

Privacy Policy

Last updated: April 06, 2022

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy. This Privacy Policy has been created with the help of the [Privacy Policy Template](#).

Purpose of Processing Personal data: Your personal data that you share with us ensures that we can fulfill the requirements of the services we offer in the best way.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique account created for You to access our Service or parts of our Service.
- **Affiliate** means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.
- **Application** means the software program provided by the Company downloaded by You on any electronic device, named Rovenma Qr Test App
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to ROVENMA A.Ş., Üniversiteler Mah. 1596.cad. Hacettepe Teknoket 6.Ar-Ge Safir Bloklar A Blok Kat:9 No:28, 06800 Çankaya/Ankara.
- **Country** refers to: Turkey
- **Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service** refers to the Application.
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Collecting and Using Your Personal Data

Types of Data Collected

Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Usage Data

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

IP gives you only for user agent, to do analysis and candies etc. technologies, automated or non-automated, up-to-date and real analytics providers, advertisers, search providers, technology providers obtained, recorded, stored and retrieved, and obtained from them and by the business, the real business objectives will be achieved.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers. and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service.
- **To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- **To manage Your requests:** To attend and manage Your requests to Us.

- **For business transfers:** We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.
- **For other purposes:** We may use Your information for other purposes, such as data analysis, and also to analyze advertising preferences, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.
- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

Your personal data you share with us; It can be transferred to third parties, institutions and organizations at home and abroad, with which we receive and/or provide services to carry out our activities, with whom we have contractual relations, with whom we cooperate, and to judicial and administrative authorities upon request, provided that necessary technical and administrative measures are taken.

Retention of Your Personal Data

Data controllers and data processors prevent unauthorized persons from accessing the systems and databases where your personal data is stored, by preventing the unlawful processing of personal data in accordance with Article 12 of the Personal Data Protection Law; It is obliged to take software measures such as hash, encryption, transaction log, access management and physical security measures in order to ensure their safekeeping.

If it is learned that the personal data has been obtained by others illegally, the situation will be immediately reported to the Personal Data Protection Board in accordance with the legal regulation and in writing.

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your collected personal data to be processed in Turkey or to be processed and stored outside of Turkey may also be transferred to service intermediaries abroad (to countries accredited by the Personal Data Board and where there is adequate protection for the protection of personal data), provided that they remain within the scope of Personal Data Protection Law and in accordance with the purposes of the contract.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

If necessary, Your Personal Data will be transferred to official institutions such as courts and enforcement offices, and other public institutions and organizations that are authorized to request your personal data.

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

Security of Your Personal Data

The data controller is obliged to take all necessary technical and organizational measures to provide an appropriate level of security for the purposes of:

- preventing unlawful processing of personal data,
- preventing unlawful access to personal data,
- ensuring protection of personal data.

In case the processing of personal data is carried out by another natural or legal person on behalf of the data controller, the data controller shall jointly be responsible with these persons for taking the measures laid down in the first paragraph.

The data controller is obliged to carry out the necessary audits, or have them made, in its own institution or organization, in order to ensure the implementation of the provisions of this Law.

The data controllers and data processors shall not disclose the personal data that they have learned to anyone contrary to the provisions of this Law, neither shall they use such data for purposes other than that for which the personal data have been processed. This obligation shall continue even after the end of their term of office.

In case the data processed are obtained by others by unlawful means, the data controller shall communicate the breach to the data subject and notify it to the Board within the shortest time. Where necessary, the Board may announce such breach at its official website or through in any other way it deems appropriate.

Keeping Personal Data Up-to-Date and Accurate

Personal data can only be processed according to the procedure prescribed by law and can be processed in accordance with the principles.

It is obligatory to comply with the following principles in the processing of personal data:

- Personal data shall only be processed in compliance with procedures and principles laid down in this Law or other laws.
- The following principles shall be complied within the processing of personal data:
 - Lawfulness and fairness.
 - Being accurate and kept up to date where necessary.
 - Being processed for specified, explicit and legitimate purposes.
 - Being relevant, limited and proportionate to the purposes for which they are processed.
 - Being stored for the period laid down by relevant legislation or the period required for the purpose for which the personal data are processed.

Children's Privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, In this regard, we will do what is necessary to remove this information from our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy

Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By visiting this page on our website:

<https://www.rovenma.com/kvk/>

<https://www.rovenma.com/tr/contact/>

Personal Data Owners can send their questions, opinions or requests to info@rovenma.com e-mail address.