

# PRIVACY POLICY

BEYLER SAĞLIK BİLİSİM SAVUNMA DANIŞMANLIK SANAYİ VE TİCARET LIMITED ŞİRKETİ (“Beyler Software” or “Company”) residing in Aziziye Mahallesi, Cinnah Caddesi No: 72/7 06690 Çankaya/ANKARA/TÜRKİYE, 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 terms set out in the standard “LICENSED APPLICATION END USER LICENSE AGREEMENT” (can be found here <http://www.apple.com/legal/internet-services/itunes/appstore/dev/stdeula/>), users agree to the Application collecting certain detailed user information indicated in EULA & PRIVACY POLICY below.

## 1. INTRODUCTION

This Privacy Policy applies when you use any of the Apps of this publisher and should be read together with the End User License Agreement EULA. By using a Publisher’s App, you are consenting to our processing of your information in ways set out in this Privacy Policy. If you do not agree with it, please do not use any Publisher’s Apps. In certain cases, for example, if geolocation data is processed by the relevant Publisher’s App, the Publisher’s App will prompt you to give additional consent. In such case, you can choose not to give consent to us processing data related to your location but you can still use the Publisher’s App.

This Privacy Policy may change so you should review it regularly. We will notify you of any material changes in the way we treat your information through the Publisher’s Apps you use.

## **2. DATA WE COLLECT**

When you use an Publisher's App, Publisher may collect data, including information which directly or indirectly identifies you. Your information may be kept in an identifiable format, or in an aggregate format which means that you cannot reasonably be identified from it. The information we collect about you includes: If an Publisher's App offers you the option to register, we will collect the information you provide to us in the registration form. This may include identification data such as your name, email address or other account or registration information.

We will also collect your information when you use Publisher's Apps such as when you post or share material, upload data, request further services or make selections using the Publisher's Apps, if such functionality is available in the Publisher's App.

We will collect information about you when you interact with us such as when you report a problem, contact or communicate with us. We may collect certain device information and electronic identifiers such as your mobile device identifier provided by your mobile device operating system, your mobile operating system details and the name of your mobile carrier. For example, if you use the iOS platform then Advertiser IDs (also known as "IDFAs") may be collected. Information about how and when you use the Publisher's App. This includes the amount of times you used the Publisher's App, which parts of it you viewed and other technical data such as country settings and timestamps.

Geolocation data, which is any information which indicates the geographical position of your device and which may include the time the location was recorded. Before processing any precise GPS geolocation data, the Publisher's App will require you to give your consent, which you can revoke by changing the privacy settings of your device. Any of your information you provide or permit to be provided to us via a social network or public forum provider like Facebook when you link the Publisher's App to your social network or public forum account. This data may include your use of the Publisher's App on such public forums and/or social networks, including with whom you share the Publisher's App. For further information how and for what purpose the social network

provider collects etc. your data see their privacy policy. We automatically collect certain information from your device when you use the

Publisher's App including information about your device, carrier and other technical data.

If our application includes functionality that requires the collection of images from you, this is done only to meet the specific operational requirements of those features.

These images are not kept in the database in our current applications, they are only kept locally on your devices.

One of our app called Looksmaxxing AI (<https://apps.apple.com/app/id6477760302>) requests your face image to perform the app function.

- Your face data is not retrained.
- We don't store your face data in our databases or any our ends.
- We don't share your face data with any third parties.

### **3. ONLINE TRACKING AND OPT-OUT**

We are committed to providing you with meaningful choices about the information collected from you on our Publisher's Apps for third party purposes, and that is why we provide the links below to the NAI "Consumer Opt-out," DAA opt-out, and Google and other opt-outs that are only applicable to participating third parties, which does not include Publisher. As stated below you may also block certain App Identifiers by changing the settings of your device. However, we do not currently recognize or respond to browser-initiated Do Not Track signals, as the Internet industry is still working on Do Not Track standards, implementations and solutions. <https://support.google.com/ads/answer/2662922?hl=en>

## 4. HOW WE USE THE INFORMATION WE COLLECT

We may use your information we collect to:

Deliver the Publisher's Apps to you and ensure their optimal functionality and operation; Provide you with customer support;

Perform research and analysis about your use of, or interest in, our products, services, or content;

In accordance with applicable law, communicate with you by e-mail, postal mail, telephone and/or mobile devices (including through in- application advertising) about products or services that may be of interest to you either from us, our parent or subsidiary companies or other third parties. If you do not wish to receive in-application advertising, you can upgrade to the paid version of the app.; Develop and display content and advertising tailored to your interests and to measure its effectiveness;

Verify your eligibility and deliver prizes in connection with contests and sweepstakes and in order to conduct polls and surveys;

Enforce our terms, conditions and policies and to communicate with you; Manage and improve the Publisher's App. For this purpose, we may use and combine your information which we collect across different Publisher's Apps used by you;

When we collect your precise GPS geolocation data (subject to your consent), we do so for the purpose of providing you with our location-related products and services, for example to provide you with forecast and weather alerts for your location.

When you share your information with us via a social network provider like Facebook, we use this to show information on your social network profile (subject to your privacy setting and preferences for such social network) and to allow you to share information about our services with your connections or on your social network profile.

When you use the Publisher's App, we may use the App Identifiers to facilitate access to the Publisher's Apps, help us recognize you across different Publisher's Apps, to enable you to use the Publisher's Apps, to personalize your experience, to increase security, measure the use and effectiveness of our Publisher's

Apps and serve advertising. You can block certain App Identifiers by changing the settings of your device.

## **5. CROSS-APP ADVERTISING AND OTHER INTEREST-BASED ADVERTISING TECHNOLOGIES**

As described above, we sometimes work with third parties to deliver ads, content or offers. Sometimes we or these third parties do so through a mobile “SDK.” The SDK is a bit of computer code that app developers can include in their apps to enable ads to be shown, data to be collected, and related services to be implemented. We may use this and similar technology to deliver certain advertising through mobile applications and browsers based on data associated with your mobile device, and we may work with third parties who likewise embed their SDKs into our apps, for third party advertising. If you’d like to opt-out from having ads tailored to you in this way on your mobile device, please follow the instructions below. If you wish to opt out of interest-based cross-application tracking through your mobile device, you can do so through your device “settings”, as follows (but please note that the below is for informational purposes only and Apple, Google, or other device platforms may change the manner in which their “opt out” settings work at any time).

Please note that if you opt out through these settings, you will continue to receive advertising after you opt-out, but it may not be tailored to your interests. For instance, that advertising may be based on your real-time or “contextual” application usage or general location inferred from IP address.

### Opting Out on iOS Devices Such as iPhones, iPads or iPods

If you have an Apple device, you can opt out of mobile interest-based or “cross-app” advertising by updating to iOS 6.0 or higher, and setting Limit Ad Tracking to ‘ON’. On an iPhone 6 for example, you can do this by clicking on Settings -> General -> Privacy -> Advertising and toggling “Limit Ad Tracking” to ‘ON’. Our systems

are designed to respect your choice and not use Information to provide interest-based advertising when this setting is ON. We may sometimes work with partners to help us or help them correlate content or ads provided to users across devices or browsers. For instance, a brand may wish to use the Information that we collect (or data that its own partners collect) to send offers to its customers across both mobile applications and browsers. We thus also provide the links below to the NAI “Consumer Opt-out,” DAA opt-out, and Google opt-out that are only applicable to participating third parties, which does not include IAC. You may also block certain App Identifiers by changing the settings of your device. However, we do not currently recognize or respond to browser-initiated Do Not Track signals, as the Internet industry has not reached a consensus as to Do Not Track standards, implementations and solutions.

<http://www.google.com/policies/privacy/partners/>

<https://support.google.com/ads/answer/2662922?hl=en>

## **6. SHARING YOUR INFORMATION**

We do not share your information with others except as indicated below:

We may share your information with our authorized service providers that perform certain services on our behalf. These services may include providing customer service and marketing assistance, performing business and sales analysis, supporting Publisher’s Apps functionality, and supporting marketing promotions (e.g., contests and sweepstakes) surveys and other features offered through Publisher’s Apps. These service providers may have limited access to your information, which is needed to perform their functions, but are not permitted to share or use such information for any other purposes. When you engage in promotions offered through the Publisher’s Apps, we may share your information with the businesses with which we partner to offer you those products, services, promotions, contests and/or sweepstakes. When you elect to engage in a particular merchant’s offer or program, you authorize us to provide your email address and other information to that merchant.

We may also allow third-parties, including our authorized service providers, parent and subsidiary companies, affiliates, advertising companies, and ad networks, to display advertisements in the Publisher's Apps or use App Identifiers for the purpose of advertising and direct marketing. These companies may use technologies to collect information about users who view or interact with their advertisements. This information allows them to deliver targeted advertisements and gauge their effectiveness. We combine information internally at Publisher across different Publisher's Apps. This means, for example, that we may combine your information from our Notepad app with information we have about you in our Emoji app. This will enable us to provide more tailored and personal experiences and services to you across the family of Publisher's Apps Other Situations. We may disclose your information (i) in response to a subpoena or similar investigative demand, a court order, or a request for cooperation from a law enforcement or other government agency, (ii) in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; (iii) to protect and defend the rights, property or safety of our company, our users, our employees, or others; (iv) to comply with applicable law or cooperate with law enforcement; (v) to enforce Publisher's Apps terms and conditions or other agreements or policies; and (vi) in connection with a substantial corporate transaction, such as the sale of our business or the Publisher's Apps, a divestiture, merger, consolidation, or asset sale or transfer, or in the unlikely event of bankruptcy. In addition, we may share aggregated information we collect, under any of the above circumstances, with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis or other legitimate business purposes.

Please note that such aggregated information will not include any information which allows third parties to identify you.

## **7. COOKIES, IDENTIFIERS AND DATA ANALYSIS**

Firestore

Publisher's uses the Google Analytics tool Firebase in order to carry out analysis on Information which is gathered by Publisher's Apps. App Identifiers and other Information which Publisher's gather are provided to Google in order to enable them to carry out data analysis. Any Information (including App Identifiers) which are provided to Google will become subject to Google's privacy policy which is located here: <http://www.google.com/privacy.html>. For further information on how Google's Firebase analytics tool uses data, please see the site "How Google uses data when you use our partners' sites or apps", (located at <http://www.google.com/policies/privacy/partners/>).

### Website Cookies

Separately to the Publisher's Apps, the Publisher's website itself uses cookies. Certain information about you, (including personal information), may be collected through the use of cookies when you visit and interact with our website. Some of these cookies are essential for the Publisher's website to operate and ensure that we provide the services you requested. By using our services you agree to the use of certain non-essential cookies unless you set your browser to reject them.

A cookie is a small text file that is stored on your computer's hard drive or browser. We use cookies and the information contained therein for a number of purposes including but not limited to: tracking the duration of visits and content accessed; and storing frequently used user information to personalise your online experience and ease the log-in process. You may block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies.

However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Websites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit our Site. Further information on cookies and how websites use them can be obtained at <http://www.cookiecentral.com>



## **8. HOW WE PROTECT YOUR INFORMATION**

The security and confidentiality of your information is very important to us, so we take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your information from unauthorized access and disclosure. Please know that, despite our efforts, no security measures are perfect or impenetrable.

## **9. INFORMATION RELATING TO CHILDREN**

Some of the Publisher's Apps are not directed to children under the age of 13. We do not knowingly collect (or knowingly allow any third party to collect) information from persons under the age of 13. If we become aware that information has been collected from a person under the age of 13, we will delete this information and terminate the person's account as quickly as possible. If you believe that we may have information from or about a child under the age of 13, please contact us and we will promptly delete that information.

## **10. WHERE WE STORE YOUR INFORMATION**

The information that we collect from you may be transferred to, and stored at, a destination outside of your country and the European Economic Area ("EEA") and, in particular, the US. It may also be processed by any service providers appointed by us who operate outside the EEA and their staff, and/or our own staff based outside of the EEA. By submitting your data, you agree to this transfer, storing or processing outside of the EEA. Data transferred will be treated in accordance with this Privacy Policy.

## **11. HOW LONG WE STORE YOUR INFORMATION**

We will keep your information for as long as is necessary to provide you with the Publisher's Apps and for us to comply with our obligations under this Privacy Policy and at law.

## **12. DATA DELETION**

Uninstallation and removal methods vary depending on your device. To uninstall and remove the Publisher's Apps, please use the application manager provided with your device or consult your device manual for reference. Any of your data stored by us will be deleted after a reasonable period following deletion of a Publisher's App.

## **13. ACCESS TO AND CHOICES REGARDING YOUR INFORMATION**

You have the right to access information held about you or require it to be modified if inaccurate or deleted. Your right of access can be exercised by contacting us using the details set out below. Any access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you.

## **14. EU Consent Policy and Personalized Experience**

What type of personal data will be processed?

Depending on your Privacy Settings, our partners may collect and process personal data such as device identifiers, language, location data, and other demographic and interest data about you to provide you with the most relevant experience when using this app. You can learn more about the data we collect for our partner from the links to our partners' Privacy Policy pages below:

- <https://www.google.com/about/company/user-consent-policy.html>
- <https://support.google.com/admob/answer/7666366?hl=en-GB#>

- <https://www.facebook.com/business/m/one-sheeters/gdpr-developer-faqs>
- <https://www.facebook.com/business/gdpr>
- [https://firebase.google.com/support/privacy/#firebase\\_is\\_gdpr\\_ready](https://firebase.google.com/support/privacy/#firebase_is_gdpr_ready)

Why are such data processed? Who will be processing the data? Your consent to collect personal data in the app personalizes your experience (ad and usage) via numerous advertising and analytics partners. It will allow to remember your preferred language choice, show you more targeted ads, check for fraud, share with our partners who will then sell you their services or show ads which are more relevant to you, as well as it will help to faster identify bugs and problems in the app if they appear.

When will processing take place? How do I withdraw my consent?

Once you agree to collect your personal data, the app starts processing it. Depending on partner type, user data is stored hours or months to enhance your experience in the app and erased once it becomes no longer necessary in relation to the purposes for which they were collected or otherwise processed. If you change your mind later to withdraw your consent, you can always opt in by disabling Limit Ad Tracking setting on your mobile device and then revisiting this app. If you consent us and our partners personalizing your experience in a different app, we'll collect data via that app.

How do I erase my personal data?

According to EU GDPR law, Controllers have an obligation to delete data that was processed on the basis of consent once that consent is withdrawn.