

## GENERAL DATA PROTECTION AND PRIVACY POLICY

This Privacy Policy explains how Nobium Bilgi Teknolojileri Ve Danışmanlık Tic.A.S. ("Qumpara", "our", "us", and "we") collects, uses, and discloses information about you. This Privacy Policy applies to information we collect when you use our website located at <http://www.nobium.com.tr> ("Site") and related services (collectively, the "Platform Services") or when you otherwise interact with us.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you a notification). We encourage you to review this Privacy Policy before you use or submit any information on or through the Platform Services to stay informed about our information practices and the ways you can help protect your privacy. By using the Platform Services, you consent to the collection, use, disclosure and sharing of your information as further outlined below in this Privacy Policy. This Privacy Policy is provided as a part of our Terms of Services and applies to all users of the Platform Services. You must agree to both this Privacy Policy and our Terms of Service in order to use the Platform Services.

### **Key terms:**

*Anonymisation* : The process of either encrypting or removing personal data from a database, so that the individuals whom the data describe remain anonymous. This is done for the purpose of protecting individuals' private activities while maintaining the integrity of the data gathered and shared.

*Behavioural Advertising* : The act of tracking users' online activities and then delivering ads or recommendations based upon the tracked activities.

*Biometric Data* : Personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopy data.

*Chief Privacy Officer*: The individual appointed by Qumpara globally to carry out certain responsibilities and functions in respect of privacy and data protection.

*Consent*: Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

*Cookies*: A small text file stored on a user machine that may later be retrieved by a web server from the machine. Cookies allow web servers to keep track of the end user's browser activities, and connect individual web requests into a session.

*Data Enrichment* : A process used to enhance, refine or otherwise improve existing data.

*Data Processing*: Any operation or set of operations which is performed on personal data, such as collecting, recording, organizing, storing, adapting or altering, retrieving, consulting, using,

disclosing by transmission, dissemination or otherwise making the data available, aligning or combining data, or blocking, erasing or destroying data. Not limited to automatic means.

*Data Protection Officer:* The individual appointed by Qumpara locally to carry out certain responsibilities and functions in respect of privacy and data protection.

*Data Retention :* The policies and processes used within Qumpara for determining the time period for archiving and storing of personal data.

*Data Subject:* The natural person that the personal data refers to.

*Direct Marketing:* A form of advertising in which companies provide physical marketing materials to consumers to communicate information about a product or service.

*Encryption:* The method by which plaintext or any other type of data is converted from a readable form to an encoded version that can only be decoded by another entity if they have access to a decryption key.

*GDPR:* General Data Protection Regulation.

*Genetic Data :* Personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question.

*Health Data:* Personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status

*International Organisation:* An organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.

*IP Address:* A unique address that identifies a device on the Internet or a local network and which allows a system to be recognized by other systems connected via the Internet protocol.

*Online Behavioural Advertising:* Websites or online advertising services that engage in the tracking or analysis of, e.g., search terms, browser or user profiles, preferences, demographics, online activity, offline activity, location data, and offer advertising based on that tracking.

*Personal Data:* Any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, in particular, by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

*Personal Data Breach:* A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

*Privacy and Data Protection* : The collection of laws and regulation that applies to the collection, usage, storage, protection and other processing of personal data. This includes data protection, privacy, banking secrecy, electronic communications and confidentiality laws and regulations, and any other applicable laws or regulations to the extent they relate to privacy of personal data.

*Processor*: A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

*Profiling*: Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

*Pseudonymization*: The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

*Recipient*: A natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third-party or not. However, public authorities which may receive personal data in the framework of a inquiry in accordance with regulations shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

*Restriction of Processing*: The marking of stored personal data with the aim of limiting their processing in the future.

*Special Categories of Personal Data*: Special categories of personal data, include: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data (for uniquely identifying an individual) and of data concerning health, sex life or sexual orientation.

*Third-Party*: A natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### **Collection of Information:**

We may collect the following kinds of information about you through your use of the Site or Platform Services:

### **Information You Provide Directly To Us.**

We collect information you provide directly to us in the course of using the Platform Services, including personally identifiable information. For example, we collect information when you create an account on the Site, provide payment and billing information, provide identification verification, participate in any interactive features of the Platform Services, fill out a form,

perform project and topic searches, post bids for projects, request customer support or otherwise communicate with us. The types of information we may collect include your name, phone number(s), email address, postal address, credit card or other billing information, date of birth, taxpayer ID, and any other information you choose to provide. We may combine such information with information we already have about you. We will use your billing information linked to your Qumpara account for campaigns. The processing of campaigns will be subject to the terms, conditions, and privacy policies of the campaign processor in addition to this Privacy Policy and our Terms of Service.

### **Information We Collect Automatically**

When you access or use the Platform Services, we automatically collect information about you, including:

- **Log Information:** We collect log information about your use of the Platform Services, including the type of browser you use, access times, pages viewed, your IP address, the page you visited before navigating to the Platform Services, and Project bids.
- **Device Information:** We collect information about the computer or mobile device you use to access the Platform Services, including the hardware model, operating system and version, unique device identifiers and mobile network information.
- **Information Collected by Cookies and Other Tracking Technologies:** We use various technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve the Platform Services and your experience, see which areas and features of the Platform Services are popular and count visits. Web beacons are electronic images that may be used in the Platform Services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see "Cookies" below.

### **Information We Collect From Other Sources**

We may also obtain information from other sources and combine that with information we collect through the Platform Services. For example, we may collect information about you from third parties, including but not limited to identity verification services, credit bureaus, mailing list providers, publicly available sources, and prohibited persons lists.

### **How We Use Your Information**

We may use information about you for various purposes, including to:

- Provide, maintain, and improve the Platform Services;
- Provide our services, process transactions, and send you related information, including confirmations and invoices;
- Match Qumpara clients with users of the Site;
- Send you technical notices, updates, security alerts, and support and administrative messages;
- Ensure compliance with our Terms of Service, including but not limited to identifying and preventing misuse, inappropriate behavior, fraud, or any criminal activity;
- Respond to your comments, questions and requests and provide customer service;

- Communicate with you about products, services, offers, promotions, rewards, and events offered by Qumpara and others, and provide news and information we think will be of interest to you;
- Monitor and analyze trends, usage and activities in connection with the Platform Services;
- Personalize and improve the Platform Services and provide advertisements, content or features that match user account profiles or interests;
- Link or combine with information we get from others to help understand your needs and provide you with better service; and
- Carry out any other purpose described to you at the time the information was collected.

### **How We Share Your Information**

We may share information about you as follows or as otherwise described in this Privacy Policy

- With vendors, consultants, third party payment processors and other service providers who need access to such information to carry out work on our behalf;
- With third parties for their own services and marketing purposes, unless you opt out of this type of sharing by logging into your Qumpara account and updating your account settings;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;
- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of Qumpara or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among Qumpara and our current and future parents, affiliates, subsidiaries and other companies under common control and ownership; and
- With your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

### **Advertising and Analytics Services**

We may allow others to provide analytics services and serve advertisements on our behalf across the Internet and in applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Platform Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked and conversion information. This information may be used by Qumpara and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on the Platform Services and other websites and better understand your online activity. You may also opt-out of having your information used for advertising purposes by logging into your Qumpara account and updating your account settings.

### **Modifying and Reviewing your Data:**

You have the right to review, change and delete information about you at any time. You can do so by editing your profiles on the Site or emailing us at [kvkk@nobium.com.tr](mailto:kvkk@nobium.com.tr) Deleting all your

information may result in account deactivation. You can choose to have your account deleted from the system by emailing kvkk@nobium.com.tr, but note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

### **Data Security:**

We take the protection of your information seriously and use reasonable measures designed to help protect your information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. You should understand that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. Please note that information collected by third parties may not have the same security protections as information you submit to us, and we are not responsible for protecting the security of such information. Additionally, we are not responsible for the confidentiality of any information and content created and shared between users of the Site when they agree to share any such information. Users who choose to share any information with other users of the Site are responsible for maintaining the privacy and security of that data in accordance with our Terms of Service.

### **Cookies:**

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Removing or rejecting browser cookies does not necessarily affect third party flash cookies used in connection with the Platform Services. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Platform Services.

### **Links to Other Websites and Applications:**

There may be links to other websites and applications on the Site, but the inclusion of these links does not represent our endorsement, authorization or affiliation with the other websites or applications. This Privacy Policy and our Terms of Service do not cover any third party applications or websites. Users should consult the terms and conditions of third party websites or applications to understand their privacy policies and how they collect and use your information.

### **Do-Not-Track Signals and Similar Mechanisms**

Some web browsers transmit "Do-Not-Track" signals to websites. The Site does not currently respond to browser "Do-Not-Track" requests.

### **Marketing E-Mails:**

We may send you periodic promotional or informational e-mails. You may opt-out of such communications by following the opt-out instructions contained in the e-mail. Please note that it may take up to **5 business** days for us to process opt-out requests. If you opt-out of receiving e-mails about recommendations or other information we think may interest you, we may still send you e-mails about your account on the Site or the Platform Services.

### **Your Turkish Data Protection Rights:**

Turkish law permits residents and/or citizens of Turkish Republic to request certain details about how their information is shared with third parties for direct marketing purposes. If you are a Turkish Republic resident and would like to opt-out of having your information shared with third parties for direct marketing, please log in to your Qumpara account and update your preferences in your account settings.

### **Data Retention:**

The time periods for which we retain your personal information will depend on the purposes for which we use it. We will retain your personal information for so long as is necessary to provide the Platform Services, unless applicable law requires we either dispose of it or keep it longer. We may also continue to store your personal information to allow us to resolve disputes, enforce our agreements, comply with legal obligations and/or for other legally permissible purposes consistent with this Privacy Policy and our Terms of Service

### **Children's Privacy:**

No part of the Platform Services or Site is directed to persons under 18 years of age. We do not knowingly allow individuals under the age of 18 to create accounts that allow access to the Platform Services.

### **Contact Us:**

If you have any questions about this Privacy Policy, please contact us at: kvkk@nobium.com.tr