

## INFORMATION NOTICE ON PROCESSING OF PERSONAL DATA

We would like to inform you in connection with your personal data processed by **KIDLY YAYINCILIK VE PAZARLAMA ANONİM ŞİRKETİ**, a company registered under 303659-5 in Istanbul Trade Registry Office (“**Company**”), acting in the capacity of the Data Controller in accordance with the Personal Data Protection Law No. 6698 (“**Law**”). The purpose of this Information Notice is to inform you about the personal data processing activities in case you:

- create a user account in KIDLY mobile application (“**Platform**”);
- purchase monthly or yearly subscription to use additional services in the Platform;
- contact us over the website at [www.gokidly.com](http://www.gokidly.com),
- visit our website at [www.gokidly.com](http://www.gokidly.com),
- accept general and personal special campaign notifications through commercial communication channels

### • **Personal Data Processed, Purposes of Processing Personal Data, Recipients and Purposes of Transfer**

We transfer your personal data in accordance with the purposes of processing specified, in the light of general principles specified in Article 4 of the Law, they are processed through fully or partially automatic means or non-automatic means provided that they are a part of a data registration system and we transfer them to the specified recipient groups. Our Company takes the administrative and technical measures required to ensure security of your personal data.

#### **Adult that Uses the Platform upon creating a user account**

<b>Personal Data</b>	<b>Purpose of Processing</b>	<b>Legal Ground</b>	<b>Recipient</b>	<b>Purpose of Transfer</b>
<b>Communication</b> ( <i>E-Mail Address</i> )	- Subscription processes - Communication of reports on the use of application	- Execution and performance of agreement - <b>E x p l i c i t</b> Consent (for transfer abroad)	- <b>T e c h n i c a l</b> infrastructure providers abroad	- Hosting and <b>t e c h n i c a l</b> infrastructure service
<b>Identification</b> ( <i>Year of Birth</i> )	- Determining that the person who is to use the platform is an adult - Subscription processes	- Execution and performance of agreement - <b>E x p l i c i t</b> Consent (for transfer abroad)	- <b>T e c h n i c a l</b> infrastructure providers abroad	- Hosting and <b>t e c h n i c a l</b> infrastructure service
<b>Process Security</b> ( <i>Password and User account Information</i> )	- Implementation of Access Authorizations - Establishing <b>P r o c e s s</b> Security,	- Execution and performance of agreement - <b>E x p l i c i t</b> Consent (for transfer abroad)	- <b>T e c h n i c a l</b> infrastructure providers abroad	- Hosting and <b>t e c h n i c a l</b> infrastructure service

<b>Other</b> (Answers given to surveys)	– Performance of activities aimed at customer satisfaction	– Legitimate interest	– Technical infrastructure providers abroad	– Hosting and technical infrastructure service
<b>Other</b> ( <i>User preferences</i> )	– Making recommendations based on user preferences	– Legitimate interest	– Technical infrastructure providers abroad	– Hosting and technical infrastructure service
<b>ID</b> ( <i>Name Surname</i> ) <b>Communication</b> ( <i>E-Mail Address</i> ) <b>Other</b> ( <i>questions, inquiries and complaints</i> )	– Management of inquiries and complaints,	– Creating a right, – Explicit Consent (for transfer abroad)	– Technical infrastructure providers abroad	– Hosting and technical infrastructure service
<b>Process Security</b> ( <i>Mobile Device Information</i> ) <b>Communication</b> ( <i>E-Mail Address</i> )	– Conducting advertising and marketing activities	– Explicit consent	– Technical infrastructure providers abroad, suppliers/business partners abroad	– Conducting advertising and marketing activities – Hosting and technical infrastructure service
<b>*Identification</b> ( <i>date of birth of the Profile User</i> )	– Contents based on age groups	– Performance of agreement – Explicit Consent (for transfer abroad)	– Technical infrastructure providers abroad	– Hosting and technical infrastructure service
<b>*Identification</b> ( <i>Profile name- [Nickname/ name]</i> ) <b>*Other</b> ( <i>Interests of Profile User, Downloaded/ Liked contents, Content Reading Duration, Badges Used, Contents Read</i> )	– Improvement of application experience – Game creation for services – Separation of sub-profiles and reporting to adults	– Performance of agreement – Explicit Consent (for transfer abroad)	– Technical infrastructure providers abroad	– Hosting and technical infrastructure service

*\* It shall be deemed that you are legally authorized to give consent for and on behalf of the relevant person and you obtained consent of the data subject for the processing of the profile details in accordance with the Law and this information notice.*

**Persons who purchase monthly or yearly subscription to use additional services in the Platform;**

<b>Personal Data</b>	<b>Purpose of Processing</b>	<b>Legal Ground</b>	<b>Recipient</b>	<b>Purpose of Transfer</b>
<p><b>The information provided below is processed in addition to the information specified in the category above</b></p> <p><b>Other (User Type- Subscription Type)</b></p>	<ul style="list-style-type: none"> <li>- Performance of Processes Regarding the Sale of Goods and Services</li> </ul>	<ul style="list-style-type: none"> <li>- Execution and performance of agreement</li> <li>- <b>E x p l i c i t</b> Consent (for transfer abroad)</li> </ul>	<ul style="list-style-type: none"> <li>- <b>T e c h n i c a l</b> infrastructure providers abroad</li> </ul>	<ul style="list-style-type: none"> <li>- <b>H o s t i n g</b> and <b>t e c h n i c a l</b> infrastructure service</li> </ul>

**Persons contacting over our website named [www.gokidly.com](http://www.gokidly.com)**

<b>Personal Data</b>	<b>Purpose of Processing</b>	<b>Legal Ground</b>	<b>Recipient</b>	<b>Purpose of Transfer</b>
<p><b>ID</b> (Name Surname)</p> <p><b>Communication</b> (E-Mail Address)</p> <p><b>Other</b> (questions, inquiries and complaints)</p>	<ul style="list-style-type: none"> <li>- Management of inquiries and complaints,</li> </ul>	<ul style="list-style-type: none"> <li>- Creating a right,</li> <li>- <b>E x p l i c i t</b> Consent (for transfer abroad)</li> </ul>	<ul style="list-style-type: none"> <li>- <b>T e c h n i c a l</b> infrastructure providers abroad</li> </ul>	<ul style="list-style-type: none"> <li>- <b>H o s t i n g</b> and <b>t e c h n i c a l</b> infrastructure service</li> </ul>

**Persons visiting our website named [www.gokidly.com](http://www.gokidly.com)**

<b>Personal Data</b>	<b>Purpose of Processing</b>	<b>Legal Ground</b>	<b>Recipient</b>	<b>Purpose of Transfer</b>
<p><b>Process Security</b> ( <i>C o o k i e</i> Information)</p> <p>For detailed information on cookies, please see our Cookies Policy at <a href="http://www.gokidly.com/cookiepolicy">www.gokidly.com/cookiepolicy</a></p>	<ul style="list-style-type: none"> <li>- Profiling activities</li> <li>- Statistical works, targeted advertisement</li> </ul>	<ul style="list-style-type: none"> <li>- The relevant person is given right to choose non-mandatory cookies.</li> <li>- Explicit consent</li> </ul>	<ul style="list-style-type: none"> <li>- <b>T e c h n i c a l</b> infrastructure providers abroad, suppliers/ business partners abroad that provide advertising services</li> </ul>	<ul style="list-style-type: none"> <li>- Profiling activities</li> <li>- Statistical works, targeted advertisement</li> <li>- <b>H o s t i n g</b> and <b>t e c h n i c a l</b> infrastructure service</li> </ul>

**Persons who accept general and personal special campaign notifications through commercial communication channels**

Personal Data	Purpose of Processing	Legal Ground	Recipient	Purpose of Transfer
Communication (E-Mail Address)	- Promotion, marketing of services, promotion of the enterprise, improvement of publicity with contents such as celebration and wishes	- Explicit consent	- Technical infrastructure provider (abroad)	- Promotion, marketing of services, promotion of the enterprise, improvement of publicity with contents such as celebration and wishes - Hosting and technical infrastructure service

\* Pursuant to the Law No. 6563 on Regulation of Electronic Tradem your explicit consent is required pursuant to KVKK in order to send you an commercial electronic message as our suppliers providing technical infrastructure for E-mailing processes are located abroad. You may suspend commercial communication at any time and without showing any reason by completing the process (rejection) specified in the commercial electronic messages and thus, you may stop the personal data processing based on explicit consent.

- **Children’s Privacy**

We do not seek to collect any Personal Data from individuals who are not of legal age to consent to the collection and processing of their personal data (“children”). While parents and guardians may submit information related to children as part of the parent/guardian's account, if you are under the age of eighteen (18), please do not submit any Personal Data to our websites or mobile applications. Any Personal Data that is inadvertently collected from a child will be deleted at the request of the parent or guardian and if we reasonably identify any Personal Data that was collected from a child, the Personal Data will be deleted.

- **Method of Collecting Personal Data**

Your personal data are collected when you send information over the Platform, sign an agreement with us, with automatic methods such as recording your inquiries and complaints specified during communication via communication channels and in electronic and physical environments through other methods.

- **Rights of Data Subject**

Regarding your personal data processed by us, you may send your inquiries within the scope of Article 11 of the Law to us in writing or via registered electronic mail (KEP) address, with electronic signature, mobile signature or by using the electronic mail address you previously provided to us and recorded in our system in accordance with the Communique Regarding the Procedures and Principles on Application to the Data Controller.

- **Information for California Residents**

If you reside in the United States in the state of California, we are required by California law to provide you with additional information about how we use and disclose your information, and you

may have additional rights with regard to how we use your information. We have included this California-specific information below.

**CA Personal Information.** We collect certain categories and specific pieces of information about individuals that are considered "Personal Information" in California ("**CA Personal Information**"). Specifically, we may collect the following types of CA Personal Information:

- **[Identifiers:** email address, age, date of birth, username and password for our websites, IP address;
- **Commercial information:** products or services purchased, obtained or considered, other purchasing or consuming histories or tendencies, transaction history;
- **Internet or other electronic network activity information:** computer and connection information, statistics on page views, traffic to and from the websites, ad data and other standard weblog information; and
- **Geolocation information:** city, country and/or state wise location information through the use of our website, services and/or products.]

**Sources.** We collect certain categories of CA Personal Information from you and other third parties as. The categories of third parties from whom we collect CA Personal Information include the following:

- [Third-party partners;
- Third party applications;
- Advertising networks;
- Other companies or organizations, such as market research firms or data aggregators.]

**Purposes.** We collect the CA Personal Information for the business and commercial purposes described above. We also share and/or disclose your CA Personal Information as follows:

- **Sharing your CA Personal Information for business purposes:** As described above, we may share the following categories of your CA Personal Information with third party partners, public or government authorities and future business partners for our business purposes:
  - [Identifiers,
  - Commercial Information,
  - Professional or employment-related information
  - Internet or other electronic network activity information
  - Geolocation information.]

As described above, examples of business purposes include product and service fulfillment, internal operations, prevention of fraud and other harm, and legal compliance.

- **Sharing your CA Personal Information for other purposes:** We may share the following categories of your CA Personal Information with third party partners in a manner that constitutes a "sale" under California law:
  - [Identifiers,
  - Commercial Information,
  - Professional or employment-related information
  - Internet or other electronic network activity information]

This information may be shared for the following purposes: marketing, analytics, product or service performance measurements.

We do not knowingly share the CA Personal Information of individuals under 16 years of age, in a manner that constitutes a "sale" under California law.

**California Consumer Rights.** Subject to certain exceptions, as a California resident, you have the right to: (i) request access to your CA Personal Information; (ii) request deletion of your CA Personal Information; (iii) request information about the CA Personal Information about you that we have disclosed and/or "sold" (as such term is defined under California law) to third parties within the past 12 months; and (iv) opt-out of the "sale" of your CA Personal Information, as detailed above.

**Exercising other California consumer rights.** Should you wish to request the exercise of your other rights as detailed above with regard to your CA Personal Information, we will not discriminate against you by offering you different pricing or products, or by providing you with a different level or quality of products, based solely upon this request. You also have the option of designating an authorized agent to exercise your rights on your behalf. For authorized agents submitting requests on behalf of California residents, please contact us as described below, with any evidence you have that you have been authorized by a California consumer to submit a request on their behalf.

**Data Controller: KIDLY YAYINCILIK VE PAZARLAMA ANONİM ŞİRKETİ**

**E-mail:** [contact@gokidly.com](mailto:contact@gokidly.com)

**Kep Address:** [kidlyyayincilik@hs01.kep.tr](mailto:kidlyyayincilik@hs01.kep.tr)

**Address:** Esentepe Mah. Haberler Sokak No:6 D:5 Şişli/İstanbul