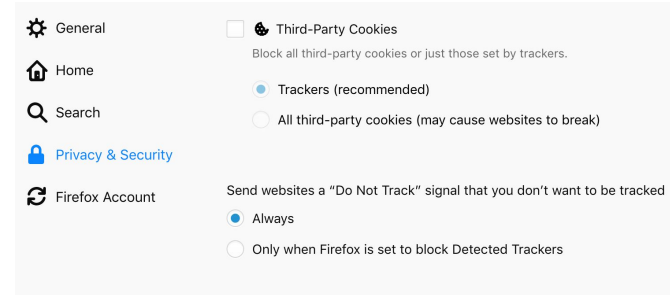
How to enable DNT in popular browsers



On Chrome, you can enable Do Not Track from Settings / Advanced and by enabling: "Send a "Do Not Track" request with your browsing traffic"



On Microsoft Edge you can find Do Not Track setting under "Advanced Settings"

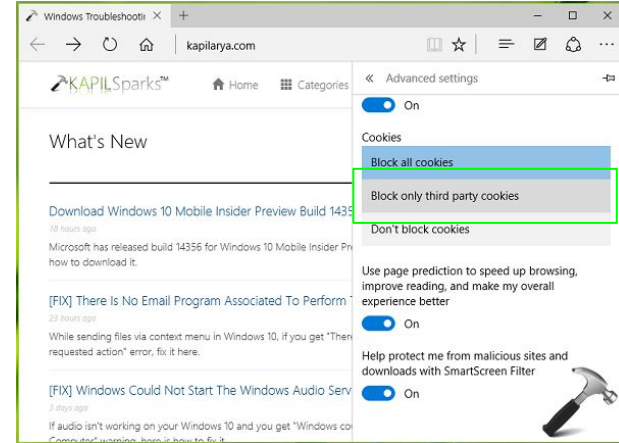
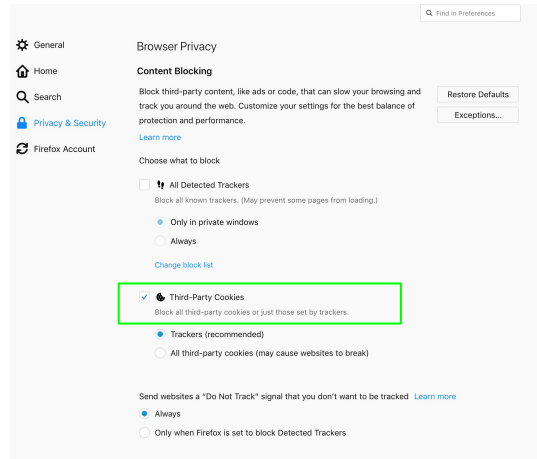
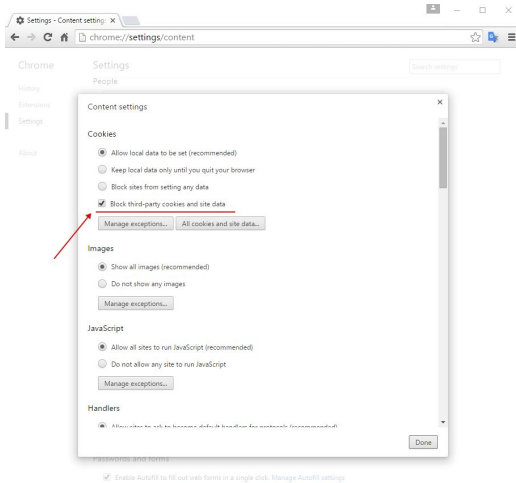


On Firefox, Do Not Track is enabled by default. You can find setting under Preferences / Privacy and Security

Blocking or clearing 3rd party cookies

N.Rich cookies are so called [3rd party cookies](#), which include no essential information related to website usage. Therefore it is possible to block all 3rd party cookies or to clear them safely without disruption to website user experience.

How to block 3rd party cookies on popular browsers



Technical: N.Rich Cookies and Tag

N.Rich Default Cookies ¹			
Name	Host	Purpose	Lifetime
_nauid	.nrich.ai	Cookie ID: Unique identifier of user's browser	540 days
N.RICH_PRIVACY_INFORMATION	.nrich.ai	Link to N.Rich Privacy Notice and Opt out page	540 days
_nrich-opt-out	.nrich.ai	Indicates that user has opted out. No other cookies will be set.	Perpetual

¹N.Rich sets two cookies as default or optionally one "Opt-out" cookie. Additionally through client specific integrations N.Rich may also set cookies related to marketing automation systems: Eloqua, Pardot, Marketo or Hubspot and Ad platforms: Google Analytics / Google Ads, Facebook, LinkedIn and Twitter.

Overview of the Data N.Rich Tag Collects	
Name	Description and purpose
Referring URL and URL including any parameters	Analytics about user's visit URL and origin of visit, including for example UTM-parameters.
IP Address	Analytics about the ip address of the user enabling association to a company and determining user's location
Browsing time including mouse / pointer actions	Analytics about time user is using to visiting an individual URL and user's actions on based on scrolling and pointer movement.
Language (locale)	Analytics about the browser and computer language and country settings
User agent of the browser and device type	Analytics about user's browser and device
Screen and browser window width and height	Analytics about user's screen and browser window size

[More technical details are available from N.Rich Knowledge Base](#)



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