

Twin Privacy Policy

Last Updated: 17.12.2018

Hello and Welcome to our Privacy Policy!

This Privacy Policy of *Hayal Ortakları Derneği İktisadi İşletmesi* (We will call it “**Twin**”, “**We**” or “**Us**” in the text from now on) a business incorporated under Turkish Laws with its registered address at *Nişantepe Mah. Orman Sok. No:13, Özyeğin Üniversitesi Öğrenci Merkezi, No:34-36, 34794 Alemdağ, Çekmeköy, İstanbul, Turkey* aims to inform you on the processing of and the choices you have with respect to the information you share with us via Twin Guide Mobile App or any other ways (e.g. visiting our webpage or contacting us through e-mail). Therefore, we advise you to read it thoroughly.

You need to approve the Twin Terms of Use and Twin Privacy Policy before you can start using the Twin Guide Mobile App. If you do not agree to the terms in this Privacy Policy, you should not use any services provided by us, including the Mobile App and our website. If you want to contact Twin, but on the condition that your information is not used for the purposes explained below, you need to state that in your communication with us.

1. Introduction and Basics

This Privacy Policy includes information on the principles we adhere to and our practices regarding privacy of your personal information that we collect and process. Information that is not considered personal data, falls outside the scope of this Privacy Policy.

We may update this Privacy Policy from time to time, for instance when we start providing new services or when changes in regulations oblige us to provide you with new information. Updates are binding from the update date onwards. Therefore, we recommend you to visit this page regularly and get most up-to-date information on the policy applied to your personal information.

Data Controller for the information you provide to Twin is *Hayal Ortakları Derneği İktisadi İşletmesi*. So you should direct your requests to our e-mail address (info@yga.org.tr) or our physical address which can be found at the bottom end of this Privacy Policy.

As stated in our Terms of Use, Twin Guide Mobile App and all other services we provide are directed at persons older than 18 years. If you are younger, you may use our services only via your parent or legal guardian and under their supervision. If you provide us with any information about children, you guarantee that you have the permission of their parent or legal guardian to do so.

Purpose of this privacy policy is:

- To explain, in the most transparent and readable way possible, our ways and purposes of using the data we collect for creating a better mobile app and providing a better experience for you;
- To clarify the types of information we collect upon your permission and the purposes and methods for processing of them;
- To inform you on the third parties we transfer this information to as well as our purpose and method in doing so;
- To let you know your legal rights with respect to your personal data;
- To describe the extent of our responsibility for protection of your rights and privacy.

2. General Principles

We will always act in compliance with applicable regulations and respect your personal rights to the greatest extent.

We want you to know that we will always adhere to the following principles as a result of the caution and respect we have for your personal information:

- We will act lawfully and fairly and we will be transparent about our processing activities.
- We will take necessary steps to ensure that your information is accurate, and when necessary, up to date.
- We will process your information for specified, explicit and legitimate purposes and only as long as we need to process them. We will not use your information for any purpose incompatible with those original purposes.
- We will only process information that is adequate, relevant and limited with our purposes. Which means we will not request from you any information we do not need and we will dispose of any information that becomes irrelevant.
- We will ensure safety of your personal information and take necessary measures to protect it against unlawful access, damage, and destruction.

In the following parts of this Policy, you may find detailed information on how we will apply these principles in practice.

3. What Information We Collect

We collect following information through the Twin Guide Mobile App and other ways you share information with us:

- Information you give to us by yourself while registering to our Mobile App or while using or contacting Twin, such as your name, birthdate, telephone number and e-mail address, some of which may identify you personally.
- Information we generate or obtain during your use of Twin Guide Mobile App, our website or other services we provide. Examples to this include your IP Address and location; products or services that you purchase and use; information relating to the browser and device you are using, other information necessary to identify your device, account information for the platform you use (e.g. IOS App Store or Google Play Store) to download the App and to purchase the in-app content; technical information of the device you use, your language preferences, information collected from your device's sensors and receptors such as your momentum, direction etc. and your interactions with our services such as the content and webpages you have viewed.
- We may also match the information gathered from our third-party business partners with your user profile. **An example of this is the information transmitted by Facebook to us when you register with Facebook.** When you use apps or websites that we have partnerships (direct or indirect) with, information related to your use of such webpages may be transmitted to us.

If you fail to give information to us, or in case you mislead us with the information you give, you may be unable to use our services.

When your information changes, you can update most fields through the settings section of our App. If you want to change information that cannot be accessed this way, you may always contact us on info@yga.org.tr.

4. How We Use Your Information

We use the collected information for following purposes, each with some examples in following paragraph, but our use is not limited to those examples and may include similar other uses:

- To facilitate your use of our App and its content.

For instance, when you want to share a video you have recorded to our app, we might use your name and other information to show together with the video on the App.

- To let you utilize your user account.

We match your purchased products and services with your user account so that when you change your device, you can use them in your new device by logging in to your account.

- To recognize and help you with our customer support.

When you contact us for a problem you are facing in the app, we may use the technical information we have about your device to understand the underlying reason and to find a possible solution.

- To provide better services.

By following your interactions with our app, we can keep track of which products and services are used and ensure that the new content we provide is interesting for all of our users.

- To contact you when needed.

When there is an issue related to a payment you make, we may contact you to resolve it. Or when you contact us through different channels, we record those communications so we can look into the issue and respond to you.

- Promotion and Marketing.

Thanks to the information we have, we can create exclusive promotions for you and let you know. Additionally, we can offer benefits for recommending us to your friends and then we use the information of you and your friend to validate such benefits.

We do not send marketing material unless we have your prior approval. If you have given approval, we can send you promotional bulletins related to Twin and other services that we think may be of interest to you. If you do not wish to receive those bulletins anymore, you can follow the instructions within them or you may send a message to info@yga.org.tr explaining your request. Please include your e-mail address and/or phone number in your message so that we can know to which contact details we should not send promotions any more.

- To ensure the safety and security of our services.

We may need to make various controls and examinations on your personal information to prevent unlawful and fraudulent transactions. These procedures may include automatic algorithms as well as human effort under set rules. If you learn that a transaction you make has been rejected as a result of those procedures, you may contact us via e-mail on info@yga.org.tr to object that result.

- Other instances based on your request.

When we allow you to interact with other users or review our content, we need to use your information to facilitate your interactions and to publish your reviews.

- To meet our legal obligations and to resolve disputes.

Some legal regulations bring rules governing our use of your information. For instance, the Law No. 5651 on Regulation of Publications on The Internet and Combating Crimes Committed by Means of Such Publication requires us to keep logs for your access to our app and website. Other regulations in various fields such as tax and commerce may also require us to retain information relating to our operations (which may include your information).

Also when there is a legal dispute, we may review the information we hold and serve it to courts and other authorities.

5. Our Legal Basis for Processing Your Information

- We may need to process your personal data for performance of the contracts executed between you and us when you start using our App or other services and products we provide.
- We may use your personal data for our legitimate interests unless such use is against your interests in a way overriding our legitimate interest. For instance, we may use the information about your past transactions for giving you the means to review your activity log as well as to make statistical research which help us improve our services.
- We may rely on your consent for purposes such as sending you marketing material and obtaining your opinion in voluntary surveys. In those cases, you can always withdraw your consent by sending a notification by e-mail to info@yga.org.tr or to our physical address at the end of this Policy. You should include information that enable us to recognize you in that notification. Your notification of withdrawal of your consent will be effective in the future and therefore will not make our prior processing unlawful but it will make us cease to process those information from the receipt of your notification onwards.

6. Cookies and Tracking Mechanisms

When you use our App or website, we or our business partners may place cookies (small text files) to gather information on your use and to utilize the information for providing our functions, managing our infrastructure and marketing. If your wish is not to accept those cookies, you may change the settings of your browser to reflect that. Cookies stored on your local drive are expired after a certain period of time and you can delete them any time through respective settings of your browser. But your refusal of cookies may hinder with your use of our website and other services.

This website uses a web analytics tool named Google Analytics developed by Google Inc. ("Google") Google Analytics utilizes cookies and other identifiers to help website owners analyze the use of their website by their visitors and for rendering of the services provided by Google. Information related to your use of the website may be transferred to Google's servers located in various countries and be processed by Google at those locations. Google shall use this information for analyzing your use of web, drafting reports on the use of website for website owners and providing other services related to internet use (e.g. creating user segmentations). Google may transfer this information to third persons upon legal obligations and/ when third persons process this information on behalf of Google. If you do not want your information to be used for Google Analytics, you may use the following link to opt-out: <https://tools.google.com/dlpage/gaoptout/>

7. Transfer of Information to Third Parties

We make use of third party service providers that help us with providing better services. Our use of those third-party service providers sometimes requires us to share some information with them. But in any case, we will keep being responsible for safety of your personal data and inform you on those transfers, whenever it is feasible to do so. Besides, we will never sell your information to any third party that uses them for purposes incompatible with those we state here.

We utilize some third-party services and software such as **Fabric, Mapbox, Adjust and Netmera to** provide some features (such as maps) within our App. We may transmit some information about your registration as well as your device model, software, viewed area, location, user behavior and habits to these providers for them to help with developing and providing our services. We take necessary guarantees from them to protect your information and to use it for specified purposes only. They may transfer your information when they are using another third party service provider (subject to the same guarantees) or in other lawful cases.

You may purchase the digital content within the Twin Guide Mobile App via App Store or Google Play Store, depending on the device you are using. In those cases, you give your payment details including credit card and billing information to the respective store and we have no access to those. Yet Twin may transfer to the respective store a limited portion of information such as the name of the content you purchase to facilitate the payments and those platforms may match this information with the user account you use there which enables you to use your content on any device you use with the same store account. Responsibility for the information held by the respective store belongs to you and the operators of those stores only. We recommend you to view their privacy policies for more guidance on these subjects.

We can charge you through your mobile carrier for the digital content within our app if you use the carrier(s) we are associated with. In those cases, we may transfer your phone number, name and surname as well as other information related to your account and purchase to the respective carrier for facilitation of the payments to our associated mobile carrier.

When we accept credit card payments or other methods that may be of use to you, we transfer your payment information as well as some account information to our payment service providers for realizing the payments and prevention of fraudulent transactions.

We often collaborate with third-party business partners to provide discounts and free content to you. In those cases we may transfer the information that you need to provide in order to utilize the promotion as well as some of your account information to those third parties for enabling you to benefit from the promotion and to prevent fraudulent participations and misuse.

Law enforcement agents and other authorities may request information from us. We will share your information only when there is a legal obligation to do so; or when it is necessary to prevent and/or prosecute a crime and all those transfers will be lawful at all times.

8. Transfers to Third Countries

By approving this Privacy Policy, you agree to international transfer of your personal data. Our Information Technology infrastructure and servers are located within different countries including Turkey and those within the European Union. You should know that these countries where we transfer your personal data may include those not designated as providing adequate legal safeguards for protection of personal data by European Commission, e.g. Turkey. Also, some of the third parties stipulated above may be located in various countries. We guarantee that your personal data is only transferred to countries

regarded to be providing adequate safeguards or to parties that guarantee to ensure the safety of your personal information.

In case you do not approve those international transfers, you should stop using our App as well as other services we provide and you should request erasure of your information by sending an e-mail to info@yga.org.tr .

9. Data Retention

We keep your personal data only for a reasonable amount of time that allows us to provide our services and meet legal requirements. Some information including your e-mail address, name and purchase history are retained for the time period your user account remains active. After your account has been deactivated, we keep retaining those information to meet legal requirements and to keep statistics which help us improve our services. The period we keep the information such as usage statistics and interactions with the App may be shorter. These periods always overlap with the amount of time that the information remains relevant and reasonably up-to-date and may vary from one category of information to another. After those retention periods, we delete or anonymize your personal information so that they can no longer be associated with you. To request erasure of your information before the retention periods end and to request more information about this issue, you may always contact us on info@yga.org.tr .

10. Information Security

In line with the personal data protection rules of both European Union and Turkey, we take reasonable measures to prevent unauthorized access to and unlawful use of personal data. We give priority to privacy and protection of personal data from the beginning until the end of our business processes and we provide you privacy-enhancing options as default.

The measures we take for protecting the personal information you give us includes both technical and physical restrictions. Only authorized and duly trained personnel can access your personal information and even their access is limited to the extent that they need it to do their job.

In case a data breach occurs despite all our efforts to prevent it, we will fulfil our obligation to inform you and relevant supervisory authorities about any breached information.

11. Your Rights

We want you to know that in line with regulations governing personal data you have following rights :

- (a) To learn: if we process your personal data, the types of data we process, sources we get your personal data from, third parties we transfer your personal data to within the country or internationally, the period for which we keep the personal data or how we determine that period;
- (b) To access your personal data and to request the data provided by you to be given to you or another data controller in a structured, commonly used and machine readable format,
- (c) To learn the purposes for which your personal data is processed and to query if they are used in a compatible manner with those purposes,
- (d) To object to and request restriction of processing of your personal data,
- (e) To request rectification of inaccurate and incomplete personal data about you,
- (f) To request erasure of your personal data when there is no legal basis for further processing,

- (g) To request notification of procedures such as erasure and rectification to other third parties to whom your personal data has been transferred,
- (h) To object to any negative consequences arising from automatic analysis of your personal data,
- (i) To request indemnification for any damages arising from unlawful processing of your personal data.

You can these rights by sending an e-mail to info@yga.org.tr or by sending a letter to our physical address at the end of this Policy. Your application should include the information you have given to us while registering or making use of our services.

12. Your Right to Complain - Applicable Law and Competent Courts

You can send your requests to our physical address below or e-mail us at info@yga.org.tr for issues related to this Privacy Policy. We will notify you of the result of your request within a reasonable period and at the latest within 30 days. Unless your request has been caused by our unlawful act and when it creates an extra burden for us, we may ask for a reasonable fee to be paid for completion of your request. If you are not satisfied with the result of your application, you can lodge a complaint before the Personal Data Protection Board of Turkey.

Additionally, you can use your right to request indemnification as stated in the article 12/I above, in Istanbul Central Courts of The Republic of Turkey.

Laws of The Republic of Turkey shall apply, to the greatest extent permitted by law, to your relationship with Twin and the issues included in this Privacy Policy.

* * *

Information About The Data Controller

Trade Name : Hayal Ortakları Derneği İktisadi İşletmesi

Address : Nişantepe Mah. Orman Sok. No:13, Özyeğin Üniversitesi Öğrenci Merkezi, No:34-36, 34794 Alemdağ, Çekmeköy, İstanbul, Turkey

Trade Registry/

Registration # : İstanbul Trade Registry / 762234-0

MERSIS #

(Central Registry) : 1321-4658-8685-9444

Tax Office : Sultanbeyli Tax Office

Tax ID # : 460043640

Website : <http://www.twin.com.tr>

E-mail : info@yga.org.tr