



# mindlee

Personal Data Protection Law Clarification Text Last update: 22/06/2023

Your security is important to us. For this reason, your personal data that you will share with us is protected sensitively.

We, Mindlee Yazılım ve Bilgi Teknolojileri A.Ş. ("Company"), are the data controller within the scope of the Law on the Protection of Personal Data ("Law"). With this Personal Data Protection Law Clarification Text, we aim to inform you about which of your personal data will be processed and for what purpose, with whom and why the processed data can be shared, our data processing method and our legal reasons, and what your rights are regarding your processed data.

## **Your Collected Personal Data, The Method of Collection and The Legal Reason**

Your Identity Data: Name, last name, identity card information, date of birth, gender, Turkish ID number

Your Contact Data: Address, e-mail, mobile phone number, Your Location Data: Location data

Your User Process Data: Purchased service information, shopping history, special day records, commercial electronic message permission, campaigns utilized

Your Marketing Data: Cookie records, records of users' past actions, targets, habits and likes

Your Legal Process Data: Request and complaint records, attachment and alimony information, commercial electronic message permission, legal action file records, dunning notices, information in correspondence with judicial and administrative authorities

Your Process Security Data: IP Address, password information, traffic data, website/mobile application login/logout information, username information

Risk Management Data: IP address, password and username information

Your personal data is collected by us through technologies such as cookies, by automatic or non-automatic methods and sometimes by third parties such as analytics providers, advertising networks, search information providers, technology providers.

### **The Purpose of Processing Your Personal Data**

1. Confirming the identity information of users who make takes action through the website/mobile application

Personal Data Processed: Identity, Contact, Process Security Data, Risk Management Data

Legal Grounds: i)As it is clearly projected by law, ii) It is necessary to process personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract, iii) It is mandatory for the data controller to fulfill its legal obligation, iv) Data processing is mandatory for the establishment, exercise or protection of a right, and v) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject

2. To enable our users to shop through the website and / or mobile applications, to communicate with our users regarding the services received / to be received by our users and regarding their requests / complaints

Personal Data Processed: Identity, Contact, User Action, Legal Action

Legal Grounds: i) Processing of personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or performance of a contract, ii) It is mandatory for the data controller to fulfill its legal obligation, iii) Data processing is mandatory for the establishment, exercise or protection of a right, and iv) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject

3. Execution of the users' actions and utilization of the membership rights of the users

Personal Data Processed: Identity, Contact, User Actions, Legal Actions, Processed Security Data, Risk Management Data

Legal Reasons: i) Processing of personal data belonging to the parties to the contract is necessary, provided that it is directly related to the establishment or performance of a contract, ii) It is mandatory for the data controller to fulfill its legal obligation, iii) Data processing is mandatory for the establishment, exercise or protection of a right, and iv) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject

4. Preparation of all records and documents that will be the basis of the process in electronic (internet/mobile etc.) or paper environment

Personal Data Processed: Identity, Contact, User Actions, Legal Actions

Legal Grounds: i)As it is clearly projected by law, ii) It is necessary to process personal data of the parties to the contract, provided that it is directly related to the

establishment or performance of a contract, iii) It is mandatory for the data controller to fulfill its legal obligation. iv) Data processing is mandatory for the establishment, exercise or protection of a right, and v) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject

5. Improving and developing our services offered to our users, conducting business development processes

Personal Data Processed: Identity, Contact, User Actions, Marketing Data

Legal Reasons: Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject

6. Responding to information requests from competent authorities

Personal Data Processed: Identity, Contact, User Actions, Legal Actions, Processed Security Data, Marketing Data, Risk Management Data

Legal Grounds: i)As it is clearly projected by law, ii) it is mandatory for the data controller to fulfill its legal obligation. iii) Data processing is mandatory for the establishment, exercise or protection of a right and iv) data processing is also

mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject

7. Providing information about our services and campaigns that our users may be interested in by taking the interests of our users into account

Personal Data Processed: Identity, Contact, User Actions, Marketing Data Legal grounds: Explicit Consent

8. Carrying out advertising, marketing and promotional activities for the special preferences and interests of our users by conducting market analysis, targeting, profiling and analysis studies

Personal Data Processed: Identity, Contact, User Actions, Marketing Data, Processed Security Data, Risk Management Data

Legal grounds: Explicit Consent

9. Improving the experience of our users who shop on the website and/or mobile applications, carrying out the loyalty processes of products and services, conducting activities to ensure user satisfaction and organizing surveys in electronic and/or physical environments through contracted organizations

Personal Data Processed: Identity, Contact, User Actions, Processed Security Data, Marketing Data, Risk Management Data

Legal grounds: Explicit Consent

10. Sending commercial electronic messages to our users for promotional, marketing, advertising, campaign and celebration purposes

Personal Data: Identity, Contact, User Actions, Marketing Data  
Legal Grounds: Explicit Consent

#### 11. Evaluating the requests, suggestions and complaints of our users

Personal Data Processed: Identity, Contact, User Actions, Legal Actions, Processed Security Data, Risk Management Data

Legal Grounds: i) It is mandatory for the data controller to fulfill its legal obligation ii) Data processing is mandatory for the establishment, exercise or protection of a right, and iii) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject

#### 12. Ensuring information and process security when using our services

Personal Data Processed: Identity, Contact, User Actions, Legal Actions, Processed Security Data, Risk Management Data

Legal Grounds: i) As it is clearly projected by law, ii) It is necessary to process personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract, iii) It is mandatory for the data controller to fulfill its legal obligation, iv) Data processing is mandatory for the establishment, exercise or protection of a right, and v) Data processing is mandatory

for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject

#### 13. Follow-up and execution of legal affairs

Personal Data Processed: Identity, Contact, User Actions, Legal Actions, Processed Security Data, Marketing Data, Risk Management Data

Legal Grounds: i) As it is clearly projected by law, ii) It is necessary to process personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract, iii) It is mandatory for the data controller to fulfill its legal obligation, iv) Data processing is mandatory for the establishment, exercise or protection of a right, and v) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject

#### 14. Execution and supervision of our business activities, improvement and development of our services

Personal Data Processed: Identity, Contact, User Actions, Legal Actions, Processed Security Data, Marketing Data, Risk Management Data

Legal Grounds: i) As it is clearly projected by law, ii) It is necessary to process personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract, iii) It is mandatory for the data controller to fulfill its legal obligation, iv) Data processing is mandatory for the establishment, exercise or protection of a right, and v) Data processing is mandatory for the legitimate

interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject

15. To fulfill our legal obligations and to exercise our rights arising from the legislation in force

Personal Data Processed: Identity, Contact, User Actions, Legal Actions, Processed Security Data, Marketing Data, Risk Management Data

Legal Grounds: i) As it is clearly projected by law, ii) It is necessary to process personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract, iii) It is mandatory for the data controller to fulfill its legal obligation, iv) Data processing is mandatory for the establishment, exercise or protection of a right, and v) Data processing is mandatory

for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject

To whom and for what purposes the collected personal data can be transferred

Your personal data that you share with us may be transferred to third parties, institutions and organizations in Turkey and abroad from which we receive and/or provide services, with which we have a contractual relationship, with which we cooperate, for the following purposes, provided that the necessary technical and administrative measures are taken.

- To the Company's shareholders, employees and business partners in order to evaluate career applications
- To business partners for the provision of services on the website or mobile application,
- To business partners that we have contracted with in order to send commercial electronic messages based on the approval of users and to carry out advertising, campaign and promotional activities within this scope
- To various agencies, advertising companies, market research companies and survey companies in Turkey and abroad within the scope of marketing activities in order to improve the user experience and ensure user satisfaction,
- To service providers to provide statistical and technical services
- To the company from which we receive the service in order to carry out the management of user relations and requests and complaints processes.
- To the Company's shareholders and subsidiaries in order to carry out the Company's management processes and statistical study and reporting processes
- To program partner organizations and social networking sites in Turkey and abroad with which we cooperate in order to carry out our activities and business development processes
- To our domestic and foreign business partners from whom we receive cloud storage of personal data
- To domestic and foreign service providers that provide technological infrastructure, server service, e-mail service and cookie service for the website
- To audit companies, lawyers, authorized institutions and organizations in order to

fulfill our legal obligations

- To judicial and administrative authorities upon request

### Your Rights as a Person Whose Personal Data is Processed

Pursuant to Article 11 of Personal Data Protection Law Clarification Text, anyone can exercise the following rights by applying to the data controller:

- a. To learn whether personal data is being processed,
- b. Request information if personal data has been processed,
- c. To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- d. To know the third parties to whom personal data are transferred domestically or abroad,
- e. To request correction of personal data in case of incomplete or incorrect processing,
- f. Request deletion or destruction of personal data,
- g. To request notification of the actions taken pursuant to subparagraphs (e) and (f) to third parties to whom personal data are transferred,
- h. To object to the emergence of a result against the person himself/herself by analyzing the processed data exclusively through automated systems,
- i. To demand the compensation of the damage in the event that personal data is damaged due to unlawful processing of personal data.

You can contact us via [team@mindlee.co](mailto:team@mindlee.co) to exercise your rights listed above.

If you submit your requests, your request will be finalized free of charge within 30 (thirty) days at the latest. However, if an additional cost arises; you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.

### **Contact Us**

In order to provide you with services in line with your requests, you are completely free to accept or not, to give consent to the processing of your personal data; which is only necessary in accordance with this privacy and personal data processing policy. If you continue to use the application, we will assume that you agree with our terms. If you do not agree, please uninstall the application from all your devices. For further information, please do not hesitate to contact us via e-mail at [team@mindlee.co](mailto:team@mindlee.co).