



Privacy Policy & Data Guidelines

Sapene Studios, Inc provides the following guidelines “as is” based on the requirements set forth by the Website as referred to in the Insertion Order for your advertisements. We make no representation of the accuracy of these requirements or any tools suggested herein. We do however; require their strict implementation of the guidelines before we will proceed with the launch of your campaign.

If your website requires a Privacy Policy, we suggest looking into tools like Terms Feed’s privacy policy generator. <https://termsfeed.com/privacy-policy/generator/> which will generate one for a fee based on your needs. Our campaigns use both data collection and interest based advertisement; we do not however collect Personally Identifiable Information through them. However, your site may be collecting such data if you have signup forms.

The General services Administration of the US Government defines Personally Identifiable Information (“PII”) as

"information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother’s maiden name, etc."

We encourage our clients to keep up to date with regulations on the use of data and PII on the internet.

Policy requirements

- Your Privacy Policy must include information on any use of the Ad features which happens on your site or app
- You aren't allowed to run interest-based advertising campaigns that collect personally identifiable information (PII) including, but not limited to, email addresses, telephone numbers, and credit card numbers
- You aren't allowed to use or associate personally identifiable information with remarketing lists, cookies, data feeds, or other anonymous identifiers
- You aren't allowed to use or associate targeting information, such as demographics or location, with any personally identifiable information collected from the ad or its landing page

- You aren't allowed to share any personally identifiable information with Google through your remarketing tag or any product data feeds which might be associated with your ads.
- You aren't allowed to send Google precise location information without obtaining people's consent.
- You must abide by the policy for sensitive categories outlined below
 - When creating a remarketing list, you can't use any sensitive information about your site or app visitors, whether you collected it directly or associated it with a visitor, based on the visitor's profile or behavior on your site or app
 - Restrictions on list creation may apply to both individual webpages and entire websites or apps
 - Ad content may not imply knowledge of personally identifiable or sensitive information
- Google may include an in-ads notice labels to disclose interest-based advertising to our users
- Google reserves the right to display to users which remarketing lists they're on, along with the corresponding domain name
- You aren't allowed to modify or obscure these notices
- You can implement your own in-ads notice with written consent from Google, and the label must comply with relevant industry standards

Other requirements

Using remarketing lists created via DoubleClick remarketing and other remarketing list services:

You may not use a remarketing list created via DoubleClick's remarketing feature (formerly known as Boomerang) or other remarketing list service for the purposes of AdWords remarketing campaigns, unless the websites and apps from which those lists were compiled meet the requirements of this policy.

Sharing of data in your remarketing lists

Google won't allow another advertiser to use your remarketing lists or similar audiences lists without your consent.

Restrictions that apply to sensitive categories in interest-based advertising

When creating remarketing lists or creating your ads, you can't use any sensitive information about site or app visitors. For the purposes of this policy, sensitive information includes:

- interest or participation in adult activities (including alcohol, gambling, adult dating, pornography, etc.)

- sexual behavior or orientation, such as sexual orientation inferred from a user's visit to a particular website
- racial or ethnic information, such as from sites or apps that collect affirmative racial or ethnic identification from visitors
- political affiliation (other than the public registration information of United States voters), such as from sites or apps that solicit or store people's affirmative political stances
- trade union membership or affiliation, such as a user's visit to a trade union's site or app
- religion or religious belief, such as from sites or apps that collect people's affirmative information on religion or religious beliefs
- negative financial status or situation, such as information indicating that a user has a low credit rating or high debt load
- health or medical information, such as from sites or apps that market to a specific health-related group
- status as a child under 13
- the commission or alleged commission of any crime, such as information indicating that a user has a criminal record
- divorce or marital separation, such as from sites or apps for divorce lawyers or divorce counseling

As an advertiser using any type of interest-based advertising, you're restricted from:

- Running ads that collect personally identifiable information
- Using interest-based advertising or implementing the remarketing tag on any site or app directed to children under 13 or which stores or solicits age information from people under the age of 13
- Creating a remarketing list or creating ad content that specifically seeks to reach people in ways that are prohibited
- Creating ad content which implies knowledge of personally identifiable or sensitive information about the site or app visitor, even when the remarketing list has been created without using such information
- Including products which fall into these sensitive categories, such as pharmaceutical products, in any data feeds

What to include in your privacy policy for remarketing

The remarketing or similar audiences feature allows you to reach people who previously visited your website, and match the right people with the right message. While remarketing can be a great way to attract past visitors back to your site, you should inform these people that you gather information for remarketing or similar audiences on your website.

When you use the remarketing or similar audiences feature in your website, you're required to have the following information in your website's privacy policy:

- An appropriate description of how you're using remarketing or similar audiences to advertise online.
- A message about how third-party vendors, including Google, show your ads on sites across the Internet.
- A message about how third-party vendors, including Google, use cookies to serve ads based on someone's past visits to your website.
- Information about how your visitors can opt out of Google's use of cookies by visiting Google's [Ads Settings](#). Alternatively, you can point your visitors to opt out of a third-party vendor's use of cookies by visiting the [Network Advertising Initiative opt-out page](#). For Facebook, you should include a link to their opt-out page: <https://www.facebook.com/ads/preferences/edit/>