

PRIVACY POLICY

We, as Nara Edtech, follow a company policy that respects your personal data.

By using this website you are indicating you agree with our Privacy Policy and Terms and Conditions. If you are not agree with it, please stop using the website. This Privacy Notice details how Nara Edtech collects and uses the personal data that you provide us if you are.

This privacy policy explains how and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others and how we keep it secure in accordance with the General Data Protection Regulation (GDPR).

Who are we?

As Nara Eđitim Teknolojileri A.Ş. – Nara Edtech we process the personal data of our customers who visit our website with the GDPR.

The commercial address of our company is “Saricaeli Ky No: 276 /1/121 Merkez/ANAKKALE / TURKEY ”.

Nara Edtech is committed to protecting the privacy and security of your personal information. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

What type of personal information is collected about you?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are “special categories” of more sensitive personal data which require a higher level of protection.

The personal information we collect, store, and use about you might include the following categories

Credentials	Name, Surname
Contact Information	E-Mail Address
Website Usage Data	Date of being a member, Times and frequency of membership login, Website User, Update Date, Preferred Positions to Work, IP, Device ID, Operator Information that he/she uses, Device Information (Version-Model)

How do we collect personal information from you?

We collect your personal data;

- Through cookies when you visit our site.

How will we use information about you?

We use your personal data for the following purposes:

- To be able to fulfill requests from official institutions regarding the activities carried out on the site.
- To keep log, IP and traffic records in order to follow the transaction security on the website.
- To resolve any disputes concerning your use of the site.
- To customize, measure and improve our site for you.
- To be able to resolve any dispute coming up due to the content on the website.
- To be able to perform our customer service activities (responding to requests, quality control, etc.)
- To monitor and improve the security of our site

As stated above, we process and use your data due to the performance of the legal relationship between you and us as a legitimate interest beneficiary

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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

Sensitive Personal Information

Due to the legal relationship between you and us, any data we request from you is not sensitive personal information. When we process sensitive personal data for the performance of our legal relationship in the future, we will notify you besides.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Who has access to your personal information?

In principle, we do not share your personal data with third parties. However, if we have a legal obligation or legitimate interest, we may share your personal data with the third parties.

We will not sell or rent your personal information to third parties.

We will not share your personal information with third parties for marketing purposes.

We may share your personal information with companies within the group company and these other organisations or people:

- Our third-party service providers, agents subcontractors and other associated organisations and people who we use to help provide you with our products and services;

- Our third-party service providers, agents subcontractors and other associated organisations and people who we use to help provide another client with our products and services;

- Revenue and customs authorities, regulators and other authorities;

- IT and website developers;

- Organisations or people we have a joint venture or agreement to co-operate with;

- Organisations or people you ask us to share your data with.

- Public institutions and organizations authorized by law

However, when we use third party service providers we disclose only the personal information that is necessary to deliver the products and services and we have a contract in place that requires them to keep your personal information secure and not to use it for their own direct marketing purposes.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal information in order to comply with any legal obligation or to protect the rights, property or safety of our clients. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

Transferring your personal information outside of Europe

As part of the products and services we offer or in order to perform our contract with you, your personal information may be transferred to countries outside the European Economic Area ("EEA"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EEA. These countries may or may not have similar data protection laws to the EEA. If we transfer your personal information outside of the EEA in this way, we will take steps to ensure that it is protected in the same way as if it was being used in the EEA, by using one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more on the European Commission Justice website.
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this here on the European Commission Justice website

How long do we keep your personal information?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We review our retention periods for personal information on a regular basis.

We are legally required to hold some types of personal information to fulfil our statutory obligations.

Some of the reasons for the Storage of Your Personal Data are:

- To respond to any questions or complaints;
- To show that we performed our contractual obligations;
- To show that we complied with other legal obligations;
- To maintain records according to rules that apply to us.

We keep the personal data of data owners who visit our site, become members of our site, shop on our site, for 5 years since the end of our legal relationship.

We may keep your personal information for longer than the durations abovementioned if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and that we only use your personal information for those purposes.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Cookies

Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive.

We use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some options for our Service.

Most web browsers allow you to control cookies through your browser settings. To find out more about cookies generally and how to manage or delete them, you can [visit here](#).

Find out how to manage cookies on popular browsers:

- ❖ Google Chrome ([here](#))
- ❖ Microsoft Edge ([here](#))
- ❖ Mozilla Firefox ([here](#))
- ❖ Microsoft Internet Explorer ([here](#))

- ❖ Opera ([here](#))
- ❖ Apple Safari ([here](#))

To find information relating to other browsers, visit the browser developer's website

Rights of Turkish resident

If you are an user from Turkey you have certain rights in connection with your personal information and how we handle it based on the Law No. 6698 Kişisel Verileri Koruma Kanunu. Some of these rights may be subject to some exceptions or limitations.

According to the relevant legislation, you have the right to;

- learn whether or not your personal data is being processed,
- request information as to processing if it has been processed,
- learn the purpose of personal data processing and whether the personal data is used appropriately in line such purposes,
- know the third parties to which your personal data is transferred domestically or abroad,
- to request correction if "your personal data is incompletely or incorrectly processed,
- to request deletion or destruction of your personal data,
- to request the transmission of your correction, deletion and destruction requests to third parties to whom your personal data has been transferred,
- to object to any consequence occurred against you by analyzing your processed data through automated systems
- request compensation in case you incur any damage due to the unlawful processing of personal data.

If you have questions or concerns about your rights related to personal data information please contact us via our email: info@nara.com.tr

We endeavor to respond to a verifiable consumer request within 30 days of its receipt. We will deliver our written response by mail.

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

There may be legal or other official reasons why we need to keep or use your personal information.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Nara Edtech, “Saricaeli Köyü No: 276 /1/121 Merkez/ÇANAKKALE / TURKEY” in writing or email to us info@nara.com.tr

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Nara Edtech at info@nara.com.tr Once we have received notification that

you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Review of this Privacy Policy

We keep this privacy policy under regular review. This privacy policy was last updated in February 2021.

We may change this privacy policy from time to time and we will publish any new privacy policy on our website when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Any questions regarding this privacy policy and our privacy practices should be sent by email to info@nara.com.tr or by writing to Nara Edtech ***“Saricaeli Köyü No: 276 /1/121 Merkez/ÇANAKKALE / TURKEY”***