

## TERMS OF USE AND PRIVACY POLICY

Date of Enforcement: February 1st, 2024

### TERMS OF USE

EBD Consulting. ("EBD") is committed to respecting the right to inform its visitors about the terms of use of EBD's website of <http://www.ebdconsulting.co> ("Website" or "Site") and the privacy of its visitors together with their personal data when browsing its . This terms of use is meant to explain to all visitor who access and use the services provided by the Website, the terms of use of the Website and the privacy policy applied for the data collected and processed by EBD as per Law No: 6698 on Protection of Personal Data ("Law No:6698"). The visitors who access our Website shall be deemed approved by the below conditions set forth hereunder.

#### Terms:

EBD is the owner of both the Website and all information, visual, material, document, design, etc. ("Website Content") displayed on the Website. EBD may freely determine, update, revise, change, or abolish the content displayed on the Website by itself.

The Visitor may view the content and the Website for personal use and for the sake of gathering information. All accesses and actions beside such personal use and acquisition of knowledge shall be deemed unlawful. The Visitor, shall hereby accept and declare to act within the boundaries of the current laws and legislation of the Republic of Turkey and not to infringe 3rd party's legal rights. All visitors shall accept and declare that the judiciary, administrative and criminal liabilities of all transactions and actions that they conduct during their visit of the Website and make use of its content shall fully and exclusively belong to them and further explicitly accepts that EBD shall not be liable of any unlawful acts of its visitors against third parties and that in such case shall be liable to indemnify EBD's loss occurred or to be occurred by lawful acts.

All writings, information, interpretation, opinion, news, content, visual,photo, video, image, design, picture, trademark,logo, figure, graphic, illustration and Website database including the design of the Website are a production, by means of law, work ("Work") and belongs to EBD and/or any other third parties. The Work(s) are all by legislation on protection of intellectual and industrial rights. The visitor only have right to use the Website and shall not provide any right or entitlement on intellectual and industrial property rights of the Works(s). Without EBD's and the Work/artist/producer/design owner/ trademark owner/patent owner explicit consent, the visitors shall not copy, reproduce, translate, download, upload, use without making a reference, process, adapt, spread, publish, declare to public, represent and make any other kind of use of any of the Work(s) and/or any property of them, shall not make use exceeding ordinary legitimate use and exploitation, and/or shall not subject to unfair competition. The Visitor shall not interfere into, revoke, change, reverse engineer the Website Content and the numbers and/or codes that represent the content.

In the event of any infringement in intellectual and industrial rights of the visitors, this shall mean both infringement of the rights of EBD and the other third party Work owners/artists/producers/designers and EBD and shall bear judiciary and criminal liabilities towards the Work owners/right holders.

The visitor may visit the Website without providing any personal data, however in some cases such as when they would like to conduct direct correspondence with EBD or when subscribing to the newsletter, your personal information will be collected and stored within

the boundaries of the legislation. The detailed explanation on how the personal data of our visitors are collected, stored and used as per Law No: 6698 is provided under Privacy Policy here below.

EBD does not provide accuracy and/or sufficiency and/or actuality of the information/content on the Website. The visitors hereby accept and declare that they will conduct the necessary research and validity check personally before using the information provided on the Website. The visitors shall solely be liable from the consequences of the content use and decisions taken upon the content of the Website and accept, declare and undertake not to attribute EBD any responsibility under no circumstances. The visitors accept and declare not to use any information, software etc. which will include viruses that may inhibit, slow down, make difficult the general accessibility of the Website and are obliged to avoid any direct and indirect interference towards the Website.

The visitors shall hereby accept and undertake that there may be some links to other websites or some content displayed on different websites, and that the control, accuracy or sufficiency of such content does not have any relation with EBD and that EBD shall not guarantee the security and/or validity of the information provided in such websites and that does not have any commitment and responsibility arising from the products, services and privacy policy of such websites.

The visitors shall accept and declare that Website is not an electronic sales platform, the responsibilities of the information, displays, advertisements, campaigns, sales etc. which will be reached through a link via the Website shall belong to the relevant third party providers and therefore all the demands mainly in terms of such products and services arising from legislation on consumer law shall be addressed to the relevant third party providers and that EBD is not representative, placeholder or such third parties and therefore would not be the respondent party for any matters concerning such products and services.

The visitors shall accept and declare that EBD shall freely make any kind of decision on the Website such as interrupting, slowing down, disrupting its accessibility etc. Therefore, the visitors hereby accept and declare that in such cases they shall not indemnify any of their damages or loss from EBD.

The visitors shall accept that EBD, EBD's employees, employers, authorized parties have no liabilities if the brand EBD or the Website Content comprised of Work displayed in another Website or if the information gathered from the uploads of the third parties and visitor uploads used or if any content which is to be gathered within the boundaries of general internet regulations are used. Visitors further accept and declare that EBD and their project partners and all the employees of these companies shall not be liable to bear to indemnify any loss or damage arising by reason of unawareness (not reading) of this terms of use or infringing despite reading it.

In the event the visitors infringe these terms of use in any way and act against the operation of the Website, knowingly cause disproportionate burden to the Website, infringe or act in danger of infringing the rights of the third parties, the visitors' use of the Website can be permanently or temporarily detained. In such cases, the visitor agrees beforehand that they shall not demand to indemnify any loss and/or damage.

The visitors shall explicitly accept and declare that they will act in good faith in all their actions and obey the Terms of Use and the relevant legal regulations, on the contrary case they shall solely bear the judiciary, administrative and criminal liabilities of their unlawful acts. In case of any disputes arising from the terms of use, Turkish Law shall be applicable and İstanbul Çağlayan Courts and Execution Offices shall be entitled. Furthermore, the parties hereby accept, declare and undertake that all content of the Website and all electronic

environment, digital data of EBD shall be deemed material evidence for the dispute as per Article 193 of the Turkish Code of Civil Procedure.

## PRIVACY POLICY

EBD is committed to respecting the privacy and protection of the visitors' personal and non-personal data when browsing the Website.

This Privacy Policy is meant to explain to all visitors who access and use the services provided by the Website, how personal and non-personal data of the visitors are collected, why such data are collected and how EBD is in use of such data.

### What Types of Data Are Collected?

#### Personal Data

The Personal Data are (i) contact details (i.e. name, surname, phone number, e-mail address, cv, etc.) and (ii) personal information (i.e. date of birth, National ID number, education information, cv, etc.)

EBD receives such personal data when its visitors fill out the form on the Website for newsletter subscription or when the visitors make job applications announced through the Website.

Such data are only used and processed through the purpose of use provided by our visitors. In other words, we may send e-newsletters and informative emails to you.

Our visitors hereby accept and declare that, they share their personal data, as per Law No 6698 Article 5/1 and Article 6/2, at their own free will and express consent and that such data are requested by EBD for a better quality service and to make them informed about their applications or complaints and the events and updates announced on the Website.

#### Non-Personal Data

The non-personal data includes the data which do not give out any information about the identity of the visitor such as the data of the accessed website, IP address of your device, visit details including access time, browser type and referring URL, device designator, operating system type, standard web diary data, location data and other information. The web diary data includes the type of browser and the traffic between the visitors and the Website. EBD collects such non-personal data during the access of its visitors to the Website.

We use the help of Google Analytics to improve our Website, make it more practical, efficient and secure. In each visit to our Website or contact and interaction with us, Google analytics collects data on accessibility and Website use automatically and during such process cookies, flash cookies and web analysis may further be enabled to receive the information.

Such non-personal data gathered through access to our Website are used for market investigation, planning, statistical analysis, commercials etc.

#### The Data Received From Third Parties

If you enable access, we may access your personal data from other third party sources (i.e. all websites or online platforms such as other social media accounts which reserves personal data). This type of data may also include the data collected from commercial sources such as the administrative databases and data collectors and third parties. The personal data types that will be collected in such sources are generally name, surname, address, age and also information on your lifestyle such as shopping habits, likes, areas of interest, etc. and ,within the scope of the legislation, the personal data created by the visitor.

This privacy policy does not include any provision concerning the data collected by the parties such as applications, third party websites and platforms (such as social media websites/platforms such as facebook, twitter etc.), the data collected through the links of the Website and other commercials or promotion. The data which are collected, stored and used by the third parties or any other actions taken for the provided personal data are not under EBD's responsibility or control.

How is the collected personal data used?

EBD, processes all collected personal and non-personal data, as per Article 4 of Law No: 6698 in line with the law and in good faith, correctly, up to date, specific, explicit, and legitimate way, also within the scope of purpose and in a limited and restrained way in line with Article 5 and 6.

The processing of the personal data means collecting the data through fully or partially automatic system or through manual ways but integrating it into a data record system, or making all kinds of actions on the collected data such as saving, storing, keeping, changing, rearranging, explaining, transferring, acquiring, making available, categorizing or preventing the use.

EBD processes the data by pursuing a specific goal, within the necessity and principle of proportionality, does not use the data for any reason besides its purpose, keeps them for the duration set forth in the legislation and does not keep the data more than its legal duration without anonymizing by the end of the term.

EBD, may collect, store and in sense process and share with foreign countries the personal data in line with Articles 5 and 6 and for the purposes set forth under these articles.

Furthermore, the non-personal data is collected to improve the relations of the visitors and to improve the Website and the security of the Website, improve its functionality and to revise the content of the Website upon demand of the visitors, to make business development, to operate and improve communication activities

In addition to this, EBD may share the data with the support service provider third parties (data processing providers, hosting or managing service providers which also conducts data analysis, customer service providers, payment method service providers, etc.). The relevant third parties are provided with access to your encrypted data in order to fulfill their automated services.

The collected data shall not be used, processed, or shared with third parties.

EBD, within the scope of the provisions stipulated under Law No:6698 and the decrees of the Council, shall not transfer the collected data to the other third party real or legal entities without explicit consent of the data providers. However, under the obligatory conditions set forth under Law No:6698 and in relevant legislation, the data will be shared with the relevant entitled administrative and judiciary governmental authority without explicit consent of the

data provider. In addition to this, for the conditions set forth under Article 8, if it is not possible to take the explicit consent of the provider for a de facto impossibility (i.e. for enacting or execution of a contract or to fulfill a requirement arising from legislation in force.) and as for special personal data for the conditions set forth under Article 6/3, the data may further be transferred without explicit consent of the provider.

What are the rights of our Visitors arising from Law No. 6698?

As per Article 11 of the Law No. 6698, our visitor who shares their personal information with us may apply to EBD (info@ebdconsulting.co) to;

- a) Learn if your personal data have been processed,
- b) If processed, to request information,
- c) Find out the reason for processing and whether the data have been used in accordance with the purpose,
- d) Learn about the third parties your data have been sent to in and out of the country,
- e) Request correction if it is processed incompletely/incorrectly,
- f) Request deletion/destruction pursuant to the provisions of Article 7 of Law No. 6698,
- g) Request the third parties, to which the data was sent, to inform about the processes performed as per paragraphs (e) and (f) above,
- h) Object to an adverse result against you due to the analysis of data with automatic systems exclusively,
- i) In the event of incurring damages due to unlawful processing of data demand recovery of damages.