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June 17, 2021

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**VIA EDGAR**

United States Securities and Exchange Commission  
Division of Corporation Finance  
Office of Technology  
100 F Street, N.E.  
Washington, D.C. 20549-6010

Attention: Brittany Ebbert  
Kathleen Collins  
Alexandra Barone  
Larry Spirgel

Re: **Tremor International Ltd.**  
**Amendment No. 2 to the Registration Statement on Form F-1**  
**Filed June 14, 2021**  
**SEC File No. 333-256452**

Ladies and Gentlemen:

On behalf of Tremor International Ltd. (the "**Company**"), we are responding to oral comments received by conference call on June 16, 2021 (the "**Comments**") from the staff (the "**Staff**") of the United States Securities and Exchange Commission (the "**Commission**") with respect to the Amendment No. 2 to the Registration Statement of the Company filed with the Commission on Form F-1/A on June 14, 2021 (the "**Registration Statement**"). Your comments and our responses thereto are set forth below:

**1. Please add footnotes describing the beneficial ownership of the four principal shareholder funds listed on page 116 of the Registration Statement.**

*Response:* The Company respectfully acknowledges the Staff's comment and has revised the disclosure on pages 116 and 117 of the Registration Statement.

\* \* \*

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**LATHAM & WATKINS**

We hope the foregoing answers are responsive to your comments. Please do not hesitate to contact me by telephone at +44.20.7710.4669 with any questions or comments regarding this correspondence.

Very truly yours,

/s/ Ryan Benedict

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Ryan Benedict of  
LATHAM & WATKINS LLP

cc: Ofer Druker, Tremor International Ltd.  
Sagi Niri, Tremor International Ltd.  
Josh Kiernan, Latham & Watkins LLP  
Tuvia Geffen, Naschitz, Brandes, Amir & Co., Advocates