

Effective date: August 05, 2024

1. Introduction

A State of Mobilion Biliřim Teknolojileri řirketi (“Mobilion”, “Company”, “we,” “us”, or “our”) provides this privacy policy (“Privacy Policy”) to explain our practice regarding the collection, use, share and protection of information in relation to its mobile application gChat (“The App”, “App”)

Mobilion takes your privacy seriously. This Privacy Policy explains our data protection policy and describe the types of information we may process when you install and/or user the ‘The App’ software application for mobile devices.

2. Objective

Mobilion aims to process the personal data of users in accordance with general principles of privacy and the provisions of the applicable data protection legislation to the relevant person, particularly Law on Personal Data Protection No. 6698, (“PDP Law”) and other applicable legislation. In addition to the PDP Law, this policy also stipulates the extra rights of the individuals, where General Data Protection Regulation (European Union) 2016/679 is applicable.

Your personal data, which you provided/will provide to our Company and/or obtained by our Company by any external means, may be processed by our Company as “Data Controller”;

- In the context of the objective of processing your personal data and in connection with this purpose, in a limited and measured manner,
- By maintaining the accuracy and up-to-date version of the personal data as reported or notified to our Company,
- May be recorded, stored, preserved, reorganized and be transferred to the institutions authorized to request such personal data by law and shall be transferred, classified and shared with third parties within the country or abroad under the conditions stipulated by legislation and upon your explicit consent if necessary, and they may be processed by other means listed under the legislation and be subject to other procedures set forth in the legislation.

This Privacy Policy is adopted for the continuance and improvement of the activities carried out by Mobilion in line with the principles set forth in the PDP Law.

This Privacy Policy describes which data we collect, how we intend to use, store, protect and share the data we collect, how you can withdraw your consent for the processing of these data and how you can correct and revise the data.

This Privacy Policy applies to all visitors, users, and others who access app (“Users”, “you”). By accessing or using App you signify that you have read, understood and agree to our collection, storage, use and disclosure of your information as described in this Privacy Policy.

Capitalized terms in this Policy shall have the meanings specified in the Terms and Conditions unless defined separately in this Policy.

3. Collection of Personal Data and Method

Mobilion may process your personal data for the purposes specified in this Privacy Policy.

The personal data of users collected and used by Mobilion in particular, are as follows: your name and surname, email address and phone number which we will receive once you contact Mobilion; your order information if you make a purchase through in-app purchase, messages, phrases, text, information, photos, images, visual and audio records, and other data which you have uploaded or transmitted to The Application and identifier for advertisers designated in your mobile device used in accessing our services (The Identifier for Advertisers-IDFA), identifier for vendors/developers designated your mobile device (The Identifier for Vendors-IDVF) and Internet Protocol Address-IP Address.

Data Categories and Data Types	
Identity Information	Name and Surname
Contact Information	Phone Number, email adress
Process Security	Internet traffic data (network movements, IP address, visit data, time and date information), device name, In-app purchase history, Token ID (when you allow notifications through your device), identifier for advertisers designated in your mobile device used in accessing our services (if you give a permission, the Identifier for Advertisers-IDFA), identifier for vendors/developers designated your mobile device (The Identifier for Vendors-IDVF), User Device ID, Platform (iOS/Android), Device OSVersion, App Version, First request time, Language, Region/Country, Timezone, Model
User Content	Messages, posts, communication, statements, information, phrases entries, text, questions, answers, materials, images, photos, visual records, graphics and any content, record or data that you provide, upload, transmit, create, store, use, edit or share with or through App
Visual	The Photo you take or upload; - Your images may be temporarily stored on our server for image recognition purposes. We use OpenAI technology to facilitate this process. - Photos and Videos: "We do not collect photos, GIFs, or videos when you upload them from your mobile devices while using the app. Generated photos and videos will be deleted from our server after 1 hour and can only be accessed locally on your device. - Facial Features: We do not collect facial feature data from your photos.

Generated Content	- The generated content will not be stored on our servers, and photos or videos that you upload as materials, as well as generated content, will not be stored on our server. - The app utilizes the OpenAI API for image recognition
Customer Transaction	Order Information
Marketing Data	IDFA, IDVF

We may collect your abovementioned data directly from you through electronic or physical mediums, your mobile device, third party applications or third party sources which you can access our application through these mediums such as Apple App Store, Google Play App Store (similar platforms together with “App Stores”), for the purposes of compliance with legal obligations, enhancing our services, administering your use of our services, as well as enabling you to enjoy and easily navigate our services.

We may collect your log data generated while you are using our services/applications (through our products or third party products). This log data may include information such as your device’s Internet Protocol (“IP”) address, device name, operating system version, the configuration of the app when utilizing our service/application, the time/date of your use of the service/application, and other statistics.

General Principles Regarding Personal Data Processing

In accordance with this Privacy Policy, personal data are processed by Mobilion as a data controller in line with the basic principles named here:

- (i) being in accordance with law and good faith,
- (ii) being accurate and, where necessary, up-to-date,
- (iii) being processed for specific, explicit and legitimate purposes,
- (iv) being limited for the purpose for which they are processed and data minimization;
- (v) being stored for the period stipulated in the relevant legislation or required for the purpose for which they are processed.

4. Purposes of Processing Personal Data and Legal Reasons

Your personal data will be processed via automatic or non-automatic means for the purposes stated below. In accordance with the applicable legislation and articles 5 and 6 of the PDP Law where it is expressly permitted by the laws, the establishment of a contract or direct relation to the execution or performance of the contract and for the legitimate interests of Mobilion provided that your fundamental rights and freedoms are protected.

a) Purposes Processing Personal Data

In accordance with this text, your personal data is processed for the following purposes in accordance with the above general conditions:

Identiy Information Customer Transaction	- Execution of activities in compliance with legislation - Execution of company/product/service commitment operations - Execution of communication activities - Execution/auditing of business activities - Conducting after-sales support services for goods/services - Execution of goods/services sales processes - Conducting storage and archieve activities - Execution of agreement process
Process Security	- Execution of information security process - Conducting audit/ethical activities - Execution/audit of business activities - Conducting activities to ensure business continutiy - Providing information to authorized persons, institutions and organizations
Customer Transactions	- Execution/auditing of business activities - Conducting after-sales support service for goods/services - Execution of goods/services sales processes - Conducting activities for customer satisfaction - Execution of agreement processes
User Content	- Operation of our product, e.g., to prepare texts and communication for you - Execution of activities in compliance with legislation - Execution of agreement processes - Conduction storage and archieve activities - Execution/auditing of business activities - Conductiong activities to ensure business continuity - Execution of activities for customer satisfaction - Improving our services (including training AI models)
Marketing Data	- Conducting marketing analysis studies - Execution of advertising/campaign/promotion procesees

Besides the purpose of processing personal data may be updated in line with our obligations arising from our company policies and legislation; in particular,

- Creating user accounts for the service recipients/application users,
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- Customizing our Services, understanding our users and their preferences to enhance user experience and enjoyment using our Services and improve our users' experience,
- Informing about new products, services and applications and delivering you information regarding advertisements and promotions,
- Carrying out a digital subscription and in-app purchase processes of service recipients,
- Carrying out the auto renewable subscription for giving users access to content, services, or premium features in our service,

- Carrying out the processes of information security and out strategic planning activities,
- Conducting activities in accordance with legislation,
- Fulfilling the demands of competent authorities,
- Conducting the processes of finance and accounting transactions,
- Conducting communication activities and the processes of contracts,
- Following up requests and complaints.

b) Legal Reasons

Contact Information	- It is necessary to process your personal data, provided that we establish a contractual relationship with you, or that it is directly related to our performance obligation arising from this contract - We have to process data in order to establish a right for you, to exercise and protect this right
Profile Information	- It is necessary to process your personal data, provided that we establish contractual relationship with you, or that it is directly related to our performance obligation arising from this contract - We have to process data in order to establish a right for you, to exercise and protect this right
User Content and Facial Data	- It is necessary to process your personal data, provided that we establish a contractual relationship with you, or that it is directly related to our performance obligation arising from this contract - We have to process data in order to establish a right for you, to exercise and protect this right - Processing is necessary for our legitimate interests, provided that your fundamental rights and freedoms of are not harmed
Process Security	- The law explicitly stipulates the process by which we process your personal data - Conditions that are necessary in order to fulfill our legal obligation - It is necessary to process your personal data, provided that we establish a contractual relationship with you, or that it is directly related to our performance obligation arising from this contract
Marketing Data	- Your explicit consent (acquired via Apple and/or Google)

Third Party Websites and Applications

This App; may contain links to other websites or apps that are unknown to Mobilion and whose content is not controlled. These linked websites or apps may contain terms and conditions other than Mobilion texts. Mobilion cannot be held responsible for the use or disclosure of information that these websites or apps may process. Likewise, Mobilion shall not have any responsibility for any links from other sites or apps provided to App owned by Mobilion.

We collect information by fair and lawful means, with your knowledge and consent. We also let you know why we're collecting it and how it will be used. You are free to refuse our request for this information, with the understanding that we may be unable to provide you with some of your desired services without it.

While using the this App, you may provide information through third party websites and apps to Mobilion, please be aware that your liability and obligations against third party apps or website will continue and Mobilion shall not be held responsible any terms, conditions, rules or policies determined by third parties.

Cookies

Cookies are little text files that are stored on the browser or hard drive of your computer or mobile device when you visit a webpage or application. Cookies allow a website to run more efficiently in addition to ensuring the presentation of personalized web pages in order to make you live a faster visit experience which is more fit for your specific personal needs and demands. Containing only data on your website visit history via the internet, cookies do not collect any information, including your personal data/files stored on your computer or mobile device. We may use cookies when it is necessary for operating our services, to enhance our service performance and functionality, and to deliver content, including ads relevant to your interests, on our sites, or third-party sites. You can delete cookies which are already present on your computer and prevent the recording/location of cookies on your internet explorer. Internet browsers are predefined to automatically accept the cookies as default. As the management of cookies varies from browser to browser, you may look at the help menu of the browser or application to get detailed information.

Push Notifications

Mobilion may occasionally send you push notifications via its mobile applications regarding application upgrades or notifications about our services. You can always edit such communication and notifications through the settings on your device and stop receiving such communications and notifications.

Your data will be stored for the duration specified in the applicable legislation or for a reasonable time until the purpose of processing cease to exist, or during legal periods of limitation.

Mobilion may continue to store your personal data, even after the expiry of the purpose of its use provided that it is required by other laws or a separate granted by you in this regard.

In cases that you allow Mobilion to store your personal data for additional time by giving your consent, such data shall be immediately deleted, destructed or anonymized upon the expiry of such additional time or once the purpose of processing no longer exists.

Technical and Administrative Measures

Mobilion stores the personal data it processes in accordance with relevant legislation for periods stipulated in relevant legislation or required for the purpose of processing. Mobilion undertakes to take all necessary technical and administrative measures and to take the due care to ensure the confidentiality, integrity and security of personal data. In this context, it takes the

necessary measures to prevent unlawful processing of personal data, unauthorized access to data, unlawful disclosure, modification or destruction of data. Accordingly, Mobilion takes the following technical and administrative measures regarding the personal data it processes:

Anti-virus application. On all computers and servers in Mobilion's information technology infrastructure, a periodically updated anti-virus application is installed.

Firewall. The data center and disaster recovery centers hosting Mobilion servers are protected by periodically updated software-loaded firewalls; the relevant next generation firewalls control the internet connections of all staff and provide protection against viruses and similar threats during this control.

VPN. Suppliers can access Mobilion servers or systems through SSL-VPN defined on Firewalls. A separate SSL-VPN identification has been made for each supplier; with the identification made, the supplier only provides access to the systems that it should use or is authorized to use.

User identifications. Mobilion employees' authorization to Mobilion systems is limited only to the extent necessary by job descriptions; in case of any change of authority or duty, systemic authorizations are also updated.

Information security threat and event management. Events that occur on Mobilion servers and firewalls, are transferred to the "Information Security Threat and Event Management" system. This system alerts the responsible staff when a security threat occurs and allows them to respond immediately to the threat.

Encryption. Sensitive data is stored with cryptographic methods and if required, transferred through environments encrypted with cryptographic methods and cryptographic keys are stored in secure and various environments.

Logging. All transaction records regarding sensitive data are securely logged.

Two-factor authentication. Remote access to sensitive data is allowed through at least two-factor authentication.

Penetration test. Periodically, penetration tests are performed on servers in the Mobilion system. The security gaps created as a result of this test are closed and a verification test is performed to show that the relevant security gaps have been closed. Besides, Information Security Threat and Event Management System automatically performs penetration tests. Test results are recorded.

Information Security Management System (ISMS). At the ISMS meetings made within Mobilion, the topics contained in the control forum are audited monthly by the director of information technology and the director of financial operations.

Training. In order to increase the awareness of Mobilion employees against various information security violations and to minimize the impact of the human factor in information violation incidents, trainings are provided to employees at regular intervals.

Physical Data Security. It ensures that personal data on papers is necessarily stored in lockers and accessed only by authorized persons. Adequate security measures (for situations such as electric leakage, fire, deluge, thievery etc.) are taken based on the nature of the environment where sensitive data is stored.

Backup. Mobilion periodically backs up the data it stores. As a backup mechanism, it uses the backup facilities provided by the cloud infrastructure providers, as well as the backup solutions it develops when deemed necessary, provided that it is in compliance with relevant legislation and provisions of this Policy.

Non-disclosure agreement. Non-disclosure agreements are concluded with employees taking part in sensitive personal data processing.

Transfer of sensitive personal data. If transfer of sensitive personal data is required through email; such transfer is done through

- encrypted corporate email
- Registered E-mail.

In the event that the personal data is damaged as a result of attacks on this app or on the Mobilion system, despite Mobilion taking the necessary information security measures, or the personal data is obtained by unauthorized third parties, Mobilion notifies this situation to Users immediately and, if necessary, to relevant data protection authority and takes necessary measures

5. Transferring Personal Data to Third Parties

The procedures and principles to be applied for transferring of personal data are regulated in articles 8 and 9 of the PDP Law, and the personal and special categories of data of the supplier may be transferred to third parties within the country or abroad since we may use servers and cloud systems located abroad.

Your personal data may be transferred abroad for the following reasons:

- Conducting storage and archive activities
- Conducting business activities
- Conducting after-sales support services for goods/services
- Managing customer relationship management processes

Mobilion may also transfer your personal data to services providers of our Company, third parties such as Facebook SDK, Adjust, Adapte and Firebase Analytics which are embedded into our service for the following purposes:

- Sharing identity, communication and transaction security information with authorized public institutions and organizations for the purpose of execution of activities in compliance with legislation, monitor and execution of legal affairs, informing authorized persons, institutions and organizations.
- Sharing identity and contact information to manage after-sales support services, conduct business activities and manage customer relationship management processes.

6. Your Rights as the Data Subject

Pursuant to Article 11 of the PDP Law, you may request the following regarding your personal data by applying to Mobilion:

- Learn whether or not your personal data have been processed;
- Demand for information as to if your personal data have been processed;
- Learn the purpose of the processing of personal data and whether data are used in accordance with their purpose;
- Know the third parties in the country or abroad to whom your personal data have been transferred;
- In case the personal data is processed incompletely or inaccurately; requesting notification of the transactions made under this scope to third parties to whom personal data have been transferred;
- Request deletion, destruction or anonymization of personal data if the reasons for the processing have disappeared and request notification of the transactions made under this scope to third parties to whom personal data have been transferred;
- Object to occurrence of any result that is to your detriment by means of the analysis of personal data exclusively through automated systems;
- Request compensation for the damages in case you incur damages due to unlawful processing of your personal data.

Where **General Data Protection Regulation (GDPR)** is applicable, data subjects have the following rights:

- Right of access - Learning whether personal data is being processed and, if so, accessing your personal data and the information regarding the processing of your personal data,
- Right to correction -To request the correction of information that you believe is inaccurate or the completion of information that you believe is incomplete by Mobilion,
- Right to delete – To request deletion of personal data under the conditions stipulated in GDPR,
- The right to restrict processing - To request the restriction of the processing of personal data under the conditions stipulated in the GDPR,
- Right to object to processing - To object to the processing of personal data under the conditions stipulated in the GDPR,
- Right to data portability - To request the data collected by Mobilion to be transferred directly to another organization or under certain conditions,
- Objection to the occurrence of a result against the person himself/herself, by analyzing the processed data exclusively through automatic systems, including profiling.

In the application that includes your explanations about the right you have as the data subject and exercise your rights stated above and that you request to exercise; your request must be explicit and understandable, if the subject of your request is related to you or if you are acting on behalf of someone else, you must be specially authorized in this regard and your authority must be documented, the application must contain identity and address information and documents proving your identity must be attached to the application. Our Company will enable you to file

such requests through the “Data Subject Application Form” at info@mobilion.com.tr In accordance with Article 13 of the PDP Law, our Company will finalize your requests, free of charge, within 30 (thirty) days at the latest depending on the nature of the request. In case the request is rejected, the reason or reasons for the rejection will be notified in writing or electronically along with its justification.

If you believe that we or someone with whom we have transferred your data is violating your rights, you can file a complaint to the data protection authority in your country and to other competent supervisory authorities.

This Privacy Policy may be revised by our Company when deemed necessary. If you continue to access this app and use or access this app without benefiting from the Services offered by Mobilion after the notification period, you shall be deemed to have allowed the changes in this Privacy Policy.

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