

ANTIQCAM PRIVACY POLICY

Effective Date: September 07, 2026

1. Introduction

Mobilion Bilişim Teknolojileri ve Reklam Pazarlama Ltd. Şti. (“Mobilion”, “Company”, “we”, “us”, or “our”) provides this Privacy Policy (“Privacy Policy”) to explain our practices regarding the collection, use, sharing and protection of information in relation to its mobile application **ANTIQCAM** (“The App”, “App”).

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

ANTIQCAM allows Users to take or upload photographs of products or objects, receive information about such products or objects through artificial intelligence technologies, conduct product and price research, share photographed products or objects with other Users and, where applicable, contact other Users through email in relation to shared content.

2. Objective

Mobilion aims to process the personal data of Users in accordance with general principles of privacy and the provisions of applicable data protection legislation, particularly the Turkish Law on Personal Data Protection No. 6698 (“PDP Law”) and other applicable legislation.

In addition to the PDP Law, this Policy also stipulates the additional rights of individuals where the General Data Protection Regulation (European Union) 2016/679 (“GDPR”) or other applicable data protection and privacy laws are applicable.

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

- In connection with the purpose of processing your personal data and in a limited and proportionate 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 transferred to institutions authorized to request such personal data by law,
- May be transferred, classified and shared with third parties within the country or abroad under the conditions stipulated by applicable legislation and upon your explicit consent where necessary,
- May be processed by other means listed under applicable legislation and be subject to other procedures permitted under applicable law.

This Privacy Policy is adopted for the continuation and improvement of activities carried out by Mobilion in line with the principles set forth in applicable data protection legislation.

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 where processing is based on consent, and how you can correct and revise your data.

This Privacy Policy applies to all visitors, Users and others who access the App (“Users”, “you”).

By accessing or using the App, you acknowledge that you have read and understood 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 may include the following:

your name and surname, username and profile information where provided; your email address; information which we receive once you contact Mobilion; messages, statements, texts, descriptions, information, photographs, images and other content which you upload, transmit, create or share through the App; photographs taken through the App or selected from your device; information generated in relation to products or objects analyzed through artificial intelligence technologies; product and price research information; information regarding products or objects shared with other Users; and technical information relating to the device used to access our Services.

Where applicable, we may also process device and application identifiers, Internet Protocol Address (“IP Address”), notification tokens and advertising identifiers where such identifiers are used and the necessary permissions have been obtained.

The existing Math AI policy similarly processes user-provided text/images, photos, device identifiers, IP address and technical device information.

Data Categories and Data Types

Identity Information

- Name and surname
- Username
- Account identifier
- Profile information, where provided

Contact Information

- Email address

Process Security

- Internet traffic data
- Network movements
- IP address
- Visit data
- Time and date information
- Device name
- Notification Token ID where notifications are allowed
- Device identifiers
- Platform (iOS/Android)
- Device operating system version
- App version

- First request time
- Language
- Region/Country
- Time zone
- Device model
- Similar technical and security-related information

User Content

- Messages
- Posts
- Communications
- Statements
- Information
- Descriptions
- Text
- Questions and answers
- Materials
- Product information
- Images
- Photographs
- Visual records
- Graphics
- Links
- Any content, record or data that you provide, upload, transmit, create, store, use, edit or share with or through the App

Visual Data

- Photographs taken through ANTIQCAM
- Photographs selected and uploaded from your device

AI Analysis Data

- Information generated based on photographs submitted through the App
- Product or object descriptions
- Possible product or object category
- Possible brand
- Possible model or type
- Product characteristics
- Materials

- Style
- Period or age-related estimates, where applicable
- Keywords
- Other AI-generated information relating to the photographed product or object

Product and Price Research Data

- Product names
- Product descriptions
- Search terms
- Search queries
- Product characteristics
- Publicly available product information
- Pricing information
- Comparable product information
- Marketplace information
- Website information
- Search and research results

User Sharing Information

- Products or objects shared by Users
- Product photographs
- Descriptions
- AI-generated information
- Other information intentionally shared with other Users through the App

Communication Information

- Email address
- Information necessary to enable communication between Users regarding products or objects shared through the App

Marketing Data

Where applicable and where the necessary permission or consent is obtained:

- Advertising identifiers such as IDFA
- Vendor or device identifiers used for marketing purposes

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

We may collect 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, configuration of the App when utilizing our Service, time/date of your use of the Service 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 following basic principles:

- (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 relevant, limited and proportionate to the purposes for which they are processed and in accordance with the principle of data minimization,
- (v) being stored for the period stipulated in relevant legislation or required for the purpose for which they are processed.

These principles are preserved from the existing Privacy Policy.

4. Purposes of Processing Personal Data and Legal Reasons

Your personal data may be processed through automatic or non-automatic means for the purposes stated below.

In accordance with applicable legislation, personal data may be processed where processing is expressly permitted by law, necessary for the establishment or performance of a contractual relationship, required for compliance with legal obligations, necessary for the establishment, exercise or protection of a right, necessary for Mobilion's legitimate interests provided that your fundamental rights and freedoms are protected, or based on your explicit consent where consent is required.

a) Purposes of Processing Personal Data

Identity Information / Contact Information

- Execution of activities in compliance with legislation
- Creating and managing User accounts
- Execution of Company/product/service commitment operations
- Execution of communication activities
- Execution and auditing of business activities
- Conducting User support services
- Conducting storage and archive activities
- Execution of agreement processes
- Following up User requests and complaints

Process Security

- Execution of information security processes
- Conducting audit activities

- Execution and auditing of business activities
- Conducting activities to ensure business continuity
- Preventing unauthorized access
- Detecting and preventing misuse, fraud, spam or other prohibited activities
- Providing information to authorized persons, institutions and organizations where required by law

User Content / Visual Data

- Operation of the App
- Enabling Users to take photographs through the App
- Enabling Users to upload photographs from their devices
- Processing photographs in order to provide product or object information
- Enabling Users to store and manage their content
- Enabling Users to share products or objects with other Users
- Displaying User-shared content to other Users
- Execution of activities in compliance with legislation
- Execution of agreement processes
- Conducting storage and archive activities
- Execution and auditing of business activities
- Conducting activities to ensure business continuity
- Improving the functionality, performance and reliability of the Services

AI Analysis Data

- Analyzing photographs uploaded or captured by Users
- Identifying or categorizing products or objects
- Providing information regarding photographed products or objects
- Generating descriptions
- Identifying possible product characteristics
- Identifying possible brands, models, categories, materials, styles, periods or similar characteristics
- Generating information requested by Users
- Supporting product research functionality
- Improving the functionality and performance of the App

AI-generated information may not always be complete, accurate or correct.

Product and Price Research Data

- Conducting product research
- Conducting price research
- Generating relevant product search queries

- Finding publicly available product and pricing information
- Providing comparable product information
- Providing marketplace and external website information
- Providing price-related research results
- Improving product and price research functionality

User Sharing Information

- Enabling Users to publish or share products or objects
- Allowing other Users to view shared products or objects
- Displaying photographs, descriptions, AI-generated information and related information selected by the User for sharing
- Enabling interaction between Users regarding shared products or objects

Communication Information

- Enabling Users to contact other Users regarding products or objects shared through the App
- Making an email address available to another User where necessary for the User-to-User contact functionality
- Facilitating communication between Users

Where a User voluntarily chooses to use the User-to-User contact functionality, the relevant email address may be disclosed or made available to the other User for the purpose of communication relating to the relevant product or object.

Email addresses obtained through ANTIQCAM must not be used for unsolicited marketing, spam, harassment or unlawful purposes.

Where Users subsequently communicate through independent third-party email services, such communications may also be subject to the terms and privacy policies of the relevant email providers.

Marketing Data

Where applicable:

- Conducting marketing analysis studies
- Execution of advertising, campaign and promotion processes

Marketing-related personal data will only be processed where permitted under applicable law and where the necessary consent or platform permission has been obtained.

Besides the purposes specified above, personal data may also be processed for purposes including:

- Creating User accounts for application Users,
- Providing AI-supported product and object analysis,
- Conducting product and price research,
- Enabling Users to share products or objects with other Users,
- Enabling Users to communicate regarding shared products or objects,
- Customizing our Services,

- Understanding our Users and their preferences in order to improve User experience,
- Informing Users regarding the App and our Services,
- Carrying out information security processes,
- Conducting activities in accordance with applicable legislation,
- Fulfilling requests of competent authorities,
- Conducting communication activities,
- Following up requests and complaints.

b) Legal Reasons

Contact Information / Identity Information

Personal data may be processed where:

- It is necessary to process your personal data for the establishment or performance of a contractual relationship with you,
- Processing is directly related to our performance obligations arising from such relationship,
- Processing is necessary for the establishment, exercise or protection of a right,
- Processing is necessary to comply with our legal obligations,
- Processing is necessary for Mobilion's legitimate interests, provided that your fundamental rights and freedoms are protected.

User Content / Visual Data / AI Analysis Data / Product and Price Research Data

Personal data may be processed where:

- Processing is necessary in order to provide the Services requested by you,
- Processing is necessary for the establishment or performance of our contractual relationship with you,
- Processing is necessary for the establishment, exercise or protection of a right,
- Processing is necessary for Mobilion's legitimate interests, provided that your fundamental rights and freedoms are not harmed,
- Your explicit consent is obtained where consent is legally required.

User Sharing Information / Communication Information

Where you voluntarily choose to share a product or object through ANTIQCAM or use functionality that enables another User to contact you, related information may be processed in order to provide such functionality.

Where applicable, your email address may be made available to another User for the purpose of enabling communication regarding a product or object shared through the App.

Process Security

Personal data may be processed where:

- Processing is expressly permitted or required by law,
- Processing is necessary for compliance with our legal obligations,

- Processing is necessary for the establishment or performance of a contractual relationship,
- Processing is necessary for Mobilion's legitimate interests in maintaining the security and integrity of the App and Services, provided that your fundamental rights and freedoms are protected.

Marketing Data

Marketing Data may be processed based on:

- Your explicit consent where required,
- Permissions obtained through Apple, Google or other applicable platforms where applicable.

Third-Party Websites and Applications

The App may contain links to other websites, marketplaces, applications or services that are unknown to Mobilion or whose content is not controlled by Mobilion.

These linked websites or applications may contain terms and conditions and privacy policies different from those of Mobilion.

Mobilion cannot be held responsible for the use or disclosure of information that independent third-party websites or applications may process.

Likewise, Mobilion shall not have responsibility for links from other websites or applications to the App.

ANTIQCAM may provide links, product information, marketplace information, search results or pricing information obtained through third-party websites or services as part of its product and price research functionality.

Such third-party websites, marketplaces and services operate independently from Mobilion.

We collect information by fair and lawful means and, where required, with your knowledge and consent.

We inform you why information is being collected and how it will be used.

You are free to refuse requests for certain information, with the understanding that we may be unable to provide certain functions or Services without such information.

While using the App, you may provide information through third-party websites and applications to Mobilion. Please be aware that your rights and obligations regarding such third-party applications or websites may also be subject to their own terms, conditions, rules and privacy policies.

The source Privacy Policy uses the same approach for third-party websites and applications.

Cookies

Cookies are small text files that may be stored on a browser, computer or mobile device when you visit a webpage or use certain online services.

Where Mobilion or ANTIQCAM uses web-based services or similar technologies, cookies and comparable technologies may be used where necessary for operating our Services, enhancing performance and functionality, security, analytics or, where permitted and consented to, advertising purposes.

You may manage cookies and similar technologies through the relevant browser, device or application settings where applicable.

Push Notifications

Mobilion may occasionally send you push notifications through the App regarding application updates, User interactions, shared content, product-related activity or other notifications concerning our Services.

You may change notification settings through your device settings and stop receiving push notifications.

Data Retention

Your personal data will be stored for the duration specified in applicable legislation or for a reasonable period until the purpose of processing ceases to exist, or during applicable statutory limitation periods.

Mobilion may continue to store your personal data after the original purpose of processing has ceased where retention is required by applicable legislation or another valid legal basis exists.

Where your consent constitutes the basis for additional storage, such personal data will be deleted, destroyed or anonymized after the relevant consent is withdrawn or the processing purpose ceases to exist, unless continued retention is required under applicable law.

Content shared by Users through ANTIQCAM may remain available until deleted by the User, the relevant account is deleted, the User changes the sharing settings where such functionality is available, or Mobilion removes the content in accordance with applicable law, its Terms and Conditions or other applicable policies.

The source policy similarly provides for retention until the processing purpose ceases or applicable statutory periods expire.

Technical and Administrative Measures

Mobilion stores personal data in accordance with applicable legislation for the periods stipulated in relevant legislation or required for the purpose of processing.

Mobilion undertakes to take necessary technical and administrative measures and exercise appropriate care to ensure the confidentiality, integrity and security of personal data.

In this context, Mobilion takes necessary measures to prevent:

- unlawful processing of personal data,
- unauthorized access to personal data,
- unlawful disclosure,
- unlawful modification,
- unlawful destruction or loss.

Accordingly, Mobilion may take the following technical and administrative measures regarding personal data:

Anti-virus Applications

Appropriate endpoint and security software may be used on Mobilion information technology systems.

Firewall

Servers, networks and relevant infrastructure may be protected through firewalls and other network security technologies.

VPN

Where remote access to Mobilion systems is required, secure remote-access technologies may be used and access may be limited according to authorization.

User Authorization

Mobilion employees' access to systems is limited according to their roles and responsibilities.

Where an employee's duties or authorization changes, related system permissions may also be updated.

Information Security Threat and Event Management

Events relating to Mobilion systems may be logged and monitored in order to detect and respond to potential information security threats.

Encryption

Where appropriate, personal data may be stored and/or transmitted through cryptographic methods and secure communication technologies.

Logging

Relevant system and transaction records may be securely logged for security, audit and compliance purposes.

Multi-Factor Authentication

Where appropriate, remote or privileged access to sensitive systems may be protected using multi-factor authentication mechanisms.

Penetration Tests and Security Assessments

Mobilion may periodically conduct security assessments and penetration tests and take measures to address identified vulnerabilities.

Information Security Management

Mobilion maintains organizational processes intended to manage and monitor information security risks.

Training

Mobilion employees may receive training regarding information security and personal data protection.

Physical Data Security

Appropriate physical measures may be implemented where personal data is processed or stored in physical environments.

Backup

Mobilion may periodically back up relevant data using cloud infrastructure providers and/or other backup solutions, subject to applicable legislation.

Confidentiality

Employees, contractors and service providers involved in personal data processing may be subject to confidentiality obligations.

In the event that personal data is unlawfully accessed, damaged or obtained by unauthorized third parties despite appropriate security measures, Mobilion will take measures and provide notifications to affected Users and/or competent authorities where required by applicable law.

The source Policy contains substantially the same categories of security measures, including encryption, logging, MFA, penetration testing, training and backup.

5. Transferring Personal Data to Third Parties

The procedures and principles applicable to the transfer of personal data are governed by applicable data protection legislation.

Personal data may be transferred to third parties within the country or abroad where required to provide ANTIQCAM Services and where such transfer complies with applicable legislation.

As ANTIQCAM may be provided globally and Mobilion may use cloud infrastructure, artificial intelligence technologies and other service providers operating internationally, your personal data may be processed through servers, systems or service providers located outside your country of residence.

Your personal data may be transferred for purposes including:

- Conducting storage and archive activities,
- Providing cloud infrastructure and hosting,
- Conducting business activities,
- Providing application functionality,
- Providing artificial intelligence-supported product or object analysis,
- Providing product and price research functionality,
- Conducting User support services,
- Managing User communications,
- Maintaining information security,
- Preventing fraud, spam and abuse,
- Providing analytics and technical diagnostics where applicable.

Mobilion may transfer personal data to service providers and third parties that support ANTIQCAM, including, where applicable:

- Cloud hosting and storage providers,
- Artificial intelligence service providers,
- Product research and price information service providers,
- Search service providers,
- Analytics and crash reporting providers,
- Authentication service providers,
- Push notification providers,
- Security providers,
- Apple,
- Google,
- Other technology providers necessary for the operation of the App.

Personal data may also be transferred to authorized public institutions and organizations where required for:

- Conducting activities in compliance with legislation,
- Monitoring and execution of legal affairs,

- Informing authorized persons, institutions and organizations,
- Complying with legally binding requests.

Where a User voluntarily uses ANTIQCAM's User-to-User contact functionality, certain personal data, including the User's email address, may also be disclosed or made available to another User for the purpose of communication regarding the relevant product or object.

International transfers will be carried out in accordance with applicable personal data protection legislation and any safeguards or transfer mechanisms required by such legislation.

The original Privacy Policy also expressly contemplates transfers to domestic and foreign service providers and cloud systems.

6. Your Rights as the Data Subject

Depending on the applicable data protection legislation and your jurisdiction, you may have certain rights regarding your personal data.

Rights under the Turkish PDP Law

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

- Learn whether or not your personal data have been processed;
- Request information if your personal data have been processed;
- Learn the purpose of processing personal data and whether the data are used in accordance with such purpose;
- Know the third parties in the country or abroad to whom your personal data have been transferred;
- Request correction of personal data where processed incompletely or inaccurately;
- Request notification of correction procedures to third parties to whom personal data have been transferred where applicable;
- Request deletion, destruction or anonymization of personal data where the reasons requiring processing no longer exist and applicable legal conditions are satisfied;
- Request notification of deletion or destruction procedures to third parties where applicable;
- Object to the occurrence of a result against you through analysis of personal data exclusively by automated systems;
- Request compensation for damages where you suffer damage due to unlawful processing of personal data.

Rights under the GDPR

Where GDPR applies, data subjects may have the following rights:

- **Right of access** — learning whether personal data is being processed and accessing your personal data and information regarding its processing;
- **Right to correction** — requesting correction of information that you believe is inaccurate or completion of information that you believe is incomplete;
- **Right to deletion** — requesting deletion of personal data under the conditions stipulated in the GDPR;

- **Right to restrict processing** — requesting restriction of processing under the conditions stipulated in the GDPR;
- **Right to object** — objecting to processing under the conditions stipulated in the GDPR;
- **Right to data portability** — requesting certain personal data collected by Mobilion to be provided to you or transferred to another organization where applicable;
- **Right to withdraw consent** — where processing is based on consent;
- **Rights relating to automated decision-making** — where applicable under the GDPR.

Users in other jurisdictions may also have additional privacy rights under the data protection laws applicable to them.

The source policy similarly provides both PDP Law Article 11 rights and additional GDPR rights.

To exercise your applicable rights, your request should be explicit and understandable.

Where legally required or permitted, Mobilion may request information reasonably necessary to verify your identity or your authority to act on behalf of another person.

Requests may be submitted to:

support@mobilion.com.tr

Where the Turkish PDP Law applies, requests will be finalized within the time limits required under the PDP Law.

Where other data protection laws apply, requests will be processed within the applicable statutory periods.

If you believe that Mobilion or a third party to whom your data has been transferred is violating your applicable privacy rights, you may also have the right to file a complaint with a competent data protection or supervisory authority in your country or jurisdiction.

Changes to This Privacy Policy

This Privacy Policy may be revised by Mobilion when deemed necessary, including as a result of changes to the App, Services, technologies, business practices or applicable legislation.

Where required by applicable law, Users will be notified of material changes through the App or by other appropriate means.

The Effective Date displayed at the beginning of this Privacy Policy indicates when the current version became effective.

Contact Information

Company Title:

Mobilion Bilişim Teknolojileri ve Reklam Pazarlama Ltd. Şti.

Address:

Büyükdere Cad. No.105 K.4 D.8 Şişli İstanbul, Türkiye

E-mail:

support@mobilion.com.tr

Phone:

+90-212-211-1165

These are the same company contact details contained in the existing Privacy Policy.