

# Privacy Policy

Last updated: April 16, 2020

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.

## 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:

- **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.

Under GDPR (General Data Protection Regulation), You can be referred to as the Data Subject or as the User as you are the individual using the Service.

- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to EKSİK PARÇA YAYINCILIK TİC. VE SAN. A.Ş., Gülbahar M. Elif S. No: 4/A Şişli İstanbul.

For the purpose of the GDPR, the Company is the Data Controller.

- **Application** means the software program provided by the Company

downloaded by You on any electronic device, named Kral Şakir Macera Adası

- **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.
- **Account** means a unique account created for You to access our Service or parts of our Service.
- **Service** refers to the Application.
- **Country** refers to: Turkey
- **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.

For the purpose of the GDPR, Service Providers are considered Data Processors.

- **Third-party Social Media Service** refers to any website or any social network website through which a User can log in or create an account to use the Service.
- **Personal Data** is any information that relates to an identified or identifiable individual.

For the purposes for GDPR, Personal Data means any information relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

- **Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.
- **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).
- **Data Controller**, for the purposes of the GDPR (General Data Protection Regulation), refers to the Company

as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data.

# **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.

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.

## **Information Collected while Using the Application**

While using Our Application, in order to

provide features of Our Application, We may collect, with your prior permission:

We use this information to provide features of Our Service, to improve and customize Our Service. The information may be uploaded to the Company's servers and/or a Service Provider's server or it be simply stored on Your device.

You can enable or disable access to this information at any time, through Your Device settings.

## **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.

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 show advertisements to You to help support and maintain Our Service, to advertise on third party websites to You after You visited 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. If You interact with other users or register through a Third-Party Social Media Service, Your contacts on the Third-Party Social Media Service may see Your name, profile, pictures and

description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.

## **Retention of Your Personal Data**

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 information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers

located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

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**

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a

government agency).

## **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 security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

# **Detailed Information on the Processing of Your Personal Data**

Service Providers have access to Your Personal Data only to perform their tasks on Our behalf and are obligated not to disclose or use it for any other purpose.

## **Analytics**

We may use third-party Service providers to monitor and analyze the use of our Service.

- **Firebase**

Firebase is an analytics service provided by Google Inc.

You may opt-out of certain Firebase features through your mobile device settings, such as your device advertising settings or by following

the instructions provided by Google in their Privacy Policy:

<https://policies.google.com/privacy?hl=en>

We also encourage you to review the Google's policy for safeguarding your data:

<https://support.google.com/analytics/ar>

For more information on what type of information Firebase collects, please visit the Google Privacy & Terms web page:

<https://policies.google.com/privacy?hl=en>

- **Unity Analytics**

Unity Analytics is provided by Unity Technologies.

For more information on what type of information Unity Analytics collects, please visit their Privacy Policy page: <https://unity3d.com/legal/privacy-policy>

## Advertising

We may use Service providers to show advertisements to You to help support and maintain Our Service.

- **AdColony**

AdColony is provided by Jirbo Inc.

You can opt-out from AdColony service by visiting the AdColony Opt-out page:

<https://www.adcolony.com/privacy-policy/>

You can also opt-out from AdColony through the Digital Advertising Alliance in the USA

<http://www.aboutads.info/choices/> or opt-out using your mobile device settings.

For more information AdColony, please visit the Privacy Policy of AdColony:

<http://www.adcolony.com/privacy-policy/>

- **AppLovin**

AppLovin is provided by the AppLovin Corporation.

If you'd like to opt-out from AppLovin service, please visit the AppLovin Opt-out page:

<https://www.applovin.com/optout>

If you'd like to learn more about AppLovin, please visit the Privacy Policy page of AppLovin:

<https://www.applovin.com/privacy>

- **Vungle**

Vungle is provided by Vungle Inc.

You can opt-out from Vungle service by following the instructions as described by Vungle on their Privacy Policy page:

<http://vungle.com/privacy/>

For more information about Vungle, please visit Vungle Privacy Policy:

<http://vungle.com/privacy/>

- **Unity Ads**

Unity Ads is provided by Unity Technologies.

You can opt-out from Unity Ads service by following the instructions as described by Unity Technologies on their Privacy Policy page:

<https://unity3d.com/legal/privacy-policy>

For more information about Unity Technologies, please visit Unity Technologies Privacy Policy:

<https://unity3d.com/legal/privacy-policy>

## **Behavioral Remarketing**

The Company uses remarketing services to advertise on third party

websites to You after You visited our Service. We and Our third-party vendors use cookies to inform, optimize and serve ads based on Your past visits to our Service.

- **Google Ads (AdWords)**

Google Ads (AdWords) remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the Google Ads Settings page:

<http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on -

<https://tools.google.com/dlpage/gaoptc>

- for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

- **Facebook**

Facebook remarketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by

visiting this page:

<https://www.facebook.com/help/164968>

To opt-out from Facebook's interest-based ads, follow these instructions from Facebook:

<https://www.facebook.com/help/56813>

Facebook adheres to the Self-Regulatory Principles for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA

<http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe

<http://www.youonlinechoices.eu/>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy:

<https://www.facebook.com/privacy/exp>

# **GDPR Privacy**

## **Legal Basis for Processing Personal Data under GDPR**

We may process Personal Data under the following conditions:

- **Consent:** You have given Your consent for processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority

vested in the Company.

- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

## **Your Rights under the GDPR**

The Company undertakes to respect the confidentiality of Your Personal

Data and to guarantee You can exercise Your rights.

You have the right under this Privacy Policy, and by law if You are within the EU, to:

- **Request access to Your Personal Data.** The right to access, update or delete the information We have on You. Whenever made possible, you can access, update or request deletion of Your Personal Data directly within Your account settings section. If you are unable to perform these actions yourself, please contact Us to assist You. This also enables You to receive a copy of the Personal Data We hold about You.
- **Request correction of the Personal Data that We hold about You.** You

have the right to to have any incomplete or inaccurate information We hold about You corrected.

- **Object to processing of Your Personal Data.** This right exists where We are relying on a legitimate interest as the legal basis for Our processing and there is something about Your particular situation, which makes You want to object to our processing of Your Personal Data on this ground. You also have the right to object where We are processing Your Personal Data for direct marketing purposes.
- **Request erasure of Your Personal Data.** You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.

- **Request the transfer of Your Personal Data.** We will provide to You, or to a third-party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which You initially provided consent for Us to use or where We used the information to perform a contract with You.
- **Withdraw Your consent.** You have the right to withdraw Your consent on using your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Service.

## **Exercising of Your**

# GDPR Data Protection Rights

You may exercise Your rights of access, rectification, cancellation and opposition by contacting Us. Please note that we may ask You to verify Your identity before responding to such requests. If You make a request, We will try our best to respond to You as soon as possible.

You have the right to complain to a Data Protection Authority about Our collection and use of Your Personal Data. For more information, if You are in the European Economic Area (EEA), please contact Your local data protection authority in the EEA.

# Children's Privacy

The Service may contain content appropriate for children under the age of 13. As a parent, you should know that through the Service children under the age of 13 may participate in activities that involve the collection or use of personal information. We use reasonable efforts to ensure that before we collect any personal information from a child, the child's parent receives notice of and consents to our personal information practices.

We also may limit how We collect, use, and store some of the information of Users between 13 and 18 years old. In some cases, this means We will be unable to provide certain functionality

of the Service to these Users. 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.

We may ask a User to verify its date of birth before collecting any personal information from them. If the User is under the age of 13, the Service will be either blocked or redirected to a parental consent process.

## **Information Collected from Children Under the Age of 13**

The Company may collect and store persistent identifiers such as cookies or IP addresses from Children without parental consent for the purpose of supporting the internal operation of the Service.

We may collect and store other personal information about children if this information is submitted by a child with prior parent consent or by the parent or guardian of the child.

The Company may collect and store the following types of personal information about a child when submitted by a child with prior parental consent or by the parent or guardian of the child:

- First and/or last name

- Date of birth
- Gender
- Grade level
- Email address
- Telephone number
- Parent's or guardian's name
- Parent's or guardian's email address

For further details on the information We might collect, You can refer to the "Types of Data Collected" section of this Privacy Policy. We follow our standard Privacy Policy for the disclosure of personal information collected from and about children.

## **Parental Access**

A parent who has already given the Company permission to collect and use

his child personal information can, at any time:

- Review, correct or delete the child's personal information
- Discontinue further collection or use of the child's personal information

To make such a request, You can write to Us using the contact information provided in this Privacy Policy.

# **Your California Privacy Rights (California Business and**

# Professions Code Section 22581)

California Business and Professions Code section 22581 allow California residents under the age of 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted.

To request removal of such data, and if you are a California resident, You can contact Us using the contact information provided below, and include the email address associated with Your account.

Be aware that Your request does not

guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

# **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 email: [eksikparca1@gmail.com](mailto:eksikparca1@gmail.com)