

K-WORDS PRIVACY POLICY

(Last updated on 1 July 2026)

This Privacy Policy is addressed to internet users who interact with the contextual advertisements served using K-Words technology on the pages of the websites of our publishing partners (hereinafter the “Partner Sites”). Our technology selects advertisements solely on the basis of the editorial content of the Partner Sites and not on the basis of your profile.

The purpose of this Policy is to inform visitors to the Partner Sites (hereinafter “Visitors”, “you”, “your”) about the processing of your personal data carried out by K-Words in this context, your rights in relation to such data and the procedures for exercising them.

This information is also provided, at the time of collection, on the Partner Sites through their consent management platform (CMP) and their own privacy policy.

This Policy does not cover processing carried out by K-Words on its own website <www.k-words.io> (contact forms, prospecting, applications), which is subject to a separate Privacy Policy available [here](#).

For all processing activities it carries out, K-Words undertakes to ensure confidentiality, integrity and security, in accordance with the General Data Protection Regulation EU No. 2016/679 (GDPR) and French Law No. 78-17 of 6 January 1978, as amended (French Data Protection Act).

1. Who are we?

K-Words SAS (hereinafter “K-Words” or “we”) is a company specialising in semantic contextual advertising, a service offered to Partner Sites. Its registered office is located at 8 rue du Commandant Pilot, 92200 Neuilly-sur-Seine, France, and it is registered with the Nanterre Trade and Companies Register under number 979 576 790.

K-Words technology does not enable targeted advertising based on Internet users’ profiles, advertising retargeting, or tracking Internet users across the different Partner Sites.

K-Words is a member of the Interactive Advertising Bureau Europe (IAB Europe) Transparency and Consent Framework for online advertising. Its identification number within this framework is Vendor (1635).

2. Who is the data controller? Who is the data processor?

The “data controller” within the meaning of the GDPR is the person who, alone or jointly with others, determines the purposes and means of the processing of personal data. The “data processor” is the person who acts on the instructions of the data controller.

For the processing activities described below, and depending on the circumstances, K-Words may qualify as either a data controller or a data processor.

3. What personal data do we collect?

Personal data is data that makes it possible to identify an individual directly or by cross-referencing it with other data.

In accordance with the principle of data minimisation (Article 5(1)(c) of the GDPR), we only process the technical personal data strictly necessary to serve contextual advertising appropriate to the page viewed and to measure its performance. We do not collect any directly identifying data such as your name, email address or postal address.

In the absence of an objection on your part, when you interact with a Partner Site we collect the following data:

- The IP address;
- Device and browser data (user agent);
- Geolocation data (city, country) inferred from the IP address, as well as latitude and longitude;
- The consent signal transmitted by the Partner Site’s CMP, indicating your choices (opt-out) regarding processing.

These data are never used as the basis for selecting the contextual advertisement served through K-Words technology, which relies exclusively on the content of the Partner Site page. They are necessary to route the advertising request to your device and to measure audience for reporting purposes.

With regard to the IP address, K-Words servers access it in real time to enable the delivery of contextual advertising. Such access is technically unavoidable, since every HTTP request necessarily carries the IP address of the transmitting device. However, the Visitor's IP address is never stored in clear text by K-Words servers, which pseudonymise it upon receipt by hashing it together with browser data (the user agent) to generate a fingerprint (hereinafter the "Visitor Unique Identifier").

PLEASE NOTE: If you object, via the Partner Site's CMP, to the processing of the technical data referred to above by K-Words, contextual advertising will continue to be served on the basis of the page content alone, in a degraded mode, since without such data K-Words cannot perform audience measurement, including the counting of unique visitors, which is necessary for reporting to the publishers of the Partner Sites.

4. For what purposes, on what legal basis do we process your data and how long do we retain it?

The table below sets out, for each purpose (in particular according to the IAB Europe TCF nomenclature available here – purposes highlighted in bold in the table), the applicable legal basis in accordance with Article 6 of the GDPR:

Purpose	Legal basis	Retention period
Purpose 7 – Measure advertising performance (audience) Measurement of "unique visitors" and reporting (clicks, revenue), based on the Visitor Unique Identifier	Our legitimate interest (Art. 6(1)(f) GDPR)	Visitor Unique Identifier: maximum 365 days from its creation; Other technical data (Section 3): not retained, real-time access only
Purpose 8 – Measure the performance of Partner Site content (audience) Measurement of "unique visitors" and reporting (clicks, revenue), based on the Visitor Unique Identifier	Our legitimate interest (Art. 6(1)(f) GDPR)	Visitor Unique Identifier: maximum 365 days from its creation; Other technical data (Section 3): not retained, real-time access only
Special Purpose 2 – Serve and present advertisements and content Technical delivery of contextual (non-personalised) advertising on the Partner Site page visited	Our legitimate interest (Art. 6(1)(f) GDPR)	Data not retained; real-time access only
Technical delivery of contextual advertising (collection and transmission to SSPs of technical data, performance measurement) without individual targeting or cross-site tracking		
Special Purpose 3 – Store and communicate privacy choices Transmission of the consent/objection choices you have expressed.	Our legitimate interest (Art. 6(1)(f) GDPR)	Data not retained; real-time access only
Handling requests to exercise GDPR rights (access, rectification, erasure, objection...)	Legal obligation (Art. 6(1)(c) GDPR)	5 years from closure of the request (general statutory limitation period)

5. To whom are your data disclosed?

In the context of serving contextual advertising, the technical personal data described above are transmitted to SSPs in order to enable matching with advertisers and the real-time delivery of advertising on the page of the Partner Site being viewed.

K-Words may use technical service providers acting as data processors within the meaning of Article 28 of the GDPR, in particular for the hosting and security of its infrastructure. Such providers act only on K-Words' instructions and are bound by contractual provisions compliant with the GDPR.

K-Words may also be required to disclose data in order to comply with a legal obligation or a request from a competent judicial or administrative authority. We never sell your personal data to third parties.

6. Transfers outside the European Union

Where data are transferred to a third country that does not benefit from an adequacy decision from the European Commission, K-Words implements the appropriate safeguards provided for under Articles 46 et seq. of the GDPR, including the Standard Contractual Clauses (SCCs) adopted by the European Commission.

You may obtain a copy of these safeguards at any time using the contact details provided in this Privacy Policy.

7. Your rights regarding your personal data

You may at any time modify or withdraw your consent to the loading of the K-Words script via the consent management platform (CMP) of the relevant Partner Site, generally accessible from the banner or footer of that Site. Withdrawal of consent does not affect the lawfulness of processing carried out by K-Words prior to such withdrawal.

You may also exercise with K-Words all rights provided for under Articles 15 to 22 of the GDPR, as described below.

You have the rights provided for under Articles 15 to 22 of the GDPR, as described below. However, as indicated in Section 3, K-Words does not retain the technical personal data it processes, with the exception of the Visitor Unique Identifier as defined in Section 3. As the purposes described in this Policy do not require you to be identified (Article 11(1) of the GDPR), exercising your rights of access, rectification, erasure, objection and restriction requires you to provide us with the IP address you were using, so that we can recalculate the corresponding fingerprint (Articles 11(2) and 12(6) of the GDPR). Failing this, K-Words may be unable to respond to your request and will inform you accordingly.

Right of access

You may at any time ask us to provide you with all personal data concerning you held by K-Words. This right is provided for by Article 15 of the GDPR.

Given the nature of the data processed, the data that may be provided to you are limited to the technical data linked to the relevant fingerprint, as K-Words does not hold any profile or directly identifying data concerning you.

We may refuse your request in several cases:

- your request is “unfounded”;
- your request is “excessive”;
- your request adversely affects the rights of other individuals (for example, copyright or where disclosure of personal data relating to a third party cannot be avoided).

Right to rectification

To the extent applicable, you may ask us to amend your personal data that are inaccurate, incomplete or outdated in accordance with Article 16 of the GDPR.

Right to restriction of processing

You may ask us to restrict the processing of your personal data in certain cases defined in Article 18 of the GDPR.

Right to object

In accordance with Article 21 of the GDPR, this right allows you to object to processing carried out for a specific purpose, provided that you can demonstrate “grounds relating to your particular situation”.

K-Words may nevertheless refuse your objection in certain cases, including where:

- there are compelling legitimate grounds for processing your personal data;
- your personal data are necessary for the establishment, exercise or defence of legal claims;
- a legal obligation requires K-Words to process your personal data.

Right to erasure (“right to be forgotten”)

You may request the deletion of your personal data under the conditions provided for by applicable laws, in accordance with Article 17 of the GDPR.

K-Words may nevertheless refuse your erasure request, in particular where:

- your personal data are necessary for exercising the right to freedom of expression and information;
- your personal data are necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes;

- a legal obligation requires K-Words to process your data;
- your personal data are necessary for the establishment, exercise or defence of legal claims.

Right to data portability

The right to data portability provided for in Article 20 of the GDPR applies only to automated processing based on consent within the meaning of Article 6(1)(a) of the GDPR or on the performance of a contract. The processing carried out by K-Words under the GDPR in connection with its contextual advertising service is based on legitimate interest (Article 6(1)(f) of the GDPR). Accordingly, the right to data portability does not apply to such processing.

How can you exercise your rights?

You may exercise the rights listed above by writing to our Data Protection Officer (DPO) using the contact details below. In doing so, you must clearly indicate the right(s) you wish to exercise and which personal data are concerned.

- By email: dpo@k-words.io
- By post: K-Words SAS, Data Protection Contact, 8 rue du Commandant Pilot, 92200 Neuilly-sur-Seine, France

We undertake to respond to any request within one month of receipt. This period may be extended to three months in the event of a complex or multiple request, in which case we will inform you.

Your identity may be verified before your request is processed. Proof of identity may be requested where there is reasonable doubt.

Right to lodge a complaint with the CNIL

If you believe that your rights are not being respected, you may lodge a complaint with the competent data protection supervisory authority pursuant to Article 77 of the GDPR. In France, the competent authority is the Commission Nationale de l'Informatique et des Libertés (CNIL), whose services can be accessed at: <https://www.cnil.fr/fr/plaintes>.

8. Data security

K-Words undertakes to ensure the confidentiality of the data collected and to implement appropriate technical and organisational measures to protect their security and integrity, in particular against destruction, loss, alteration, disclosure or unauthorised access, in accordance with Article 32 of the GDPR.

In the event of a personal data breach likely to result in a high risk to your rights and freedoms, you will be informed as soon as possible, in accordance with Article 34 of the GDPR.

9. Minors

K-Words' service is not intended for minors. Given the contextual nature of its service and the absence of direct identification of individuals, K-Words is unable to know the age of Visitors or identify whether data relates to a minor.

If you are a parent or legal guardian and believe that we may be processing personal data concerning your minor child, please contact our Data Protection Officer (DPO) directly at the following email address: dpo@k-words.io so that we can delete such data. Deletion will be carried out subject to the conditions and limitations described in the "Your rights" section of this Policy.

10. Amendments

This Privacy Policy may be amended to take account of any legal, regulatory or case-law developments, or changes to our services. The version in force is the version available on the Site on the date of consultation. You are therefore invited to consult the latest version of this Policy regularly.

Effective date: 1 July 2026