

PRIVACY AND PERSONAL DATA RETENTION AGREEMENT

VERSION: 1

DATE:

1. By accessing the online education platform named “**Trigemy**” (hereinafter referred to as the “**Site**”) registered under **Trigemy Online Private Education Consultancy Services Inc.** (hereinafter referred to as the “**Company**”), you shall be deemed to have read, understood, and accepted the provisions of this **Privacy and Personal Data Retention Agreement**.

2. Pursuant to the **Law No. 6698 on the Protection of Personal Data (“KVKK”)**, the Company acts as the **data controller** with respect to the personal data that you provide through the registration forms, request forms, surveys, newsletters, user logs, cookies, and other methods submitted via our website for the purpose of using the Site.

Within this scope, the Company may **record, classify, update, process, and store your personal data** in order to enable your access to the services offered through the Site and may share such data with third parties **to the extent permitted by applicable legislation and based on your explicit consent where required.**

3. The Company attaches the utmost importance to the **confidentiality and protection of all data shared with us, including your personal data.**

Our primary objective is to protect your privacy and ensure the security of the information that you provide. Personal data processed by the Company are protected in the best possible manner within the limits of available technical infrastructure and security measures.

4. The Site uses **session cookies and/or persistent cookies.**

5. Data relating to existing and potential users may be obtained, recorded, stored, preserved, modified, reorganized, or otherwise processed **in whole or in part, through automated or non-automated means**, and may be shared with third parties where legally permitted.

User data may include data that identify or make identifiable existing and potential customers, as well as **special categories of personal data**. All such data shall collectively be referred to as “**User Data.**”

6. The Company processes User Data, including personal data and special categories of personal data, within the scope of the **consent obtained from users through the approval of the “Member/User Agreement.”**

In addition, User Data may be processed in cases explicitly stipulated by law, including but not limited to the following circumstances:

- a) where the processing of personal data belonging to the parties to a contract is necessary, provided that it is directly related to the establishment or performance of such contract;
- b) where processing is mandatory for the Company to fulfill its legal obligations;
- c) where the relevant personal data have been made public by the data subject;
- d) where data processing is necessary for the establishment, exercise, or protection of a legal right.

In such cases, data shall be processed **limited to the legitimate purposes for which they are required**.

7. When processing User Data, the Company observes the following principles:

- processing in accordance with the law and the principles of honesty and good faith,
- ensuring that the processed data are accurate and up to date where necessary,
- processing data for specified, explicit, and legitimate purposes,
- ensuring that the processing is relevant, limited, and proportionate to the purposes for which the data are collected or further processed,
- retaining data only for the period required for the purposes of processing.

8. Purposes of Processing Personal Data

The purposes for which the Company processes personal data belonging to real persons falling within the categories defined in **Article 5 of the KVKK and listed in Annex-1** include the following:

1. preparing market and trend reports;
2. conducting studies aimed at improving user experience;
3. identifying and reporting content pools appropriate to user needs;
4. fulfilling legal obligations arising from various regulations and responding to user/member applications;
5. conducting advertising and marketing activities through written, digital, or other communication channels;
6. planning and executing event management processes;
7. monitoring contractual processes and/or legal claims;
8. monitoring customer and user requests and/or complaints;
9. executing strategic planning activities;
10. planning, auditing, and/or executing information security processes;
11. planning and/or executing operational and/or efficiency processes;
12. planning and/or executing projects in line with the Company's strategic objectives;
13. providing personalized content tailored to the interests and needs of Site users, grouping users for such purposes, and determining whether users are interested in the news and information shared;

14. generating statistics regarding Site usage, including the number of visitors, user types, visit frequency, user behavior, referral sources, subsequent websites visited, geographical locations of users, and similar analytics;
15. meeting management reporting requirements;
16. enabling the Company to exercise its legal rights, including situations related to legal procedures or obtaining legal advice;
17. maintaining a database regarding user habits following the termination of the user relationship or using such data as evidence in case of disputes.

Special Categories of Personal Data

Article 6 of the KVKK regulates the conditions under which **special categories of personal data** may be processed.

Special categories of personal data include data relating to a person's:

- race
- ethnic origin
- political opinions
- philosophical beliefs
- religion or sect
- other beliefs
- clothing and appearance
- membership in associations, foundations, or trade unions
- health
- sexual life
- criminal convictions and security measures
- biometric and genetic data.

Such data may be processed only under the following conditions:

- where the **explicit consent of the data subject** exists;
- where the processing of special categories of personal data other than health and sexual life is **explicitly permitted by law**;
- where personal data relating to health and sexual life are processed by persons or authorized institutions bound by confidentiality obligations for purposes such as **protection of public**

health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of healthcare services and their financing.

9. Cookies

When collecting data for the purposes stated above, the Company may use **cookies**.

Cookies are small text files sent by a website to the user's computer or mobile device browser.

It is possible to block cookies through browser settings. By visiting the Site, the user shall be deemed to have **consented to the use of cookies within the scope of this policy**.

10. Third-Party Websites

Links to websites or content managed by third parties may be provided on the Site, or access to such content may be enabled.

The Company **has no control over such third-party content** and bears no responsibility for the privacy practices or data processing activities of such third parties.

11. Third-Party Plug-ins

The Site may use **plug-ins belonging to third-party platforms**.

Information collected when users visit the Site may be used by these third-party platforms. If users visit the Site while logged into their accounts on such platforms, the information collected by the Site and by the third parties may be associated with each other.

12. Transfer of Personal Data

Pursuant to **Article 8 of the KVKK**, personal data may generally be transferred in the following circumstances:

- where the explicit consent of the data subject exists,
- where processing is clearly stipulated by law,
- where processing is necessary to protect the life or physical integrity of a person who is unable to give consent due to actual impossibility,
- where processing of personal data belonging to the parties to a contract is necessary for the establishment or performance of the contract,
- where processing is mandatory for the data controller to fulfill its legal obligations,
- where the personal data have been made public by the data subject,
- where data processing is necessary for the establishment, exercise, or protection of a legal right.