

# Privacy Policy

## Entrance

We respect your privacy and are committed to protecting your personal data. This privacy policy explains how we treat your personal data when you access and use our event platform, tells you about your privacy-related rights and how applicable laws protect you.

### 1. Important note and about us

Purpose of this privacy policy

This privacy policy is intended to provide you with information about how VirtualActivity.com collects and processes your personal data and any other data you may provide) when you use our platform (and all related websites, applications, and online services and tools referenced in this policy, regardless of how you access or use them).

It is important that you read this privacy policy in conjunction with any other privacy policy or fair dealing policy that we may provide when collecting or processing personal data about you. This way, you are fully informed about how and why we use your data. This privacy policy complements other notices and privacy policies and is not intended to override them.

Controller

SanalEtkinlik.com controller in relation to certain uses of your personal data (also referred to as "we" in this privacy policy).

We have appointed a data privacy manager who is responsible for overseeing matters related to this privacy policy.

If you have any questions about this privacy policy, including your requests to exercise your legal rights, please contact the data privacy manager using the information set out below.

Contact information.

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager using the following information:

**Full name of the legal entity: Adam Event Film Production Services Ltd.Şti.**

**Email address: [info@adametkinlik.com](mailto:info@adametkinlik.com)**

You have the right to lodge a complaint with the competent authorities for data protection matters at any time. However, if you contact us in the first place, we will be able to meet your requests and complaints much more quickly.

Changes to our privacy policy and your responsibility to notify us of changes to your personal data.

We regularly review our privacy policy. It is important that the personal data we hold about you is accurate and up to date. Please let us know if your personal data changes while you are using our platform.

Your access to and use of 3rd party websites or services

Our Platform may contain links to 3rd party websites and applications, as well as links to different service providers specific to a particular event.

Clicking on links to 3rd party websites, content they offer, or applications may allow these 3rd party parties or entities to collect or share data about you. We do not control these 3rd party websites or content and are not responsible for their privacy statements or the way they collect or use your data.

When you access or use 3rd party services provided by an event organizer, advertiser, sponsor, or other party participating in an event, we encourage you to read the service provider's privacy policy and ask for its details. We do not control these 3rd party individuals and entities and are not responsible for their privacy statements or the way they collect or use your data.

We will never share your data with any third-party service provider, online or offline, without your explicit consent.

**Please note:**

We are a platform provider. The SanalEtkinlik.com platform allows you to participate in events like any other physical activity. when you access our platform as a user of the SanalEtkinlik.com event platform or as a participant of any event, we are not part of this relationship when you have access to 3rd party services, documents, content and applications. We do not participate in any part of any service, documentation, content, or application provided to you or in a service agreement. You accept full responsibility for the use of such services, documents, content and applications that you use are appropriate for you, that you have consented to and that you use them.

**2. Your data we collect**

Personal data, or personal information, is any information that enables a person to be identified. It does not include anonymous data from which credentials are removed.

We may collect, use, store and transfer different types of personal data that we have grouped about you as follows:

Identification information that includes your photo, first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, and gender. It may also include audiovisual content that you provide when attending or interacting with an event as a speaker.

Contact information that hides your address, email address and phone number.

Transaction documents that contain details of the products and services you access or use through our Platform and details about the payments you make. We do not store your credit card information on our server. Credit and debit card payments are processed by **lyzico** on secure payment servers and all card information is fully encrypted and stored by them.

Technical data, including your Internet protocol (IP) address, login data, browser type and version, hardware information, time zone setting and location, browser plug-in types and versions, operating system, and other technologies on the devices you use to access our website and platform.

Profile data, including your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.

Usage data, which includes information about how you use our platform, products, and services.

Marketing and communications data from us and our 3rd party business partners, including your marketing communication preferences.

We also collect, use, and share aggregated data, such as statistical or demographic data, for any purpose. The aggregated data may be derived from your personal data, but this data is not legally considered personal data as it will not directly or indirectly reveal your identity.

We do not store personal information for longer than necessary. When storing this information, we protect it in commercially acceptable ways to prevent loss and theft, as well as unauthorized access, disclosure, dissemination, copying, use or alteration. However, we remind you that no method of electronic transmission or storage is 100% secure and cannot guarantee absolute data security. If necessary, we may retain your personal information so that we comply with a legal obligation.

If you do not provide personal data

Where we are required to collect personal data by law or in accordance with the terms of our contract with you and you do not provide this data when requested, we may not be able to fulfil our contractual responsibilities which we have or are trying to enter. (For example, by enabling you to participate in a specific event on the SanalEtkinlik.com platform).

### **3. How is your personal data collected?**

We use different methods to collect data about you from you, including:

Direct interactions. You may provide us with your identity, contact and other data by filling out web forms or by corresponding with us by e-mail or in other ways on the platform (e.g. chatbot). This includes personal data that you provide in the following cases: (a) when you create an account; (b) when you subscribe to our services or attend an event; (c) you have consented to the marketing communications; (d) when you participate in a promotion or survey; or (e) when you provide feedback to us.

Automated technologies or interactions. When you interact with our event platform, we will automatically collect technical data about your equipment, browsing actions and usage patterns. We collect this personal data using cookies, server logs and other similar technologies.

### **4. How do we use your personal data?**

Automated technologies or interactions. When you interact with our event platform, we will automatically collect technical data about your equipment, navigation actions and patterns. We collect this personal data using cookies, server logs and other similar technologies.

When we are about to enter a contract or when we need to perform a contract with you (for example, to provide you with access to a function of the platform).

When necessary for our legitimate interests (or the interests of a third party). Your interests and fundamental rights do not override those interests.

Where we are required to comply with a legal obligation.

The purposes for which we will use your personal data.

Below we have set out in tabular form all the ways in which we plan to use your personal data and a description of the legal bases on which we rely to do so. We have also identified what our legitimate interests are, where appropriate.

Please note that depending on the specific purpose for which we use your data, we may process your personal data on more than one legal basis. Where more than one reason is set out in the table below, please contact us for details on our legal basis for processing your personal data.

Purpose/Action	Data type	Legal basis for data processing, including the basis legitimate interest.
To register you as a user of our platform	(a) Identity (b) Contact	Performance of a contract with you
To process paid entry to any event:  (a) Managing payments, fees and expenses  (b) Verify your identity and details of your payment method or credit card account	(a) Identity  (b) Contact  (c) Operation  (d) Marketing communications	(a) Performance of a contract with you  (b) To communicate with you, for example, to send you confirmation of participation
to manage our relationship with you, including:  (a) Providing access to Platform services  (b) Notifying you of changes to our usage plans or privacy policy  (c) Asking you to leave a review or participate in a survey  (d) Investigating your complaints	(a) Identity  (b) Contact  (c) Profile  (d) Marketing communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records up to date and to review how users use our platform and related products/services)
to administer and protect our business and services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and data hosting)	(a) Identity (b) Communication (c) Technical	(a) Necessary for our legitimate interests (to conduct our business, manage our CRM, provision of management and IT services, network security, prevent fraud, and in the context of a restructuring)  (b) Necessary to comply with a legal obligation

<p>To enable you to participate in a contest or a survey</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Communications</li> <li>(c) Profile</li> <li>(d) Use</li> <li>(e) Marketing communications</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary for our legitimate interests (to study how users use our platform, to develop and grow our business)</li> </ul>
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<p>To provide you with platform content/advertising that may be of interest to you and to measure or understand the effectiveness of the advertisements we serve to you</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Communication</li> <li>(c) Profile</li> <li>(d) Use</li> <li>(e) Marketing communication</li> <li>(f) Technical</li> </ul>	<p>Necessary for our legitimate interests (To examine how users use our platform, to grow our business, to revise our marketing and growth strategy)</p>
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<p>Use data analytics to improve our platform, products/services, marketing, user and partner relationships, and experiences</p>	<ul style="list-style-type: none"> <li>(a) Technical</li> <li>(b) Use</li> </ul>	<p>Necessary for our legitimate interests (to identify user types for our specific services and to keep our services and website up-to-date and interesting, to improve our business and to revise our marketing strategy)</p>
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<p>To provide advice and suggestions that may be of interest to you about events or other services offered to you through our Platform</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Communication</li> <li>(c) Technical</li> <li>(d) Use</li> <li>(e) Profile</li> <li>(f) Marketing communications</li> </ul>	<p>Necessary for our legitimate interests (to improve the products and services offered through our Platform)</p>
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## Marketing

We strive to give you choices about the use of personal data in areas such as marketing and advertising.

## Advice from us

We may use your identity, communication, technical, usage and profile data to create a view of what we think may be of interest to you. This is how we decide which services and offers may be right for you.

If you have requested information from us about our products and services through our Platform, if you have previously used our products and services or after purchasing our products and services, you will receive marketing communications from us. This will continue until you stop receiving messages. You can easily opt-out at any time.

## Third-party marketing

Before sharing your personal data with any third party or entity for marketing purposes, we will obtain your express consent.

## Stop

You can ask us or third parties and entities to stop sending you marketing communications at any time. If you opt out of receiving these marketing communications, this will not apply to personal data provided to us as a result of your use of our platform or any associated services.

## Cookies

You can set your browser to reject browser cookies in whole or in part. If you disable or refuse cookies, please note that some parts of our platform may become inaccessible or may not function properly.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we think that we should use it for a reasonable reason, which is compatible with our original purpose. If you would like to receive an explanation of how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will inform you and explain the legal basis that allows us to do so.

Please note:

Please note that we may process your personal data without your knowledge or consent, in accordance with the above rules where required or permitted by law.

#### 5. Disclosure and dissemination of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table "For what purposes we will use your personal data" above.

third parties as indicated.

Third parties to whom we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire or merge with other businesses. If there is a change in our business, the new owners may use your personal data in the manner set out in this privacy policy.

Where third parties organize events or support the provision of services offered to you through our platform, these third parties and entities may receive certain personal data from you. While we are not under the control of any third party with whom you request the sharing of your data, we do require all third parties to respect the security of your personal data and process it in accordance with the law. Unless they have obtained your explicit consent, we do not allow any third-party activities or service providers to use your personal data for their own purposes and only allow them to process your personal data for the stated purposes and in accordance with your instructions.

We may use aggregated information to help continuously improve and customize the service we provide to you through our platform. This allows us to administer and improve our services, analyze trends, gather broad demographic information, identify suspicious/fraudulent transactions, and most importantly, monitor and improve our day-to-day operations on a daily basis. In the course of carrying out this activity, we may transfer certain information to third parties in an aggregated and anonymous form.

#### Disclosure and dissemination of your data to 3rd parties

Except as otherwise expressly provided in this Privacy Policy, this document refers solely to the use and disclosure of information we collect from you. If you share your information with others, different rules may apply to the use or dissemination of the information you provide to them. SanalEtkinlik.com does not control the privacy policies of third parties. Where necessary, you are subject to the privacy policies of these third parties and entities.

#### 6. Data security

We have put in place the necessary security measures to prevent accidental loss, use or unauthorized access, alteration or dissemination of your personal data. We also limit access to your personal data to employees, intermediaries, contractors and other third parties who need to know about the business. They will only process your personal data in accordance with our instructions and are subject to a confidentiality obligation. We have procedures in place to manage any suspected personal data breach and will inform you and the competent authorities of the relevant breach when we are legally required to put these procedures in place.

## 7. Data retention

How long will you use my personal data?

We will only retain your personal data for as long as is reasonably necessary to fulfil the purposes for which we collected it, including for purposes to meet legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period of time in the event of a complaint or if we reasonably believe that there is a possibility of litigation in relation to our relationship with you.

To determine the appropriate retention period for personal data; we assess the amount, nature and sensitivity of personal data, the risk of potential harm from the unauthorized use or dissemination of your personal data, the purposes for which we process your personal data, our ability to achieve these purposes by other means, and any relevant legal, regulatory, tax, accounting or other requirements.

With your prior consent, we may process sensitive personal data.

This data may include your race or ethnic origin, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data. No sharing of sensitive personal data will be used without your prior express written consent.

In some cases, you can ask us to delete your data: see your legal rights below for more information.

In some cases, we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes and use this information indefinitely without further notice to you.

## 8. Your legal rights

Under certain circumstances, you have rights under personal data protection laws in relation to your personal data.

Request access to your personal data. This allows you to obtain a copy of the personal data we hold about you and to check whether we process it in accordance with the law.

Request the correction of the personal data we hold about you. Although this requires us to verify the accuracy of the new data you provide to us, it does ensure that any incomplete or inaccurate data we hold about you is corrected.

Request deletion of your personal data. This allows you to ask us to delete or remove your personal data when there is no good reason for us to continue processing. Please note that we may not always be able to comply with your deletion request for certain legal reasons and, where possible, you will be notified of these reasons at the time of your request.

Request that your personal data be transferred to you or to a third party. We will provide your personal data to you or a third party of your choice in a structured, commonly used, machine-readable format. Please note that this right only applies to information that you initially gave us permission to use or that we used to perform a contract with you.



At any time, withdraw your consent, which we consider to be the basis for processing your personal data. However, this will not affect the lawfulness of any processing taken before you withdraw your consent. If you withdraw your consent, we may not be able to provide you with certain products or services. When you withdraw your consent, we will let you know if this is the case.

If you wish to exercise any of your rights set out above, please contact us.

We usually don't charge fees.

You will not have to pay any fees to access (or exercise any of the other rights) your personal data. However, if your request is manifestly unfounded, frequently repeated, or is clearly excessive than it should be, we may charge a reasonable fee. Alternatively, we may refuse to comply with your request in these circumstances.

What can we ask of you?

We may need to request certain information from you to help us verify your identity and exercise your right to access your personal data (or exercise any of your other rights). This is a security measure to ensure that your personal data is not disclosed to anyone who does not have the right to access. We may also contact you to request more information regarding your request in order to expedite our responses.

Response time

We try to respond to all legitimate requests within a month. At times, it may take longer than a month, especially if your request is complex or you have made a series of requests. In this case, we will inform you.

## 9. Definitions

Legitimate interest means our company's interest in operating and managing our business to ensure that we provide you with the best service/product, the best and safest experience. We make sure that we consider and balance your potential effects (both positive and negative) on you and your rights before processing your personal data for our legitimate interests. We will not use your personal data unless we have obtained your consent, are otherwise required or permitted by law for activities where the effect it has on you overrides our interests.

The performance of the contract means the processing of your data upon your request when it is necessary for the performance of a contract to which you are or are about to become a party. Making our event platform available to you constitutes the purpose and framework of our contract with you. We do not interfere with the processing of your personal data as part of any interaction you enter into with our third-party business partners. We will always obtain your consent to transfer any personal data to any third party or entity for the provision of the relevant services to you.

Complying with a legal obligation means the processing of your personal data where it is necessary to comply with a legal obligation to which we are subject.

### 3. partiler

Service providers related to IT and system administration.

Cloud service providers such as AWS and Google.

**Iyzico** – for the purpose of managing payment transactions.

<https://www.iyzico.com/gizlilik-politikasi>

Professional consultants, including lawyers, bankers, auditors and insurers who provide consulting, banking, legal, insurance and accounting services.

Regulators and other authorities requesting reporting of processing activities in certain circumstances.

Our third-party business partners and affiliates with whom you interact using our event platform to facilitate service delivery.

Effective

This privacy policy is effective as of March 08, 2023.

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