

PRIVACY POLICY

As **Miny Bilişim Teknolojileri Limited Şirketi**, a corporation incorporated and validly operating in Türkiye and having the registered address of İnönü Mah. Zümrüt Sk. Cevriye Hanım Apt. No:11/17 Ataşehir İstanbul (hereinafter referred to as “**Miny**”, the “**Company**”, “**We**”, and through similar words such as “us”, “our”, etc.), we respect your privacy. We provide a website at <https://www.miny.dev> (the “**Website**”), through which visitors may learn about our services and reach us via our contact form (the “**Service**”).

This Global Privacy Policy (the “**Policy**”) describes Miny’s practices and policies regarding the use and processing of personal information while operating the Website and providing the services thereunder (the “**Service**”). In this regard, this Policy describes the types of personal information we collect through the Website, how we use that information, our legal basis for doing so, with whom we share it, your rights and choices in this regard, and how you can contact us about our privacy practices. This Policy does not apply to third-party sites, products, or services, even if they link to our services or the Website, and you should consider the privacy practices of those third parties carefully.

Capitalised words not defined under this Policy shall be understood as described under our Terms of Use (the “**Terms**”).

By accepting this Policy, you are familiarising yourself with this Policy, understood and are agreeing with the terms and practices described in this Policy (including new versions of the Policy when and as they come into effect), and the Terms, which govern this Policy and contain all disclaimers of warranties and limitation of liabilities.

1. DEFINITIONS

Within the scope of this Policy, the following terms shall have the meanings ascribed to them below:

Company	<i>Miny Bilişim Teknolojileri Limited Şirketi, a corporation incorporated and validly operating in Türkiye and having the registered address of İnönü Mah. Zümrüt Sk. Cevriye Hanım Apt. No:11/17 Ataşehir İstanbul.</i>
Data Controller	<i>For the purposes of the GDPR and KVKK, the Company acts as the data controller, as it is the legal person which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.</i>
Data Subject	<i>A natural person who can be identified or rendered identifiable through the personal data related to them.</i>
Device	<i>Any device suitable to access the Service, such as a computer, a mobile phone, or a digital tablet.</i>
GDPR	<i>The General Data Protection Regulation (Regulation (EU) 2016/679), a directly applicable European Union regulation which governs the processing of personal data and the free movement of such data within the European Economic Area.</i>
KVKK	<i>The Law on the Protection of Personal Data No. 6698 (Kişisel Verilerin Korunması Kanunu), the primary personal data protection legislation of the Republic of Türkiye.</i>
Personal Data	<i>Any information that relates to an identified or identifiable individual. For the purposes of the GDPR, Personal Data means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural</i>

	<i>person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.</i>
Service Provider	<i>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 analysing how the Service is used. For the purposes of the GDPR, Service Providers are considered Data Processors.</i>
Website	<i>The website accessible at https://www.miny.dev</i>
User	<i>The individual accessing or using the Website, or the company, or other legal entity on behalf of which such individual is accessing or using the Website, as applicable. The User may be referred to as “you” in this Policy. For the purposes of the GDPR, the User can be referred to as the Data Subject.</i>

2. OVERVIEW

If you access or interact with our Website, we may collect certain Personal Data relating to you. This occurs in the following circumstances:

- **When you contact us:** If you reach out via our contact form, we collect your e-mail address and the content of your message.

We do not collect any other personal data through this Website. We do not maintain user accounts, process purchases, or send newsletters through the Website.

3. APPLICABILITY OF THE POLICY

Miny Website and Contact Services

This Policy explains how we process your personal information when you interact with Miny through our Website, in particular when you submit an enquiry via our contact form. It applies to personal information collected during any such interaction.

Miny may prepare separate privacy notices for specific groups, such as employees, suppliers, and business partners. These notices will be made available to the relevant groups when necessary.

Where applicable, we will inform you whether the provision of personal data is mandatory and the potential consequences of not providing such information. If you choose not to provide certain personal information, we may not be able to respond to your enquiry.

This Policy does not apply to the Brandsight mobile application, which is governed by a separate privacy notice, nor to any third-party sites or services, even if they link to our Website.

If you are uncomfortable with the ways in which your data may be processed as described in this Policy, please do not submit the contact form.

4. TYPES OF DATA WE COLLECT

a. Personal Data that We Collect from You

We collect personal data only when you voluntarily submit our contact form. The data we collect is strictly limited to:

- **E-mail address:** the address you provide in the contact form.
- **Message content:** the content of your enquiry or message.

We do not collect any further personal data through the Website, including financial information, health data, or special categories of personal data.

5. HOW WE USE PERSONAL DATA

a. Our Services

We rely on several legal bases to ensure that the processing of your Personal Data is lawful, fair, and transparent, as required under the GDPR and KVKK. These include the performance of pre-contractual steps, compliance with legal obligations, and our legitimate business interests.

Contractual and Pre-contractual Relationships:

We process your Personal Data to respond to your enquiry and to take any pre-contractual steps you request. These include:

- Using your e-mail address to communicate with you in response to your contact form submission.
- Retaining a record of our correspondence for the purposes of managing our professional relationship.

Legitimate Business Interests:

We process certain Personal Data under the basis of legitimate interests, such as:

- Responding to enquiries and providing support;
- Monitoring and ensuring the security of our Website and communications infrastructure.

In all cases, we carefully balance our legitimate interests with your privacy rights and apply additional safeguards where required.

We do not use your data for marketing, profiling, or automated decision-making. If we need to use your Personal Data for a new purpose not described here, we will inform you and, where required, request your consent in advance.

6. HOW WE SHARE PERSONAL DATA

Miny may share your Personal Data to **(i)** satisfy any applicable law, regulation, legal process, or governmental request; **(ii)** enforce this Policy and our Terms, including investigation of potential violations hereof; **(iii)** detect, prevent, or otherwise address fraud, security, or technical issues; **(iv)** respond to your requests; or **(v)** protect our rights, property, or safety, our Users, and the public.

We share Personal Data with a limited number of our Service Providers. We have Service Providers that provide services on our behalf, such as website hosting and information technology infrastructure. These Service Providers may need to access Personal Data to perform their services properly. We authorise such Service Providers to use or disclose the Personal Data only as necessary to perform services on our behalf or comply with legal requirements. We require such Service Providers to contractually commit to protecting the security and confidentiality of the Personal Data they process on our behalf.

We do not sell, rent, or share your Personal Data with third parties for commercial purposes.

Business Transfers

In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganisation, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business, assets, or stock, we may share Personal Data with third parties for the purpose of facilitating and completing the transaction. If we do, we will inform such entities of the requirement to handle your information in accordance with this Privacy Policy or inform you that you are covered by a new privacy policy.

7. YOUR RIGHTS AND CHOICES UNDER GDPR

Miny is committed to respecting the confidentiality of your Personal Data and ensuring that you can exercise your rights under the General Data Protection Regulation (EU) 2016/679 (“GDPR”). If you are located within the European Union or European Economic Area (EEA), you have the following rights concerning your Personal Data:

- *Right of Access:* You have the right to obtain confirmation as to whether or not we process Personal Data concerning you. Where that is the case, you may request access to such data and information about how it is processed.
- *Right to Rectification:* You have the right to request the correction of inaccurate Personal Data and to have incomplete Personal Data completed.
- *Right to Erasure (“Right to be Forgotten”):* You may request the deletion of your Personal Data where, for example, it is no longer necessary for the purposes for which it was collected, or where you have withdrawn your consent (where applicable).
- *Right to Restriction of Processing:* You may request that we restrict the processing of your Personal Data under certain circumstances, such as when you contest the accuracy of the data or object to its processing.
- *Right to Data Portability:* You have the right to receive your Personal Data in a structured, commonly used, and machine-readable format and to transmit it to another data controller without hindrance, where the processing is based on consent or contract and is carried out by automated means.
- *Right to Object:* You may object to the processing of your Personal Data where the processing is based on legitimate interests, including profiling. You always have the right to object to the processing of your data for direct marketing purposes.
- *Right Not to Be Subject to Automated Decision-Making:* You have the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects or significantly affects you, unless certain exceptions apply.
- *Right to Lodge a Complaint:* You have the right to file a complaint with a supervisory authority in the EEA if you believe that your rights under the GDPR have been infringed.
- *Right to Compensation:* If you suffer material or non-material damage as a result of an infringement of the GDPR, you may be entitled to receive compensation.

8. YOUR RIGHTS UNDER KVKK (ARTICLE 11)

If you are a data subject under Turkish law, you have the following rights pursuant to Article 11 of KVKK. You may apply to us to:

- Learn whether your Personal Data is being processed;
- Request information about how it is being processed;
- Learn the purpose of processing and whether your data is being used in accordance with that purpose;
- Know the third parties to whom your data has been transferred, domestically or abroad;

- Request rectification of incomplete or inaccurate data;
- Request erasure or destruction of your data under the conditions set out in Article 7 of KVKK;
- Request that any rectification, erasure, or destruction be notified to third parties to whom your data has been disclosed;
- Object to the processing of your data solely by automated means where such processing produces a result against your interests;
- Claim compensation if you suffer damage as a result of unlawful processing.

To exercise your KVKK rights, you may submit a written application to us at [\[info@miny.dev\]](mailto:info@miny.dev) or deliver it in person, by notary, or by certified mail to our registered address. We will respond within thirty (30) days of receipt, free of charge.

9. SECURITY AND RETENTION

We are making reasonable efforts to provide you with an appropriate level of security for the risks associated with processing of your Personal Data. We take organisational, technical, and administrative measures designed to protect your Personal Data against unauthorised access, destruction, loss, alteration, or abuse. Your Personal Data may only be accessed by a limited number of personnel who need access to such information in order to perform their duties properly. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please contact us immediately.

We retain your contact form data for as long as necessary to handle your enquiry and any resulting business relationship. Unless a legal obligation requires longer retention, we will delete or anonymise this data three (3) years from the date of last contact.

11. USE BY MINORS

The Website is not directed to individuals under the age of eighteen (18), and minors shall not provide Personal Data through the Website or the Service. If you have reason to believe that anyone under the age of 18 has provided us with any personal information, please contact us.

12. UPDATES TO THIS POLICY AND NOTIFICATIONS

We may change this Policy from time to time to reflect new services, changes in our Personal Data practices, or relevant laws. The “Last Updated Date” legend at the top of this Policy indicates when this Policy was last revised. Any changes are effective when we post the revised Policy on the Website. We may provide you with disclosures and alerts regarding the Policy or Personal Data collected by posting them on our Website and by contacting you through the e-mail address you provided (if any).

14. CONTACT US

If you have any questions or complaints about this Policy, please contact us at [\[info@brandsight.app\]](mailto:info@brandsight.app).

You may send us your request on exercising your above-mentioned rights, together with documents establishing your identity and the scope of your request, through the following channels:

- By sending an e-mail to [\[info@brandsight.app\]](mailto:info@brandsight.app), with or without a secured electronic signature;
- Through delivery by hand, by notary, or by certified mail to the address of **İnönü Mah. Zümrüt Sk. Cevriye Hanım Apt. No:11/17 Ataşehir İstanbul.**

We are committed to answering your request as soon as possible, not more than 30 (thirty) days, and free of charge as long as there is no transaction cost.