LATHAM®WATKINS

June 17, 2021

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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 Ebbertt

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:

 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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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

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